# CENTER FOR DRUG EVALUATION AND RESEARCH

*APPLICATION NUMBER:*

**40386**

# BIOEQUIVALENCY REVIEW(S)

# OFFICE OF GENERIC DRUGS
# DIVISION OF BIOEQUIVALENCE

ANDA # 40-386 SPONSOR :Thames Pharmacal Co., Inc.

DRUG AND DOSAGE FORM : **Triamcinolone Acetonide Ointment**
STRENGTH(S) : 0.5%
TYPES OF STUDIES : Waiver

CLINICAL STUDY SITE(S) : N/A
ANALYTICAL SITE(S) : N/A

STUDY SUMMARY : Please see review

DISSOLUTION : N/A

**DSI INSPECTION STATUS**

| Inspection needed: NO | Inspection status: | Inspection results: |
|---|---|---|
| First Generic _____<br>New facility _____<br>For cause _____<br>Other _____ | Inspection requested: (date)<br>Inspection completed: (date) | |

PRIMARY REVIEWER : S. Pradhan BRANCH : I

INITIAL : /S/ DATE : 9.14.00

TEAM LEADER : Y. Huang BRANCH : I

INITIAL : /S/ DATE : 9/14/2000

DIRECTOR, DIVISION OF BIOEQUIVALENCE : DALE P. CONNER, Pharm. D.
INITIAL : _____ DATE : 9/18/00

Triamcinolone Acetonide
Ointment, USP, 0.5%
ANDA #40-386
Reviewer: Sikta Pradhan

Thames Pharmacal Co., Inc.
Ronkonkoma, NY
Submission Date:
August 31, 2000

## Review of an Amendment to a Waiver Request

Triamcinolone Acetonide Ointment, USP, 0.5% is indicated for skin rashes and itches. It is a pre-1962 drug and is coded AT in the listing of Approved Drug Products (1999).

The firm had previously requested (dated August 3, 1999 and February 25, 2000) a waiver of in-vivo bioequivalence study requirements for its 0.5% Triamcinolone Acetonide Ointment. The waiver request was denied by the Agency due to the difference in compositions of the test and reference products with respect to inactive ingredients (see FORMULATION). The listed reference product was Aristocort A$^R$ Ointment, 0.5%, manufactured by Lederle and currently own by Fujisawa Healthcare, Inc.

However, Aristocort A$^R$ is not currently available in the market and therefore, the Clay Park's Product (NO87385) has recently been selected by the Agency as the new RLD for this product.

FORMULATION:

| Ingredient | Test Product (Thames) Potency w/w(%) | Approved Generic (Clay Park) Potency w/w(%) | Aristocort A$^R$(Current RLD) (Fujisawa Healthcare) Potency w/w(%) |
|---|---|---|---|
| Triamcinolone Acetonide, USP | 0.5 | | |
| Light Mineral Oil, NF | | | |
| White Petrolatum, USP | | | |

% of Triamcinolone Acetonide, USP, is added as excess
**Batch record shows % overage

***The amount of White Petrolatum, % in the test product is acceptable, as Betamethasone Valerate (NO18864), a topical ointment containing % White Petrolatum has recently been approved by the Agency.

COMMENTS:

1. Recently, Clay Park's Product (NO87385) has been selected as the new RLD to replace Aristocort A[R], the previous RLD for this product.

2. The composition of the test product is different from that of the old RLD, Aristocort A[R] of Fujisawa Healthcare, Inc., but it is similar to that of the new RLD of Clay Park Laboratory, Inc.

RECOMMENDATION:

The Division of Bioequivalence agrees that the information submitted by Thames Pharmacal Co., Inc. demonstrates that the test product, Triamcinolone Acetonide Ointment, USP, 0.5% is bioequivalent to the recently selected RLD of Clay Park Laboratory, Inc. The waiver of in vivo bioequivalence study requirements for the test product, Triamcinolone Acetonide Ointment, USP, 0.5% is granted. From the bioequivalence point of view, the Division of Bioequivalence deems the test ointment, Triamcinolone Acetonide, 0.5%, to be bioequivalent to Triamcinolone Acetonide Ointment, USP, 0.5%, manufactured by Clay Park.

/S/

Sikta Pradhan, Ph.D.
Division of Bioequivalence
Review Branch I

RD INITIALED YCHUANG
FT INITIALED YCHUANG ---------- /S/ 9/14/2000

/S/

Concur: ---------- Date: 9/18/00

Dale P. Conner, Pharm.D.
Director, Division of Bioequivalence

cc: ANDA # 40386W.800 (Original, duplicate), HFD-652 (Huang, Pradhan), HFD-650 (Director), Drug File, Division File

BIOEQUIVALENCY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: #40-386 APPLICANT: Thames Pharmacal Co., Inc.

DRUG PRODUCT: Triamcinolone Acetonide Ointment, 0.5%

The Division of Bioequivalence has completed its review and has no further questions at this time.

Please note that the bioequivalency comments provided in this communication are preliminary. These comments are subject to revision after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling, or other scientific or regulatory issues. Please be advised that these reviews may result in the need for additional bioequivalency information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

/S/

Dale P. Conner, Pharm. D.
Director
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

CC: ANDA #40-386
ANDA DUPLICATE
DIVISION FILE
BIO DRUG FILE
FIELD COPY

Endorsements: (Final with Dates)
HFD-652/ S. Pradhan
HFD-650/ Y. Huang 9/14/2000
HFD-617/ K. Scardina 9/20/00
HFD-650/ D. Conner 9/18/00

Printed in draft on 9/14/00
Printed in final on

1. Waiver 0.5% Ointment Submission date: 08-31-2000

Outcome AC

OUTCOME DECISIONS: AC - Acceptable

JUL 31 2000

BIOEQUIVALENCY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: #40-386 APPLICANT: Thames Pharmacal Co., Inc.

DRUG PRODUCT: Triamcinolone Acetonide Ointment, 0.5%

The Division of Bioequivalence has completed its review of your submission(s) acknowledged on the cover sheet. The following deficiency has been identified:

According to the Agency Regulation in 1992 on inactive ingredients requirements, the waiver request of in-vivo bioequivalence study requirements for Thames' 0.5% Triamcinolone Acetonide Ointment has been denied due to the difference in compositions of the test and reference products with respect to inactive ingredients.

Sincerely yours,

/S/

Dale P. Conner, Pharm. D.
Director
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

Triamcinolone Acetonide
Ointment, USP, 0.5%
ANDA #40-386
Reviewer: Sikta Pradhan

Thames Pharmacal Co., Inc.
Ronkonkoma, NY
Submission Date:
February 25, 2000

## Review of an Amendment to a Waiver Request

Triamcinolone Acetonide Ointment, USP, 0.5% is indicated for skin rashes and itches. The listed reference product is Aristocort A$^{R}$ Ointment, 0.5%, manufactured by Lederle and currently own by Fujisawa Healthcare, Inc. It is a pre-1962 drug and is coded AT in the listing of Approved Drug Products (1999).

The firm had previously requested (dated August 3, 1999) a waiver of in-vivo bioequivalence study requirements for its 0.5% Triamcinolone Acetonide Ointment. The waiver request was denied by the Agency due to the difference in compositions of the test and reference products with respect to inactive ingredients, propylene glycol, light mineral oil and emusifying wax (see FORMULATION).

In this amendment the firm has cited examples of previously approved Triamcinolone Acetonide Ointment, USP, 0.5% marketed by Clay Park and by Altana. Both of these contain white petrolatum, USP and Light Mineral Oil, NF. The firm has stated that the inactive ingredients in the test formulation containing white petrolatum, USP and Light Mineral Oil, NF are less likely to affect the safety of the test product, Triamcinolone Acetonide Ointment, USP, 0.5%.

FORMULATION:

| Ingredient | Test Product (Thames) Potency w/w(%) | Current RLD$^{R}$ (Aristocort A$^{R}$) (Fujisawa Healthcare, Inc.) Potency w/w(%) |
|---|---|---|
| Triamcinolone Acetonide, USP | 0.5 | |
| Light Mineral Oil, NF | | |
| White Petrolatum, USP | | |

*Batch record shows % overage
**The amount of White Petrolatum, % in the test product is acceptable (see Betamethasone Valerate (NO18864), a topical ointment containing % White Petrolatum has recently been approved by the Agency).

COMMENTS:

1. According to the Agency Regulation in 1992 on inactive ingredients requirements, the waiver of in-vivo bioequivalence study requirements for Thames' 0.5% Triamcinolone Acetonide Ointment has been denied due to the difference in compositions of the test and reference products with respect to inactive ingredients.

2. As Thames Pharmacal Co. has mentioned, the Agency had approved Triamcinolone Acetonide Ointment, USP, 0.5% marketed by Clay Park (approved 1981) and by Altana (approved 1978) having different compositions with respect to inactive ingredients from the reference product. However, these approvals were taken place before Agency Regulations on Inactive Ingredients were passed in 1992.

RECOMMENDATION:

The Division of Bioequivalence does not agree that the information submitted by Thames Pharmacal Co., Inc. demonstrates that the test product, Triamcinolone Acetonide Ointment, USP, 0.5% is bioequivalent to the Aristocort A[R] of Fujisawa Healthcare, Inc. Therefore, the waiver request of in vivo bioequivalence study requirements for the test product, Triamcinolone Acetonide Ointment, USP, 0.5% is denied.

/S/

Sikta Pradhan, Ph.D.
Division of Bioequivalence
Review Branch I

RD INITIALED YCHUANG
FT INITIALED YCHUANG ---------- /S/ 7/17/2000

/S/

Concur: ---------- Date: 7/20/2000

for Dale P. Conner, Pharm.D.
Director, Division of Bioequivalence

cc: ANDA # 40386W.200 (Original, duplicate), HFD-652 (Huang, Pradhan), HFD-650 (Director), Drug File, Division File

Final: 6/16/00

CC: ANDA #40-386
ANDA DUPLICATE
DIVISION FILE
BIO DRUG FILE
FIELD COPY

Endorsements: (Final with Dates)
HFD-652/ S. Pradhan SP
HFD-650/ Y. Huang YH 7/17/2000
HFD-617/ ~~E. Hu~~ K. Schrdina KS 7/24/00
HFD-650/ D. Conner for 7/26/2000

Printed in final on

1. ~~Waiver~~ Study Amendment 0.5% Ointment (STA) OK Submission date: ~~08-03-99~~ February 25, 2000

Outcome UN

OUTCOME DECISIONS: UN - Unacceptable