

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 76-422

LABELING REVIEW(S)

**REVIEW OF PROFESSIONAL LABELING - #1
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH**

ANDA Number: 76-422

Date of Submission: August 5, 2002

Applicant's Name: Altana Inc.

Established Name: Ciclopirox Topical Suspension USP, 0.77% (Lotion)

Labeling Deficiencies:

1. **CONTAINER** - The established name of this product is Ciclopirox Topical Suspension. Revise your container label accordingly. If you prefer, you may include the dosage form "lotion" underneath the established name as follows:

Ciclopirox Topical Suspension, USP
LOTION 0.77% (w/w)

2. **CARTON** – See "CONTAINER" comment.

3. **INSERT:**

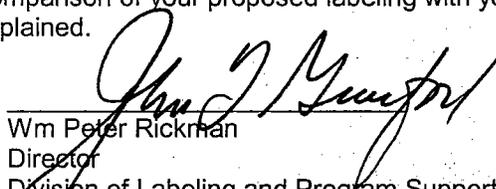
- a. **TITLE** - See "CONTAINER" comment.
- b. **TEXT** – Revise your established name throughout your text to read "Ciclopirox Topical Suspension USP (Lotion)" or "Ciclopirox Topical Suspension USP, 0.77% (Lotion)".

Please revise your labels and labeling, as instructed above, and submit 12 final printed copies for approval.

Prior to approval, it may be necessary to further revise your labeling subsequent to approved changes for the reference-listed drug. In order to keep your ANDA current, we suggest that you subscribe to the daily or weekly updates of new documents posted on the CDER web site at the following address –

<http://www.fda.gov/cder/cdernew/listserv.html>

To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with your last submission with all differences annotated and explained.


Wm Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)			
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.			
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
			X

Has the firm failed to describe the scoring in the HOW SUPPLIED section?			
Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?		X	
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?			X
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?			X
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)			X
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?			
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioequivalency values: insert to study. List Cmax, Tmax, T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?			X
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

NOTES/QUESTIONS TO THE CHEMIST: Does the firm's stability studies support "Store between 5° and 25°C (41° - 77°F)"?

FOR THE RECORD:

1. MODEL LABELING

This review was based on the labeling for Loprox by Medicus; NDA 19-824/S-008. The labeling was approved March 26, 2003. Please note that the established name is revised from Ciclopirox Olamine to Ciclopirox (NDA 19-824/S-008/S-009: Approved March 26, 2003).

Please note the USP still list Ciclopirox Olamine as the established name. The USP has not updated their records for LOPRX Lotion. Per Frank Cross PM, the correct established name for the Loprox Lotion is "Ciclopirox" per the most recently approved labeling 19-824/S-008/S009. Dr. DeCamp is working with the USP to update their records for Loprox Lotion. (see attached E-mail correspondence)

2. INACTIVE INGREDIENTS

There does not appear to be a discrepancy in inactives between the DESCRIPTION and the composition statement.

[Vol. A1.1 pg. 15]

3. **PATENTS/EXCLUSIVITIES**
Patent Data – NDA 19-824

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
NONE			There is no unexpired patent for this product.		NONE

Exclusivity-Data – NDA 19-824

Code	Reference	Expiration	Labeling Impact
NONE	There is no unexpired exclusivity for this product in the Orange Book Database.	N/A	NONE

4. **STORAGE TEMPERATURE RECOMMENDATIONS COMPARISON**

- USP: Preserve in tight containers.
- RLD: Store between 41° - 77°F (5° and 25°C).
- ANDA: Store between 5° and 25°C (41° - 77°F).

5. **DISPENSING STATEMENT COMPARISON**

- USP: None
- RLD: Bottle space provided to allow for vigorous shaking before each use.
- ANDA: Same as

6. **PACKAGE CONFIGURATION**

- RLD: Packaged in 30 mL and 60 mL bottles.
- ANDA: Same as RLD

7. **CONTAINER/CLOSURE**

Unprinted Bottle, _____ Boston Round with _____ ribbed snap top caps.
 [Vol. 1.5 pg. 1870]

8. **FINISHED DOSAGE FORM**

- RLD: Lotion
 - ANDA: A white to off-white thick smooth homogenous lotion.
- [Vol. A1.5 pg. 1950]

9. **MANUFACTURING FACILITY OF FINISHED DOSAGE FORM**

Altana Inc.
 60 Baylis Road
 Melville, NY 11747
 [Vol. A1.4 pg. 1514]

Date of Review:

Date of Submission: August 5, 2002

Primary Reviewer: Beverly Weitzman Date: 12/29/2003
B. Weitzman

Team Leader: *John J. Grace* Date: 12/30/2007

cc:

ANDA: 76-422
 DUP/DIVISION FILE
 HFD-613/Jgrace (no cc)
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 Review

APPROVAL SUMMARY

REVIEW OF PROFESSIONAL LABELING DIVISION OF LABELING AND PROGRAM SUPPORT LABELING REVIEW BRANCH

ANDA Number: 76-422

Date of Submission: January 22, 2004

Applicant's Name: Altana Inc.

Established Name: Ciclopirox Topical Suspension USP, 0.77% (LOTION)

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

- Do you have 12 Final Printed Labels and Labeling? Yes
- Container Labels: (30 mL, and 60 mL) – Satisfactory in FPL as of January 22, 2004 submission. [Revised 1/04; Code #'s L231430 and L231460, respectively.]
- Carton Labeling: (30 mL, and 60 mL) – Satisfactory in FPL as of January 22, 2004 submission. [Revised 1/04; Code #'s IP5026 and IP5027, respectively.]
- Professional Package Insert Labeling: Satisfactory in FPL as of January 22, 2003 submission. [Revised 1/04; Code # I2314 #218]

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Loprox Lotion, 0.77%
- NDA Number: 19-824
- NDA Drug Name: Ciclopirox Topical Suspension USP, 0.77% (Lotion)
- NDA Firm: Medicus
- Date of Approval of NDA Insert: Supplements S-008/S-009: Approved March 26, 2003
- Has this been verified by the MIS system for the NDA? Yes
- Was this approval based upon an OGD labeling guidance? No
- Basis of Approval for the Container Labels: Side-by-side comparison
- Revisions needed post-approval: No
- Patents/Exclusivities: Refer to chart below.

Patent Data – NDA 19-824

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
NONE			There are no unexpired patents for this product in the Orange Book database		NONE

Exclusivity-Data – NDA 19-824

Code	Reference	Expiration	Labeling Impact
NONE	There are no unexpired patents for this product in the Orange Book database	NA	NONE

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	Yes	No	N.A.
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.			
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
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NOTES/QUESTIONS TO THE CHEMIST: Does the firm's stability studies support "Store between 5° and 25°C (41° - 77°F)"? *Yes, LLH 6/1/04*

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Altana Inc.
 60 Baylis Road
 Melville, NY 11747
 [Vol. A1.4 pg. 1514]

Date of Review:

Date of Submission: January 22, 2004

Primary Reviewer: Beverly Weitzman Date: 2/5/2004

Team Leader: John J. Gunn Date: 2/9/2004

cc:

ANDA: 76-422
 DUP/DIVISION FILE
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 Review