

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

201803Orig1s000

MICROBIOLOGY REVIEW(S)

Product Quality Microbiology Review

28 FEB 2010

NDA: 201-803

Drug Product Name

Proprietary: Advil (b) (4)

Non-proprietary: Sodium Ibuprofen dehydrate, 256 mg

Review Number: 1

Dates of Submission(s) Covered by this Review

Submit	Received	Review Request	Assigned to Reviewer
30 JUN 2010	1 JUL 2010	24 AUG 2010	30 AUG 2010
03 FEB 2011	03 FEB 2011	N/A	N/A
25 FEB 2011	25 FEB 2011	N/A	N/A

Applicant/Sponsor

Name: Pfizer Consumer Healthcare

Address: 5 Giralda Farms
Madison, NJ 07940

Representative: Yael Gozin, Manager Global Regulatory Affairs

Telephone: 973-660-5151

Name of Reviewer: Jessica G. Cole, Ph.D.

Conclusion: Recommended for approval.

Product Quality Microbiology Data Sheet

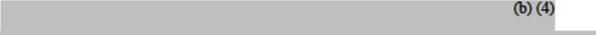
- A. 1. **TYPE OF SUBMISSION:** Original NDA, 505(b)(2)
2. **SUBMISSION PROVIDES FOR:** New drug product
3. **MANUFACTURING SITE:**
 (b) (4)
4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:**
- Tablet and caplet
 - Oral administration
 - 256 mg (ibuprofen 200 mg)
5. **METHOD(S) OF STERILIZATION:** Non-sterile product
6. **PHARMACOLOGICAL CATEGORY:** Analgesic
- B. **SUPPORTING/RELATED DOCUMENTS:** None
- C. **REMARKS:** The listed drug for this product is Motrin IB under the McNeil NDA 19-012.

The following information request was sent to the ONDQA project manager on 30 December 2010. A response was received on 3 February 2011 and is incorporated into the relevant sections of this review.

Microbiology Comment:

Please provide the following information or a reference to its location in the subject submission.

1. Your proposal to omit Microbial Limits testing is not adequately supported by data presented in this application. Provide the following information:
 - a. In-process test(s) that provide assurance of adequate microbial control during manufacture. These may include, but are not limited to,  (b) (4)

 - b. The maximum hold time for the  (b) (4)

2. You may propose to omit finished product microbial limits testing for batch release and substitute in-process manufacturing controls, tests and acceptance criteria that provide assurance of the microbiological quality for each batch of your product as required in 21 CFR 211.165(a) and (b). Microbial limits testing as a release criteria can be eliminated but microbial limits testing should

continue as part of the Stability Program with testing at the initial time point (at a minimum). A note indicating that microbial limits testing is performed only in the Stability Protocol should be added to the product's Specification Statement.

A second IR was sent to the project manager on 10 February 2011. A response was received on 25 February 2011 and the response was incorporated into the relevant sections of this review.

Microbiology Comment:

We acknowledge receipt of your 3 February 2011 amendment containing a commitment to perform microbial limits testing on the final drug product. We also note that you declined to provide the test method or validation information. The specification currently references the entire USP/NF for the microbial enumeration methods. Please update the specification to include reference to USP chapters <61> and <62> for microbial limits testing.

filename: N201803R1.doc

Executive Summary

I. Recommendations

- A. Recommendation on Approvability** – Recommended for approval on the basis of product quality microbiology.
- B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable** – Not applicable.

II. Summary of Microbiology Assessments

- A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology** – This product is a non-sterile tablet [REDACTED] (b) (4).
- B. Brief Description of Microbiology Deficiencies** – Not applicable.
- C. Assessment of Risk Due to Microbiology Deficiencies** – Not applicable.

III. Administrative

- A. Reviewer's Signature** _____
Jessica G. Cole, Ph.D.
- B. Endorsement Block** _____
Stephen Langille, Ph.D.
Senior Microbiology Reviewer
- C. CC Block**
N/A

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This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

JESSICA COLE
03/07/2011

STEPHEN E LANGILLE
03/07/2011