CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

75-811

Bioequivalence Review(s)

BIOEQUIVALENCY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: #75811 APPLICANT: American Pharmaceutical Partners, Inc.

DRUG PRODUCT: Mesna Injection, 100 mg/ml multidose vial

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,

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

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

-ANDA Number: 75-811 **Date of Submission: February 25, 2000**
Applicant's Name: American Pharmaceutical Partners, Inc.
Established Name: Mesna Injection, 100 mg/mL (1 gram in 10 mL Multiple dose Vial)

Labeling Deficiencies:

1. CONTAINER (10 mL Multidose vial)

   a. Revise "Latex Free Stoppers" to read "Vial stoppers do not contain natural rubber latex.".
   b. Enhance the prominence and conspicuousness of the established name.

2. SHELF PACK CARTON (10 x 10 mL Multidose vials)

   a. Revise "Latex Free Stoppers" to read "Vial stoppers do not contain natural rubber latex.".
   b. Enhance the prominence and conspicuousness of the established name.

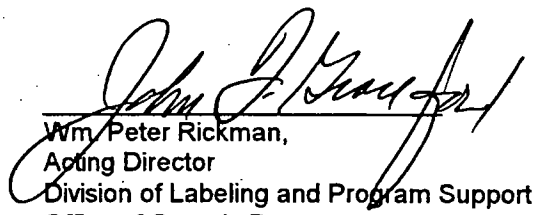
3. INSERT

   a. HOW SUPPLIED – Revise "Vial stoppers are latex free." to read "Vial stopper does not contain natural rubber latex.".

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

Prior to approval, it may be necessary to further revise your labeling subsequent to approved changes for the reference listed drug. We suggest that you routinely monitor the following website for any approved changes- http://www.fda.gov/cder/ogd/rld/labeling_review_branch.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,
Acting Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

Mesna Injection
100 mg/ml
ANDA #75-811
Reviewer: Carol Y. Kim
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American Pharmaceutical Partners, Inc.
Melrose Park, IL
Submission Date:
February 25, 2000

REVIEW OF A WAIVER REQUEST

I. Background

1. The firm has requested a waiver of an *in vivo* bioequivalence study requirement for its proposed product, Mesna Injection, 100 mg/ml, multi-dose vials. The reference listed product is Mesnex[R] (Mesna) Injection, 100 mg/ml, 1 gm in 10 ml, multi-dose vials, manufactured by

2. Both the test and the RLD products contain benzyl alcohol, 10.4 mg, added as preservative, in multi-dose vials.

3. Mesna Injection is a ready-to-use solution for injection indicated as a prophylactic agent in reducing the incidence of ifosfamide-induced hemorrhagic cystitis.

4. The test and the reference listed product are both intended for intravenous use only.

II. Formulation comparison

The test and reference formulations are compared as shown below:

Ingredients	Mesnex[R] (Mesna Injection) 100 mg/ml (per ml)	Mesna Injection 100 mg/ml (per ml)
Mesna	100.0 mg	100.0 mg
Edetate Disodium, USP		
Benzyl Alcohol, NF		
Sodium Hydroxide, NF		.5 to 8.5)*
Water for Injection, USP		
Nitrogen NF		

III. Comments

1. The test product, Mesna Injection, 100 mg/ml, multi-dose vials, contains the same active and inactive ingredients in the same concentration and dosage

form as the reference product, Mesnex[R] (Mesna) Injection, 100 mg/ml, 1 gm in 10 ml, multi-dose vials.

2. The waiver is granted under 21 CFR 320.22 (b) (1), which states that the drug product is (i) a parenteral solution and (ii) contains the same active and inactive ingredients in the same concentrations as a drug product that is the subject of an approved full NDA.

IV. Recommendation

The Division of Bioequivalence agrees that the information submitted by American Pharmaceutical Partners, Inc. demonstrates that Mesna Injection, 100 mg/ml, multi-dose vials, falls under 21 CFR section 320.22 (b) (1) of the Bioavailability/Bioequivalence Regulations. The waiver of an *in vivo* bioequivalence study requirement for the drug is granted. The Division of Bioequivalence deems the test product, Mesna Injection, 100 mg/ml, multi-dose vials, bioequivalent to the reference product, Mesnex[R] (Mesna) Injection, 100 mg/ml, 1 gm in 10 ml, multi-dose vials, manufactured by Asta Medica in Germany for Mead Johnson.

The firm should be informed of the recommendation.

Carol Y. Kim, Pharm.D.
Division of Bioequivalence
Review Branch III

RD INITIALLED BY BDAVIT 4/13/00
FT INITIALLED BY BDAVIT Barbara M Davit Date: 4/14/00

Concur: Dale P. Conner Date: 5/1/00
Dale P. Conner, Pharm.D.
Director
Division of Bioequivalence

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