CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-195 & 22-207

OFFICE DIRECTOR MEMO

MEMORANDUM
Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research

Date: December 12, 2007

To: Bob Rappaport, M.D., Director
Division of Anesthesia, Analgesia and Rheumatology Products
(HFD-170)

Through: Michael Klein, Ph.D., Acting Director
Silvia Calderon. Ph.D., Team Leader
Controlled Substance Staff (HFD-009)

From: Lori A. Love, M.D., Ph.D., Medical Officer
Controlled Substance Staff (HFD-009)

Subject: CSS Consultation to review NDAs on morphine sulfate:
NDA 22-195 morphine sulfate oral solution 10 mg/5 ml and 20 mg/5 ml
NDA 22-207 morphine sulfate IR tablets 15 and 30 mg
Indications: relief of moderate to severe acute and chronic pain
Company: Roxane Laboratories, Inc

Materials received: NDA meeting packages for sponsor meeting

Summary:

The sponsor has submitted two NDAs on currently marketed, but unapproved morphine sulfate products to bring them into voluntary regulatory compliance. These NDAs are submitted as 505(b)(2) applications. The comparator products are morphine sulfate extended release capsules (Avinza, King Pharms, NDA 21260) for chronic pain and morphine sulfate injection USP (Duramorph, Baxter Healthcare, NDA 18565) for acute pain indications, respectively.

The sponsor has no questions specific for CSS, but DAARP requests input from a CSS perspective.

Background:

Morphine sulfate has a century-long history of use as an analgesic. While there are numerous FDA approved oral controlled release and parenteral morphine sulfate products, there are currently no immediate-release oral products approved in the United States. Morphine sulfate is listed as Schedule II in the Controlled Substances Act.

The sponsor is developing morphine sulfate immediate release 15 mg and 30 mg and oral aqueous solutions in 10mg/5 ml and 20mg/ 5 ml concentrations. The sponsor has marketed these products since the 1980, under the generic name morphine sulfate.

CSS Review:
The new products will have the same indication, dosage, and route and duration of administration as the currently marketed, but unapproved drugs. There were no questions specific to CSS.

CSS will participate in label review and development for these products.

CSS Comments to be relayed to the Sponsor

There are no specific questions in the submissions that directly relate to CSS. We request that the following comments be relayed to the sponsor:

1. As a Schedule II drug under the CSA, all Schedule II regulations and procedures regarding manufacture, distribution, dispensing, storage, recordkeeping, and disposal of study drug should be in place and strictly followed.

2. Information and data related to abuse, misuse, diversion and overdose should be provided to the Agency. Specifically, the sponsor should submit descriptions of all reports and details, including narratives, of an incident of abuse, overuse, or overdose (intentional or unintentional), or drug that is lost, stolen, missing or unaccounted for in all clinical studies. Additionally, the sponsor should provide any available epidemiological data on abuse, misuse, diversion and overdose on their currently marketed, but unapproved morphine products.

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/s/

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12/12/2007 03:04:35 PM
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