

# **CENTER FOR DRUG EVALUATION AND RESEARCH**

## **Approval Package for:**

***APPLICATION NUMBER:***  
**ANDA 078815**

**Name:** Oxaliplatin for Injection (Preservative-Free)  
50 mg/vial and 100 mg/vial  
Single-Use Vials

**Sponsor:** Hospira Worldwide Inc.

**Approval Date:** September 30, 2009

# CENTER FOR DRUG EVALUATION AND RESEARCH

***APPLICATION NUMBER:***  
**ANDA 078815**

## CONTENTS

<b>Reviews / Information Included in this Review</b>
--

<b>Approval Letter</b>	<b>X</b>
<b>Tentative Approval Letter</b>	<b>X</b>
<b>Labeling</b>	<b>X</b>
<b>Labeling Review(s)</b>	<b>X</b>
<b>Medical Review(s)</b>	
<b>Chemistry Review(s)</b>	<b>X</b>
<b>Bioequivalence Review(s)</b>	<b>X</b>
<b>Statistical Review(s)</b>	
<b>Microbiology Review(s)</b>	<b>X</b>
<b>Other Review(s)</b>	
<b>Administrative &amp; Correspondence Documents</b>	<b>X</b>

# **CENTER FOR DRUG EVALUATION AND RESEARCH**

***APPLICATION NUMBER:***

**ANDA 078815**

**APPROVAL LETTER**



DEPARTMENT OF HEALTH & HUMAN SERVICES

---

Food and Drug Administration  
Rockville, MD 20857

ANDA 78-815

Hospira Worldwide Inc.  
Attention: Laurie Wojtko  
Senior Associate, Global Regulatory Affairs  
Department 389, Bldg H2-2  
275 North Field Drive  
Lake Forest, IL 60045

Dear Madam:

This is in reference to your abbreviated new drug application (ANDA) dated February 9, 2007, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Oxaliplatin for Injection, (Preservative-Free), 50 mg/vial and 100 mg/vial, Single-use Vials.

Reference is also made to the tentative approval letter issued by this office on May 22, 2009, and to your amendment dated September 3, 2009.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the ANDA is approved, effective on the date of this letter. The Division of Bioequivalence has determined your Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Eloxatin for Injection, 50 mg/vial and 100 mg/vial, respectively, of Sanofi Aventis US, LLC (Sanofi).

The RLD upon which you have based your ANDA, Sanofi's Eloxatin for Injection, 50 mg/vial and 100 mg/vial, is subject to periods of patent protection. The following patents and their expiration dates (with pediatric exclusivity added) are currently listed in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book") for this drug product:



<u>U.S. Patent Number</u>	<u>Expiration Date</u>
5,290,961 (the '961 patent)	July 12, 2013
5,338,874 (the '874 patent)	October 7, 2013
5,420,319 (the '319 patent)	February 9, 2017

With respect to each of these patents, your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the Act stating that each patent is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial, under this ANDA. Section 505(j)(5)(B)(iii) of the Act provides that approval of an ANDA shall be made effective immediately, unless an action was brought against Hospira Worldwide PTY (Hospira) for infringement of one or more of these patents that were the subjects of the paragraph IV certifications. You have notified the agency that Hospira complied with the requirements of section 505(j)(2)(B) of the Act, and that litigation for infringement of the '874 patent was brought against Hospira within the statutory 45-day period in the United States District Court for the District of New Jersey [Sanofi-Aventis U.S. LLC v. Mayne Pharma Limited, Civil Action No. 3:07-CV-03409-FLW-JJH]. You have also notified the agency that on June 30, 2009, the court decided that the '874 patent is invalid, unenforceable, or not infringed; therefore, under section 505(j)(5)(B)(iii) of the Act, your ANDA is eligible for approval.

With respect to 180-day generic drug exclusivity, we note that Hospira was one of the first ANDA applicants to submit a substantially complete ANDA with a paragraph IV certification to the patents listed above. Therefore, with this approval, Hospira is eligible for 180 days of generic drug exclusivity for Oxaliplatin for Injection, 50 mg and 100 mg Single-use Vials. This exclusivity, which is provided for under section 505(j)(5)(B)(iv) of the Act, begins to run from the date of commercial marketing identified in section 505(j)(5)(B)(iv). Please submit correspondence to this ANDA informing the agency of the date commercial marketing begins.

Under section 506A of the Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

Please note that if FDA requires a Risk Evaluation & Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the Act.

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert directly to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Drug Marketing, Advertising, and Communications  
5901-B Ammendale Road  
Beltsville, MD 20705

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Division of Drug Marketing, Advertising, and Communications with a completed Form FDA 2253 at the time of their initial use.

Within 14 days of the date of this letter, submit updated content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/oc/datacouncil/spl.html>, that is identical in content to the approved labeling. Upon receipt and verification, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission as "**Miscellaneous Correspondence - SPL for Approved ANDA 78-815**".

Sincerely yours,

{See appended electronic signature page}

Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
-----	-----	-----	-----
ANDA-78815	ORIG-1	HOSPIRA WORLDWIDE INC	OXALIPLATIN

-----

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

-----

/s/

-----

ROBERT L WEST  
09/30/2009  
Deputy Director, for Gary Buehler

**CENTER FOR DRUG EVALUATION AND RESEARCH**

***APPLICATION NUMBER:***

**ANDA 078815**

**TENTATIVE APPROVAL LETTER**



ANDA 78-815

Hospira Worldwide PTY  
Attention: Laurie Wojtko  
Senior Associate, Global Regulatory Affairs  
275 North Field Drive  
D-0389, Bldg H2-2N  
Lake Forest, IL 60045

Dear Madam:

This is in reference to your abbreviated new drug application (ANDA) dated February 9, 2007, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial Single-dose Vials.

Reference is also made to your amendments dated August 23, 2007; August 1, September 4, November 3, 14 and 19, 2008; and February 3 and 5, and April 29, 2009. In addition, we acknowledge receipt of your correspondence dated August 7, and September 10, 2007, addressing the patent issues associated with this ANDA.

We have completed the review of this ANDA, and based upon the information you have presented to date we have concluded that the drug is safe and effective for use as recommended in the submitted labeling. However, we are unable to grant final approval to your ANDA at this time because of the patent issue noted below. Therefore, the ANDA is **tentatively approved**. This determination is based upon information available to the agency at this time (i.e., information in your ANDA and the status of current good manufacturing practices (cGMPs) of the facilities used in the manufacture and testing of the drug product). This determination is subject to change on the basis of new information that may come to our attention. This letter does not address issues related to the 180-day exclusivity provisions under section 505(j)(5)(B)(iv) of the Act.

The reference listed drug (RLD) upon which you have based your ANDA, Eloxatin for Injection, 50 mg/vial and 100 mg/vial, of Sanofi Synthelabo, Inc., is subject to periods of patent protection. The following patents and expiration dates (with pediatric exclusivity added) are currently listed in the

agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"):

<u>U.S. Patent Number</u>	<u>Expiration Date</u>
5,290,961 (the '961 patent)	July 12, 2013
5,338,874 (the '874 patent)	October 7, 2013
5,420,319 (the '319 patent)	February 9, 2017

With respect to each of these patents, your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the Act stating that each patent is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial, under this ANDA. Section 505(j)(5)(B)(iii) of the Act provides that approval of an ANDA shall be made effective immediately, unless an action is brought against Hospira Worldwide PTY (Hospira) for infringement of one or more of the patents that were the subject of the paragraph IV certifications. You have notified the agency that Hospira complied with the requirements of section 505(j)(2)(B) of the Act, and litigation for infringement of the '874 patent was brought against Hospira in the United States District Court for the District of New Jersey [Sanofi-Aventis U.S. LLC v. Mayne Pharma Limited, Civil Action No. 3:07-CV-03409-FLW-JJH].

Therefore, final approval cannot be granted until:

1. a. pursuant to sections 505(j)(5)(B)(iii)<sup>1</sup>, 505(j)(5)(F)(ii), and 505A(b)(1)(A)(i) of the Act, the expiration of the 8-year period from the date of approval of the RLD,
- b. the date the court decides<sup>2</sup> that the '874 patent is invalid or not infringed (see sections 505(j)(5)(B)(iii)(I), (II), and (III) of the Act), or

---

<sup>1</sup> Because information on the '874 patent was submitted before August 18, 2003, this reference to section 505(j)(5)(B)(iii) is to that section of the Act as in effect prior to December 8, 2003, when the Medicare Prescription Drug, Improvement and Modernization Act (MMA) (Public Law 108-173) was enacted. See MMA § 1101(c)(3).

<sup>2</sup> This decision may be either a decision of the district court or the court of appeals, whichever court is the first to decide that the patent is invalid or not infringed.

c. the '874 patent has expired, and

2. The agency is assured there is no new information that would affect whether final approval should be granted.

To reactivate your ANDA prior to final approval, please submit a "MINOR AMENDMENT - FINAL APPROVAL REQUESTED" 90 days prior to the date you believe that your ANDA will be eligible for final approval. This amendment should provide the legal/regulatory basis for your request for final approval and should include a copy of a court decision, or a settlement or licensing agreement, as appropriate. It should also identify changes, if any, in the conditions under which the ANDA was tentatively approved, i.e., updated information such as final-printed labeling, chemistry, manufacturing, and controls data as appropriate. This amendment should be submitted even if none of these changes were made, and it should be designated clearly in your cover letter as a MINOR AMENDMENT - FINAL APPROVAL REQUESTED.

In addition to the amendment requested above, the agency may request at any time prior to the date of final approval that you submit an additional amendment containing the requested information. Failure to submit either or, if requested, both amendments may result in rescission of the tentative approval status of your ANDA, or may result in a delay in the issuance of the final approval letter.

Any significant changes in the conditions outlined in this ANDA as well as changes in the status of the manufacturing and testing facilities' compliance with current good manufacturing practices (cGMPs) are subject to agency review before final approval of the application will be made. Such changes should be categorized as representing either "major" or "minor" changes, and they will be reviewed according to OGD policy in effect at the time of receipt. The submission of multiple amendments prior to final approval may also result in a delay in the issuance of the final approval letter.

This drug product may not be marketed without final agency approval under section 505 of the Act. The introduction or delivery for introduction into interstate commerce of this drug product before the final approval date is prohibited under section 301 of the Act. Also, until the agency issues the final approval letter, this drug product will not be deemed to be approved for marketing under section 505 of the Act, and will not be listed in the "Orange Book."

For further information on the status of this application, or prior to submitting additional amendments, please contact Esther Chuh, Project Manager, at 240-276-8530.

Sincerely yours,

*{See appended electronic signature page}*

Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



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

/s/

-----  
Robert L. West  
5/22/2009 02:11:40 PM  
Deputy Director, for Gary Buehler

# **CENTER FOR DRUG EVALUATION AND RESEARCH**

***APPLICATION NUMBER:***

**ANDA 078815**

**LABELING**

## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use Oxaliplatin for Injection safely and effectively. See full prescribing information for Oxaliplatin for Injection.

Oxaliplatin for Injection, powder for solution for intravenous use

Initial U.S. Approval: 2002

**WARNING: ANAPHYLACTIC REACTIONS**  
See full prescribing information for complete boxed warning.  
Anaphylactic reactions to Oxaliplatin for Injection have been reported, and may occur within minutes of Oxaliplatin for Injection administration. Epinephrine, corticosteroids, and antihistamines have been employed to alleviate symptoms. (5.1)

## INDICATIONS AND USAGE

Oxaliplatin for Injection is a platinum-based drug used in combination with infusional 5-fluorouracil/leucovorin, which is indicated for:

- adjuvant treatment of stage III colon cancer in patients who have undergone complete resection of the primary tumor.
- treatment of advanced colorectal cancer. (1)

## DOSE AND ADMINISTRATION

- Administer Oxaliplatin for Injection in combination with 5-fluorouracil/leucovorin every 2 weeks. (2.1)

Day 1: Oxaliplatin for Injection 85 mg/m<sup>2</sup> intravenous infusion in 250-500 mL 5% Dextrose Injection, USP and leucovorin 200 mg/m<sup>2</sup> intravenous infusion in 5% Dextrose Injection, USP both given over 120 minutes at the same time in separate bags using a Y-line, followed by 5-fluorouracil 400 mg/m<sup>2</sup> intravenous bolus given over 2 to 4 minutes, followed by 5-fluorouracil 600 mg/m<sup>2</sup> intravenous infusion in 500 mL 5% Dextrose Injection, USP (recommended) as a 22-hour continuous infusion.

Day 2: Leucovorin 200 mg/m<sup>2</sup> intravenous infusion over 120 minutes followed by 5-fluorouracil 400 mg/m<sup>2</sup> intravenous bolus given over 2 to 4 minutes followed by 5-fluorouracil 600 mg/m<sup>2</sup> intravenous infusion in 500 mL 5% Dextrose Injection, USP (recommended) as a 22-hour continuous infusion.

Reduce the dose of Oxaliplatin for Injection to 75 mg/m<sup>2</sup> (adjunct setting) or 65 mg/m<sup>2</sup> (advanced colorectal cancer) (2.2).

## FULL PRESCRIBING INFORMATION: CONTENTS\*

### WARNING

#### 1 INDICATIONS AND USAGE

#### 2 DOSE AND ADMINISTRATION

- 2.1 Dosage
- 2.2 Dose Modification Recommendations
- 2.3 Preparation of Infusion Solution

#### 3 DOSE FORMS AND STRENGTHS

#### 4 CONTRAINDICATIONS

#### 5 WARNINGS AND PRECAUTIONS

- 5.1 Allergic Reactions
- 5.2 Neurotoxicity
- 5.3 Pain and Paresthesia
- 5.4 Hepatotoxicity
- 5.5 Use in Pregnancy
- 5.6 Recommended Laboratory Tests

#### 6 ADVERSE REACTIONS

- 6.1 Clinical Trials Experience
- 6.2 Postmarketing Experience

#### 7 DRUG INTERACTION

#### 8 USE IN SPECIFIC POPULATIONS

- 8.1 Pregnancy
- 8.2 Nursing Mothers
- 8.4 Pediatric Use

- if there are persistent grade 2 neurosensory events that do not resolve.
- after recovery from grade 3/4 gastrointestinal toxicities (despite prophylactic treatment) or grade 4 neutropenia or grade 3/4 thrombocytopenia. Delay next dose until neutrophils  $\geq 1.5 \times 10^9/L$  and platelets  $\geq 75 \times 10^9/L$ .

- Discontinue Oxaliplatin for Injection if there are persistent Grade 3 neurosensory events. (2.2)
- Never reconstitute or prepare final dilution with a sodium chloride solution or other chloride-containing solutions. (2.3)

**DOSE FORMS AND STRENGTHS**  
Single use vials of 50 mg or 100 mg oxaliplatin as a sterile, preservative-free lyophilized powder for injection. (5.1)

## CONTRAINDICATIONS

- Known allergy to Oxaliplatin for Injection or other platinum compounds. (4.5.1)

## WARNINGS AND PRECAUTIONS

- Allergic Reactions: Monitor for development of rash, urticaria, erythema, pruritus, bronchospasm, and hypotension. (5.1)

- Neurotoxicity: Reduce the dose or discontinue Oxaliplatin for Injection if necessary. (5.2)
- Pulmonary Toxicity: May need to discontinue Oxaliplatin for Injection until interstitial lung disease or pulmonary fibrosis are excluded. (5.3)

- Hepatotoxicity: Monitor liver function tests. (5.4)
- Pregnancy: Fetal harm can occur when administered to a pregnant woman. Women should be apprised of the potential harm to the fetus. (5.5, 8.1)

**ADVERSE REACTIONS**  
Most common adverse reactions (incidence  $\geq 40\%$ ) were peripheral sensory neuropathy, neutropenia, thrombocytopenia, anemia, nausea, increase in transaminases and alkaline phosphatase, diarrhea, emesis, fatigue and stomatitis. Other adverse reactions, including serious adverse reactions, have been reported. (6.1)

To report SUSPECTED ADVERSE REACTIONS, contact Hospira, Inc. at 1-800-441-4100 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.

See 17 for PATIENT COUNSELING INFORMATION and FDA approved patient labeling.

Revised: (04/2009)

8.5 Geriatric Use

8.6 Patients with Renal Impairment

## 10 OVERDOSAGE

## 11 DESCRIPTION

## 12 CLINICAL PHARMACOLOGY

- 12.1 Mechanism of Action
- 12.3 Pharmacokinetics

## 13 NONCLINICAL TOXICOLOGY

- 13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

- 14.1 Combination Adjuvant Therapy with Oxaliplatin for Injection and Infusional 5-Fluorouracil/Leucovorin in Patients with Colon Cancer

- 14.2 Combination Therapy with Oxaliplatin for Injection and 5-Fluorouracil/Leucovorin in Patients Previously Untreated for Advanced Colorectal Cancer

- 14.3 Combination Therapy with Oxaliplatin for Injection and 5-Fluorouracil/Leucovorin in Previously Treated Patients with Advanced Colorectal Cancer

## 15 REFERENCES

## 16 HOW SUPPLIED/STORAGE AND HANDLING

- 16.1 How Supplied
- 16.2 Storage

## 17 PATIENT COUNSELING INFORMATION

- 17.1 Information for Patients
- 17.2 FDA-Approved Patient Labeling

\*Sections or subsections omitted from the full prescribing information are not listed.

## FULL PRESCRIBING INFORMATION

### WARNING: ANAPHYLACTIC REACTIONS

Anaphylactic reactions to Oxaliplatin for Injection have been reported, and may occur within minutes of Oxaliplatin for Injection administration. Epinephrine, corticosteroids, and antihistamines have been employed to alleviate symptoms of anaphylaxis (see *Warnings and Precautions* (5.1)).

#### 1 INDICATIONS AND USAGE

Oxaliplatin for Injection, used in combination with infusional 5-fluorouracil/leucovorin, is indicated for:

- adjuvant treatment of stage III colon cancer in patients who have undergone complete resection of the primary tumor.
- treatment of advanced colorectal cancer.

#### 2 DOSE AND ADMINISTRATION

Oxaliplatin for Injection should be administered under the supervision of a qualified physician experienced in the use of cancer chemotherapeutic agents. Appropriate management of therapy and complications is possible only when adequate diagnostic and treatment facilities are readily available.

##### 2.1 Dosage

Administer Oxaliplatin for Injection in combination with 5-fluorouracil/leucovorin every 2 weeks. For advanced disease, treatment is recommended until disease progression or unacceptable toxicity. For adjuvant use, treatment is recommended for a total of 6 months (21 cycles).

Day 1: Oxaliplatin for Injection 85 mg/m<sup>2</sup> intravenous infusion in 250-500 mL 5% Dextrose Injection, USP and leucovorin 200 mg/m<sup>2</sup> intravenous infusion in 5% Dextrose Injection, USP both given over 120 minutes at the same time in separate bags using a Y-line, followed by 5-fluorouracil 400 mg/m<sup>2</sup> intravenous bolus given over 2 to 4 minutes, followed by 5-fluorouracil 600 mg/m<sup>2</sup> intravenous infusion in 500 mL 5% Dextrose Injection, USP (recommended) as a 22-hour continuous infusion.

Day 2: Leucovorin 200 mg/m<sup>2</sup> intravenous infusion over 120 minutes, followed by 5-fluorouracil 400 mg/m<sup>2</sup> intravenous bolus given over 2 to 4 minutes, followed by 5-fluorouracil 600 mg/m<sup>2</sup> intravenous infusion in 500 mL 5% Dextrose Injection, USP (recommended) as a 22-hour continuous infusion.

Figure 1

The administration of Oxaliplatin for Injection does not require hydration. Premedication with antiemetics, including 5-HT<sub>3</sub> blockers with or without dexamethasone, is recommended. For information on 5-fluorouracil and leucovorin, see the respective package inserts.

##### 2.2 Dose Modification Recommendations

Prior to subsequent therapy cycles, patients should be evaluated for clinical toxicities and recommended laboratory tests (see *Warnings and Precautions* (5.6)). Prolongation of infusion time for Oxaliplatin for Injection from 2 hours to 6 hours may mitigate acute toxicities. The infusion times for 5-fluorouracil and leucovorin do not need to be changed.

*Adjuvant Therapy in Patients with Stage III Colon Cancer*

Neurotoxicity and other toxicities were graded using the NCI CTC scale version 1 (see *Warnings and Precautions* (5.2)).

For patients who experience persistent Grade 2 neurosensory events that do not resolve, a dose reduction of Oxaliplatin for Injection to 75 mg/m<sup>2</sup> should be considered. For patients with persistent Grade 3 neurosensory events, discontinuing therapy should be considered.

The infusional 5-fluorouracil/leucovorin regimen need not be altered.

A dose reduction of Oxaliplatin for Injection to 75 mg/m<sup>2</sup> and infusional 5-fluorouracil to 300 mg/m<sup>2</sup> bolus and 500 mg/m<sup>2</sup> 22-hour infusion is recommended for patients after recovery from grade 3/4 gastrointestinal (despite prophylactic treatment) or grade 4 neutropenia or grade 3/4 thrombocytopenia. The next dose should be delayed until neutrophils  $\geq 1.5 \times 10^9/L$  and platelets  $\geq 75 \times 10^9/L$ .

*Dose Modifications in Therapy in Previously Untreated and Previously Treated Patients with Advanced Colorectal Cancer*

Neurotoxicity was graded using a study-specific neurotoxicity scale (see *Warnings and Precautions* (5.2)). Other toxicities were graded by the NCI CTC, Version 2.0.

For patients who experience persistent Grade 2 neurosensory events that do not resolve, a dose reduction of Oxaliplatin for Injection to 65 mg/m<sup>2</sup> should be considered. For patients with persistent Grade 3 neurosensory events, discontinuing therapy should be considered.

The 5-fluorouracil/leucovorin regimen need not be altered.

A dose reduction of Oxaliplatin for Injection to 65 mg/m<sup>2</sup> and 5-fluorouracil by 20% (300 mg/m<sup>2</sup> bolus and 500 mg/m<sup>2</sup> 22-hour infusion) is recommended for patients after recovery from grade 3/4 gastrointestinal (despite prophylactic treatment) or grade 4 neutropenia or grade 3/4 thrombocytopenia. The next dose should be delayed until neutrophils  $\geq 1.5 \times 10^9/L$  and platelets  $\geq 75 \times 10^9/L$ .

**2.3 Preparation of Infusion Solution**  
Reconstituted or final dilution must never be performed with a sodium chloride solution or other chloride containing solutions.

The lyophilized powder is reconstituted by adding 10 mL (for the 50 mg vial) or 20 mL (for the 100 mg vial) of Water for Injection, USP or 5% Dextrose Injection, USP. Do not administer the reconstituted solution without further dilution. The reconstituted solution must be further diluted in an infusion solution of 250-500 mL of 5% Dextrose Injection, USP.

After reconstitution in the original vial, the solution may be stored up to 24 hours under refrigeration (2-8°C (36-46°F)). After final dilution with 250-500 mL of 5% Dextrose Injection, USP, the shelf life is 6 hours at room temperature (20-25°C (68-77°F)) or up to 24 hours under refrigeration (2-8°C (36-46°F)).

**Dextrose Injection, USP prior to administration of any concomitant medication.** Oxaliplatin for Injection should be administered under the supervision of a qualified physician experienced in the use of cancer chemotherapeutic agents. Appropriate management of therapy and complications is possible only when adequate diagnostic and treatment facilities are readily available.

Parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration and discarded if present.

Needles or intravenous administration sets containing aluminum parts that may come in contact with Oxaliplatin for Injection should not be used for the preparation or mixing of the drug. Aluminum has been reported to cause degradation of platinum compounds.

#### 3 DOSE FORMS AND STRENGTHS

Oxaliplatin for Injection is supplied in single-use vials containing 50 mg or 100 mg of oxaliplatin as a sterile, preservative-free lyophilized powder for reconstitution.

#### 4 CONTRAINDICATIONS

Oxaliplatin for Injection should not be administered to patients with a history of known allergy to Oxaliplatin for Injection or other platinum compounds (see *Warnings and Precautions* (5.1)).

#### 5 WARNINGS AND PRECAUTIONS

##### 5.1 Allergic Reactions

See boxed warning.

Grade 3/4 hypersensitivity, including anaphylactic/anaphylactoid reactions, to Oxaliplatin for Injection have been observed in 2 to 3% of colon cancer patients. These allergic reactions which can be fatal, can occur within minutes of administration and at any cycle, and were similar in nature and severity to those reported with other platinum-containing compounds, such as rash, urticaria, erythema, pruritus, and, rarely, bronchospasm and hypotension. The symptoms associated with hypersensitivity reactions are associated with gastrointestinal and hematologic adverse reactions. When Oxaliplatin for Injection is administered in combination with infusional 5-fluorouracil/leucovorin, the incidence of these events is increased.

The incidence of death within 28 days of last treatment, regardless of causality, was 0.5% (n=6) in both the Oxaliplatin for Injection combination and infusional 5-fluorouracil/leucovorin arms, respectively. Deaths within 60 days from initiation of therapy were 2 from sepsis/septic shock, 2 from intracerebral bleeding and one from anaphylactic reaction. On the 5-fluorouracil/leucovorin arm, one death was attributed to suicide.

Deaths from severe neutropenic sepsis (1 patient) also had sepsis, 1 unknown cause, 1 anoxic cerebral infarction and 1 probable abdominal aorta rupture.

##### 5.2 Neurotoxicity

Oxaliplatin for Injection is associated with two types of neurotoxicity.

An acute, reversible, primarily peripheral, sensory neuropathy that is of early onset, occurring within hours or one to two days of dosing, that resolves within 14 days, and that frequently recurs with further dosing. The symptoms may be precipitated or exacerbated by exposure to cold temperatures or cold objects and they usually present as transient paresthesia, dysesthesia and hypoaesthesia in the hands, feet, perioral area, or throat. Jaw spasm, abnormal tongue sensation, dysarthria, eye pain, and a feeling of chest pressure have also been observed. The acute, reversible pattern of sensory neuropathy was observed in about 56% of study patients who received Oxaliplatin for Injection with 5-fluorouracil/leucovorin. In any individual cycle acute neurotoxicity was observed in approximately 30% of patients. In adjuvant patients the median cycle of onset for grade 3 peripheral sensory neuropathy was 3 in the previously treated patients the median number of cycles administered on the Oxaliplatin for Injection with 5-fluorouracil/leucovorin combination arm was 6.

An acute syndrome of pharyngolaryngeal dysesthesia seen in 1 to 2% (grade 3/4) of patients previously untreated for advanced colorectal cancer, and the previously treated patients, is characterized by subjective sensations of dysphagia or dyspnea, without any laryngospasm or bronchospasm (no stridor or wheezing). Ice (mucositis prophylaxis) should be avoided during the infusion of Oxaliplatin for Injection because cold temperature can exacerbate neurologic symptoms.

A persistent (> 14 days), primarily peripheral, sensory neuropathy that is usually characterized by paresthesias, dysesthesias, hypoaesthesia, but may also include deficits in proprioception that can interfere with daily activities (e.g., writing, buttoning, swallowing, and difficulty walking from impaired proprioception). These forms of neuropathy occurred in 48% of the study patients receiving Oxaliplatin for Injection with 5-fluorouracil/leucovorin. Persistent neuropathy can occur without any prior acute neurotoxicity event. The majority of the patients (80%) who developed grade 3 persistent neuropathy progressed from prior Grade 1 or 2 events. These symptoms may improve in some patients upon discontinuation of Oxaliplatin for Injection.

In the adjuvant colon cancer trial, neuropathy was graded using a prestilled module derived from the Neuro-Sensory section of the National Cancer Institute Common Toxicity Criteria (NCI CTC) scale, Version 1, as follows:

**Table 1 – NCI CTC Grading for Neuropathy in Adjuvant Patients**

**Grade** **Definition**

Grade 0 No change or none

Grade 1 Mild paresthesias, loss of deep tendon reflexes

Grade 2 Mild to moderate objective sensory loss, moderate paresthesias

Grade 3 Severe objective sensory loss or paresthesias that interfere with function

Grade 4 Not applicable

Peripheral sensory neuropathy was reported in adjuvant patients treated with the Oxaliplatin for Injection combination with a frequency of 92% (all grades) and 15% (grade 3). At the 28-day follow-up after the last treatment cycle, 60% of all patients had any grade (Grade 1-4=0%, Grade 2-16%, Grade 3-5%) peripheral sensory neuropathy decreasing to 39% at 6 months follow-up (Grade 1-15%, Grade 2-7%, Grade 3-1%) and 21% at 16 months of follow-up (Grade 1-17%, Grade 2-3%, Grade 3-1%).

In the advanced colorectal cancer studies, neuropathy was graded using a study-specific neurotoxicity scale, which was different from the NCI CTC scale, Version 2.0 (see below).

**Table 2 – Grading Scale for Paresthesia/Dysesthesias in Advanced Colorectal Cancer Patients**

**Grade** **Definition**

Grade 1 Resolved and did not interfere with functioning

Grade 2 Interfered with function but not daily activities

Grade 3 Pain or functional impairment that interfered with daily activities

Grade 4 Persistent impairment that is disabling or life-threatening

## 13 NONCLINICAL TOXICOLOGY

- 13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

## 14 CLINICAL STUDIES

- 14.1 Combination Adjuvant Therapy with Oxaliplatin for Injection and Infusional 5-Fluorouracil/Leucovorin in Patients with Colon Cancer

- 14.2 Combination Therapy with Oxaliplatin for Injection and 5-Fluorouracil/Leucovorin in Patients Previously Untreated for Advanced Colorectal Cancer

- 14.3 Combination Therapy with Oxaliplatin for Injection and 5-Fluorouracil/Leucovorin in Previously Treated Patients with Advanced Colorectal Cancer

## 15 REFERENCES

## 16 HOW SUPPLIED/STORAGE AND HANDLING

- 16.1 How Supplied
- 16.2 Storage

## 17 PATIENT COUNSELING INFORMATION

- 17.1 Information for Patients
- 17.2 FDA-Approved Patient Labeling

\*Sections or subsections omitted from the full prescribing information are not listed.

The following table provides adverse reactions reported in the adjuvant therapy colon cancer clinical trial (see *Clinical Studies* (14)) by body system and decreasing order of frequency in the Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin arm for events with overall incidences  $\geq 5\%$  and for NCI grade 3/4 events with incidences  $\geq 1\%$ .

**Table 3 – Adverse Reactions Reported in Patients with Colon Cancer receiving Adjuvant Treatment (< 5% of all patients and with < 1% NCI Grade 3/4 events)**

**Adverse Reaction (WHO/Pre)** **Oxaliplatin + 5-FU/LV N=259** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)**

Any Event 99 82 98 70 99 76

Any Event 11 2 100 99 31

**Allegory/Immunology**

Allergic Reaction 10 3 2 <1

## Constitutional Symptoms/Pain

Fatigue 44 4 38 1

Abdominal Pain 18 1 17 2

Skin Disorder 32 2 36 2

Injection Site Reaction 11 2 10 3

**Gastrointestinal**

Nausea 74 5 61 2

Diarrhea 56 11 48 7

Vomiting 47 6 24 1

Stomatitis 42 3 40 1

Anorexia 13 1 8 <1

**Fever/Infection**

Fever 27 1 12 1

Infection 25 4 25 3

## Neurology

Overall Peripheral Sensory Neuropathy 92 12 16 <1

\*Includes thrombosis related to the catheter

The following table provides adverse reactions reported in the adjuvant therapy colon cancer clinical trial (see *Clinical Studies* (14)) by body system and decreasing order of frequency in the Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin arm for events with overall incidences  $\geq 5\%$  but with incidences < 1% NCI grade 3/4 events.

**Table 4 – Adverse Reactions Reported in Patients with Colon Cancer receiving Adjuvant Treatment (< 5% of all patients, but < 1% NCI Grade 3/4 events)**

**Adverse Reaction (WHO/Pre)** **Oxaliplatin + 5-FU/LV N=1108** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)** **Grade 3/4 (%)**

Any Event 99 82 98 70 99 76

Any Event 11 2 100 99 31

## Constitutional Symptoms/Pain/Ocular/Visual

Fatigue 44 4 38 1

Abdominal Pain 18 1 17 2

Skin Disorder 32 2 36 2

Injection Site Reaction 11 2 10 3

**Gastrointestinal**

Nausea 74 5 61 2

Diarrhea 56 11 48 7

Vomiting 47 6 24 1

Stomatitis 42 3 40 1

Anorexia 13 1 8 <1

**Fever/Infection**

Fever 27 1 12 1

Infection 25 4 25 3

## Neurology

Overall Peripheral Sensory Neuropathy 92 12 16 <1

\*Includes thrombosis related to the catheter

The following table provides adverse reactions reported in the adjuvant therapy colon cancer clinical trial (see *Clinical Studies* (14)) by body system and decreasing order of frequency in the Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin arm for events with overall incidences  $\geq 5\%$  but with incidences < 1% NCI grade 3/4 events.

**Table 5 – Adverse Reactions Reported in Patients Previously Untreated for Advanced Colorectal Cancer Clinical Trial (< 5% of all patients and with < 1% NCI Grade 3/4 events)**



**Table 13 – Adverse Hepatic – Clinical Chemistry Abnormalities in Patients Previously Untreated for Advanced Colorectal Cancer (≥ 5% of patients)**

Clinical Chemistry	Oxaliplatin + 5-FU/LV (N=259)		Irinotecan + 5-FU/LV (N=256)		Oxaliplatin + Irinotecan (N=258)	
	All Grades (%)	Grade 3/4 (%)	All Grades (%)	Grade 3/4 (%)	All Grades (%)	Grade 3/4 (%)
ALT (SGPT-ALAT)	6	1	2	0	5	2
AST (SGOT-ASAT)	17	1	2	1	11	1
Alkaline Phosphatase	16	0	8	0	14	2
Total Bilirubin	6	1	3	1	3	2

**Table 14 – Adverse Hepatic – Clinical Chemistry Abnormalities in Previously Treated Patients (≥ 5% of patients)**

Clinical Chemistry	5-FU/LV (N=142)		Oxaliplatin (N=153)		5-FU/LV + Oxaliplatin (N=150)	
	All Grades (%)	Grade 3/4 (%)	All Grades (%)	Grade 3/4 (%)	All Grades (%)	Grade 3/4 (%)
ALT (SGPT-ALAT)	28	3	36	1	31	0
AST (SGOT-ASAT)	39	2	54	4	47	0
Total Bilirubin	22	6	13	5	13	1

#### Thrombocytopenia

The incidence of thrombocytopenic events in adjuvant patients with colon cancer was 6% (1.8% grade 3/4) in the infusional 5-fluorouracil/leucovorin arm and 6% (1.2% grade 3/4) in the Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin combined arm, respectively. The incidence was 6 and 9% of the patients previously untreated for advanced colorectal cancer and previously treated patients in the Oxaliplatin for Injection and 5-fluorouracil/leucovorin combination arm, respectively.

#### Postmarketing Experience

The following adverse reactions have been identified during post-approved use of Oxaliplatin for Injection. Because these reactions are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

#### Body as a whole

asthenia, anaphylactic shock, angioedema, arthralgic nervous system disorders, loss of deep tendon reflexes, dysarthria, Lhermitte's sign, cranial nerve palsies, fasciculations, convulsion

#### Liver and Gastrointestinal System Disorders

severe diarrhoea/vomiting resulting in hypovolemia, colitis (including *Clostridium difficile* diarrhea), metabolic acidosis, ileus, intestinal obstruction, pancreatitis, yew-occlusive disease of liver also known as sinusoidal obstruction syndrome, and perianastoid fistulas which may or may progress

#### Head and vestibular system disorders

dizziness

#### Platelet, bleeding, and clotting disorders

immune-allergic thrombocytopenia, prolongation of prothrombin time and of INR in patients receiving anticoagulants

#### Blood Cell Disorders

hemolytic anemia syndrome, immuno-allergic hemolytic anemia

#### Renal Disorders

acute tubular necrosis, acute interstitial nephritis and acute renal failure

#### Respiratory system disorders

pulmonary fibrosis, and other interstitial lung diseases (sometimes fatal)

#### Vision disorders

decrease of visual acuity, visual field disturbance, optic neuritis and transient vision loss (reversible following therapy discontinuation)

#### DRUG INTERACTIONS

No specific cytochrome P-450-based drug interaction studies have been conducted. No pharmacokinetic interaction between 85 mg/m<sup>2</sup> Oxaliplatin for Injection and 5-fluorouracil/leucovorin has been observed in patients treated every 2 weeks. Increases of 5-fluorouracil plasma concentrations by approximately 20% have been observed with doses of 130 mg/m<sup>2</sup> Oxaliplatin for Injection dosed every 3 weeks. Because platinum-containing species are eliminated primarily through the kidneys, plasma concentrations may be decreased by coadministration of potentially nephrotoxic compounds; although, this has not been specifically studied [see Clinical Pharmacology (12.3)].

#### USE IN SPECIFIC POPULATIONS

#### Pregnancy

#### Pregnancy Category D

Based on direct interaction with DNA, Oxaliplatin for Injection may cause fetal harm when administered to a pregnant woman. There are no adequate and well-controlled studies of Oxaliplatin for Injection in pregnant women. Reproductive toxicity studies in rats demonstrated adverse effects on fertility and embryo-fetal development at maternal doses that were below the recommended human dose based on body surface area. If this drug is used during pregnancy or if the patient becomes pregnant while taking this drug, the patient should be apprised of the potential hazard to the fetus. Women of childbearing potential should be advised to avoid becoming pregnant and use effective contraception while receiving treatment with Oxaliplatin for Injection.

Pregnant rats were administered oxaliplatin at less than one-third the recommended human dose based on body surface area during gestation days 1-5 (pre-implantation), 6-10, or 11-16 (during organogenesis). Oxaliplatin caused developmental mortality (increased resorptions) when administered to pregnant rats at doses of 0.5, 1, or 2 mg/kg/day (approximately 0.05, 0.1, or 0.2 mg/m<sup>2</sup> of Oxaliplatin for Injection, respectively) during days 6-10. Oxaliplatin caused fetal growth (decreased fetal weight, delayed ossification) when administered on days 6-10. Administration of oxaliplatin to male and female rats prior to mating resulted in 50% post-implantation loss in animals that received approximately one-seventh the recommended human dose based on the body surface area.

#### It is not known whether Oxaliplatin for Injection or its derivatives are excreted in human milk. Because many drugs are excreted in human milk and because of the potential for serious adverse reactions in nursing infants from Oxaliplatin for Injection, a decision should be made whether to discontinue nursing or discontinue the drug, taking into account the importance of the drug to the mother.

#### Pediatric Use

The effectiveness of oxaliplatin in children has not been established. Information related to the treatment of pediatric patients is approved for Sanofi-Aventis' Oxaliplatin for Injection drug product.

#### Geriatric Use

No significant effect of age on the clearance of ultrafiltrable platinum has been observed. In the adjuvant therapy colon cancer randomized clinical trial, [see Clinical Studies (14)] 723 patients treated with Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin were <65 years and 400 patients were ≥ 65 years. A descriptive subgroup analysis demonstrated that the efficacy of Oxaliplatin for Injection combination arm compared to the infusional 5-fluorouracil/leucovorin alone arm appeared to be maintained across genders. The effect of Oxaliplatin for Injection in patients ≥ 65 years of age was not conclusive. Insufficient survival sizes prevented analysis by race. Patients ≥ 65 years of age receiving the Oxaliplatin for Injection combination therapy experienced more grade 3-4 granulocytopenia than patients < 65 years of age (43% versus 39%).

In the previously untreated for advanced colorectal cancer randomized clinical trial [see Clinical Studies (14)] of Oxaliplatin for Injection, 160 patients treated with Oxaliplatin for Injection and 5-fluorouracil/leucovorin were <65 years and 99 patients were ≥ 65 years. The same efficacy improvements in response rate, time to tumor progression, and overall survival were observed in the ≥ 65 year old patients as in the overall study population. In the previously treated for advanced colorectal cancer randomized clinical trial [see Clinical Studies (14)] of Oxaliplatin for Injection, 95 patients treated with Oxaliplatin for Injection and 5-fluorouracil/leucovorin were <65 years and 50 patients were ≥ 65 years. The rates of overall adverse reactions, including grade 3 and 4 events, were similar across and within arms in the different age groups in all studies. The incidence of diarrhea, dehydration, hypokalemia, isotopenia, fatigue and syncope were higher in patients ≥ 65 years old. No adjustment to starting dose was required in patients ≥ 65 years old.

#### 8.6 Patients with Renal Impairment

The safety and effectiveness of the combination of Oxaliplatin for Injection and 5-fluorouracil/leucovorin in patients with renal impairment have not been evaluated. The combination of Oxaliplatin for Injection and 5-fluorouracil/leucovorin should be used with caution in patients with preexisting renal impairment since the primary route of platinum elimination is renal. Clearance of ultrafiltrable platinum is decreased in patients with mild, moderate, and severe renal impairment. A pharmacodynamic relationship between platinum ultrafiltrate levels and clinical safety and effectiveness has not been established [see Adverse Reactions (6.1) and Clinical Pharmacology (12.3)].

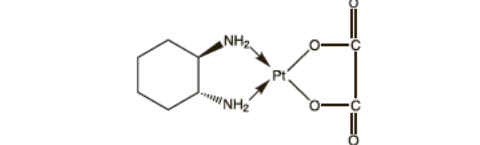
#### 10 OVERDOSAGE

There is no known antidote for Oxaliplatin for Injection overdose. In addition to thrombocytopenia, the anticipated consequences of an Oxaliplatin for Injection overdose include hypersensitivity reaction, myelosuppression, nausea, vomiting, diarrhea and neurotoxicity.

Several cases of overdoses have been reported with Oxaliplatin for Injection. Adverse reactions observed were Grade 4 thrombocytopenia (≥ 20,000/mm<sup>3</sup>) without any bleeding, anemia, sensory neuropathy such as paresthesia, dysesthesia, laryngospasm and facial muscle spasms, gastrointestinal disorders such as nausea, vomiting, stomatitis, flatulence, abdomen enlarged and Grade 4 intestinal obstruction, Grade 4 dehydration, dyspnea, wheezing, chest pain, respiratory failure, severe headache and death. Patients suspected of receiving an overdose should be monitored, and supportive treatment should be administered. The maximum dose of oxaliplatin that has been administered in a single infusion is 825 mg.

#### 11 DESCRIPTION

Oxaliplatin for Injection is an antineoplastic agent with the molecular formula C<sub>12</sub>H<sub>16</sub>N<sub>2</sub>O<sub>8</sub>Pt and the chemical name of cis-[1 (R,2 R)-1,2-cyclohexanediamine-N,N'] oxalatol(2-)-O,0'] platinum. Oxaliplatin is a platinum (II) complex in which the platinum atom is coordinated with 1,2-diaminocyclohexane (DACH) and with an oxalate ligand as a leaving group.



The incidence of thrombocytopenic events in adjuvant patients with colon cancer was 6% (1.8% grade 3/4) in the infusional 5-fluorouracil/leucovorin arm and 6% (1.2% grade 3/4) in the Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin combined arm, respectively. The incidence was 6 and 9% of the patients previously untreated for advanced colorectal cancer and previously treated patients in the Oxaliplatin for Injection and 5-fluorouracil/leucovorin combination arm, respectively.

The following adverse reactions have been identified during post-approved use of Oxaliplatin for Injection. Because these reactions are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

#### 12.1 Mechanism of Action

Oxaliplatin undergoes nonenzymatic conversion in physiologic solutions to active derivatives via displacement of the labile oxalate ligand. Several transient reactive species are formed, including monocation and diaquo DACH platinum, which covalently bind with macromolecules. Both inter- and intrastrand Pt-DNA crosslinks are formed. Crosslinks are formed between the N7 positions of two adjacent guanines (GG), adjacent adenine-guanine (AG), and guanines separated by an intervening nucleotide (GNG). These crosslinks inhibit DNA replication and transcription. Cytotoxicity is cell-cycle non-specific. *In vivo* studies have shown antitumor activity of oxaliplatin against colon carcinomas. In combination with 5-fluorouracil (5-FU), oxaliplatin exhibits *in vitro* and *in vivo* antineoplastic activity greater than either compound alone in several tumor models (HT29 (colon), GI (mammary), and L1210 [leukemia]).

**Pharmacokinetics** The reactive oxaliplatin derivatives are present as a fraction of the unbound platinum in plasma ultrafiltrate. The decline of ultrafiltrable platinum levels following oxaliplatin administration is biphasic, characterized by two relatively short distribution phases ( $t_{1/2\alpha}$ : 0.40 hours and  $t_{1/2\beta}$ : 16.8 hours) and a long terminal elimination phase ( $t_{1/2\gamma}$ : 391 hours). Pharmacokinetic parameters obtained after a single 2-hour intravenous infusion of Oxaliplatin for Injection at a dose of 85 mg/m<sup>2</sup> expressed as ultrafiltrable platinum were C<sub>max</sub> of 0.94 mg/mL and volume of distribution of 460 L. Interpatient and intrapatient variability in ultrafiltrable platinum exposure (AUC<sub>0-∞</sub>) assessed over 3 cycles was moderate to low (22% and 6%, respectively). A pharmacodynamic relationship between platinum ultrafiltrate levels and clinical safety and effectiveness has not been established.

**Distribution** At the end of a 2-hour infusion of Oxaliplatin for Injection, approximately 15% of the administered platinum is present in the systemic circulation. The remaining 85% is rapidly distributed into tissues or eliminated in the urine. In patients, plasma protein binding of platinum is irreversible and is greater than 90%. The main binding proteins are albumin and gamma-globulins. Platinum also binds irreversibly and accumulates (approximately 2-fold) in erythrocytes, where it appears to have no relevant activity. No platinum accumulation was observed in plasma ultrafiltrate following 85 mg/m<sup>2</sup> every two weeks.

**Metabolism** Oxaliplatin undergoes rapid and extensive nonenzymatic biotransformation. There is no evidence of cytochrome P450-mediated metabolism *in vivo*.

Up to 17 platinum-containing derivatives have been observed in plasma ultrafiltrate samples from patients, including several cytotoxic species (nonoxoiron DACH platinum, dichloro DACH platinum, and monoaquo and diaquo DACH platinum) and a number of noncytotoxic, conjugated species.

**Elimination** The major route of platinum elimination is renal excretion. At five days after a single 2-hour infusion of Oxaliplatin for Injection, urinary elimination accounted for about 54% of the platinum administered, with fecal excretion accounting for only about 2%. Platinum was cleared from plasma at a rate (10–17 L/h) that was similar to or exceeded the average human glomerular filtration rate (GFR: 7-13 L/h). There was no significant effect of gender on the clearance of ultrafiltrable platinum. The renal clearance of ultrafiltrable platinum is significantly correlated with GFR.

**Pharmacokinetics in Special Populations** **Pediatric** [See Use in Specific Patient Populations (8.6)]. **Renal Impairment** The AUC<sub>0-∞</sub> of platinum in the plasma ultrafiltrate increases as renal function decreases. Increases of AUC<sub>0-∞</sub> of platinum in mild (creatinine clearance, CL<sub>cr</sub> 50 to 80 mL/min), moderate (CL<sub>cr</sub> 30 to < 50 mL/min) and severe renal (CL<sub>cr</sub> < 30 mL/min) impairment is increased by about 60, 140 and 190%, respectively, compared with patients with normal renal function (CL<sub>cr</sub> > 80 mL/min). [See Adverse Reactions (6.8), Drug Interactions (7) and Use in Specific Patient Populations (8.6)].

**Drug-Drug Interactions** No pharmacokinetic interaction between 85 mg/m<sup>2</sup> of Oxaliplatin for Injection and infusional 5-fluorouracil has been observed in patients treated every 2 weeks, but increases of 5-fluorouracil plasma concentrations by approximately 20% have been observed with doses of 130 mg/m<sup>2</sup> of Oxaliplatin for Injection administered every 3 weeks. *In vitro*, platinum was not displaced from plasma proteins by the following medications: erythronine, salicylate, sodium valproate, granisetron, and pemetrex. *In vivo*, oxaliplatin is not metabolized by, nor does it inhibit, human cytochrome P450 isoenzymes. No P450-mediated drug-drug interactions are therefore anticipated in patients. Since platinum-containing species are eliminated primarily through the kidney, clearance of these products may be decreased by co-administration of potentially nephrotoxic compounds, although this has not been specifically studied.

#### 13 NONCLINICAL TOXICOLOGY

**13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility** Long-term animal studies have not been performed to evaluate the carcinogenic potential of oxaliplatin. Oxaliplatin was not mutagenic to bacteria (Ames test) but was mutagenic to mammalian cells *in vitro* (L5178Y mouse lymphoma assay). Oxaliplatin was also clastogenic both *in vitro* (chromosome aberration in human lymphocytes) and *in vivo* (mouse bone marrow micronucleus assay).

In a fertility study, male rats were given oxaliplatin at 0, 0.5, 1, or 2 mg/kg/day for five days every 21 days for a total of three cycles prior to mating with females that received two cycles of oxaliplatin on the same schedule. A dose of 2 mg/kg/day (less than one-seventh the recommended human dose on a body surface area basis) did not affect pregnancy rate, but caused developmental mortality (increased early resorptions, decreased live fetuses, decreased live births) and delayed growth (decreased fetal weight).

Testicular damage, characterized by degeneration, hypoplasia, and atrophy, was observed in dogs administered oxaliplatin at 0.75 mg/kg/day x 5 days every 28 days for three cycles. A no effect level was not identified. This daily dose is approximately one-sixth of the recommended human dose on a body surface area basis.

**14 CLINICAL STUDIES** **14.1 Combination Adjuvant Therapy with Oxaliplatin for Injection and Infusional 5-Fluorouracil/Leucovorin in Patients with Colon Cancer** An international, multicenter, randomized study compared the efficacy and evaluated the safety of Oxaliplatin for Injection in combination with an infusional schedule of 5-fluorouracil/leucovorin in patients with resectable stage II (Dukes' B2) or III (Dukes' C) colon cancer who had undergone complete resection of the primary tumor. The primary objective of the study was to compare the 3-year disease-free survival (DFS) in patients receiving Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin to those receiving 5-fluorouracil/leucovorin alone. Patients were to be treated for a total of 6 months (i.e., 12 cycles). A total of 2246 patients were randomized; 1123 patients per study arm. Patients in the study had to be between 18 and 75 years of age.

have histologically proven stage II (T<sub>1-2</sub>, N0 M0; Dukes' B2) or III (any T N<sub>1-3</sub> M0; Dukes' C) colon carcinomas (with the inferior pole of the tumor above the peritoneal reflection, i.e., ≥ 15 cm from the anal margin) and undergone (within 7 weeks prior to randomization) complete resection of the primary tumor without gross or microscopic evidence of residual disease. Patients had to have had no prior chemotherapy, immunotherapy or radiotherapy, and have an ECOG performance status of 1, 1, or 2 (score ≤ 20%), absolute neutrophil count (ANC) > 1.5x10<sup>9</sup>/L, platelets ≥ 100x10<sup>9</sup>/L, serum creatinine ≤ 1.25 x ULN total bilirubin < 2 x ULN, AST/ALT < 2 x ULN and carcino-embryonic antigen (CEA) <10 ng/mL. Patients with preexisting peripheral neuropathy (NCI grade ≥ 1) were ineligible for this trial.

The following table shows the dosing regimens for the two arms of the study. Figure 2 shows the DFS Kaplan-Meier curves for the comparison of Oxaliplatin for Injection and infusional 5-fluorouracil/leucovorin combination and infusional 5-fluorouracil/leucovorin alone in Stage II patients.

Treatment Arm	Dose	Regimen
Oxaliplatin + 5-FU/LV (FOLFFOX) (N =1123)	Day 1: Oxaliplatin: 85 mg/m <sup>2</sup> (2-hour infusion) + LV: 200 mg/m <sup>2</sup> (2-hour infusion), followed by 5-FU: 400 mg/m <sup>2</sup> (bolus), 600 mg/m <sup>2</sup> (22-hour infusion) Day 2: LV: 200 mg/m <sup>2</sup> (2-hour infusion), followed by 5-FU: 400 mg/m <sup>2</sup> (bolus), 600 mg/m <sup>2</sup> (22-hour infusion)	every 2 weeks 12 cycles
5-FU/LV (N=1122)	Day 1: LV: 200 mg/m <sup>2</sup> (2-hour infusion), followed by 5-FU: 400 mg/m <sup>2</sup> (bolus), 600 mg/m <sup>2</sup> (22-hour infusion) Day 2: LV: 200 mg/m <sup>2</sup> (2-hour infusion), followed by 5-FU: 400 mg/m <sup>2</sup> (bolus), 600 mg/m <sup>2</sup> (22-hour infusion)	every 2 weeks 12 cycles

The following tables show the baseline characteristics and dosing of the patient population entered into this study. The baseline characteristics were well balanced between arms.

Table 16 – Patient Characteristics at Baseline		Oxaliplatin + Infusional 5-FU/LV (N=1123)		Infusional 5-FU/LV (N=1123)	
Sex: Male (%)	58.1	52.4			
Female (%)	41.9	47.6			
Median age (years)	61.0	60.0			
<65 years of age (%)	64.4	66.2			
≥65 years of age (%)	35.6	33.8			
Karnofsky Performance Status (KPS) (%)					
100	29.7	30.5			
90	52.2	53.9			
80	4.4	3.3			
70	13.2	11.9			
<60	0.6	0.4			
Primary site (%)					
Colon including cecum	64.4				
Sigmoid	31.9	32.8			
Recto sigmoid	12.9	10.9			
Other including rectum	0.6	0.9			
Bowel obstruction (%)					
Yes	17.9	10.3			
Perforation (%)					
Yes	6.9	6.9			
Stage at Randomization (%)					
II (T <sub>1-3</sub> , N0-M0)	40.1	39.9			
III (T <sub>4</sub> any, N1-2, M=0)	59.8	59.9			
IV (T <sub>4</sub> any, N=any, M=1)	0.4	0.8			
Staging – T (%)					
T1	0.5	0.7			
T2	4.5	4.8			
T3	76.0	75.9			
T4	19.0	18.5			
Staging – N (%)					
N0	40.2	39.9			
N1	38.4	39.4			
N2	20.4	20.7			
Staging – M (%)					
M1	0.4	0.8			

Table 17 – Dosing in Adjuvant Therapy Study		Oxaliplatin + Infusional 5-FU/LV (N=1108)		Infusional 5-FU/LV (N=1111)	
Median Relative Dose Intensity (%)					
5-FU	84.4	97.7			
Oxaliplatin for Injection	80.5	N/A			
Median Number of Cycles	12	12			
Median Number of cycles with Oxaliplatin for Injection	11	N/A			
The following table and figures summarize the disease-free survival (DFS) results in the overall randomized population and in patients with stage II and III disease based on an ITT analysis. The median duration of follow-up was approximately 77 months.					
Table 18 – Summary of DFS Analysis – ITT analysis		Oxaliplatin + Infusional 5-FU/LV		Infusional 5-FU/LV	
Parameter	Overall				
N	1123	1123		1123	
Number of events – relapse or death (%)	304 (27.1)	360 (32.1)			
Disease-free survival (%) [95% CI]	73.3 [70.7, 76.0]	67.4 [64.6, 70.2]			
Hazard ratio [95% CI] **	0.80 [0.68, 0.93]				
Stratified Logrank test	p=0.003				
Stage III (Dukes' C)					
N	672	675			
Number of events – relapse or death (%)	226 (33.5)	271 (40.1)			
Disease-free survival (%) [95% CI]	66.4 [62.7, 70.0]	58.9 [56.2, 62.7]			
Hazard ratio [95% CI] **	0.78 [0.65, 0.93]				
Logrank test	p=0.006				
Stage II (Dukes' B2)					
N	451	448			
Number of events – relapse or death (%)	78 (17.3)	89 (19.9)			
Disease-free survival (%) [95% CI]	83.7 [80.2, 87.1]	79.9 [76.2, 83.7]			
Hazard ratio [95% CI] **	0.84 [0.62, 1.14]				
Logrank test	p=0.258				

Data cut-off for disease free survival 1 June 2008  
\*Disease-free survival at 5 years  
\*\*A hazard ratio of less than 1.00 favors Oxaliplatin for Injection + infusional 5-fluorouracil/leucovorin  
In the overall and stage III colon cancer populations DFS was statistically significantly improved in the Oxaliplatin for Injection combination arm compared to infusional 5-fluorouracil/leucovorin alone. However a statistically significant improvement in DFS was not noted in Stage II patients.

In the overall and stage II colon cancer populations DFS was statistically significantly improved in the Oxaliplatin for Injection combination arm compared to infusional 5-fluorouracil/leucovorin alone. However a statistically significant improvement in DFS was not noted in Stage II patients.

The following table presents the dosing regimens of the three arms of the study.

Disease-free survival %	73.3 [70.7, 76.0]	67.4 [64.6, 70.2]
Hazard ratio [95% CI] **	0.80 [0.68, 0.95]	
Stratified Logrank test	p=0.003	
Stage III (Duques' C)		
N	672	675
Number of events – relapse or death (%)	226 (33.6)	271 (40.1)
Disease-free survival % [95% CI]	66.4 [62.7, 70.0]	58.9 [55.2, 62.7]
Hazard ratio [95% CI] **	0.78 [0.65, 0.93]	
Logrank test	p=0.006	
Stage II (Duques' B2)		
N	451	448
Number of events – relapse or death (%)	78 (17.3)	89 (19.6)
Disease-free survival % [95% CI]	83.7 [80.2, 87.1]	79.9 [76.2, 83.7]
Hazard ratio [95% CI] **	0.84 [0.62, 1.14]	
Logrank test	p=0.258	



(b) (4)

<b>Colour/s</b> <div><div></div> Black C</div> <div><div></div> (b) (4)</div> <div><div></div></div>	<b>Artwork Version</b> 4	
	<b>Date of Preparation</b> 22/10/08	
	<b>Artworker/Designer</b> (b) (6)	

50 mg Single Use Vial

NDC 61703-361-35

Sterile

Oxaliplatin for Injection

50 mg

Rx only

(lyophilized)

For Intravenous Use Only

Must be reconstituted and diluted before use

Do not reconstitute with

sodium chloride/chloride-containing solutions

Caution: Cytotoxic Agent

Each vial contains:

50 mg oxaliplatin,

inactive: 450 mg lactose

monohydrate, NF.

Preservative free.

Discard unused solution.

Usual Dosage:

See package insert

for complete product information.

Prior to Reconstitution:

Store at 20°-25°C (68°-77°F);

excursions permitted to 15°-30°C (59°-86°F)

(see USP Controlled Room Temperature).

See package insert for storage of reconstituted and diluted solutions.




Hospira, Inc.

Lake Forest, IL 60045

Product of Australia

484 221

(01)00361703361356

<b>Colour/s</b>  Black C  	<b>Artwork Version</b> 3	
	<b>Date of Preparation</b> 23/10/08	
	<b>Artworker/Designer</b> (b) (6)	

100 mg Single Use Vial

NDC 61703-362-50

Sterile

Oxaliplatin for Injection

100 mg

Rx only


(lyophilized)

For Intravenous Use Only

Must be reconstituted and diluted before use

Do not reconstitute with sodium chloride/chloride-containing solutions

Caution: Cytotoxic Agent



Each vial contains:  
100 mg oxaliplatin.  
Inactive: 900 mg lactose monohydrate, NF.

Preservative free.

Discard unused solution.

Usual Dosage:

See package insert for complete product information.

Prior to Reconstitution: Store at 20°-25°C (68°-77°F); excursions permitted to 15°-30°C (59°-86°F) (see USP Controlled Room Temperature).


See package insert for storage of reconstituted and diluted solutions.

Hospira, Inc.

Lake Forest, IL 60045

Product of Australia

484224



(01)93861703362506

2

(b) (4)

Colour/s	Artwork Version	5
<div><div></div>Black C</div> <div><div></div>(b) (4)</div> <div><div></div></div> <div><div></div>All text &amp; graphics will have UV Varnish</div>	Date of Preparation	24/10/08
	Artworker/Designer	(b) (6)



(b) (4)

Colour/s	Artwork Version	3
<div><div></div>Black C</div> <div><div></div>(b) (4)</div> <div><div></div>All text &amp; graphics will have UV Varnish</div>	Date of Preparation	23/10/08
	Artworker/Designer	(b) (6)





# **CENTER FOR DRUG EVALUATION AND RESEARCH**

*APPLICATION NUMBER:*  
**ANDA 078815**

**LABELING REVIEWS**

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

---

ANDA Number: 78-815

Date of Submission: 09 FEB 2007 (Original)

Applicant's Name: Mayne Pharma

Established Name: Oxaliplatin for Injection 50 mg and 100 mg per vial- PF-SDV, Lyophilized

---

Labeling Deficiencies: Firm submitted e-draft.

**1. CONTAINER**

- a. We encourage you to add "cytotoxic agent" to your labels.
- b. List the in actives under an "inactive" category.
- c. We are aware that the innovator uses tall man lettering as part of the established name. However, upon further review this product should not display tall man lettering. We acknowledge you have revised without regard for tall man lettering and have displayed "Oxaliplatin" rather than "OXALlplatin" and we find that acceptable.

**2. CARTON** -See comments under CONTAINER.

**3. INSERT** - Minor correction in the Highlighted section, second paragraph - revise "..... powder for solution for intravenous...".

**4. PATIENT INFORMATION SHEET** - Satisfactory in draft.

Revise your labels and labeling, as instructed above, and submit final printed or draft electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – ANDA.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling 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 and the latest approved labeling for the reference listed drug (or your last submission) with all differences annotated and explained.

FOR THE RECORD  
LABELING REVIEW BRANCH

1. APPLICANT INFORMATION

ANDA Number	78-815
Date of Submission	
Applicant	Mayne Pharma
Drug Name	Oxaliplatin for Injection
Strength(s)	50 mg and 100 mg vials- PF- SDV lyophilized

LABELS AND LABELING

Container Labels
50 mg
100 mg
Carton labeling
50 mg
100 mg
Insert Labeling
Patient Information      Draft

2. NOTES/QUESTIONS TO THE CHEMIST:

3. Review based on the labeling of Eloxatin (Sanofi).

Reference Listed Drug
RLD on the 356(h) form      Eloxatin
NDA Number      21-492 (for Injection- Dc'ed) related NDA is 21-759 RTU solution
RLD established name      OXALiPlatin Injection 50 MG AND 100 MG - PF-SDV
Firm      Sanofi Aventis US
Currently approved PI      SE8-008
AP Date      10 JAN 2007
RLD has (b) (4) supplement in (b) (4).

4. Patent Data For NDA 21-492

Patent No	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
5290961	12 JAN 2013 PEDS- 12 Jul 2013			PIV	Same As
5338874	07 APR 2013 PED- 07 Oct 2013			PIV	Same As
5420319	09 AUG 2016 PED- 09 Feb 2017			PIV	Same As
5716988	07 AUG 2015 PED- 07 Feb 2016		Only listed for 21-759	PIV	Same As

Exclusivity Data For NDA: 21-492

Code/sup	Expiration	Use Code	Description	Labeling Impact
NCE	09 AUG 2007 peds 09 Feb 2008			Same As

I-441	04 Nov 2007 peds 04 May 2008		USE COMBINATION WITH INFUSIONAL 5-FU/LV FOR ADJUVANT TREATMENT STAGE III COLON CANCER PTS WHO HAVE UNDERGONE COMPLETE RESECTION PRIMARY TUMOR-BASED ON IMPROVEMENT IN DISEASE FREE SURVIVAL, NO DEMONSTRATED BENEFIT OVERALL SURVIVAL AFTER 4YRS	Same As
M-61	10 JAN 2010 peds 10 JUL 2010		REVISIONS TO LABELING BASED ON DATA SUBMITTED IN RESPONSE TO PEDIATRIC WRITTEN REQUEST	Same As
I-425	09 JAN 2007 peds July 2007		ELOXATIN IN COMBINATION WITH INFUSIONAL 5-FLUOROURACIL (5-FU) AND LEUCOVORIN (LV) FOR THE TREATMENT OF PATIENTS PREVIOUSLY UNTREATED FOR ADVANCED COLORECTAL CANCER	Same As

5. Storage Conditions:  
NDA – lyophilized for injection was discontinued for non safety and efficacy reasons. The Injection should be stored 25C(77F) excursions permitted to 15-30. Do not Freeze. Protect from light (keep in outer carton) discard Unused portion and (see package insert for storage of further diluted solutions). Also label must NOT consider Tall Man letter but must add instructions to do not mix or add to sodium chloride/chloride-containing solutions. Open vial is ok for 6 hours and infusion diluted solutions should be discarded 6 hours at RT and 24 hrs under refrigeration after preparation.  
ANDA – Oxaliplatin injection label is the same.  
USP – Not a USP item.
6. Dispensing Recommendations:  
NDA – Does not have on the label “Caution: Cytotoxic agent”  
ANDA – will add to label “Caution: Cytotoxic agent”  
USP - Preserve in Containers for sterile solids as described under Injections (1), Caution – Great care should be taken in handling carboplatin because it is a suspected carcinogen.<sup>7</sup>
7. Scoring: not applicable
8. Product Line:  
The innovator markets their product as a lyophilized powder to be reconstituted and Injections (50 mg , 100 mg, and 200 mg vials) 5 mg/mL PF single-dose. The applicant proposes to market only the 50 mg and 100 mg products powder.
9. The tablet/capsule imprint(ings)/embossing(s)/ debossing(s) has/have been accurately described in the HOW SUPPLIED section as required by 21 CFR 206,et al. (Imprinting of Solid Oral Dosage Form Products for Human Use; Final Rule, effective 9/13/95). Not applicable
10. Inactive Ingredients: lactose monhydrate.
11. The listing of inactive ingredients in the DESCRIPTION section of the package insert appears to be consistent with the listing of inactive ingredients found in the statement of components and composition appearing on page .
12. Manufactured by Mayne Pharma in Australlia for Mayne in US.

---

**Date of Review: 3/13/08**

---

**Date of Submission: 09 FEB 2007**

---



---

cc: ANDA: 78-815  
DUP/DIVISION FILE  
HFD-613/APayne/JGrace (no cc)  
V:\FIRMSAM\MaynePharma\LTRS&REV\78815na2labdfsreview.doc

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

/s/

-----  
Angela Payne  
3/13/2008 09:49:20 PM  
LABELING REVIEWER

John Grace  
3/16/2008 04:59:58 PM  
LABELING REVIEWER

**REVIEW OF PROFESSIONAL LABELING #2  
DIVISION OF LABELING AND PROGRAM SUPPORT  
LABELING REVIEW BRANCH**

---

ANDA Number: 78-815

Date of Submission: 03 NOV 2008 and 19 NOV 2008

Applicant's Name: Mayne Pharma

Established Name: Oxaliplatin for Injection 50 mg and 100 mg per vial- PF-SDV, Lyophilized

---

Labeling Deficiencies:

1. **CONTAINER** - Satisfactory.
2. **CARTON** - Satisfactory.
3. **INSERT** - Please increase the resolution of the text to improve upon the tables and graphs as expressed in my recent telephone communication with you. Please resubmit.
4. **PATIENT INFORMATION SHEET** - Satisfactory in draft.

Revise your labels and labeling, as instructed above, and submit final printed or draft electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – ANDA.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling 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 and the latest approved labeling for the reference listed drug (or your last submission) with all differences annotated and explained.

FOR THE RECORD #2  
LABELING REVIEW BRANCH

1. APPLICANT INFORMATION

ANDA Number	78-815
Date of Submission	
Applicant	Mayne Pharma
Drug Name	Oxaliplatin for Injection
Strength(s)	50 mg and 100 mg vials- PF- SDV lyophilized

LABELS AND LABELING SUMMARY

Container	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\container.pdf
100 mg	
Carton	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\carton.pdf
100 mg	
Insert	RESUBMIT
Patient Information	

2. NOTES/QUESTIONS TO THE CHEMIST:

3. Review based on the labeling of Eloxatin (Sanofi).

Reference Listed Drug	
RLD on the 356(h) form	Eloxatin
NDA Number	21-492 (for Injection- Dc'ed) related NDA is 21-759 RTU solution
RLD established name	OXALPlatin Injection 50 MG AND 100 MG - PF-SDV
Firm	Sanofi Aventis US
Currently approved PI	SE8-010
AP Date	21 MAY 2008
RLD has (b) (4) opened supplements.	

4. Patent Data For NDA 21-492

Patent No	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
5290961	12 JAN 2013 PEDS- 12 Jul 2013			PIV	Same As
5338874	07 APR 2013 PED- 07 Oct 2013			PIV	Same As
5420319	09 AUG 2016 PED- 09 Feb 2017			PIV	Same As
5716988	07 AUG 2015 PED- 07 Feb 2016		Only listed for 21-759	PIV	Same As

Exclusivity Data For NDA: 21-492

Code/sup	Expiration	Use Code	Description	Labeling Impact
NCE	09 AUG 2007 peds 09 Feb 2008			Same As

I-441	04 Nov 2007 peds 04 May 2008		USE COMBINATION WITH INFUSIONAL 5-FU/LV FOR ADJUVANT TREATMENT STAGE III COLON CANCER PTS WHO HAVE UNDERGONE COMPLETE RESECTION PRIMARY TUMOR-BASED ON IMPROVEMENT IN DISEASE FREE SURVIVAL, NO DEMONSTRATED BENEFIT OVERALL SURVIVAL AFTER 4YRS	Same As
M-61	10 JAN 2010 peds 10 JUL 2010		REVISIONS TO LABELING BASED ON DATA SUBMITTED IN RESPONSE TO PEDIATRIC WRITTEN REQUEST	Same As
I-425	09 JAN 2007 peds July 2007		ELOXATIN IN COMBINATION WITH INFUSIONAL 5-FLUOROURACIL (5-FU) AND LEUCOVORIN (LV) FOR THE TREATMENT OF PATIENTS PREVIOUSLY UNTREATED FOR ADVANCED COLORECTAL CANCER	Same As

5. Storage Conditions:  
NDA – lyophilized for injection was discontinued for non safety and efficacy reasons. The Injection should be stored 25C(77F) excursions permitted to 15-30. Do not Freeze. Protect from light (keep in outer carton) discard Unused portion and (see package insert for storage of further diluted solutions). Also label must NOT consider Tall Man letter but must add instructions to do not mix or add to sodium chloride/chloride-containing solutions. Open vial is ok for 6 hours and infusion diluted solutions should be discarded 6 hours at RT and 24 hrs under refrigeration after preparation.  
ANDA – Oxaliplatin injection label is the same.  
USP – Not a USP item.
6. Dispensing Recommendations:  
NDA – Does not have on the label “Caution: Cytotoxic agent”  
ANDA – will add to label “Caution: Cytotoxic agent”  
USP - Preserve in Containers for sterile solids as described under Injections (1), Caution – Great care should be taken in handling carboplatin because it is a suspected carcinogen.<sup>7</sup>
7. Scoring: not applicable
8. Product Line:  
The innovator markets their product as a lyophilized powder to be reconstituted and Injections (50 mg , 100 mg, and 200 mg vials) 5 mg/mL PF single-dose. The applicant proposes to market only the 50 mg and 100 mg products powder.
9. The tablet/capsule imprint(ings)/embossing(s)/ debossing(s) has/have been accurately described in the HOW SUPPLIED section as required by 21 CFR 206,et al. (Imprinting of Solid Oral Dosage Form Products for Human Use; Final Rule, effective 9/13/95). Not applicable
10. Inactive Ingredients: lactose monhydrate.
11. The listing of inactive ingredients in the DESCRIPTION section of the package insert appears to be consistent with the listing of inactive ingredients found in the statement of components and composition appearing on page .
12. Manufactured by Mayne Pharma in Australlia for Mayne in US.

---

**Date of Review: 2/04/09**

---

**Date of Submission: 11/19/08 and 11/03/08**

---



---

cc: ANDA: 78-815  
DUP/DIVISION FILE  
HFD-613/APayne/JGrace (no cc)  
V:\FIRMSAM\MaynePharma\LTRS&REV\78815NA2labdfsreview.doc



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

/s/

-----  
Angela Payne  
2/4/2009 11:09:47 AM  
LABELING REVIEWER

John Grace  
2/6/2009 12:23:17 PM  
LABELING REVIEWER

APPROVAL SUMMARY #2  
LABELING REVIEW BRANCH

1. APPLICANT INFORMATION

ANDA Number	78-815
Date of Submission	03 FEB 2009
Applicant	Mayne Pharma
Drug Name	Oxaliplatin for Injection
Strength(s)	50 mg and 100 mg vials- PF- SDV lyophilized

LABELS AND LABELING SUMMARY

Container	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\container.pdf
100 mg	
Carton	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\carton.pdf
100 mg	
Insert & Patient leaf	Satisfactory in FPL on Feb 3, 2009
	\\Fdswa150\nonectd\N78815\N_000\2009-02-03\m1\us\114-labeling\pi.pdf
	Attached

2. NOTES/QUESTIONS TO THE CHEMIST:

3. Review based on the labeling of Eloxatin (Sanofi).

Reference Listed Drug	
RLD on the 356(h) form	Eloxatin
NDA Number	21-492 (for Injection- Dc'ed) related NDA is 21-759 RTU solution
RLD established name	OXALPlatin Injection 50 MG AND 100 MG - PF-SDV
Firm	Sanofi Aventis US
Currently approved PI	SE8-010
AP Date	21 MAY 2008
RLD has (b) (4)	opened supplements. Do not use tall man lettering.

4. Patent Data For NDA 21-492

Patent No	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
5290961	12 JAN 2013 PEDS- 12 Jul 2013			PIV	Same As
5338874	07 APR 2013 PED- 07 Oct 2013			PIV	Same As
5420319	09 AUG 2016 PED- 09 Feb 2017			PIV	Same As
5716988	07 AUG 2015 PED- 07 Feb 2016		Only listed for 21-759	PIV	Same As

Exclusivity Data For NDA: 21-492

Code/sup	Expiration	Use Code	Description	Labeling Impact
NCE	09 AUG 2007 peds 09 Feb 2008			Same As

I-441	04 Nov 2007 peds 04 May 2008		USE COMBINATION WITH INFUSIONAL 5-FU/LV FOR ADJUVANT TREATMENT STAGE III COLON CANCER PTS WHO HAVE UNDERGONE COMPLETE RESECTION PRIMARY TUMOR-BASED ON IMPROVEMENT IN DISEASE FREE SURVIVAL, NO DEMONSTRATED BENEFIT OVERALL SURVIVAL AFTER 4YRS	Same As
M-61	10 JAN 2010 peds 10 JUL 2010		REVISIONS TO LABELING BASED ON DATA SUBMITTED IN RESPONSE TO PEDIATRIC WRITTEN REQUEST	Same As
I-425	09 JAN 2007 peds July 2007		ELOXATIN IN COMBINATION WITH INFUSIONAL 5-FLUOROURACIL (5-FU) AND LEUCOVORIN (LV) FOR THE TREATMENT OF PATIENTS PREVIOUSLY UNTREATED FOR ADVANCED COLORECTAL CANCER	Same As

5. Storage Conditions:  
NDA – lyophilized for injection was discontinued for non safety and efficacy reasons. The Injection should be stored 25C(77F) excursions permitted to 15-30. Do not Freeze. Protect from light (keep in outer carton) discard Unused portion and (see package insert for storage of further diluted solutions). Also label must NOT consider Tall Man letter but must add instructions to do not mix or add to sodium chloride/chloride-containing solutions. Open vial is ok for 6 hours and infusion diluted solutions should be discarded 6 hours at RT and 24 hrs under refrigeration after preparation.  
ANDA – Oxaliplatin injection label is the same.  
USP – Not a USP item.
6. Dispensing Recommendations:  
NDA – Does not have on the label “Caution: Cytotoxic agent”  
ANDA – will add to label “Caution: Cytotoxic agent”  
USP - Preserve in Containers for sterile solids as described under Injections (1), Caution – Great care should be taken in handling carboplatin because it is a suspected carcinogen.<sup>7</sup>
7. Scoring: not applicable
8. Product Line:  
The innovator markets their product as a lyophilized powder to be reconstituted and Injections (50 mg , 100 mg, and 200 mg vials) 5 mg/mL PF single-dose. The applicant proposes to market only the 50 mg and 100 mg products powder.
9. The tablet/capsule imprint(ings)/embossing(s)/ debossing(s) has/have been accurately described in the HOW SUPPLIED section as required by 21 CFR 206,et al. (Imprinting of Solid Oral Dosage Form Products for Human Use; Final Rule, effective 9/13/95). Not applicable
10. Inactive Ingredients: lactose monhydrate.
11. The listing of inactive ingredients in the DESCRIPTION section of the package insert appears to be consistent with the listing of inactive ingredients found in the statement of components and composition appearing on page .
12. Manufactured by Mayne Pharma in Australlia for Mayne in US.

---

**Date of Review: 2/12/09**

---

**Date of Submission: 03 FEB 2009**

---



---

cc: ANDA: 78-815  
DUP/DIVISION FILE  
HFD-613/APayne/JGrace (no cc)  
V:\FIRMSAM\MaynePharma\LTRS&REV\78815ap2labdfsreview.doc

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

/s/

-----  
Angela Payne  
2/12/2009 01:10:54 PM  
LABELING REVIEWER

John Grace  
2/17/2009 10:28:48 AM  
LABELING REVIEWER

APPROVAL SUMMARY #3  
LABELING REVIEW BRANCH

1. APPLICANT INFORMATION

ANDA Number	78-815
Date of Submission	29 APR 2009
Applicant	Mayne Pharma
Drug Name	Oxaliplatin for Injection
Strength(s)	50 mg and 100 mg vials- PF- SDV lyophilized

LABELS AND LABELING SUMMARY

Container	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\container.pdf
100 mg	
Carton	Satisfactory in FPL Nov. 19, 2008
50 mg	\\Fdswa150\nonectd\N78815\N_000\2008-11-19\m1\us\114-labeling\carton.pdf
100 mg	
Insert & Patient leaf	Satisfactory in FPL on April 29, 2009
	\\Fdswa150\nonectd\N78815\N_000\2009-04-29\m1\us\1-14-labeling\pi.pdf
	Attached

2. NOTES/QUESTIONS TO THE CHEMIST:

3. Review based on the labeling of Eloxatin (Sanofi).

Reference Listed Drug	
RLD on the 356(h) form	Eloxatin
NDA Number	21-492 (for Injection- Dc'ed) related NDA is 21-759 RTU solution
RLD established name	OXALPlatin Injection 50 MG AND 100 MG - PF-SDV
Firm	Sanofi Aventis US
Currently approved PI	SL-011
AP Date	13 MAR 2009
RLD has (b) (4) opened supplements. Do not use tall man lettering. The generic ANDAs do not share a common insert.	

4. Patent Data For NDA 21-492

Patent No	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
5290961	12 JAN 2013 PEDS- 12 Jul 2013			PIV	Same As
5338874	07 APR 2013 PED- 07 Oct 2013			PIV	Same As
5420319	09 AUG 2016 PED- 09 Feb 2017			PIV	Same As
5716988	07 AUG 2015 PED- 07 Feb 2016		Only listed for 21-759	PIV	Same As

Exclusivity Data For NDA: 21-492

Code/sup	Expiration	Use Code	Description	Labeling Impact
NCE	09 AUG 2007 peds 09 Feb 2008			Same As

I-441	04 Nov 2007 peds 04 May 2008		USE COMBINATION WITH INFUSIONAL 5-FU/LV FOR ADJUVANT TREATMENT STAGE III COLON CANCER PTS WHO HAVE UNDERGONE COMPLETE RESECTION PRIMARY TUMOR-BASED ON IMPROVEMENT IN DISEASE FREE SURVIVAL, NO DEMONSTRATED BENEFIT OVERALL SURVIVAL AFTER 4YRS	Same As
M-61	10 JAN 2010 peds 10 JUL 2010		REVISIONS TO LABELING BASED ON DATA SUBMITTED IN RESPONSE TO PEDIATRIC WRITTEN REQUEST	Same As
I-425	09 JAN 2007 peds July 2007		ELOXATIN IN COMBINATION WITH INFUSIONAL 5-FLUOROURACIL (5-FU) AND LEUCOVORIN (LV) FOR THE TREATMENT OF PATIENTS PREVIOUSLY UNTREATED FOR ADVANCED COLORECTAL CANCER	Same As

5. Storage Conditions:  
NDA – lyophilized for injection was discontinued for non safety and efficacy reasons. The Injection should be stored 25C(77F) excursions permitted to 15-30. Do not Freeze. Protect from light (keep in outer carton) discard Unused portion and (see package insert for storage of further diluted solutions). Also label must NOT consider Tall Man letter but must add instructions to do not mix or add to sodium chloride/chloride-containing solutions. Open vial is ok for 6 hours and infusion diluted solutions should be discarded 6 hours at RT and 24 hrs under refrigeration after preparation.  
ANDA – Oxaliplatin injection label is the same.  
USP – Not a USP item.
6. Dispensing Recommendations:  
NDA – Does not have on the label “Caution: Cytotoxic agent”  
ANDA – will add to label “Caution: Cytotoxic agent”  
USP - Preserve in Containers for sterile solids as described under Injections (1), Caution – Great care should be taken in handling carboplatin because it is a suspected carcinogen.<sup>7</sup>
7. Scoring: not applicable
8. Product Line:  
The innovator markets their product as a lyophilized powder to be reconstituted and Injections (50 mg , 100 mg, and 200 mg vials) 5 mg/mL PF single-dose. The applicant proposes to market only the 50 mg and 100 mg products powder.
9. The tablet/capsule imprint(ings)/embossing(s)/ debossing(s) has/have been accurately described in the HOW SUPPLIED section as required by 21 CFR 206,et al. (Imprinting of Solid Oral Dosage Form Products for Human Use; Final Rule, effective 9/13/95). Not applicable
10. Inactive Ingredients: lactose monhydrate.
11. The listing of inactive ingredients in the DESCRIPTION section of the package insert appears to be consistent with the listing of inactive ingredients found in the statement of components and composition appearing on page .
12. Manufactured by Mayne Pharma in Australlia for Mayne in US.

---

**Date of Review: 5/6/09**

**Date of Submission: 29 MAR 2009**

---



---

cc: ANDA: 78-815  
DUP/DIVISION FILE  
HFD-613/APayne/JGrace (no cc)  
V:\FIRMSAM\MaynePharma\LTRS&REV\78815ap3labdfsreview.doc

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

/s/

-----  
Angela Payne  
5/7/2009 07:36:36 AM  
LABELING REVIEWER

John Grace  
5/7/2009 12:22:38 PM  
LABELING REVIEWER

# **CENTER FOR DRUG EVALUATION AND RESEARCH**

*APPLICATION NUMBER:*  
**ANDA 078815**

**CHEMISTRY REVIEWS**



## **ANDA 78-815**

**Oxaliplatin Lyophilized Powder for Injection,  
50 mg/vial and 100 mg/vial**

**Mayne Pharma Limited**

**Bitra Mirzai-Azarm**

**Division of Chemistry I**

**Review #1**

# Table of Contents

<b>Table of Contents .....</b>	<b>2</b>
<b>Chemistry Review Data Sheet.....</b>	<b>3</b>
<b>The Executive Summary .....</b>	<b>7</b>
I. Recommendations .....	
A. Recommendation and Conclusion on Approvability .....	
B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable.....	
II. Summary of Chemistry Assessments.....	
A. Description of the Drug Product(s) and Drug Substance(s) .....	
B. Description of How the Drug Product is Intended to be Used.....	
C. Basis for Approvability or Not-Approval Recommendation.....	
<b>Chemistry Assessment .....</b>	<b>9</b>
I. Review Of Common Technical Document-Quality (Ctd-Q) Module 3.2: Body Of Data.....	
S    DRUG SUBSTANCE [Name, Manufacturer] .....	
P    DRUG PRODUCT [Name, Dosage form].....	
A    APPENDICES .....	
R    REGIONAL INFORMATION .....	
II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1 .....	
A. Labeling & Package Insert .....	
B. Environmental Assessment Or Claim Of Categorical Exclusion .....	
III. List Of Deficiencies To Be Communicated.....	

# Chemistry Review Data Sheet

1. ANDA 78-815
2. REVIEW #: 1
3. REVIEW DATE: 08-AUG-2007
4. REVIEWER: Bitu Mirzai-Azarm
5. PREVIOUS DOCUMENTS: None (1<sup>st</sup> review)

Previous DocumentsDocument Date

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) ReviewedDocument Date

Original

09-FEB-2007

7. NAME & ADDRESS OF APPLICANT:

Name: Mayne Pharma Limited  
551 Blackburn Road  
Address: Mt. Waverly, Victoria  
AUSTRALIA  
Ron Filler  
Representative: 5108 Grimm Drive  
Alexandria, VA 22304  
Telephone: 703-566-9181

## Chemistry Review Data Sheet

Fax: 703-566-9182

## 8. DRUG PRODUCT NAME/CODE/TYPE:

- a) Proprietary Name: N/A  
b) Non-Proprietary Name (USAN): Oxaliplatin for Injection

## 9. LEGAL BASIS FOR SUBMISSION:

Eloxatin® (oxaliplatin for injection) - Sanofi Aventis (NDA 21-492), **discontinued**

**The reference listed drug, Eloxatin® Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial, approved under NDA 021492, manufactured by Sanofi Aventis US, has been discontinued. Therefore, Mayne Pharma Limited makes reference to docket number 2006P-0291 filed on July 25, 2006 to determine whether Eloxatin® Oxaliplatin Lyophilised Powder for Injection has been voluntarily withdrawn or withheld from sale for safety or efficacy reasons. The Citizen's Petition is pending. The application is acceptable provided the FDA determines that the reference product was not withdrawn due to safety or efficacy reasons.**

## 10. PHARMACOL. CATEGORY:

Indicated to treat adults with stage III colon cancer after surgery to remove the tumor or with other anti-cancer medicines called 5-fluorouracil (5-FU) and leucovorin (LV) to treat adults with advanced colon or rectal cancer (colorectal cancer).

## 11. DOSAGE FORM:

Lyophilized powder for injection

## 12. STRENGTH/POTENCY:

50 mg/vial and 100 mg/vial (5 mg/mL upon reconstitution)

## 13. ROUTE OF ADMINISTRATION:

Intravenous

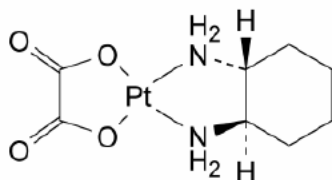
14. Rx/OTC DISPENSED: ☒ Rx ☐ OTC15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):☐ SPOTS product – Form Completed☒ Not a SPOTS product

## Chemistry Review Data Sheet

## 16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

*Nomenclature*

- Oxaliplatin
  - (SP-4-2)-[(1R,2R)-Cyclohexane-1,2-diamine-N,N'][[ethanedioato(2)-O<sup>1</sup>,O<sup>2</sup>]]platinum
- Oxalato(trans-1,2-diaminocyclohexane)platinum(II)
- [(R,R-1,2-Diaminocyclohexan)oxalatoplatin(II)]
- Oxaliplatinum

*Structure**Molecular Formula* $C_8H_{14}N_2O_4Pt$ *Molecular Weight*

397.3

*CAS Number*

61825-94-3

## 17. RELATED/SUPPORTING DOCUMENTS:

**A. DMFs:**

DMF #	TYPE	HOLDER	ITEM REFERENCED	CODE <sup>1</sup>	STATUS <sup>2</sup>	DATE REVIEW COMPLETED	COMMENTS
(b) (4)	II	(b) (4)	(b) (4)	3	Inadequate	20-JUL-2007	Reviewed by K. Furnkranz
	III		(b) (4)	4			
	III		(b) (4)	4			

<sup>1</sup> Action codes for DMF Table:

1 – DMF Reviewed.

## Chemistry Review Data Sheet

Other codes indicate why the DMF was not reviewed, as follows:

- 2 – Type 1 DMF
- 3 – Reviewed previously and no revision since last review
- 4 – Sufficient information in application
- 5 – Authority to reference not granted
- 6 – DMF not available
- 7 – Other (explain under "Comments")

<sup>2</sup> Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

**B. Other Documents:** None

DOCUMENT	APPLICATION NUMBER	DESCRIPTION

## 18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	Pending		
EES	Pending		
Methods Validation	Not necessary		
Labeling	Pending		
Bioequivalence	Acceptable	02-AUG-2007	Keri Suh
EA	21 CFR 25.31(a)	CR #1	Bitia Mirzai-Azarm
Radiopharmaceutical	N/A		

## 19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.   X   Yes        No If no, explain reason(s) below:

# The Chemistry Review for ANDA 78-815

## The Executive Summary

### I. Recommendations

#### A. Recommendation and Conclusion on Approvability

Chemistry – NA Minor

Labeling – Pending

Bio – Acceptable on 8/2/07

EER – Pending

Micro - Pending

#### B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

Routine stability commitment provided.

### II. Summary of Chemistry Assessments

#### A. Description of the Drug Product(s) and Drug Substance(s)

##### *Drug Substance:*

Oxaliplatin is a white or almost white crystalline powder, slightly soluble in water, very slightly soluble in methanol and practically insoluble in ethanol with molecular formula of  $C_8H_{14}N_2O_4Pt$  and molecular weight of 397.3. The DS manufacturer is (b) (4)

##### *Drug Product:*

Oxaliplatin for Injection is supplied as a lyophilized, sterile powder intended for intravenous administration following reconstitution with water for injection available in single-dose vials containing 50 mg or 100 mg of oxaliplatin. Each vial contains oxaliplatin and lactose monohydrate, NF.

#### B. Description of How the Drug Product is Intended to be Used

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for adjuvant treatment of stage III colon cancer patients who have undergone complete resection of the primary tumor. (b) (4)

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for the treatment of advanced carcinoma of the colon or rectum.

The Maximum Daily Dose is 147 mg ( $85 \text{ mg/m}^2 \times 1.73 \text{ m}^2$ )

Surface area of average adult =  $1.73 \text{ m}^2$

## Chemistry Assessment Section

DS: IT = 0.10% QT = 0.15%

DP: IT = 0.2% QT = 0.2%

**C. Basis for Approvability or Not-Approval Recommendation**

Chemistry – NA Minor

Labeling – Pending

Bio – Acceptable on 8/2/07

EER – Pending

Micro - Pending



## Chemistry Assessment Section

(b) (4)

**A APPENDICES**

- A.1 Facilities and Equipment (biotech only)**
- A.2 Adventitious Agents Safety Evaluation**
- A.3 Novel Excipients**

**R REGIONAL INFORMATION****R1 Executed Batch Records**

Two batches of Oxaliplatin for Injection were manufactured in support of this application. All batches were manufactured at a scale which is greater than (b) (4)

**R2 Comparability Protocols**

There are no comparability protocols proposed for Oxaliplatin Injection.

**R3 Methods Validation Package**

Enclosed within the application.

**II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1****A. Labeling & Package Insert**

Labeling review: Pending

Chemist's Review:

Description section

- a. Structure: Satisfactory
- b. Chemical names: Satisfactory
- c. Molecular formulas: Satisfactory
- d. Name of the inactive: Satisfactory

**B. Environmental Assessment Or Claim Of Categorical Exclusion**

21CFR 25.31 (a)

**III. List Of Deficiencies To Be Communicated**

See next page.

## Chemistry Assessment Section

**36. CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT**

ANDA: 78-815

APPLICANT: Mayne Pharma Limited

DRUG PRODUCT: Oxaliplatin Lyophilized Powder for Injection, 50 mg and 100 mg per vial

The deficiencies presented below represent MINOR deficiencies.

A. Deficiencies:

1. The DMF (b) (4) is deficient and the DMF holder has been notified. Please ensure a response.
2. Please express the (b) (4).
3. Please include (b) (4).
4. Please include (b) (4).
5. We acknowledge that you use (b) (4).
6. As part of the in-process control, please include (b) (4).
7. Please include (b) (4).
8. You have proposed (b) (4).
9. Please revise (b) (4).
10. We acknowledge that you us (b) (4).

## Chemistry Assessment Section

- B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:
1. Your labeling and microbiological information are pending review. Deficiencies, if any will be communicated separately.
  2. An acceptable compliance evaluation is needed for approval. We have requested an evaluation from the Office of Compliance.
  3. There appears to be a typographical error in reporting the (b) (4) on Table 4.6.1 (p. 12 of 29). It should have been (b) (4) instead of (b) (4). Please confirm.
  4. You have reported the Maximum Daily Dose (MDD) of the drug product as (b) (4). Please note that MDD should have been reported as 147 mg (= 85 mg/m x 1.73 m ).

OGD is changing its CMC review process through our question based review (QbR) initiative, which is described in more detail on the OGD website: <http://www.fda.gov/cder/ogd/QbR.htm>.

OGD's QbR was designed with the expectation that ANDA applications would be organized according to the Common Technical Document (CTD), a submission format adopted by multiple regulatory bodies including the FDA. Generic firms are strongly recommended to submit their ANDAs in the CTD format (either eCTD or paper) to facilitate the implementation of the QbR and to avoid undue delays in the review of their applications.

Because of the increasing number of ANDA submissions OGD receives each year, the Quality Overall Summary (QOS) part of the CTD format is extremely important to making our new review process more efficient. Beginning in January 2007, all ANDA applicants are recommended to provide an electronic copy of a QOS that addresses OGD's QbR questions. The QbR-Quality Overall Summary Outline posted on our webpage <http://www.fda.gov/cder/ogd/> contains all the questions to prepare the QOS. The QOS should be submitted in both MS Word and pdf format along with the paper or electronic submission. The QOS should be provided even if the remainder of the application is not in CTD format. OGD has prepared QOS models that can be found on the OGD web site. We ask you to use these as a guide for your submissions.

Chemistry Assessment Section

If you are already submitting QbR-based applications, we would like to take this opportunity to thank you for supporting this very important initiative.

Sincerely yours,

*{See appended electronic signature page}*

Rashmikanth M. Patel, Ph.D.  
Director  
Division of Chemistry I  
Office of Generic Drugs  
Center for Drug Evaluation and Research

## Chemistry Assessment Section

cc: ANDA: 78-815  
ANDA DUP  
DIV FILE  
Field Copy

## Endorsements:

HFD-625/B.M.Azarm/8/13/07, 8/21/07 (revised)

HFD-625/M.Smela/

HFD-617/E.Chuh/

F/T by

V:\Chem Div I\Team 2\TL Folder\Draft\78815N01RBM.DOC

**TYPE OF LETTER: NA MINOR**

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

/s/

-----  
Bita Mirzai-Azarm  
8/22/2007 02:42:40 PM  
CHEMIST

Esther Chuh  
8/22/2007 02:55:16 PM  
CSO

Michael Smela  
8/22/2007 03:51:22 PM  
CHEMIST

## **ANDA 78-815**

**Oxaliplatin Lyophilized Powder for Injection,  
50 mg/vial and 100 mg/vial**

**Hospira Australia Pty Ltd.**

**Bitra Mirzai-Azarm**

**Division of Chemistry I**

**Review #2**

# Table of Contents

<b>Table of Contents .....</b>	<b>2</b>
<b>Chemistry Review Data Sheet.....</b>	<b>3</b>
<b>The Executive Summary .....</b>	<b>7</b>
I. Recommendations .....	
A. Recommendation and Conclusion on Approvability .....	
B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable.....	
II. Summary of Chemistry Assessments.....	
A. Description of the Drug Product(s) and Drug Substance(s) .....	
B. Description of How the Drug Product is Intended to be Used.....	
C. Basis for Approvability or Not-Approval Recommendation.....	
<b>Chemistry Assessment .....</b>	<b>9</b>
I. Review Of Common Technical Document-Quality (Ctd-Q) Module 3.2: Body Of Data.....	
S    DRUG SUBSTANCE [Name, Manufacturer] .....	
P    DRUG PRODUCT [Name, Dosage form].....	
A    APPENDICES .....	
R    REGIONAL INFORMATION .....	
II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1 .....	
A. Labeling & Package Insert .....	
B. Environmental Assessment Or Claim Of Categorical Exclusion .....	
III. List Of Deficiencies To Be Communicated.....	



# Chemistry Review Data Sheet

1. ANDA 78-815
2. REVIEW #: 2
3. REVIEW DATE: 09-MAY-2008
4. REVIEWER: Bitu Mirzai-Azarm

5. PREVIOUS DOCUMENTS:

Previous Documents

Original

Document Date

09-FEB-2007

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed

Major Amendment

Document Date

26-NOV-2007

7. NAME & ADDRESS OF APPLICANT:

Name: **Hospira Australia Pty Limited**  
551 Blackburn Road  
Address: Mt. Waverly, Victoria  
AUSTRALIA  
Ron Filler  
Representative: 5108 Grimm Drive  
Alexandria, VA 22304  
Telephone: 703-566-9181

## Chemistry Review Data Sheet

Fax: 703-566-9182

## 8. DRUG PRODUCT NAME/CODE/TYPE:

- a) Proprietary Name: N/A
- b) Non-Proprietary Name (USAN): Oxaliplatin for Injection

## 9. LEGAL BASIS FOR SUBMISSION:

Eloxatin® (oxaliplatin for injection) - Sanofi Aventis (NDA 21-492), **discontinued**

**The reference listed drug, Eloxatin® Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial, approved under NDA 021492, manufactured by Sanofi Aventis US, has been discontinued. Therefore, Mayne Pharma Limited makes reference to docket number 2006P-0291 filed on July 25, 2006 to determine whether Eloxatin® Oxaliplatin Lyophilised Powder for Injection has been voluntarily withdrawn or withheld from sale for safety or efficacy reasons. The application is acceptable provided the FDA determines that the reference product was not withdrawn due to safety or efficacy reasons.**

## 10. PHARMACOL. CATEGORY:

Indicated to treat adults with stage III colon cancer after surgery to remove the tumor or with other anti-cancer medicines called 5-fluorouracil (5-FU) and leucovorin (LV) to treat adults with advanced colon or rectal cancer (colorectal cancer).

## 11. DOSAGE FORM:

Lyophilized powder for injection

## 12. STRENGTH/POTENCY:

50 mg/vial and 100 mg/vial (5 mg/mL upon reconstitution)

## 13. ROUTE OF ADMINISTRATION:

Intravenous

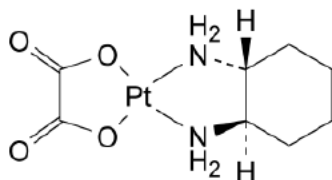
14. Rx/OTC DISPENSED: ☒ Rx ☐ OTC15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):☐ SPOTS product – Form Completed☒ Not a SPOTS product

## Chemistry Review Data Sheet

## 16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

*Nomenclature*

- Oxaliplatin
- (SP-4-2)-[(1R,2R)-Cyclohexane-1,2-diamine-N,N'][[ethanedioato(2)-O<sup>1</sup>,O<sup>2</sup>]]platinum
- Oxalato(trans-1,2-diaminocyclohexane)platinum(II)
- [(R,R-1,2-Diaminocyclohexan)oxalatoplatin(II)]
- Oxaliplatinum

*Structure**Molecular Formula*C<sub>8</sub>H<sub>14</sub>N<sub>2</sub>O<sub>4</sub>Pt*Molecular Weight*

397.3

*CAS Number*

61825-94-3

## 17. RELATED/SUPPORTING DOCUMENTS:

**A. DMFs:**

DMF #	TYPE	HOLDER	ITEM REFERENCED	CODE <sup>1</sup>	STATUS <sup>2</sup>	DATE REVIEW COMPLETED	COMMENTS
(b) (4)	II	(b) (4)	(b) (4)	3	Adequate	03-DEC-2007	Reviewed by K. Furnkranz
	II			1	Inadequate	09-MAY-2008	Bitia Mirzai-Azarm
	III			4			
	III			4			

## Chemistry Review Data Sheet

<sup>1</sup> Action codes for DMF Table:

1 – DMF Reviewed.

Other codes indicate why the DMF was not reviewed, as follows:

2 – Type 1 DMF

3 – Reviewed previously and no revision since last review

4 – Sufficient information in application

5 – Authority to reference not granted

6 – DMF not available

7 – Other (explain under "Comments")

<sup>2</sup> Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

**B. Other Documents:** None

DOCUMENT	APPLICATION NUMBER	DESCRIPTION

## 18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	<b>Pending</b>		
EES	Acceptable	02-OCT-2007	S. Adams
Methods Validation	Not necessary		
Labeling	<b>Deficient</b>	16-MAR-2008	Angela Payne
Bioequivalence	Acceptable	02-AUG-2007	Keri Suh
EA	21 CFR 25.31(a)	CR #1	Bitia Mirzai-Azarm
Radiopharmaceutical	N/A		

## 19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.   X   Yes        No If no, explain reason(s) below:

# The Chemistry Review for ANDA 78-815

## The Executive Summary

### I. Recommendations

#### A. Recommendation and Conclusion on Approvability

Chemistry – NA Minor

Labeling – Deficient on 3/16/08

Bio – Acceptable on 8/2/07

EER – Acceptable on 10/2/07

Micro - Pending

#### B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

Routine stability commitment provided.

### II. Summary of Chemistry Assessments

#### A. Description of the Drug Product(s) and Drug Substance(s)

##### *Drug Substance:*

Oxaliplatin is a white or almost white crystalline powder, slightly soluble in water, very slightly soluble in methanol and practically insoluble in ethanol with molecular formula of  $C_8H_{14}N_2O_4Pt$  and molecular weight of 397.3. The DS manufacturer is (b) (4)

(b) (4). As part of the 11/26/07 amendment an alternate manufacturing process for Oxaliplatin DS namely (b) (4) was added to the application. The manufacturer of the DS is still (b) (4) and the alternate process is under DMF (b) (4).

##### *Drug Product:*

Oxaliplatin for Injection is supplied as a lyophilized, sterile powder intended for intravenous administration following reconstitution with water for injection available in single-dose vials containing 50 mg or 100 mg of oxaliplatin. Each vial contains oxaliplatin and lactose monohydrate, NF.

#### B. Description of How the Drug Product is Intended to be Used

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for adjuvant treatment of stage III colon cancer patients who have undergone complete resection of the primary tumor. (b) (4)

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for the treatment of advanced carcinoma of the colon or rectum.

**Chemistry Assessment Section**

The Maximum Daily Dose is 147 mg ( $85 \text{ mg/m}^2 \times 1.73 \text{ m}^2$ )  
Surface area of average adult =  $1.73 \text{ m}^2$

DS: IT = 0.10% QT = 0.15%  
DP: IT = 0.2% QT = 0.2%

**C. Basis for Approvability or Not-Approval Recommendation**

Chemistry – NA Minor

Labeling – Deficient on 3/16/08

Bio – Acceptable on 8/2/07

EER – Acceptable on 10/2/07

Micro - Pending

## Chemistry Assessment Section

(b) (4)

**A APPENDICES**

- A.1 Facilities and Equipment (biotech only)**
- A.2 Adventitious Agents Safety Evaluation**
- A.3 Novel Excipients**

**R REGIONAL INFORMATION****R1 Executed Batch Records**

Two batches of Oxaliplatin for Injection were manufactured in support of this amendment.

**R2 Comparability Protocols**

There are no comparability protocols proposed for Oxaliplatin Injection.

**R3 Methods Validation Package**

## Chemistry Assessment Section

Enclosed within the application.

**II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1****A. Labeling & Package Insert**

Labeling review: Deficient on 3/16/08 per Angela Payne.

**B. Environmental Assessment Or Claim Of Categorical Exclusion**

21CFR 25.31 (a)

**III. List Of Deficiencies To Be Communicated**

See next page.



## Chemistry Assessment Section

**36. CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT**

ANDA: 78-815

APPLICANT: Hospira Australia Pty Ltd.

DRUG PRODUCT: Oxaliplatin Lyophilized Powder for Injection, 50 mg and 100 mg per vial

The deficiencies presented below represent MINOR deficiencies.

A. Deficiencies:

1. The DMF (b) (4) is deficient and the DMF holder has been notified. Please ensure a response.
2. Your proposed (b) (4) .
3. You proposed not to (b) (4) .
4. The limit for the Uniformity of content test in the release specifications should be stated as "Complies with USP <905>".

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

1. Your labeling information has been reviewed and deficiencies have been communicated to you. Please respond to the deficiencies.
2. Your microbiological information is pending review. Deficiencies, if any, will be communicated separately.

OGD is changing its CMC review process through our question based review (QbR) initiative, which is described in more detail on the OGD website: <http://www.fda.gov/cder/ogd/QbR.htm>.

OGD's QbR was designed with the expectation that ANDA applications would be organized according to the Common Technical Document (CTD), a submission format adopted by multiple regulatory bodies including the FDA. Generic firms are strongly recommended to submit their

## Chemistry Assessment Section

ANDAs in the CTD format (either eCTD or paper) to facilitate the implementation of the QbR and to avoid undue delays in the review of their applications.

Because of the increasing number of ANDA submissions OGD receives each year, the Quality Overall Summary (QOS) part of the CTD format is extremely important to making our new review process more efficient. Beginning in January 2007, all ANDA applicants are recommended to provide an electronic copy of a QOS that addresses OGD's QbR questions. The QbR-Quality Overall Summary Outline posted on our webpage <http://www.fda.gov/cder/ogd/> contains all the questions to prepare the QOS. The QOS should be submitted in both MS Word and pdf format along with the paper or electronic submission. The QOS should be provided even if the remainder of the application is not in CTD format. OGD has prepared QOS models that can be found on the OGD web site. We ask you to use these as a guide for your submissions.

If you are already submitting QbR-based applications, we would like to take this opportunity to thank you for supporting this very important initiative.

Sincerely yours,

*{See appended electronic signature page}*

Rashmikant M. Patel, Ph.D.  
Director  
Division of Chemistry I  
Office of Generic Drugs  
Center for Drug Evaluation and Research

## Chemistry Assessment Section

cc: ANDA: 78-815  
ANDA DUP  
DIV FILE  
Field Copy

## Endorsements:

HFD-625/B.M.Azarm/5/14/08 (revised)

HFD-625/M.Smela/

HFD-617/E.Chuh/

F/T by

V:\Chem Div I\Team 2\TL Folder\Draft\78815N02RBM.DOC

**TYPE OF LETTER: NA MINOR**

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

/s/

-----  
Bita Mirzai-Azarm  
5/16/2008 10:15:03 AM  
CHEMIST

Esther Chuh  
5/19/2008 12:02:54 PM  
CSO

Michael Smela  
5/20/2008 08:27:30 AM  
CHEMIST

# **ANDA 78-815**

**Oxaliplatin Lyophilized Powder for Injection,  
50 mg/vial and 100 mg/vial**

**Hospira Worldwide, Inc.**

**Bitra Mirzai-Azarm**

**Division of Chemistry I**

**Review #3**

# Table of Contents

<b>Table of Contents .....</b>	<b>2</b>
<b>Chemistry Review Data Sheet.....</b>	<b>3</b>
<b>The Executive Summary .....</b>	<b>7</b>
I. Recommendations .....	
A. Recommendation and Conclusion on Approvability .....	
B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable.....	
II. Summary of Chemistry Assessments.....	
A. Description of the Drug Product(s) and Drug Substance(s) .....	
B. Description of How the Drug Product is Intended to be Used.....	
C. Basis for Approvability or Not-Approval Recommendation.....	
<b>Chemistry Assessment .....</b>	<b>9</b>
I. Review Of Common Technical Document-Quality (Ctd-Q) Module 3.2: Body Of Data.....	
S    DRUG SUBSTANCE [Name, Manufacturer] .....	
P    DRUG PRODUCT [Name, Dosage form].....	
A    APPENDICES .....	
R    REGIONAL INFORMATION .....	
II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1 .....	
A. Labeling & Package Insert .....	
B. Environmental Assessment Or Claim Of Categorical Exclusion .....	
III. List Of Deficiencies To Be Communicated.....	

# Chemistry Review Data Sheet

1. ANDA 78-815
2. REVIEW #: 3
3. REVIEW DATE: 25-AUG-2008
4. REVIEWER: Bitu Mirzai-Azarm

5. PREVIOUS DOCUMENTS:

<u>Previous Documents</u>	<u>Document Date</u>
Original	09-FEB-2007
Major Amendment	26-NOV-2007

6. SUBMISSION(S) BEING REVIEWED:

<u>Submission(s) Reviewed</u>	<u>Document Date</u>
Minor Amendment	01-AUG-2008
Telephone Amendment	29-AUG-2008

7. NAME & ADDRESS OF APPLICANT:

Name: **Hospira Worldwide, Inc.**  
Address: **275 North Field Drive**  
**Dept. 389, Bldg. H2-2N**

## Chemistry Review Data Sheet

Representative: **Lake Forest, IL 60045-5046**  
**Laurie Wojtko**

Telephone: **224-212-6158**

Fax: **224-212-5401**

## 8. DRUG PRODUCT NAME/CODE/TYPE:

- a) Proprietary Name: N/A  
b) Non-Proprietary Name (USAN): Oxaliplatin for Injection

## 9. LEGAL BASIS FOR SUBMISSION:

Eloxatin® (oxaliplatin for injection) - Sanofi Aventis (NDA 21-492), **discontinued**

**The reference listed drug, Eloxatin® Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial, approved under NDA 021492, manufactured by Sanofi Aventis US, has been discontinued. Therefore, Mayne Pharma Limited makes reference to docket number 2006P-0291 filed on July 25, 2006 to determine whether Eloxatin® Oxaliplatin Lyophilised Powder for Injection has been voluntarily withdrawn or withheld from sale for safety or efficacy reasons. The application is acceptable provided the FDA determines that the reference product was not withdrawn due to safety or efficacy reasons.**

## 10. PHARMACOL. CATEGORY:

Indicated to treat adults with stage III colon cancer after surgery to remove the tumor or with other anti-cancer medicines called 5-fluorouracil (5-FU) and leucovorin (LV) to treat adults with advanced colon or rectal cancer (colorectal cancer).

## 11. DOSAGE FORM:

Lyophilized powder for injection

## 12. STRENGTH/POTENCY:

50 mg/vial and 100 mg/vial (5 mg/mL upon reconstitution)

## 13. ROUTE OF ADMINISTRATION:

Intravenous

14. Rx/OTC DISPENSED:   X   Rx        OTC

15. [SPOTS \(SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM\):](#)

       SPOTS product – Form Completed

  X   Not a SPOTS product

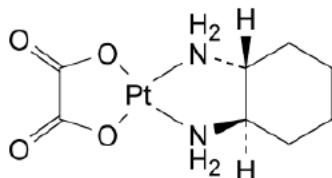


## Chemistry Review Data Sheet

## 16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

*Nomenclature*

- Oxaliplatin
  - (SP-4-2)-[(1R,2R)-Cyclohexane-1,2-diamine-N,N']][ethanedioato(2)-O<sup>1</sup>,O<sup>2</sup>]platinum
- Oxalato(trans-1,2-diaminocyclohexane)platinum(II)
- [(R,R-1,2-Diaminocyclohexan)oxalatoplatin(II)]
- Oxaliplatinum

*Structure**Molecular Formula* $C_8H_{14}N_2O_4Pt$ *Molecular Weight*

397.3

*CAS Number*

61825-94-3

## 17. RELATED/SUPPORTING DOCUMENTS:

**A. DMFs:**

DMF #	TYPE	HOLDER	ITEM REFERENCED	CODE <sup>1</sup>	STATUS <sup>2</sup>	DATE REVIEW COMPLETED	COMMENTS
(b) (4)	II	(b) (4)	(b) (4)	3	Adequate	07-JUL-2008	Reviewed by K. Furnkranz

## Chemistry Review Data Sheet

20054	II	W.C. Heraeus GmbH	Oxaliplatin	3	Adequate	11-JUL-2008	Bitra Mirzai-Azarm
(b) (4)	III	(b) (4)		4			
	III			4			

<sup>1</sup> Action codes for DMF Table:

1 – DMF Reviewed.

Other codes indicate why the DMF was not reviewed, as follows:

2 – Type 1 DMF

3 – Reviewed previously and no revision since last review

4 – Sufficient information in application

5 – Authority to reference not granted

6 – DMF not available

7 – Other (explain under "Comments")

<sup>2</sup> Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

**B. Other Documents:** None

DOCUMENT	APPLICATION NUMBER	DESCRIPTION

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	Pending		
EES	Acceptable	02-OCT-2007	S. Adams
Methods Validation	Not necessary		
Labeling	Deficient	16-MAR-2008	Angela Payne
Bioequivalence	Acceptable	02-AUG-2007	Keri Suh
EA	21 CFR 25.31(a)	CR #1	Bitra Mirzai-Azarm
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt. \_\_\_\_ Yes   X   No If no, explain reason(s) below:

Minor Amendment

# The Chemistry Review for ANDA 78-815

## The Executive Summary

### I. Recommendations

#### A. Recommendation and Conclusion on Approvability

Chemistry – Acceptable

Labeling – Deficient on 3/16/08

Bio – Acceptable on 8/2/07

EER – Acceptable on 10/2/07

Micro - Pending

#### B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

Routine stability commitment provided.

### II. Summary of Chemistry Assessments

#### A. Description of the Drug Product(s) and Drug Substance(s)

##### *Drug Substance:*

Oxaliplatin is a white or almost white crystalline powder, slightly soluble in water, very slightly soluble in methanol and practically insoluble in ethanol with molecular formula of  $C_8H_{14}N_2O_4Pt$  and molecular weight of 397.3. The DS manufacturer is (b) (4)

(b) (4) As part of the 11/26/07 amendment an alternate manufacturing process for Oxaliplatin DS namely (b) (4) was added to the application. The manufacturer of the DS is still (b) (4) and the alternate process is under DMF (b) (4).

##### *Drug Product:*

Oxaliplatin for Injection is supplied as a lyophilized, sterile powder intended for intravenous administration following reconstitution with water for injection available in single-dose vials containing 50 mg or 100 mg of oxaliplatin. Each vial contains oxaliplatin and lactose monohydrate, NF.

#### B. Description of How the Drug Product is Intended to be Used

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for adjuvant treatment of stage III colon cancer patients who have undergone complete resection of the primary tumor. (b) (4)

Oxaliplatin for Injection, used in combination with infusional 5 FU/LV, is indicated for the treatment of advanced carcinoma of the colon or rectum.

**Chemistry Assessment Section**

The Maximum Daily Dose is 147 mg ( $85 \text{ mg/m}^2 \times 1.73 \text{ m}^2$ )  
Surface area of average adult =  $1.73 \text{ m}^2$

DS: IT = 0.10% QT = 0.15%  
DP: IT = 0.2% QT = 0.2%

**C. Basis for Approvability or Not-Approval Recommendation**

Chemistry – Acceptable

Labeling – Deficient on 3/16/08

Bio – Acceptable on 8/2/07

EER – Acceptable on 10/2/07

Micro - Pending

## Chemistry Assessment Section

**A APPENDICES**

- A.1 Facilities and Equipment (biotech only)**
- A.2 Adventitious Agents Safety Evaluation**
- A.3 Novel Excipients**

**R REGIONAL INFORMATION****R1 Executed Batch Records**

Two batches of Oxaliplatin for Injection were manufactured in support of the previous amendment.

**R2 Comparability Protocols**

There are no comparability protocols proposed for Oxaliplatin Injection.

**R3 Methods Validation Package**

Enclosed within the application.

**II. Review Of Common Technical Document-Quality (Ctd-Q) Module 1****A. Labeling & Package Insert**

Labeling review: Deficient on 3/16/08 per Angela Payne.

**B. Environmental Assessment Or Claim Of Categorical Exclusion**

21CFR 25.31 (a)

**III. List Of Deficiencies To Be Communicated**

None



## CHEMISTRY REVIEW TEMPLATE



### Chemistry Assessment Section

cc: ANDA: 78-815  
ANDA DUP  
DIV FILE  
Field Copy

#### Endorsements:

HFD-625/B.M.Azarm/8/29/08 (revised)

HFD-625/M.Smela/

HFD-617/E.Chuh/

F/T by

V:\Chem Div I\Team 2\TL Folder\Draft\78815N03RBM.DOC

**TYPE OF LETTER: Chemistry Complete (labeling deficient, micro pending)**

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

/s/

-----  
Bita Mirzai-Azarm  
9/2/2008 12:05:14 PM  
CHEMIST

The option to link to the August 29, 2008  
telephone amendment was not available. I linked it  
to the August 1, 2008 minor amendment.

Michael Smela  
9/2/2008 01:24:53 PM  
CHEMIST



## **ANDA 78-815**

**Oxaliplatin Lyophilized Powder for Injection,  
50 mg/vial and 100 mg/vial**

**Hospira Worldwide, Inc.**

**Bitra Mirzai-Azarm**

**Division of Chemistry I**

**Review #3 (Addendum)**



## Chemistry Assessment Section

**ANDA:** 78-815 (Addendum to CR #3)

**APPLICANT:** Hospira Worldwide, Inc.

**DRUG PRODUCT:** Oxaliplatin for Injection, 50 mg and 100 mg per vial

**The following telephone amendment was covered as part of CR #3:**

August 29, 2008 telephone amendment:

- The test for residual solvents has been added to the DP release specification. The acceptance criterion is "Complies with USP <467>".
- Vendor Declaration Statements are provided in 3.2.P.4.4 (b) (4).

NOTE: Hospira will no longer use (b) (4) as a supplier of lactose. Only the (b) (4) vendor statement for lactose is included.

Commitment is provided to reassess <467> if vendors are changed.

On September 4, 2008 the applicant submitted a Gratuitous Amendment – Compliance with USP <467> Residual Solvents. Information provided is no different from the August 29, 2008 telephone amendment.

**For the record:**

DMF (b) (4): Adequate  
DMF (b) (4): Adequate  
Labeling: Deficient in DFS  
Micro: Pending



## CHEMISTRY REVIEW TEMPLATE



### Chemistry Assessment Section

cc: ANDA: 78-815  
ANDA DUP  
DIV FILE  
Field Copy

Endorsements:

HFD-625/B.M.Azarm/9/19/08 (revised)

HFD-625/M.Smela/

HFD-617/E.Chuh/

F/T by

V:\Chem Div I\Team 2\TL Folder\Draft\78815addendumN03RBM.DOC

**TYPE OF LETTER: Chemistry Complete (labeling deficient, micro pending)**

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

/s/

-----  
Bita Mirzai-Azarm  
9/19/2008 12:56:05 PM  
CHEMIST

Michael Smela  
9/19/2008 12:59:30 PM  
CHEMIST

The ANDA may be AP when micro and labeling  
are acceptable provided DMFs (b) (4) remain adequate, no  
USP monographs publish and no new cmc amendments  
submitted



## **ANDA 78-815**

**Oxaliplatin Lyophilized Powder for Injection,  
50 mg/vial and 100 mg/vial**

**Hospira Worldwide, Inc.**

**Bitra Mirzai-Azarm**

**Division of Chemistry I**

**Review #3 (Addendum - PF)**



## CHEMISTRY REVIEW TEMPLATE



### Chemistry Assessment Section

**ANDA:** 78-815 (Addendum to CR #3 regarding PF monograph)

**APPLICANT:** Hospira Worldwide, Inc.

**DRUG PRODUCT:** Oxaliplatin for Injection, 50 mg and 100 mg per vial

**February 5, 2009 Telephone Amendment:**

The applicant commits to update its DS specs to comply with the official oxaliplatin monograph once it becomes effective in the USP.

Satisfactory

**For the Records:**

DMF (b) (4):

*Adequate on 7/7/08*

DMF:

*Adequate on 9/19/08*

Labeling:

*Acceptable on 2/17/09 by Angela Payne*

Micro:

*Satisfactory per Lisa Shelton on 2/2/09*



## CHEMISTRY REVIEW TEMPLATE



### Chemistry Assessment Section

cc: ANDA: 78-815  
ANDA DUP  
DIV FILE  
Field Copy

#### Endorsements:

HFD-625/B.M.Azarm/2/11/09

HFD-625/K.Furnkranz/

HFD-617/E.Chuh/

V:\Chem Div I\Team 2\TL Folder\ANDA\78815N03addendum(PF)RBM.DOC

**TYPE OF LETTER: ANDA APPROVAL**

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

/s/

-----  
Bita Mirzai-Azarm  
2/26/2009 09:26:47 AM  
CHEMIST

Esther Chuh  
2/26/2009 02:24:17 PM  
CHEMIST

Kenneth Furnkranz  
3/4/2009 04:51:23 PM  
CHEMIST

**Final Approval Following a Tentative Approval  
Abbreviated New Drug Application Regulatory Assessment**

---

1. ANDA # 78-815

2. NAME AND ADDRESS OF APPLICANT

Hospira Worldwide PTY  
Attention: Laurie Wojtko  
Senior Associate, Global Regulatory Affairs  
275 North Field Drive  
D-0389, Bldg H2-2N  
Lake Forest, IL 60045

3. LEGAL BASIS FOR SUBMISSION

Eloxatin® (Oxaliplatin for Injection)-Sanofi Aventis (NDA 21-492)

Patent Certification: P-IV

U.S. Patent Number

Expiration Date

5,290,961 (the '961 patent)

July 12, 2013

5,338,874 (the '874 patent)

October 7, 2013

5,420,319 (the '319 patent)

February 9, 2017

4. PROPRIETARY NAME

n/a

5. NONPROPRIETARY NAME

Oxaliplatin for Injection, (Preservative-Free), packaged in 50 mg and 100 mg Single-use Vials

6. CURRENT SUBMISSIONS AND OTHER DATES:

2/9/2007

Original

5/22/2009

ANDA Tentatively Approved

9/3/2009

Minor Amendment: Request for Final Approval

7. PHARMACOLOGICAL CATEGORY

Antineoplastic agent

8. Rx or OTC

Rx

9. SAMPLES AND RESULTS

N/A

10. LABELING STATUS

Acceptable by Angela Payne, 5/7/2009

11. BIOEQUIVALENCY STATUS

Acceptable by Keri Suh, 8/2/2007



12. MICROBIOLOGY STATUS

Acceptable by Lisa S. Shelton, 2/2/2009

13. ESTABLISHMENT INSPECTION

Acceptable by S. Adams 10/2/2007

14. CONCLUSIONS AND RECOMMENDATIONS

ANDA Approvable

PROJECT MANAGER:

Esther Chuh, Pharm. D.

DATE COMPLETED:

9/29/2009

cc: ANDA  
Division File  
Field Copy

Endorsements:

HFD-617 E. Chuh/Project Manager  
HFD-620 B. Cai/ Team Leader

V:\Chemistry Division I\Team 2\TL Folder\Draft\ANDA\78815.RA for AP

ANDA Approval

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
-----	-----	-----	-----
ANDA-78815	ORIG-1	HOSPIRA WORLDWIDE INC	OXALIPLATIN
ANDA-78815	ORIG-1	HOSPIRA WORLDWIDE INC	OXALIPLATIN

-----

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

-----

/s/

-----

EUNJUNG E CHUH  
09/30/2009

BING CAI  
09/30/2009

**CENTER FOR DRUG EVALUATION AND RESEARCH**

*APPLICATION NUMBER:*  
**ANDA 078815**

**BIOEQUIVALENCE REVIEW**

## DIVISION OF BIOEQUIVALENCE REVIEW

<b>ANDA No.</b>	78-815
<b>Drug Product Name</b>	Oxaliplatin Lyophilized Powder for Injection
<b>Strength</b>	50 mg/vial and 100 mg/vial
<b>Applicant Name</b>	Mayne Pharma Limited
<b>Address</b>	Mt. Waverly, Victoria, Australia
<b>Submission Date(s)</b>	February 9, 2007
<b>Amendment Date(s)</b>	N/A
<b>Reviewer</b>	Keri Suh, Pharm.D.
<b>First Generic</b>	NO

### I. Submission Summary

#### A. Drug Product Information

<b>Test Product</b>	Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial
<b>Reference Product</b>	Eloxatin <sup>®</sup> Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial
<b>RLD Manufacturer</b>	Sanofi Aventis US
<b>NDA No.</b>	021492
<b>RLD Approval Date</b>	August 9, 2002 (per Orange Book)
<b>Indication</b>	Indicated to treat adults with stage III colon cancer after surgery to remove the tumor or with other anti-cancer medicines called 5-fluorouracil (5-FU) and leucovorin (LV) to treat adults with advanced colon or rectal cancer (colorectal cancer).

#### B. Formulation

Ingredients	Mayne's Oxaliplatin for Injection (50 mg/vial)	Sanofi's Eloxatin <sup>®</sup> (50 mg/vial)
Oxaliplatin	50 mg	50 mg
Lactose Monohydrate, NF	450 mg	450 mg

Ingredients	Mayne's Oxaliplatin for Injection (100 mg/vial)	Sanofi's Eloxatin <sup>®</sup> (100 mg/vial)
Oxaliplatin	100 mg	100 mg
Lactose Monohydrate, NF	900 mg	900 mg

The reference listed drug, Eloxatin<sup>®</sup> Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial, approved under NDA 021492, manufactured by Sanofi Aventis US, has been discontinued. Therefore, Mayne Pharma Limited makes reference to docket number 2006P-0291 filed on July 25, 2006 to determine whether Eloxatin<sup>®</sup> Oxaliplatin Lyophilised Powder for Injection has been voluntarily withdrawn or withheld from sale for safety or efficacy reasons. The Citizen's Petition is pending. The application is acceptable provided the FDA determines that the reference product was not withdrawn due to safety or efficacy reasons.

**Recommendations**

The Division of Bioequivalence agrees that the information submitted by Mayne Pharma Limited demonstrates that its test product, Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial, fall under the criteria set forth in 21 CFR 320.22(b)(1) of the Bioavailability/ Bioequivalence Regulations. The waiver is granted, provided the FDA determines that the reference product was not withdrawn from the market due to safety and/or efficacy reasons.

---

## BIOEQUIVALENCE COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 78-815

APPLICANT: Mayne Pharma Limited

DRUG PRODUCT: Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial

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

Please note that the bioequivalence 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 bioequivalence information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

*{See appended electronic signature page}*

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

ANDA 78-815

BIOEQUIVALENCE – ACCEPTABLE

Submission date: February 9, 2007

Amendment Dates: Amendment Date(s): N/A

1. **WAIVER (WAI)**

Strengths:

**50 mg/vial and 100 mg/vial**

**Outcome: AC**

**Outcome: AC- Acceptable**

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

/s/

-----  
Keri Suh  
8/1/2007 07:21:31 AM  
BIOPHARMACEUTICS

Lizzie Sanchez  
8/1/2007 08:30:22 AM  
BIOPHARMACEUTICS

Dale Conner  
8/2/2007 04:42:54 PM  
BIOPHARMACEUTICS



# **CENTER FOR DRUG EVALUATION AND RESEARCH**

*APPLICATION NUMBER:*

**ANDA 078815**

**MICROBIOLOGY REVIEWS**

# Product Quality Microbiology Review

October 16, 2008

ANDA: 78-815

**Drug Product Name**

**Proprietary:** N/A

**Non-proprietary:** Oxaliplatin for Injection

**Drug Product Classification:** N/A

**Review Number:** #1

**Dates of Submission(s) Covered by this Review**

Letter	Stamp	Consult Sent	Assigned to Reviewer
02/09/2007	02/09/2007	N/A	08/07/2008

**Submission History (for amendments only) – N/A**

**Applicant/Sponsor**

**Name:** Mayne Pharma Limited

**Address:** 551 Blackburn Road, Mt. Waverly, Victoria, AUSTRALIA

**U.S. Agent**

**Name:** Drug Development Consultants, Inc.

**Address:** 5108 Grimm Drive, Alexandria, VA 22304

**Representative:** Ron Filler

**Telephone:** 703-566-9181

**Name of Reviewer:** Lisa S.G. Shelton

**Conclusion:** The submission **is not recommended** for approval on the basis of sterility assurance.

# Product Quality Microbiology Data Sheet

- A. 1. **TYPE OF SUBMISSION:** Original ANDA
2. **SUBMISSION PROVIDES FOR:** Initial marketing of sterile drug product
3. **MANUFACTURING SITE:**  
Mayne Pharma Limited  
1 Lexia Place  
Mulgrave  
Victoria 3170  
Australia
4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:** Lyophilized power for injection, IV, 50 mg/vial and 100 mg/vial, packaged in a 30 mL single-use vial and 50 mL single-use vial, respectively
5. **METHOD(S) OF STERILIZATION:** (b) (4)
6. **PHARMACOLOGICAL CATEGORY:** Cytotoxic

- B. **SUPPORTING/RELATED DOCUMENTS:**  
Microbiology Review #1 and #2 for ANDA 77-790 (77-790 and 77-790a1, 12/8/06 and 3/20/07, M. Stevens-Riley)  
Microbiology Review #1 and #2 for ANDA 78-796 (78-796 and 78-796a1, 11/1/07 and 1/8/08, J. Wells)

C. **REMARKS:**

ANDAs 78-813 and 78-815 are similar and sections of this review where the review content is the same are noted. The same overall manufacturing process (b) (4), sterilization of container/closure components and equipment, and filling lines are used with the following exceptions:

- the drug formulations differ although the API is the same
- while both drugs are filled on Lines (b) (4) the 78-813 drug is (b) (4) filled on Line (b) (4)
- the 78-815 drug is lyophilized after (b) (4)
- the same manufacturing equipment is used to process the packaging components, but the container/closure systems are not the same

All references to page and volume number refer to the blue jacket copies and the OGD-assigned volume numbers (Modules 1-3 in volumes 1.1-1.7) rather than the applicant-assigned volume numbers that are in the Table of Contents (Module 1 in volume 1 of 1, Module 2 in volume 1 of 1, and Module 3 in volumes 1-6 of 6). Of note, there is no volume 6 of 6 among the OGD numbered jackets

(also not in COMIS). This reviewer sees no reason to clarify the situation since the volume is anticipated to include information not needed for sterility assurance.

**filename:** 78-815.doc

## **Executive Summary**

### **I. Recommendations**

#### **A. Recommendation on Approvability -**

The submission is **not recommended** for approval on the basis of sterility assurance. Specific comments and deficiencies are provided in the "Product Quality Microbiology Assessment" and "List of Microbiology Deficiencies and Comments" sections.

#### **B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable – N/A**

### **II. Summary of Microbiology Assessments**

#### **A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology –** (b) (4)

[Redacted]

#### **B. Brief Description of Microbiology Deficiencies –** Floor plans missing as well as location of lyophilizer. Insufficient information regarding environmental monitoring, integrity testing, validation of stopper depyrogenation, equipment sterilization, lyophilizer sterilization, media fills, and exhibit batches.

#### **C. Assessment of Risk Due to Microbiology Deficiencies –** The safety risk associated with the microbiology deficiencies is considered moderate.

### **III. Administrative**

#### **A. Reviewer's Signature \_\_\_\_\_**

#### **B. Endorsement Block**

Microbiologist/Lisa S.G. Shelton, Ph.D.

Microbiology Team Leader/Brenda Pillari, Ph.D.

#### **C. CC Block**

cc: Field Copy

### 3. LIST OF MICROBIOLOGY DEFICIENCIES AND COMMENTS:

ANDA: 78-815      APPLICANT: Mayne Pharma Limited

DRUG PRODUCT: Oxaliplatin for Injection

Microbiology Deficiencies:

1. With regard to buildings and facilities:
  - a. Please provide floor plans for the manufacturing area(s) used for the manufacture of the subject drug product.
  - b. Please provide the location (e.g. room number) of the lyophilizer(s) used in the manufacture of the subject drug product.
2. With regard to microbiological environmental monitoring:
  - a. We note that [REDACTED] (b) (4)
  - b. Please provide [REDACTED] (b) (4)
3. The application in 3.2.P.3.3 on Page 16 of 38 states that [REDACTED] (b) (4)
4. With regard to the validation studies performed for the depyrogenation of closures using [REDACTED] (b) (4)
  - a. Please provide the dates of study and the amount of [REDACTED] (b) (4)
  - b. Please describe [REDACTED] (b) (4)
  - c. Please indicate [REDACTED] (b) (4)
5. With regard to equipment sterilization [REDACTED] (b) (4)

(b) (4)

6. The manufacturing process includes

(b) (4)

7. With regard to lyophilizer(s):

a.

b.

c.

(b) (4)

8. With regard to media fills:

- a. Please provide

(b) (4)

- b. Please explain

(b) (4)

- c. We note that for the media fill performed on Filling Line (b) (4) on 19 DEC 05 the fill volume is stated as (b) (4) in ANDA 78-815 and (b) (4) in ANDA 78-813. Presumably, there is a typographical error. Please specify the correct fill volume.

9. With regard to the exhibit batches, we would like to verify that the parameters used for sterilization processes were supported by the validation studies. We note that the batch records cite only SOP numbers and do not provide the information we seek. This is acceptable; however, please provide either the relevant SOPs so we can verify the parameters used for the sterilization processes or else please provide a list of cycle parameters used in the exhibit batches (i.e. depyrogenation of vials, sterilization of closures, product sterilizing filters, receiving vessel, and filling equipment) and compare these to the cycle parameters used for the validation studies and to the cycle parameters proposed for commercial batches.

Please clearly identify your amendment to this facsimile as “RESPONSE TO MICROBIOLOGY DEFICIENCIES”. The “RESPONSE TO MICROBIOLOGY DEFICIENCIES” should also be noted in your cover page/letter.

Sincerely yours,

*{See appended electronic signature page}*

Brenda Pillari, Ph.D.  
Microbiology Team Leader  
Office of Generic Drugs  
Center for Drug Evaluation and Research



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

/s/

-----  
Lisa Shelton  
10/17/2008 06:07:15 PM  
MICROBIOLOGIST

Bonnie McNeal  
10/17/2008 06:16:31 PM  
MICROBIOLOGIST  
Checked for correct file and submission link. Both ok.

Neal Sweeney  
10/21/2008 10:02:41 AM  
MICROBIOLOGIST

Brenda Pillari  
10/23/2008 07:18:29 AM  
MICROBIOLOGIST

# Product Quality Microbiology Review

January 12, 2009

ANDA: 78-815

**Drug Product Name**

**Proprietary:** N/A

**Non-proprietary:** Oxaliplatin for Injection

**Drug Product Classification:** N/A

**Review Number:** #2

**Dates of Submission(s) Covered by this Review**

Letter	Stamp	Consult Sent	Assigned to Reviewer
11/14/2008	11/17/2008	N/A	11/24/2008

**Submission History (for amendments only)**

Submission Date(s)	Microbiology Review #	Review Date(s)
02/09/2007	1	10/16/2008

**Applicant/Sponsor**

**Name:** Hospira Worldwide, Inc. (formerly Mayne Pharma Limited)

**Address:** 275 N. Field Dr, D-0389, Bldg. H2-2N, Lakeforest, IL 60045-5046

**Representative:** Laurie Wojtko, Sr. Associate, Global Regulatory Affairs

**Telephone:** 224-212-6158

**Name of Reviewer:** Lisa S.G. Shelton

**Conclusion:** The submission is **recommended** for approval on the basis of sterility assurance.

# Product Quality Microbiology Data Sheet

- A. 1. **TYPE OF SUBMISSION:** ANDA Amendment (electronic hybrid)
2. **SUBMISSION PROVIDES FOR:** Response to Agency's deficiency letter
3. **MANUFACTURING SITE:**  
Mayne Pharma Limited  
1 Lexia Place  
Mulgrave  
Victoria 3170  
Australia
4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:** Lyophilized power for injection, IV, 50 mg/vial and 100 mg/vial, packaged in a 30 mL single-use vial and 50 mL single-use vial, respectively
5. **METHOD(S) OF STERILIZATION:** (b) (4)
6. **PHARMACOLOGICAL CATEGORY:** Cytotoxic
- B. **SUPPORTING/RELATED DOCUMENTS:** N/A
- C. **REMARKS:** The applicant was contacted by telephone (see telecon memo dated 01/09/09) to clarify the number of lyophilizers (locations) and models used in the manufacture of the subject drug product.

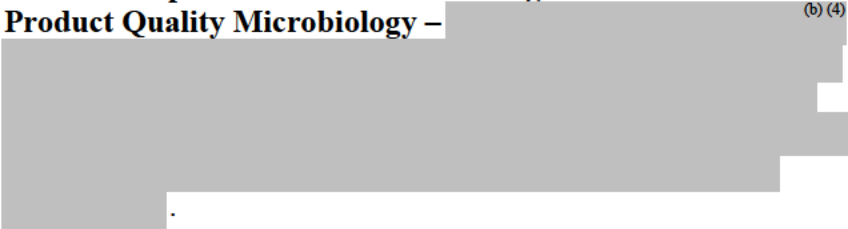
**filename:** 78-815a1.doc

## **Executive Summary**

### **I. Recommendations**

- A. Recommendation on Approvability -**  
The submission is **recommended** for approval on the basis of sterility assurance.
- B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable – N/A**

### **II. Summary of Microbiology Assessments**

- A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology –** (b) (4)  

- B. Brief Description of Microbiology Deficiencies –** None identified
- C. Assessment of Risk Due to Microbiology Deficiencies –**  
No microbiology deficiencies were identified. The applicant demonstrates an adequate level of sterility assurance for the manufacturing process.

### **III. Administrative**

- A. Reviewer's Signature** \_\_\_\_\_
- B. Endorsement Block**  
Microbiologist/Lisa S.G. Shelton, Ph.D.  
Microbiology Team Leader/Brenda Pillari, Ph.D.
- C. CC Block**  
cc: Field Copy

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

/s/

-----  
Lisa Shelton  
1/13/2009 03:07:49 PM  
MICROBIOLOGIST

Kun Shen  
1/13/2009 04:27:01 PM  
MICROBIOLOGIST

checked for correct file and linking

Neal Sweeney  
1/30/2009 04:32:54 PM  
MICROBIOLOGIST

Brenda Pillari  
2/2/2009 06:51:24 AM  
MICROBIOLOGIST

**CENTER FOR DRUG EVALUATION AND RESEARCH**

*APPLICATION NUMBER:*  
**ANDA 078815**

**ADMINISTRATIVE and CORRESPONDENCE**  
**DOCUMENTS**

**VIA COURIER**

February 9, 2007

Mr. Gary Buehler, Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
7500 Standish Place, Room 150  
Document Control Room  
Rockville, MD 20855

*[Handwritten signatures and initials, including "2/9/07" and "25815"]*

**STERILITY ASSURANCE DATA ENCLOSED**

**Original Application**

**RE: Abbreviated New Drug Application  
Oxaliplatin for Injection  
(50mg/vial and 100 mg/vial)**

Dear Mr. Buehler:

In accordance with the regulations, as promulgated under Section 505(j) of the Federal Food, Drug and Cosmetic Act, as amended, Mayne Pharma Limited is submitting this Abbreviated New Drug Application (ANDA) for Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial.

The reference listed drug (RLD) Eloxatin® (oxaliplatin for injection), 50 mg/vial and 100 mg/vial, approved under NDA 21-492, manufactured by Sanofi Aventis, has been discontinued. Therefore, Mayne Pharma Limited makes reference to docket number 2006P-0291/CP1 filed on July 25, 2006 to determine whether Eloxatin (Oxaliplatin for Injection) has been voluntarily withdrawn or withheld from sale for safety or efficacy reasons.

Oxaliplatin for Injection is supplied as a lyophilized, sterile powder intended for intravenous administration following reconstitution with Water for Injection available in single-dose vials containing 50 mg or 100 mg of Oxaliplatin. Each vial contains Oxaliplatin and Lactose Monohydrate, NF. Mayne's Oxaliplatin for Injection contains the same active ingredient, is of the same dosage form, is to be used for the same indications, in the same dosage regimen and via the same route of administration as the reference listed drug.

**RECEIVED  
FEB 09 2007  
OGD / CDER**

February 9, 2007  
Page 2 of 2

The enclosed paper application is submitted in Common Technical Document (CTD) format, as directed by relevant FDA and ICH Guidances. The application consists of the following:

Module 1: Administrative and Prescribing Information	One Volume
Module 2: Common Technical Document Summaries	One Volume
Module 3: Quality	Six Volumes
Module 4: Nonclinical Study Reports	Not Applicable
Module 5: Clinical Study Reports	Not Applicable

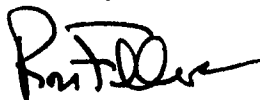
The proposed labeling has been submitted in electronic format, as directed by relevant Industry Guidances, and is contained on one (1) CD-ROM with the Archive Copy of this application, located in Module 1. The Quality Overall Summary is contained on one (1) CD-ROM with the Archive Copy of this application. Mayne Pharma Limited certifies that the electronic labeling and Quality Overall Summary have been scanned using Norton Symantic Antivirus Corporate Edition Version 8.1, and are virus-free.

Mayne originally submitted this application to the Division of Field Investigations on August 9, 2006. Per a January 25, 2007 phone call between myself and Irma Rivera, FDA advised that the sponsor submit a letter requesting activation of the application instead of resubmitting the entire application. On the following page is a copy of the letter to the Division of Field Investigations. In conjunction with the reactivation letter, Mayne is also submitting updated patent and exclusivity certifications, stability data and Quality Overall Summary to the Division of Field Investigations. Therefore, the application the Division of Field Investigations receives will be a true copy of that submitted for Archive and Review. Mayne is providing the Field Copy of this application to the Office of Generic Drugs Office in accordance with 21 CFR 314.94.

Mayne commits to resolve any issues identified in the methods validation process after approval of this application.

As Mayne's Authorized US Agent, should you have any questions concerning this submission, please contact me directly at (703) 566-9181.

Sincerely,



Ron Filler, *MD*  
Authorized US Agent for Mayne Pharma Limited  
Drug Development Consultants, Inc.  
Tel: (703) 566-9181  
Fax: (703) 566-9182





ANDA 78-815

Drug Development Consultants, Inc.  
U.S. Agent for Mayne Pharma Limited  
Attention: Ron Filler, Ph.D.  
5108 Grimm Drive  
Alexandria, VA 22304

Dear Sir:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act.

Reference is made to the telephone conversations dated April 26, May 2 and May 7, 2007 and your correspondence dated May 3 and May 11, 2007.

NAME OF DRUG: Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial

DATE OF APPLICATION: February 9, 2007

DATE (RECEIVED) ACCEPTABLE FOR FILING: February 9, 2007

You have filed a Paragraph IV patent certification, in accordance with 21 CFR 314.94(a)(12)(i)(A)(4) and Section 505(j)(2)(A)(vii)(IV) of the Act. Please be aware that you need to comply with the notice requirements, as outlined below. In order to facilitate review of this application, we suggest that you follow the outlined procedures below:

#### **CONTENTS OF THE NOTICE**

You must cite section 505(j)(2)(B)(ii) of the Act in the notice and should include, but not be limited to, the information as described in 21 CFR 314.95(c).

#### **SENDING THE NOTICE**

In accordance with 21 CFR 314.95(a):

- Send notice by U.S. registered or certified mail with return receipt requested to each of the following:
  - 1) Each owner of the patent or the representative designated by the owner to receive the notice;
  - 2) The holder of the approved application under section 505(b) of the Act for the listed drug claimed by the

patent and for which the applicant is seeking approval.

- 3) An applicant may rely on another form of documentation only if FDA has agreed to such documentation in advance.

#### **DOCUMENTATION OF NOTIFICATION/RECEIPT OF NOTICE**

You must submit an amendment to this application with the following:

- In accordance with 21 CFR 314.95(b), provide a statement certifying that the notice has been provided to each person identified under 314.95(a) and that notice met the content requirements under 314.95(c).
- In accordance with 21 CFR 314.95(e), provide documentation of receipt of notice by providing a copy of the return receipt or a letter acknowledging receipt by each person provided the notice.
- A designation on the exterior of the envelope and above the body of the cover letter should clearly state "PATENT AMENDMENT". This amendment should be submitted to your application as soon as documentation of receipt by the patent owner and patent holder is received.

#### **DOCUMENTATION OF LITIGATION/SETTLEMENT OUTCOME**

You are requested to submit an amendment to this application that is plainly marked on the cover sheet "PATENT AMENDMENT" with the following:

- If litigation occurs within the 45-day period as provided for in section 505(j)(4)(B)(iii) of the Act, we ask that you provide a copy of the pertinent notification.
- Although 21 CFR 314.95(f) states that the FDA will presume the notice to be complete and sufficient, we ask that if you are not sued within the 45-day period, that you provide a letter immediately after the 45 day period elapses, stating that no legal action was taken by each person provided notice.
- You must submit a copy of a copy of a court order or judgment or a settlement agreement between the parties, whichever is applicable, or a licensing agreement between you and the patent holder, or any other relevant information. We ask that this information be submitted promptly to the application.

If you have further questions you may contact Martin Shimer, Chief, Regulatory Support Branch, at (301)827-0503.

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the ANDA number shown above.

Should you have questions concerning this application, contact:

Esther Chuh  
Project Manager  
301-827-5773

Sincerely yours,

*{See appended electronic signature page}*

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

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

/s/

-----  
Martin Shimer  
5/21/2007 11:01:22 AM  
Signing for Wm Peter Rickman

**ANDA CHECKLIST FOR CTD or eCTD FORMAT**  
**FOR COMPLETENESS and ACCEPTABILITY of an APPLICATION FOR FILING**

For More Information on Submission of an ANDA in Electronic Common Technical Document (eCTD)

Format please go to: <http://www.fda.gov/cder/regulatory/ersr/ectd.htm>

\*For a Comprehensive Table of Contents Headings and Hierarchy please go to:

<http://www.fda.gov/cder/regulatory/ersr/5640CTOC-v1.2.pdf>

\*\* For more CTD and eCTD informational links see the final page of the ANDA Checklist

\*\*\* A model Quality Overall Summary for an immediate release tablet and an extended release capsule can be found on the OGD webpage <http://www.fda.gov/cder/ogd/> \*\*\*

ANDA #: 78-815

FIRM NAME: MAYNE PHARMA LIMITED

PIV: YES

Electronic or Paper Submission: PAPER (CTD FORMAT)

RELATED APPLICATION(S):

(b) (4)

Bio Assignments:

☒ BPH

☐ BCE

☐ BST

☐ BDI

☒ Micro Review

First Generic Product Received? NO

DRUG NAME: OXALIPLATIN

DOSAGE FORM: FOR INJECTION, 50 MG/VIAL AND 100 MG/VIAL

Random Queue: 2

Chem Team Leader: Smela, Michael PM: Esther Chuh Labeling Reviewer: Angela Payne

<b>Letter Date:</b> FEBRUARY 9, 2007		<b>Received Date:</b> FEBRUARY 9, 2007	
<b>Comments:</b> EC -2 YES		<b>On Cards:</b> YES	
<b>Therapeutic Code:</b> 5010100 CYTOXIC			
<b>Archival copy:</b> PAPER (CTD FORMAT)		<b>Sections</b> I	
<b>Review copy:</b> YES		E-Media Disposition: YES SENT TO EDR	
Not applicable to electronic sections			
PART 3 Combination Product Category N Not a Part3 Combo Product			
(Must be completed for ALL Original Applications)		Refer to the Part 3 Combination Algorithm	

<b>Reviewing</b> CSO/CST Peter Chen  Date 5/11/2007	<b>Recommendation:</b>  <input checked="" type="checkbox"/> FILE <input type="checkbox"/> REFUSE to RECEIVE
<b>Supervisory Concurrence/Date:</b> _____ <b>Date:</b> _____	

**ADDITIONAL COMMENTS REGARDING THE ANDA:**

Ron Miller was informed on 5/7/2007 that the application is still missing IR spectra for batches MP103458 and MP107374.

Ron Miller was contacted again on 5/2/2007 to provide the following:

7. Please provide stability data for post-reconstitution hold time per the PI.

(OK per 5/3/2007 NC)

Ron Miller, US Agent for Mayne was contacted on 4/26/2007 to provide a response to the following items as a NC to the ANDA:

1. Please provide exclusivity statement for the M-61 exclusivity and include the expiration date with pediatric exclusivity

(OK per 5/3/2007 NC)

2. Please provide cGMP certification for the (b)(4) supplier of the API

(OK per 5/3/2007 NC)

3. Please provide IR spectra for both batches of the API, MP103458 and MP 107374.

Missing

(OK per 5/11/2007 NC)

4. Please provide a samples availability statement for the API and the drug product and include all batch numbers

(OK per 5/3/2007 NC)

5. Please provide cGMP certification for (b)(4) facility

(OK per 5/3/2007 NC)

6. Please provide a reprocessing statement for the drug product.

(OK per 5/3/2007 NC)

**MODULE 1****ADMINISTRATIVE**

ACCEPTABLE

<b>1.1</b>	<b>1.1.2</b> <b>Signed and Completed Application Form (356h) (original signature)</b> (Check Rx/OTC Status) RX YES	<input checked="" type="checkbox"/>
<b>1.2</b>	<b>Cover Letter</b> Dated: FEBRUARY 9, 2007	<input checked="" type="checkbox"/>
<b>*</b>	<b>Table of Contents (paper submission only)</b> submitted	<input checked="" type="checkbox"/>
<b>1.3.2</b>	<b>Field Copy Certification (original signature) YES</b> (N/A for E-Submissions)	<input checked="" type="checkbox"/>
<b>1.3.3</b>	<b>Debarment Certification-GDEA (Generic Drug Enforcement Act)/Other:</b> 1. Debarment Certification (original signature) YES 2. List of Convictions statement (original signature) none used	<input checked="" type="checkbox"/>
<b>1.3.4</b>	<b>Financial Certifications</b> Bioavailability/Bioequivalence Financial Certification (Form FDA 3454) or Disclosure Statement (Form FDA 3455) NA	<input checked="" type="checkbox"/>

1.3.5	<p><b>1.3.5.1</b> <b>Patent Information</b> Patents listed for the RLD in the Electronic Orange Book Approved Drug Products with Therapeutic Equivalence Evaluations</p> <p><b>1.3.5.2</b> <b>Patent Certification</b> 1. Patent number(s) 5290961*PED JUL 12,2013 P4 5338874*PED OCT 07,2013 P4 5420319*PED FEB 09,2017 P4</p> <p>2. Paragraph: (Check all certifications that apply) MOU <input type="checkbox"/> PI <input type="checkbox"/> PII <input type="checkbox"/> PIII <input type="checkbox"/> PIV <input checked="" type="checkbox"/> No Relevant Patents <input type="checkbox"/></p> <p>3. Expiration of Patent(s): 2/9/2017 a. Pediatric exclusivity submitted? b. Expiration of Pediatric Exclusivity?</p> <p>4. Exclusivity Statement: YES but missing M-61 exclusivity (OK per 5/3/2007 NC)</p>	<input checked="" type="checkbox"/>
1.4.1	<p><b>References</b> Letters of Authorization</p> <p>1. DMF letters of authorization a. Type II DMF authorization letter(s) or synthesis for Active Pharmaceutical Ingredient submitted DMF (b) (4) as they said DMF submitted on 7/19/2006 Please note that there are 2 DMFs in Comis from (b) (4) for Oxaliplatin b. Type III DMF authorization letter(s) for container closure DMF (b) (4)</p> <p>2. US Agent Letter of Authorization (U.S. Agent [if needed, countersignature on 356h]) submitted</p>	<input checked="" type="checkbox"/>
1.12.11	<p><b>Basis for Submission</b> NDA#: 21-492 (DISCONTINUED IN ORANGE BOOK) DOCKET NO. 2006P-0291 Ref Listed Drug: ELOXATIN (for injection) Firm: SANOFI AVENTIS ANDA suitability petition required? If Yes, then is change subject to PREA (change in dosage form, route or active ingredient) see section 1.9.1</p>	<input checked="" type="checkbox"/>

**MODULE 1 (Continued)**  
**ADMINISTRATIVE**

ACCEPTABLE


1.12.12	<p><b>Comparison between Generic Drug and RLD-505(j)(2)(A)</b> 1. Conditions of use Same as RLD 2. Active ingredients Same as RLD 3. Inactive ingredients Same as RLD 4. Route of administration Same as RLD 5. Dosage Form Same as RLD 6. Strength Same as RLD</p>	<input checked="" type="checkbox"/>
1.12.14	<b>Environmental Impact Analysis Statement</b> YES	<input checked="" type="checkbox"/>
1.12.15	<p><b>Request for Waiver</b> Request for Waiver of In-Vivo BA/BE Study(ies): Paper, YES</p>	<input checked="" type="checkbox"/>

<b>1.14.1</b>	<b>Draft Labeling</b> (Mult Copies N/A for E-Submissions) <b>1.14.1.1</b> 4 copies of draft (each strength and container) submitted <b>1.14.1.2</b> 1 side by side labeling comparison of containers and carton with all differences annotated and explained submitted <b>1.14.1.3</b> 1 package insert (content of labeling) submitted electronically submitted ***Was a proprietary name request submitted? no (If yes, send email to Labeling Reviewer indicating such.)	<input checked="" type="checkbox"/>
<b>1.14.3</b>	<b>Listed Drug Labeling</b> <b>1.14.3.1</b> 1 side by side labeling (package and patient insert) comparison with all differences annotated and explained submitted <b>1.14.3.3</b> 1 RLD label and 1 RLD container label submitted	<input checked="" type="checkbox"/>



**MODULE 2**  
**SUMMARIES**

ACCEPTABLE

2.3	<p><b>Quality Overall Summary</b>  <b>E-Submission:</b>   __X__ PDF (archive)   __X__ Word Processed e.g., MS Word</p> <p>A model Quality Overall Summary for an immediate release table and an extended release capsule can be found on the OGD webpage <a href="http://www.fda.gov/cder/ogd/">http://www.fda.gov/cder/ogd/</a></p> <p><b>Question based Review (QbR)</b>       __X__ YES       _____ NO</p> <p><b>2.3.S</b>  <b>Drug Substance (Active Pharmaceutical Ingredient)</b>              2.3.S.1                  General Information              2.3.S.2                  Manufacture              2.3.S.3                  Characterization              2.3.S.4                  Control of Drug Substance              2.3.S.5                  Reference Standards or Materials              2.3.S.6                  Container Closure System              2.3.S.7                  Stability</p> <p><b>2.3.P</b>  <b>Drug Product</b>              2.3.P.1                  Description and Composition of the Drug Product              2.3.P.2                  Pharmaceutical Development                      2.3.P.2.1                          Components of the Drug Product                              2.3.P.2.1.1                                  Drug Substance                              2.3.P.2.1.2                                  Excipients                      2.3.P.2.2                          Drug Product                      2.3.P.2.3                          Manufacturing Process Development                      2.3.P.2.4                          Container Closure System              2.3.P.3                  Manufacture              2.3.P.4                  Control of Excipients              2.3.P.5                  Control of Drug Product              2.3.P.6                  Reference Standards or Materials              2.3.P.7                  Container Closure System              2.3.P.8                  Stability</p>	<div style="text-align: center;">  </div>
-----	---	--

2.7	<b>Clinical Summary (Bioequivalence)</b> <b>E-Submission: _____PDF (archive) _____ Word Processed e.g., MS Word</b>  <b>2.7.1</b> <b>Summary of Biopharmaceutic Studies and Associated Analytical Methods</b> <b>2.7.1.1</b> <b>Background and Overview</b> <b>2.7.1.2</b> <b>Summary of Results of Individual Studies</b> <b>2.7.1.3</b> <b>Comparison and Analyses of Results Across Studies</b> <ol style="list-style-type: none"> <li>Summary Bioequivalence tables: <ol style="list-style-type: none"> <li>Summary of Comparative Bioavailability (BA) Studies</li> <li>Statistical Summary of the Comparative BA Data</li> <li>Summary of In Vitro Dissolution Studies</li> </ol> </li> </ol> <b>2.7.1.4</b> <b>Appendix</b>	<input type="checkbox"/>
-----	---	--------------------------

### MODULE 3

#### 3.2.S DRUG SUBSTANCE

ACCEPTABLE

3.2.S.1	<b>General Information</b> <b>3.2.S.1.1</b> <b>Nomenclature submitted</b> <b>3.2.S.1.2</b> <b>Structure submitted</b> <b>3.2.S.1.3</b> <b>General Properties submitted</b>	<input checked="" type="checkbox"/>
3.2.S.2	<b>Manufacturer</b> <b>3.2.S.2.1</b> <b>Manufacturer(s) (This section includes contract manufacturers and testing labs)</b> <b>Drug Substance (Active Pharmaceutical Ingredient)</b> <ol style="list-style-type: none"> <li>Addresses of bulk manufacturers submitted</li> <li>Manufacturing Responsibilities submitted</li> <li>Type II DMF number for API submitted</li> <li>CFN or FEI numbers</li> </ol> Missing cGMP statement for (b) (4) (OK per 5/3/2007 NC)	<input checked="" type="checkbox"/>
3.2.S.3	<b>Characterization submitted and Reference to DMF</b>	<input checked="" type="checkbox"/>

<b>3.2.S.4</b>	<p><b>Control of Drug Substance (Active Pharmaceutical Ingredient)</b></p> <p><b>3.2.S.4.1</b>  <b>Specification</b>  Testing specifications and data from drug substance manufacturer(s) submitted</p> <p><b>3.2.S.4.2</b>  <b>Analytical Procedures</b> submitted</p> <p><b>3.2.S.4.3</b>  <b>Validation of Analytical Procedures</b>  1. Spectra and chromatograms for reference standards and test samples missing Spectra for Both API batches (one provided is for a different batch than the ones used for this ANDA)  (OK per 5/11/2007 NC)</p> <p>2. Samples-Statement of Availability and Identification of:  a. Drug Substance missing (OK per 5/3/2007 NC)  b. Same lot number(s)</p> <p><b>3.2.S.4.4</b>  <b>Batch Analysis</b>  1. COA(s) specifications and test results from drug substance mfgr(s) submitted  Batch # 10802, 10902</p> <p>2. Applicant certificate of analysis submitted  Batch # MP103458 and MP 107374</p> <p><b>3.2.S.4.5</b>  <b>Justification of Specification</b> submitted</p>	<input checked="" type="checkbox"/>
<b>3.2.S.5</b>	<b>Reference Standards or Materials</b> submitted	<input checked="" type="checkbox"/>
<b>3.2.S.6</b>	<b>Container Closure Systems</b> Reference to DMF	<input checked="" type="checkbox"/>
<b>3.2.S.7</b>	<b>Stability</b> Reference to DMF	<input checked="" type="checkbox"/>

# MODULE 3

## 3.2.P DRUG PRODUCT

ACCEPTABLE

3.2.P.1	<b>Description and Composition of the Drug Product</b> 1) Unit composition submitted 2) Inactive ingredients are appropriate per IIG <b>YES</b>	<input checked="" type="checkbox"/>
3.2.P.2	<b>Pharmaceutical Development</b> Pharmaceutical Development Report submitted	<input checked="" type="checkbox"/>
3.2.P.3	<b>Manufacture</b> <b>3.2.P.3.1</b> <b>Manufacture(s)</b> (Finished Dosage Manufacturer and Outside Contract Testing Laboratories) 1. Name and Full Address(es) of the Facility(ies) submitted 2. CGMP Certification: submitted but missing for (b) (4) testing facility 3. Function or Responsibility submitted 4. CFN or FEI numbers <b>3.2.P.3.2</b> <b>Batch Formula</b> Batch Formulation submitted <b>3.2.P.3.3</b> <b>Description of Manufacturing Process and Process Controls</b> 1. Description of the Manufacturing Process submitted 2. Master Production Batch Record(s) for largest intended production runs (no more than 10x pilot batch) with equipment specified 50 mg vials MBR TY (b) (4) 100 mg vials MBR TY (b) (4) 3. If sterile product: (b) (4) 4. Reprocessing Statement <b>missing (OK per 5/3/2007 NC)</b> <b>3.2.P.3.4</b> <b>Controls of Critical Steps and Intermediates submitted</b> <b>3.2.P.3.5</b> <b>Process Validation and/or Evaluation</b> 1. Microbiological sterilization validation submitted 2. (b) (4) submitted per Paul D. vol 1.4	<input checked="" type="checkbox"/>
3.2.P.4	<b>Controls of Excipients (Inactive Ingredients)</b> Source of inactive ingredients identified submitted <b>3.2.P.4.1</b> <b>Specifications</b> 1. Testing specifications (including identification and characterization) submitted 2. Suppliers' COA (specifications and test results) submitted <b>3.2.P.4.2</b> <b>Analytical Procedures per USP/NF</b> <b>3.2.P.4.3</b> <b>Validation of Analytical Procedures per USP/NF</b> <b>3.2.P.4.4</b> <b>Justification of Specifications</b> Applicant COA submitted	<input checked="" type="checkbox"/>

**MODULE 3**  
**3.2.P DRUG PRODUCT**

ACCEPTABLE

<b>3.2.P.5</b>	<b>Controls of Drug Product</b> <b>3.2.P.5.1</b> Specification(s) submitted <b>3.2.P.5.2</b> Analytical Procedures submitted <b>3.2.P.5.3</b> <b>Validation of Analytical Procedures</b> Samples - Statement of Availability and Identification of: 1. Finished Dosage Form missing (OK per 5/3/2007 NC) 2. Same lot numbers <b>3.2.P.5.4</b> <b>Batch Analysis</b> Certificate of Analysis for Finished Dosage Form submitted 50 mg vials Batch #N015350R 100 mg vials Batch #N025352R <b>3.2.P.5.5</b> <b>Characterization of Impurities</b> reference to another section  <b>3.2.P.5.6</b> <b>Justification of Specifications submitted</b>	<input checked="" type="checkbox"/>
<b>3.2.P.7</b>	<b>Container Closure System</b> 1. Summary of Container/Closure System (if new resin, provide data) submitted 2. Components Specification and Test Data submitted 3. Packaging Configuration and Sizes 50 mg and 100 mg vials 4. Container/Closure Testing submitted 5. Source of supply and suppliers address submitted	<input checked="" type="checkbox"/>
<b>3.2.P.8</b>	<b>3.2.P.8.1</b> <b>Stability (Finished Dosage Form)</b> 1. Stability Protocol submitted submitted 2. Expiration Dating Period 24 months <b>3.2.P.8.2</b> <b>Post-approval Stability and Conclusion</b> Post Approval Stability Protocol and Commitments submitted <b>3.2.P.8.3</b> <b>Stability Data</b> 1. 3 month accelerated stability data submitted post reconstitution stability data provided in section 3.2.P.2.6.1 2. Batch numbers on stability records the same as the test batch <b>yes</b>	<input checked="" type="checkbox"/>

**MODULE 3**  
**3.2.R Regional Information**

ACCEPTABLE

<b>3.2.R</b> <b>(Drug Substance)</b>	<b>3.2.R.1.S</b> Executed Batch Records for drug substance (if available) <b>3.2.R.2.S</b> Comparability Protocols <b>3.2.R.3.S</b> <b>Methods Validation Package</b> YES Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions) (Required for Non-USP drugs)	<input type="checkbox"/>
---	---	--------------------------

**MODULE 3****3.2.R Regional Information**

ACCEPTABLE

<b>3.2.R</b> <b>(Drug</b> <b>Product)</b>	<b>3.2.R.1.P.1</b> <b>Executed Batch Records</b> Copy of Executed Batch Record with Equipment Specified, including Packaging Records (Packaging and Labeling Procedures), Batch Reconciliation and Label Reconciliation 50 mg vials Batch #N015350R: TY (b) (4) PY (b) (4) 100 mg vials Batch #N025352R: TY (b) (4) PY (b) (4) <b>3.2.R.1.P.2</b> <b>Information on Components</b> none submitted <b>3.2.R.2.P</b> <b>Comparability Protocols</b> none submitted <b>3.2.R.3.P</b> <b>Methods Validation Package</b> submitted Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions) (Required for Non-USP drugs)	<input checked="" type="checkbox"/>
---	--	-------------------------------------

**MODULE 5****CLINICAL STUDY REPORTS**

ACCEPTABLE

<b>5.2</b>	<b>Tabular Listing of Clinical Studies</b>	<input type="checkbox"/>
<b>5.3.1</b> (complete study data)	<b>Bioavailability/Bioequivalence</b> <b>1. Formulation data same?</b> a. Comparison of all Strengths (check proportionality of multiple strengths) b. Parenterals, Ophthalmics, Otics and Topicals per 21 CFR 314.94 (a)(9)(iii)-(v) <b>2. Lot Numbers of Products used in BE Study(ies):</b> <b>3. Study Type:</b> IN-VIVO PK STUDY(IES) (Continue with the appropriate study type box below)	<input type="checkbox"/>

	<p><b>5.3.1.2</b>  <b>Comparative BA/BE Study Reports</b></p> <ol style="list-style-type: none"> <li>1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC)</li> <li>2. Summary Bioequivalence tables: <ul style="list-style-type: none"> <li>Table 6. Demographic Profile of Subjects Completing the Comparative BA Study</li> <li>Table 7. Incidence of Adverse Events in Individual Studies</li> <li>Table 8. Reanalysis of Study Samples</li> </ul> </li> </ol> <p><b>5.3.1.3</b>  <b>In Vitro-In-Vivo Correlation Study Reports</b></p> <ol style="list-style-type: none"> <li>1. Summary Bioequivalence tables: <ul style="list-style-type: none"> <li>Table 4. Summary of In Vitro Dissolution Studies</li> <li>Table 5. Formulation Data</li> </ul> </li> </ol> <p><b>5.3.1.4</b>  <b>Reports of Bioanalytical and Analytical Methods for Human Studies</b></p> <ol style="list-style-type: none"> <li>1. Summary Bioequivalence table: <ul style="list-style-type: none"> <li>Table 3. Bioanalytical Method Validation</li> </ul> </li> </ol> <p><b>5.3.7</b>  <b>Case Report Forms and Individual Patient Listing</b></p>	<input type="checkbox"/>
<b>5.4</b>	<b>Literature References</b>	
	<b>Possible Study Types:</b>	
Study Type	<p><b>IN-VIVO PK STUDY(IES)</b> (i.e., fasting/fed/sprinkle) NA</p> <ol style="list-style-type: none"> <li>1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC)</li> <li>2. EDR Email: Data Files Submitted: YES SENT TO EDR</li> <li>3. In-Vitro Dissolution: NO</li> </ol>	<input type="checkbox"/>
Study Type	<p><b>IN-VIVO BE STUDY with CLINICAL ENDPOINTS</b> NO</p> <ol style="list-style-type: none"> <li>1. Properly defined BE endpoints (eval. by Clinical Team)</li> <li>2. Summary results meet BE criteria: 90% CI of the proportional difference in success rate between test and reference must be within (-0.20, +0.20) for a binary/dichotomous endpoint. For a continuous endpoint, the test/reference ratio of the mean result must be within (0.80, 1.25).</li> <li>3. Summary results indicate superiority of active treatments (test &amp; reference) over vehicle/placebo (p&lt;0.05) (eval. by Clinical Team)</li> <li>4. EDR Email: Data Files Submitted</li> </ol>	<input type="checkbox"/>
Study Type	<p><b>IN-VITRO BE STUDY(IES)</b> (i.e., in vitro binding assays) NO</p> <ol style="list-style-type: none"> <li>1. Study(ies) meets BE criteria (90% CI of 80-125)</li> <li>2. EDR Email: Data Files Submitted:</li> <li>3. In-Vitro Dissolution:</li> </ol>	<input type="checkbox"/>

Study Type	<p><b>NASALLY ADMINISTERED DRUG PRODUCTS</b> NO</p> <p>1. <u>Solutions</u> (Q1/Q2 sameness):</p> <p>a. In-Vitro Studies (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming &amp; Repriming, Tail Off Profile)</p> <p>2. <u>Suspensions</u> (Q1/Q2 sameness):</p> <p>a. <u>In-Vivo PK Study</u></p> <p>1. Study(ies) meets BE Criteria (90% CI of 80-125, C max, AUC)</p> <p>2. EDR Email: Data Files Submitted</p> <p>b. <u>In-Vivo BE Study with Clinical End Points</u></p> <p>1. Properly defined BE endpoints (eval. by Clinical Team)</p> <p>2. Summary results meet BE criteria (90% CI within +/- 20% or 80-125)</p> <p>3. Summary results indicate superiority of active treatments (test &amp; reference) over vehicle/placebo (p&lt;0.05) (eval. by Clinical Team)</p> <p>4. EDR Email: Data Files Submitted</p> <p>c. <u>In-Vitro Studies</u> (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming &amp; Repriming, Tail Off Profile)</p>	<input type="checkbox"/>
Study Type	<p><b>TOPICAL CORTICOSTEROIDS (VASOCONSTRICTOR STUDIES)</b> NO</p> <p>1. Pilot Study (determination of ED50)</p> <p>2. Pivotal Study (study meets BE criteria 90%CI of 80-125)</p>	<input type="checkbox"/>
Study Type	<p><b>TRANSDERMAL DELIVERY SYSTEMS</b> NO</p> <p>1. <u>In-Vivo PK Study</u></p> <p>1. Study(ies) meet BE Criteria (90% CI of 80-125, C max, AUC)</p> <p>2. In-Vitro Dissolution</p> <p>3. EDR Email: Data Files Submitted</p> <p>2. <u>Adhesion Study</u></p> <p>3. <u>Skin Irritation/Sensitization Study</u></p>	<input type="checkbox"/>

Updated 10/10/2006 C. Bina



Search results from the "OB\_Disc" table for query on "021492."

---

Active Ingredient:	OXALIPLATIN
Dosage Form;Route:	INJECTABLE; IV (INFUSION)
Proprietary Name:	ELOXATIN
Applicant:	SANOFI AVENTIS US
Strength:	50MG/VIAL
Application Number:	021492
Product Number:	001
Approval Date:	Aug 9, 2002
RX/OTC/DISCN:	DISCN
Patent and Exclusivity Info for this product:	<a href="#">View</a>

---

Active Ingredient:	OXALIPLATIN
Dosage Form;Route:	INJECTABLE; IV (INFUSION)
Proprietary Name:	ELOXATIN
Applicant:	SANOFI AVENTIS US
Strength:	100MG/VIAL
Application Number:	021492
Product Number:	002
Approval Date:	Aug 9, 2002
RX/OTC/DISCN:	DISCN
Patent and Exclusivity Info for this product:	<a href="#">View</a>

---

[Return to Electronic Orange Book Home Page](#)

---

FDA/Center for Drug Evaluation and Research

Office of Generic Drugs

Division of Labeling and Program Support

Update Frequency:

Orange Book Data - **Monthly**

Generic Drug Product Information & Patent Information - **Daily**

Orange Book Data Updated Through March, 2007

Patent and Generic Drug Product Data Last Updated: April 25, 2007

Patent and Exclusivity Search Results from query on Appl No 021492 Product 001 in the OB\_Disc list.

## Patent Data

Appl No	Prod No	Patent No	Patent Expiration	Drug Substance Claim	Drug Product Claim	Patent Use Code
<a href="#">021492</a>	001	5290961	JAN 12,2013			
<a href="#">021492</a>	001	5290961*PED	JUL 12,2013			
<a href="#">021492</a>	001	5338874	APR 07,2013	Y		
<a href="#">021492</a>	001	5338874*PED	OCT 07,2013			
<a href="#">021492</a>	001	5420319	AUG 09,2016	Y		
<a href="#">021492</a>	001	5420319*PED	FEB 09,2017			

## Exclusivity Data

Appl No	Prod No	Exclusivity Code	Exclusivity Expiration
<a href="#">021492</a>	001	<a href="#">PED</a>	JUL 09,2007
<a href="#">021492</a>	001	<a href="#">I-441</a>	NOV 04,2007
<a href="#">021492</a>	001	<a href="#">I-425</a>	JAN 09,2007
<a href="#">021492</a>	001	<a href="#">PED</a>	MAY 04,2008
<a href="#">021492</a>	001	<a href="#">PED</a>	JUL 10,2010
<a href="#">021492</a>	001	<a href="#">M-61</a>	JAN 10,2010
<a href="#">021492</a>	001	<a href="#">NCE</a>	AUG 09,2007
<a href="#">021492</a>	001	<a href="#">PED</a>	FEB 09,2008

Patent and Exclusivity Search Results from query on Appl No 021492 Product 002 in the OB\_Disc list.

## Patent Data

Appl No	Prod No	Patent No	Patent Expiration	Drug Substance Claim	Drug Product Claim	Patent Use Code
<a href="#">021492</a>	002	5290961	JAN 12,2013			
<a href="#">021492</a>	002	5290961*PED	JUL 12,2013			
<a href="#">021492</a>	002	5338874	APR 07,2013	Y		
<a href="#">021492</a>	002	5338874*PED	OCT 07,2013			
<a href="#">021492</a>	002	5420319	AUG 09,2016	Y		
<a href="#">021492</a>	002	5420319*PED	FEB 09,2017			

## Exclusivity Data

Appl No	Prod No	Exclusivity Code	Exclusivity Expiration
<a href="#">021492</a>	002	<a href="#">PED</a>	JUL 09,2007
<a href="#">021492</a>	002	<a href="#">PED</a>	MAY 04,2008
<a href="#">021492</a>	002	<a href="#">I-425</a>	JAN 09,2007
<a href="#">021492</a>	002	<a href="#">PED</a>	FEB 09,2008
<a href="#">021492</a>	002	<a href="#">PED</a>	JUL 10,2010
<a href="#">021492</a>	002	<a href="#">I-441</a>	NOV 04,2007
<a href="#">021492</a>	002	<a href="#">NCE</a>	AUG 09,2007
<a href="#">021492</a>	002	<a href="#">M-61</a>	JAN 10,2010

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

/s/

-----  
Martin Shimer

5/21/2007 10:58:40 AM

Drug Development Consultants, Inc.

5108 Grimm Drive  
Alexandria, Virginia 22304  
T/F: (703) 566-9181/9182  
e-mail: ddci.rf@comcast.net

VIA COURIER

ORIGINAL

7 August 2007

Mr. Gary Buehler, Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park Two (MPN-2)  
7500 Standish Place  
Rockville, MD 20855

78815

W/mc

**Attention: Document Room**

**Re: Abbreviated New Drug Applications 78-813 and 78-815  
Amendments to Pending Applications; Notice of Filing of Legal Action**

Dear Sir:

In accordance with 21 C.F.R. § 314.95(e), Mayne Pharma Limited requests amendment of each of its Abbreviated New Drug Applications ("ANDAs") 78-813 and 78-815 to document receipt of the respective notice of certification required under § 314.95(a) by each person to whom the notice was provided.

Enclosed herewith are copies of the return receipt postcards evidencing the fact that the each of the approved NDA holder and the patent owner, as defined in § 314.95(a), properly received the notice of certification for each of ANDAs 78-813 and 78-815 between June 11-13, 2007. Also enclosed herewith are respective Forms FDA 356h, clarifying that these materials are being submitted as Amendments to Pending Applications.

In accordance with 21 C.F.R. § 314.107(f), Mayne Pharma Limited is also providing notice to FDA of the filing of a lawsuit by Sanofi-Aventis, Sanofi-Aventis U.S. LLC (the NDA holder), and Debiopharm, S.A. (the patent owner) against Mayne Pharma Limited on July 23, 2007 (Case No. 3:07-cv-03409, District of New Jersey) relating to both of the ANDAs 78-813 and 78-815. Enclosed herewith is a copy of the docket sheet for the above-referenced lawsuit.

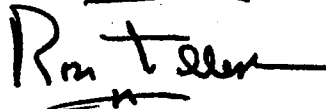
RECEIVED

AUG 08 2007

OGD

As Mayne's Authorized US agent, should you have any questions concerning this submission, please contact me directly at 1-703-566-9181.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Filler", with a horizontal line drawn underneath the name.

Ron Filler, Ph.D.

Authorized US Agent for Mayne Pharma Limited  
Drug Development Consultants, Inc.

Tel: (703) 566-9181

Fax: (703) 566-9182

Enclosures



14<sup>th</sup> August, 2007

N/me

Mr. Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park Four  
7500 Standish Place  
Rockville, MD 20855

**Re: Abbreviated New Drug Application 78-815**

Dear Sir:

Hospira Australia Pty Ltd authorizes Drug Development Consultants, Inc. to act as United States Agent for the purposes of this application including, but not limited to, signing agency correspondence and patent certifications and related documents.

Contact information for this Agent is below:

Ron Filler, Ph.D.  
Drug Development Consultants, Inc.  
5108 Grimm Drive  
Alexandria, VA 22304  
Phone: 703-566-9181  
Fax: 703-566-9182  
Email: ddcirf@comcast.net

**RECEIVED**

**AUG 28 2007**

**OGD**

Sincerely,

A handwritten signature in cursive script, appearing to read "G. Storton".

Geraldine Storton  
Regional Director of Regulatory Affairs, APAC  
Hospira Australia Pty Ltd

Hospira Australia Pty Ltd  
ABN 58 097 064 330  
551 Blackburn Road  
Mt Waverley Victoria 3149  
P O Box 394 Mulgrave North  
Victoria 3170 Australia  
Telephone +61 3 8541 5200  
Facsimile +61 3 8541 5790  
www.maynepharm.com

## MINOR AMENDMENT

ANDA 78-815

OFFICE OF GENERIC DRUGS, CDER, FDA  
Document Control Room, Metro Park North II  
7500 Standish Place, Room 150  
Rockville, MD 20855-2773 (301-594-0320)



APPLICANT: Drug Development Consultants, Inc.  
U. S. Agent for Mayne Pharma Limited

TEL: 703-566-9181

ATTN: Ron Filler

FAX: 703-566-9182

FROM: Esther Chuh

PROJECT MANAGER: (301) 827-5773

Dear Sir:

This facsimile is in reference to your abbreviated new drug application dated February 9, 2007, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial.

The application is deficient and, therefore, Not Approvable under Section 505 of the Act for the reasons provided in the attachments (3 pages). This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all of the deficiencies listed. Facsimiles or partial replies will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this facsimile will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. The designation as a MINOR AMENDMENT should appear prominently in your cover letter. You have been/will be notified in a separate communication from our Division of Bioequivalence of any deficiencies identified during our review of your bioequivalence data. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

### SPECIAL INSTRUCTIONS:

**THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.**

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.



### 36. CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 78-815

APPLICANT: Mayne Pharma Limited

DRUG PRODUCT: Oxaliplatin Lyophilized Powder for Injection, 50 mg and 100 mg per vial

The deficiencies presented below represent MINOR deficiencies.

A. Deficiencies:

1. The DMF (b) (4) is deficient and the DMF holder has been notified. Please ensure a response.
2. Please express the (b) (4).
3. Please include (b) (4).
4. Please include (b) (4).
5. We acknowledge that you use (b) (4).
6. As part of the in-process control, please include (b) (4).
7. Please include (b) (4).
8. You have proposed (b) (4).
9. Please revise (b) (4).
10. We acknowledge that you use (b) (4).

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

1. Your labeling and microbiological information are pending review. Deficiencies, if any will be communicated separately.
2. An acceptable compliance evaluation is needed for approval. We have requested an evaluation from the Office of Compliance.

3. There appears to be a typographical error in reporting the (b) (4) on Table 4.6.1 (p. 12 of 29). It should have been (b) (4) instead of (b) (4). Please confirm.
4. You have reported the Maximum Daily Dose (MDD) of the drug product as 234 mg ( $= 130 \text{ mg/m}^2 \times 1.8 \text{ m}^2$ ). Please note that MDD should have been reported as 147 mg ( $= 85 \text{ mg/m}^2 \times 1.73 \text{ m}^2$ ).

OGD is changing its CMC review process through our question based review (QbR) initiative, which is described in more detail on the OGD website: <http://www.fda.gov/cder/ogd/QbR.htm>.

OGD's QbR was designed with the expectation that ANDA applications would be organized according to the Common Technical Document (CTD), a submission format adopted by multiple regulatory bodies including the FDA. Generic firms are strongly recommended to submit their ANDAs in the CTD format (either eCTD or paper) to facilitate the implementation of the QbR and to avoid undue delays in the review of their applications.

Because of the increasing number of ANDA submissions OGD receives each year, the Quality Overall Summary (QOS) part of the CTD format is extremely important to making our new review process more efficient. Beginning in January 2007, all ANDA applicants are recommended to provide an electronic copy of a QOS that addresses OGD's QbR questions. The QbR-Quality Overall Summary Outline posted on our webpage <http://www.fda.gov/cder/ogd/> contains all the questions to prepare the QOS. The QOS should be submitted in both MS Word and pdf format along with the paper or electronic submission. The QOS should be provided even if the remainder of the application is not in CTD format. OGD has prepared QOS models that can be found on the OGD web site. We ask you to use these as a guide for your submissions.

If you are already submitting QbR-based applications, we would like to take this opportunity to thank you for supporting this very important initiative.

Sincerely yours,

*{See appended electronic signature page}*

Rashmikant M. Patel, Ph.D.  
Director  
Division of Chemistry I  
Office of Generic Drugs  
Center for Drug Evaluation and Research

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

/s/

-----  
Michael Smela  
8/22/2007 04:03:37 PM  
For Rashmikanth M. Patel, Ph.D.

**VIA COURIER**

23 August 2007

N/KA

Attn Mr. Gary Buehler, Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II  
Document Control Room  
7500 Standish Place  
Rockville, MD 20855

**Re: Abbreviated New Drug Application 78-815, Oxaliplatin for Injection**

**NOTICE OF COMPANY NAME CHANGE**

Dear Sir:

Mayne Pharma Limited is hereby forwarding to its Abbreviated New Drug Application ("ANDA") 78-815, notification of a change to company name. Effective as of August 7<sup>th</sup>, 2007, the company name, Mayne Pharma Limited, was changed to Hospira Australia Pty Ltd. The name change affects both the name of the applicant as well as the manufacturing site. All other relevant company details, including site addresses and other contact information, remain the same.

Enclosed herewith is a revised Form FDA 356h reflecting the updated company name. Changes to proposed product labeling to reflect the Hospira brand, will be effected during the review cycle of the application through deficiency responses.

There is no change to the company's US Agent, however an updated Letter of Authorization reflecting that Drug Development Consultants, Inc will continue to act on behalf of Hospira Australia Pty Ltd, is also provided.

**RECEIVED**

AUG 28 2007

**OGD**

As Hospira's Authorized US agent, should you have any questions concerning this submission, please contact me directly at 1-703-566-9181.

Sincerely,

A handwritten signature in black ink that reads "Ron Filler". The signature is written in a cursive, flowing style.

Ron Filler, Ph.D.

Authorized US Agent for Hospira Australia Pty Ltd  
Drug Development Consultants, Inc.

Tel: (703) 566-9181

Fax: (703) 566-9182

e-mail: [ddci.rf@comcast.net](mailto:ddci.rf@comcast.net)

**Enclosures**

## Record of Telephone Conversation

<p>Reference is made to the Chemistry Deficiency sent out to the firm on 8/22/2007. The firm requested for clarification on #3 of the deficiency:</p> <p><b>FDA Deficiency:</b> Please include (b) (4)</p> <p><b>Firm's Question:</b> Is agency interested in (b) (4)?</p> <p><b>Agency's Answer:</b> We are interested in (b) (4)</p>	<p style="text-align: center;"><b>Date:</b> 9/13/2007</p> <hr/> <p style="text-align: center;"><b>ANDA Number</b> <b>78-813</b> <b>78-815</b></p> <hr/> <p style="text-align: center;"><b>Product Name:</b> Oxaliplatin Injection, 5 mg/mL, 10 mL and 20 mL vials Oxaliplatin Lyophilized Powder for Injection, 50 mg and 100 mg per vial</p> <hr/> <p style="text-align: center;"><b>Firm Name:</b> Mayne Pharma Limited</p> <hr/> <p style="text-align: center;"><b>Firm Representative:</b> Ron Filler</p> <hr/> <p style="text-align: center;"><b>Phone Number:</b> 703-566-9182</p> <hr/> <p style="text-align: center;"><b>FDA Representative:</b> Mike Smela Esther Chuh</p> <hr/> <p style="text-align: center;"><b>Signatures:</b></p> <p style="text-align: center;"><b>Mike Smela</b></p> <p style="text-align: center;"><b>Esther Chuh</b></p>
--	--

CC: DFS ANDA 77813, 77815  
Chem Division I, T-Con Notebook

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

/s/

-----  
Esther Chuh  
9/14/2007 02:24:59 PM  
CSO

Michael Smela  
9/14/2007 02:34:24 PM  
CHEMIST

**VIA COURIER**

November 26, 2007

Mr. Gary Buehler, Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
7500 Standish Place  
Metro Park North II  
Rockville, MD 20855

**ORIG AMENDMENT**

N/A

*Citation to new DMF and  
batch data. Convert to  
MAJOR amendment  
H Smeler  
12/10/07*

**Re: ANDA 78-815 Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial**

**MINOR AMENDMENT - RESPONSE TO CHEMISTRY DEFICIENCIES  
GRATUITOUS AMENDMENT - ADDITION OF AN ALTERNATE DRUG  
SUBSTANCE MANUFACTURING PROCESS**

Dear Mr. Buehler:

Hospira Australia Pty Ltd. hereby amends the above-referenced abbreviated new drug application Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial, ANDA 78-815, submitted on February 9, 2007. We are responding to the Agency's chemistry deficiencies letter dated August 22, 2007. This amendment serves as the response to the chemistry deficiencies. Provided in Exhibit 1 are the Agency's comments with Hospira's responses.

Additionally, in accordance with 21 C.F.R. § 314.96, Hospira Australia Pty Ltd. hereby requests amendment of its ANDA 78-815 to add an alternate manufacturing process for oxaliplatin drug substance. This gratuitous amendment is provided in Exhibit 2.

Exhibit 2 includes information and data regarding the drug substance oxaliplatin, manufactured using an alternative process. The drug substance manufacturer, (b) (4) remains the same, and the difference in process from that originally submitted is minor. The alternate process drug substance (b) (4) is supported by a separate Drug Master File (DMF) # (b) (4).

One batch each of the 50 mg/vial and 100 mg/vial presentations has been manufactured using the (b) (4) drug substance, and batch analysis data and batch records are provided to support this gratuitous amendment. Given that the change to the drug substance manufacturing process is minor, and that the physicochemical properties, including that the impurity profile of the drug substance is identical to the original process, no drug product stability data has been provided. The drug product batch analysis data

**RECEIVED**

NOV 26 2007

**OGD**



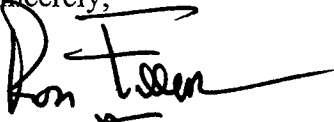
demonstrates that the alternate process produces an equivalent drug product. Since the drug substance stability is inherent, it is considered that batch analysis is sufficient to demonstrate that the change to drug substance will have no impact on the quality, safety or efficacy of the resultant drug product. The company commits to placing one (1) batch per presentation on stability and providing the stability data. Refer to Table 1 of Exhibit 2 for a tabulated summary of information provided supporting this gratuitous amendment.

Please note that the company name was changed from Mayne Pharma Limited to Hospira Australia Pty Ltd. The change was effective from August 7, 2007. Consequently, some documentation supporting this amendment reflects the previous company name. In these instances, references to Mayne Pharma Limited should be considered as Hospira Australia Pty Ltd. Section 3.2.P.3.1 has been revised and included in Exhibit 2.

Hospira Australia Pty Ltd. is providing an Archive and Review Copy of this submission to the Office of Generic Drugs. A Field Copy is also being submitted to the Office of Generic Drugs. Hospira Australia Pty Ltd. certifies that the Field Copy is a true copy of the information contained in the Review and Archive Copies.

As Hospira Australia's Authorized US Agent, should you have any questions concerning this submission, please contact me directly at 1-703-566-9181.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Filler", with a stylized flourish extending from the end.

Ron Filler, Ph.D.

Authorized US Agent for Hospira Australia Pty Ltd.  
Drug Development Consultants, Inc.

Tel: (703) 566-9181

Fax: (703) 566-9182

Enclosures



December 24, 2007

Mr. Gary Buehler, Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
7500 Standish Place, Room 150  
Central Document Room  
Rockville, MD 20855

A handwritten signature in black ink, appearing to be "N/A" or similar, with a large "R" or "E" written over it.

**RE:    ANDA 78-815            Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial**

**Gratuitous Amendment**

Dear Mr. Buehler:

A gratuitous amendment is being submitted to this ANDA application to change its US Agent from Drug Development Consultants, Inc. to Hospira, Inc.

Hospira Australia Pty. Ltd. hereby authorizes Hospira, Inc to act as its United States Agent for the purposes of this application including, but not limited to, signing agency correspondence and patent certifications and related documents.

Contact information for this Agent is below:

Judith Zutkis  
Director, Global Regulatory Affairs  
Hospira, Inc.  
275 North field Drive  
Lake Forest, IL 60045  
Tel:    (224) 212-4949  
Fax:    (224) 212-5401  
Email: judith.zutkis@hospira.com

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60064

**RECEIVED**

DEC 31 2007

**OGD**



Sincerely,

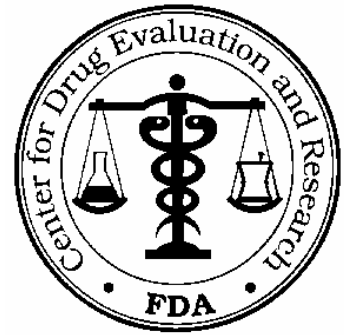
A handwritten signature in black ink, appearing to read "G. Storton".

**Geraldine Storton**  
Regional Director, Regulatory Affairs  
Asia Pacific,  
Hospira Australia Pty. Ltd.

# Telephone Fax

ANDA 78-815

OFFICE OF GENERIC DRUGS, CDER, FDA  
Document Control Room, Metro Park North I  
7520 Standish Place  
Rockville, MD 20855-2773  
**301-827-5846**



TO: Mayne Pharma

TEL: 201-225-5514

ATTN: Steve Richardson

FAX: 201-225-5530

FROM: Mrs. Angela Payne

This facsimile is in reference to your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Oxaliplatin for Injection.

**Pages (including cover):** 3

## **SPECIAL INSTRUCTIONS:**

*See attached labeling comments.*

**THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.**

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

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

ANDA Number: 78-815

Date of Submission: 09 FEB 2007 (Original)

Applicant's Name: Mayne Pharma

Established Name: Oxaliplatin for Injection 50 mg and 100 mg per vial- PF-SDV, Lyophilized

Labeling Deficiencies: Firm submitted e-draft.

**1. CONTAINER**

- a. We encourage you to add "cytotoxic agent" to your labels.
- b. List the in actives under an "inactive" category.

We are aware that the innovator uses tall man lettering as part of the established name. However, upon further review this product should not display tall man lettering. We acknowledge you have revised without regard for tall man lettering and have displayed "Oxaliplatin" rather than "OXALIplatin" and we find that acceptable.

**2. CARTON** -See comments under CONTAINER.

**3. INSERT** - Minor correction in the Highlighted section, second paragraph - revise "..... powder for solution for intravenous...".

**4. PATIENT INFORMATION SHEET** - Satisfactory in draft.

Revise your labels and labeling, as instructed above, and submit final printed or draft electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – ANDA.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling 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 and the latest approved labeling for the reference listed drug (or your last submission) with all differences annotated and explained.

*{See appended electronic signature page}*

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

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

/s/

-----  
John Grace  
3/16/2008 04:58:54 PM  
for Wm Peter Rickman

## MINOR AMENDMENT

ANDA 78-815

OFFICE OF GENERIC DRUGS, CDER, FDA  
Document Control Room, Metro Park North II  
7500 Standish Place, Room 150  
Rockville, MD 20855-2773 (301-594-0320)



APPLICANT: Hospira, Inc.

TEL: 224-212-4949

ATTN: Zudith Zutkis, Director, Regulatory Affairs

FAX: 224-212-5401

FROM: Esther Chuh

PROJECT MANAGER: (240)276-8530

Dear Sir:

This facsimile is in reference to your abbreviated new drug application dated February 9, 2007, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial.

Reference is made to your amendment dated November 26, 2007.

The application is deficient and, therefore, Not Approvable under Section 505 of the Act for the reasons provided in the attachments (3 pages). This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all of the deficiencies listed. Facsimiles or partial replies will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this facsimile will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. The designation as a MINOR AMENDMENT should appear prominently in your cover letter. You have been/will be notified in a separate communication from our Division of Bioequivalence of any deficiencies identified during our review of your bioequivalence data. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

### SPECIAL INSTRUCTIONS:

**THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.**

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

### 36. CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 78-815

APPLICANT: Hospira Australia Pty Ltd.

DRUG PRODUCT: Oxaliplatin Lyophilized Powder for Injection, 50 mg and 100 mg per vial

The deficiencies presented below represent MINOR deficiencies.

A. Deficiencies:

1. The DMF (b) (4) is deficient and the DMF holder has been notified. Please ensure a response.
2. Your proposed (b) (4)
3. You proposed not to (b) (4)
4. The limit for the Uniformity of content test in the release specifications should be stated as "Complies with USP <905>".

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

1. Your labeling information has been reviewed and deficiencies have been communicated to you. Please respond to the deficiencies.
2. Your microbiological information is pending review. Deficiencies, if any, will be communicated separately.

OGD is changing its CMC review process through our question based review (QbR) initiative, which is described in more detail on the OGD website: <http://www.fda.gov/cder/ogd/QbR.htm>.

OGD's QbR was designed with the expectation that ANDA applications would be organized according to the Common Technical Document (CTD), a submission format adopted by multiple regulatory bodies including the FDA. Generic firms are strongly recommended to submit their ANDAs in the CTD format (either eCTD or paper) to facilitate the implementation of the QbR and to avoid undue delays in the review of their applications.

Because of the increasing number of ANDA submissions OGD receives each year, the Quality Overall Summary (QOS) part of the CTD format is extremely important to making our new review process more efficient. Beginning in January 2007, all ANDA applicants are recommended to provide an electronic copy of a QOS that addresses OGD's QbR questions. The QbR-Quality Overall Summary Outline posted on our webpage <http://www.fda.gov/cder/ogd/> contains all the questions to prepare the QOS. The QOS should be submitted in both MS Word and pdf format along with the paper or electronic submission. The QOS should be provided even if the remainder of the application is not in CTD format. OGD has prepared QOS models that can be found on the OGD web site. We ask you to use these as a guide for your submissions.



If you are already submitting QbR-based applications, we would like to take this opportunity to thank you for supporting this very important initiative.

Sincerely yours,

*{See appended electronic signature page}*

Rashmikanth M. Patel, Ph.D.  
Director  
Division of Chemistry I  
Office of Generic Drugs  
Center for Drug Evaluation and Research

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

/s/

-----  
Michael Smela  
5/20/2008 03:09:18 PM  
For Rashmikanth M. Patel, Ph.D.



August 1, 2008

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II, Room 150  
Document Room  
7500 Standish Place  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial**

**MINOR AMENDMENT – RESPONSE TO CHEMISTRY DEFICIENCIES**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a chemistry amendment to the above-referenced abbreviated new drug application in response to the Agency's comments in the correspondence received on May 20, 2008.

The Agency's comments and Hospira's responses to these comments in MS Word compatible format are contained in the CD attached. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

A handwritten signature in cursive script, appearing to read "Laurie Wojtko".

Laurie Wojtko

Sr. Associate, Global Regulatory Affairs

Hospira, Inc.

Phone: (224) 212-6158

Fax: (224) 212-5401

E-mail: [Laurie.Wojtko@secure.hospira.com](mailto:Laurie.Wojtko@secure.hospira.com)

## RECORD OF TELEPHONE CONVERSATION

<b>FDA:</b>  The firm was told the following: <ul style="list-style-type: none"> <li>➤ The drug product release specification should be revised to include "Residual Solvents" with the acceptance criteria as "Complies with USP &lt;467&gt;".</li> <li>➤ The vendor's statement regarding the solvents used in the manufacture of Lactose monohydrate need to be revised and add test to your acceptance criteria if any are used.</li> <li>➤ Commitment needed from the applicant to re-evaluate &lt;467&gt; if they change suppliers of excipients.</li> </ul>	<b>Date:</b> August 29, 2008
	<b>ANDA NUMBER:</b> 78-815
	<b>PRODUCT NAME:</b> Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial
	<b>INITIATED BY:</b>  <b>FIRM</b> __ <b>FDA</b> <u>X</u>
	<b>FIRM NAME:</b> Hospira Worldwide, Inc.
	<b>FIRM REPRESENTATIVE:</b> Laurie Wojtko
	<b>TELEPHONE NUMBER:</b> 224-212-6158
	<b>FDA REPRESENTATIVE:</b> Bitia Mirzai-Azarm (Chem Reviewer)
End of the T-CON.	<b>SIGNATURE</b>          

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

/s/

-----  
Bita Mirzai-Azarm  
8/29/2008 11:14:34 AM  
CHEMIST



September 4, 2008

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II, Room 150  
Document Room  
7500 Standish Place  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial**

**GRATUITOUS AMENDMENT – COMPLIANCE WITH USP <467> RESIDUAL  
SOLVENTS**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a gratuitous chemistry amendment to the above-referenced abbreviated new drug application in order to comply with the General Chapter of the USP for Residual Solvents <467> that took effect on July 1, 2008. Hospira commits to re-evaluate the drug substance and excipients for residual solvents as a result of any future supplier change.

The amendment in MS Word compatible format is contained in the CD attached. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

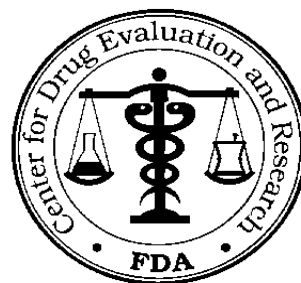
*Laurie Wojtko 9-4-08*

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@secure.hospira.com](mailto:Laurie.Wojtko@secure.hospira.com)



**FAX – Microbiology Deficiencies Enclosed**

Office of Generic Drugs, CDER, FDA  
Document Control Room, Metro Park North II  
7500 Standish Place, Room 150  
Rockville MD 20855-2773 (240-276-8408)



<b>TO:</b> Ron Filler	<b>FROM:</b> Kun Shen
Hospira Australia Pty Ltd	Microbiology Project Manager
<b>PHONE:</b> 703-566-9181	<b>PHONE:</b> (240) 276-8722
<b>FAX:</b> 703-566-9182	<b>FAX:</b> (240) 276-8725

Total number of pages, excluding this cover sheet: 4

**SPECIAL INSTRUCTIONS:**

**Please submit your response in electronic format.**

**This will improve document availability to review staff.**

**Microbiology Deficiencies:**

Enclosed are the microbiology deficiencies for ANDA 78-815, Oxaliplatin for Injection. The submission reviewed was submitted on February 9, 2007. Please respond to this communication as quickly as possible. This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed. Your amendment should respond to all of the deficiencies listed. Facsimiles or partial replies will not be considered for review. The response to this communication will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. The designation as a MINOR AMENDMENT-RESPONSE TO MICROBIOLOGY DEFICIENCIES should appear prominently in your cover letter.

Should you also have other outstanding deficiencies, for review purposes, please attempt to consolidate your responses into a single submission for this application.

If you have questions, feel free to call Kun Shen, Bonnie McNeal or Mark Anderson.

**THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.** If you are not the addressee, or person authorized to deliver the document to the addressee, you are hereby notified that any review, disclosure, dissemination, copying, or other action based on the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us at the above address by mail. Thank you.

## LIST OF MICROBIOLOGY DEFICIENCIES AND COMMENTS:

ANDA: 78-815      APPLICANT: Hospira Australia Pty Ltd

DRUG PRODUCT: Oxaliplatin for Injection

Microbiology Deficiencies:

1. With regard to buildings and facilities:
  - a. Please provide floor plans for the manufacturing area(s) used for the manufacture of the subject drug product.
  - b. Please provide the location (e.g. room number) of the lyophilizer(s) used in the manufacture of the subject drug product.
2. With regard to microbiological environmental monitoring:
  - a. We note that (b) (4)  
.
  - b. Please provide (b) (4)  
.
3. The application in 3.2.P.3.3 on Page 16 of 38 states that (b) (4)  
.
4. With regard to the validation studies performed for the depyrogenation of closures using (b) (4):
  - a. Please provide the dates of study and the amount o (b) (4)  
.
  - b. Please describe (b) (4)  
.
  - c. Please indicate (b) (4)  
.

5. With regard to equipment sterilization in (b) (4)
6. The manufacturing process includes (b) (4)
7. With regard to lyophilizer(s):
- a. (b) (4)
- b. (b) (4)
- c. (b) (4)
8. With regard to media fills:
- a. Please provide (b) (4)
- b. Please explain (b) (4)
- c. We note that for the media fill performed on Filling Line (b) (4) on 19 DEC 05 the fill volume is stated as (b) (4) in ANDA 78-815 and (b) (4) in ANDA 78-

813. Presumably, there is a typographical error. Please specify the correct fill volume.

9. With regard to the exhibit batches, we would like to verify that the parameters used for sterilization processes were supported by the validation studies. We note that the batch records cite only SOP numbers and do not provide the information we seek. This is acceptable; however, please provide either the relevant SOPs so we can verify the parameters used for the sterilization processes or else please provide a list of cycle parameters used in the exhibit batches (i.e. depyrogenation of vials, sterilization of closures, product sterilizing filters, receiving vessel, and filling equipment) and compare these to the cycle parameters used for the validation studies and to the cycle parameters proposed for commercial batches.

Please clearly identify your amendment to this facsimile as “RESPONSE TO MICROBIOLOGY DEFICIENCIES”. The “RESPONSE TO MICROBIOLOGY DEFICIENCIES” should also be noted in your cover page/letter.

Sincerely yours,

*{See appended electronic signature page}*

Brenda Pillari, Ph.D.  
Microbiology Team Leader  
Office of Generic Drugs  
Center for Drug Evaluation and Research

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

/s/

-----  
Brenda Pillari  
10/23/2008 10:59:33 AM



November 3, 2008

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II, Room 150  
Document Room  
7500 Standish Place  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial**

**MINOR AMENDMENT – RESPONSE TO LABELING DEFICIENCIES**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a labeling amendment to the above-referenced abbreviated new drug application in response to the Agency's comments in the correspondence dated on March 24, 2008. The Agency's comments and Hospira's responses to these comments in MS Word compatible format are contained in the CD attached.

The CD also contains electronic content of labeling as FPL, and the side-by-side comparisons of the revised package insert to the approved innovator's labeling components, and container and carton labeling components to the previously submitted labeling components. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

A handwritten signature in black ink, appearing to read "Laurie Wojtko", is written over the printed name.

Laurie Wojtko

Sr. Associate, Global Regulatory Affairs

Hospira, Inc.

Phone: (224) 212-6158

Fax: (224) 212-5401

E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)



November 14, 2008

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research (CDER)  
Food and Drug Administration  
Central Document Room (CDR)  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

<p><b>Electronic Hybrid Submission</b></p> <p><b>Microbiology/Sterility Assurance Documentation Enclosed</b></p>
--

**Re: Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial  
ANDA 78-815**

**MINOR AMENDMENT--RESPONSE TO MICROBIOLOGY DEFICIENCIES**

Dear Mr. Buehler:

Hospira, Inc. hereby amends the above-referenced abbreviated new drug application for Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial, ANDA 78-815. We are responding to the Agency's microbiology deficiencies sent on October 28, 2008. This amendment serves as the response to the microbiology deficiencies. Attached are the Agency's comments with Hospira's responses.

On February 2, 2007 Hospira, Inc. acquired Mayne Pharma Limited. This original ANDA applies to Hospira, Inc. In those instances herein where there is a reference to Mayne Pharma (USA), Inc. or Mayne Pharma Limited, this should be considered as applying to Hospira, Inc.

The Agency's comments and Hospira's responses to these comments in MS Word compatible format are contained on the CD attached. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format—Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,  
HOSPIRA, INC.



Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [laurie.wojtko@hospira.com](mailto:laurie.wojtko@hospira.com)



November 19, 2008

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II, Room 150  
Document Room  
7500 Standish Place  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial**

**GRATUITOUS LABELING AMENDMENT**

Dear Mr. Buehler,

Hospira, Inc. hereby re-submits a labeling amendment to the above-referenced abbreviated new drug application in response to the request from the labeling reviewer, Ms. Angela Payne on November 18, 2008. According to Ms. Payne, the labeling files previously sent on November 3, 2008 could not be opened and used as required. Therefore, another copy of the labeling amendment with all associated files related to the deficiency response is provided.

The CD also contains electronic content of labeling as FPL, and the side-by-side comparisons of the revised package insert to the approved innovator's labeling components, and container and carton labeling components to the previously submitted labeling components. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

A handwritten signature in black ink, appearing to read "Laurie Wojtko", written over the printed name.

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)

## RECORD OF TELEPHONE CONVERSATION

<p><b>FDA:</b></p> <p>The applicant was asked to provide a commitment that their DS specs will be revised based on the Pharmacopeial Forum (PF) 34(4) In-Process Revision for Oxaliplatin. In addition, to contact the DMF holder.</p>       <p>End of the T-CON.</p>	<p><b>Date:</b> 02-FEB-2009</p>
	<p><b>ANDA NUMBER:</b> 78-815</p>
	<p><b>PRODUCT NAME:</b> Oxaliplatin Lyophilized Powder for Injection, 50 mg/vial and 100 mg/vial</p>
	<p><b>INITIATED BY:</b></p> <p><b>FIRM</b> __ <b>FDA</b> <u>X</u></p>
	<p><b>FIRM NAME:</b> Hospira Worldwide, Inc.</p>
	<p><b>FIRM REPRESENTATIVE:</b> Laurie Wojtko</p>
	<p><b>TELEPHONE NUMBER:</b> 224-212-6158</p>
	<p><b>FDA REPRESENTATIVE:</b> Bita Mirzai-Azarm (Acting TL)</p>
<p><b>SIGNATURE</b></p>	

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

/s/

-----  
Bita Mirzai-Azarm  
2/2/2009 10:36:16 AM  
CHEMIST



FEB 03 2009

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
7500 Standish Place  
Metro Park North II  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial**

**TELEPHONE AMENDMENT - LABELING**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a labeling amendment to the above-referenced abbreviated new drug application in response to the request from the labeling reviewer, Ms. Angela Payne on January 14, 2008. According to Ms. Payne, the product insert amended on November 3, 2008 contained three figures that were not well resolved. Therefore, the product insert labeling files, including pdf, word, and SPL, have been updated to address the resolution issue and resubmitted herein.

This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

A handwritten signature in cursive script that reads "Laurie Wojtko" followed by the date "2-3-09".

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)



February 5, 2009

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
7500 Standish Place  
Metro Park North II  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/Vial, 100 mg/Vial**

**TELEPHONE AMENDMENT - CHEMISTRY**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a telephone amendment to the above-referenced abbreviated new drug application in response to a request from the chemistry reviewer, Ms. Bita Mirzai-Azam on January 30, 2009. Ms. Mirzai-Azam has requested that a commitment be provided as it relates to the pending drug substance monograph for Oxaliplatin in the Pharmacopeial Forum 34 (4). A commitment has been provided herein.

This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045





We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

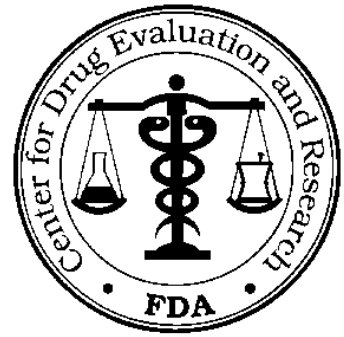
*Laurie Wojtko 2-5-09*

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)

# Telephone Fax

ANDA 78-815

OFFICE OF GENERIC DRUGS, CDER, FDA  
Document Control Room, Metro Park North I  
7520 Standish Place  
Rockville, MD 20855-2773  
**301-827-5846**



TO: Mayne Pharma

TEL: 201-225-5514

ATTN: Steve Richardson

FAX: 201-225-5530

FROM: Mrs. Angela Payne

This facsimile is in reference to your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Oxaliplatin for Injection.

**Pages (including cover):** 3

## **SPECIAL INSTRUCTIONS:**

*See attached labeling comments.*

**THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.**

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

**REVIEW OF PROFESSIONAL LABELING #2  
DIVISION OF LABELING AND PROGRAM SUPPORT  
LABELING REVIEW BRANCH**

---

ANDA Number: 78-815

Date of Submission: 03 NOV 2008 and 19 NOV 2008

Applicant's Name: Mayne Pharma

Established Name: Oxaliplatin for Injection 50 mg and 100 mg per vial- PF-SDV, Lyophilized

---

Labeling Deficiencies:

1. **CONTAINER** - Satisfactory.
2. **CARTON** - Satisfactory.
3. **INSERT** - Please increase the resolution of the text to improve upon the tables and graphs as expressed in my recent telephone communication with you. Please resubmit.
4. **PATIENT INFORMATION SHEET** - Satisfactory in draft.

Revise your labels and labeling, as instructed above, and submit final printed or draft electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – ANDA.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling 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 and the latest approved labeling for the reference listed drug (or your last submission) with all differences annotated and explained.

*{See appended electronic signature page}*

---

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

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

/s/

-----  
John Grace  
2/6/2009 12:22:56 PM  
for Wm Peter Rickman



APR 29 2009

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North II, Room 150  
Document Room  
7500 Standish Place  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin Injection, 50 mg/Vial, 100 mg/Vial**

**GRATUITOUS AMENDMENT – LABELING**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a labeling amendment to the above-referenced abbreviated new drug application in response to a labeling revision by the reference listed drug Sanofi-Aventis' Eloxatin which was approved on March 13, 2009.

The CD also contains electronic content of labeling as FPL, and the side-by-side comparisons of the revised package insert to the approved innovator's labeling components. This amendment is submitted as an electronic hybrid which does not contain an XML backbone. The CTD sections are bookmarked and hyperlinked. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.0 virus scanning software.

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

*Laurie Wojtko 4-28-09*

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)



MAY 22 2009

Mr. Mark Moyer  
Vice President, U.S. Deputy Head, Regulatory Development  
Sanofi-Aventis US LLC, a subsidiary of Sanofi-Aventis  
9 Great Valley Parkway  
Malvern, PA 19355-1304

Re: Docket No. FDA-2006-P-0025

Dear Mr. Moyer:

This letter responds to your petition dated December 19, 2006 (Petition), and supplements to that petition dated April 23, 2007 (First Supplement) and April 28, 2009 (Second Supplement).<sup>1</sup> You request that the Food and Drug Administration (FDA) give special consideration for any abbreviated new drug application (ANDA) referencing Eloxatin (oxaliplatin injection) containing added acid (other than oxalic acid), or conjugate base thereof, or containing an added sugar or sugars (e.g., lactose). You also request that FDA require such an application to demonstrate through sufficient preclinical and/or clinical testing that any new compound resulting from the addition of an added acid, or its conjugate base, or an added sugar to oxaliplatin does not compromise the safety or efficacy of the drug product.

For the reasons that follow, your petition and supplements are granted to the extent described and are otherwise denied.

## I. BACKGROUND

Eloxatin is a platinum compound approved for the adjuvant treatment of stage III colon cancer and for the treatment of advanced colorectal cancer. Eloxatin is approved in two dosage forms: (1) a lyophilized powder that is reconstituted for injection, containing lactose, which has been withdrawn from sale (new drug application (NDA) No. 21-492) and is listed in the "Discontinued Drug Product List" section of FDA's *Approved Drug Products with Therapeutic Equivalence Evaluation* (Orange Book) (27th ed.),<sup>2</sup> and (2) an aqueous solution that contains neither added acid (or its conjugate base) nor added sugar (NDA No. 21-759). The subject of this petition is the currently marketed Eloxatin aqueous solution.

<sup>1</sup> This citizen petition was originally assigned docket number 2006P-0523/CP1. The number was changed to FDA-2006-P-0025 as a result of FDA's transition to its new docket numbering system (Regulations.gov) in January 2008.

<sup>2</sup> FDA determined that this product was not withdrawn from marketing for reasons of safety or effectiveness (72 FR 65968, November 26, 2007).

The Drug Price Competition and Patent Term Restoration Act of 1984 (the Hatch-Waxman Amendments) created section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act) (21 U.S.C. 355(j)), which established the current ANDA approval process. To obtain approval, an ANDA applicant is not required to submit evidence to establish the clinical safety and effectiveness of the drug product; instead, an ANDA relies on FDA's previous finding that the reference listed drug (RLD) is safe and effective. To rely on a previous finding of safety and effectiveness, an ANDA applicant must demonstrate, among other things, that its drug product is bioequivalent to the RLD and that it has the same active ingredient or ingredients, dosage form, route of administration, strength, and labeling<sup>3</sup> as the RLD. The basic assumption underlying the Hatch-Waxman Amendments is that bioequivalent drug products that meet the following conditions are therapeutically equivalent and may be substituted for each other: (1) contain identical amounts of the same active ingredient(s) in the same route of administration and dosage form; (2) meet applicable standards of strength, quality, purity, and identity, and are manufactured in compliance with Current Good Manufacturing Practices regulations; and (3) are adequately labeled.

## **II. DISCUSSION**

### **A. Review Under an ANDA Versus NDA**

#### **1. Added acid (other than oxalic acid) or its conjugate base**

You state that because an application for generic oxaliplatin solution with an added acid, or conjugate base thereof, must contain necessary preclinical and/or clinical data, submission of an ANDA under section 505(j) of the Act would not be appropriate and that instead, the generic applicant must submit to FDA an NDA under section 505(b) of the Act (Petition at 3 and 12-13, citing section 505(j)(2)(C)(i) of the Act).

As a threshold matter, we think it is important to review the requirements for an ANDA for a parenteral drug product. A drug product intended for parenteral use generally must contain both the same active and inactive ingredients in the same concentration as the reference listed drug. There is, however, the following exception for differences in inactive ingredients under 21 CFR 314.94(a)(9)(iii):

An applicant may seek approval of a drug product that differs from the reference listed drug in preservative, buffer, or antioxidant provided that the applicant identifies and characterizes the differences and provides information demonstrating that the differences do not affect the safety or efficacy of the proposed drug product.

---

<sup>3</sup> An ANDA must contain the same drug product labeling as the RLD, except for differences approved under a suitability petition, or differences required because the proposed drug product and the RLD are produced or distributed by different manufacturers (see section 505(j)(2)(A)(v) of the Act and 21 CFR 314.94(a)(8)).



A buffer consists of a weak acid and its conjugate base. Therefore, inactive ingredients consisting of an acid and its conjugate base functioning as a buffer meet the exception for a buffer under 21 CFR 314.94(a)(9)(iii). Accordingly, FDA would accept for review an ANDA for generic oxaliplatin solution that contains an added buffer in the form of an acid (other than oxalic acid), or conjugate base thereof (buffered oxaliplatin), citing Eloxatin solution as the reference listed drug. An applicant would need to provide evidence that this buffer does not affect the safety or efficacy of the generic oxaliplatin solution.

We discuss in section II.B.1 of this document the circumstances under which we would require additional preclinical and/or clinical data to demonstrate that any new compound resulting from the addition of an added acid, or its conjugate base, does not compromise the safety or efficacy of the drug product. If clinical data were required, as you suggest, FDA would not review the application for generic buffered oxaliplatin solution under section 505(j) of the Act, but instead, would require that application to be submitted under section 505(b) of the Act. However, if FDA determined that preclinical data (e.g., toxicological studies, comparative preclinical studies) would be sufficient and clinical data is not necessary, FDA would review the generic application under section 505(j) of the Act.

## **2. Added sugar**

You assert that because an application for generic oxaliplatin solution with added sugar or sugars must contain necessary preclinical and/or clinical data, submission of an ANDA is not appropriate and the application must be submitted as an NDA under section 505(b) of the Act (First Supplement at 12).

FDA agrees that an application referencing the aqueous form of Eloxatin that contained an added sugar must be submitted under section 505(b) of the Act. As discussed in section II.A.1 of this document, as a condition for ANDA approval of a drug product intended for parenteral use, the generic formulation must contain both the same active and inactive ingredients in the same concentration as the innovator's formulation, with the exception for preservative, buffer, or antioxidant described in 21 CFR 314.94(a)(9)(iii). Because an added sugar does not meet the definition of a preservative, buffer, or antioxidant in the exception, FDA would not accept for review an ANDA for a generic oxaliplatin solution that contains an added sugar, citing Eloxatin solution as the RLD. Under these circumstances, an application for oxaliplatin solution with an added sugar could be submitted under section 505(b)(2) of the Act.<sup>4</sup>

As discussed in section II.B.2 of this document, the criteria for evaluating whether preclinical and/or clinical data may be necessary to ensure the safety and efficacy of any new platinum complex that may contain a by-product (i.e., degradation product,

---

<sup>4</sup> An application described in section 505(b)(2) of the Act relies upon investigations described in section 505(b)(1)(A) that were not conducted by or for the applicant and for which the applicant has not obtained a right of reference or use from the person by or for whom the investigations were conducted.

degradation impurity) as the result of the added sugar are the same for an ANDA submission as for an NDA submission.

**B. Necessity for Preclinical/Clinical Trials to Demonstrate Safety and/or Efficacy**

**1. Added acid (other than oxalic acid) or its conjugate base**

You state that FDA must require any ANDA referencing Eloxatin to contain data from preclinical and/or clinical testing sufficient to demonstrate that the addition of an acid (other than oxalic acid), or conjugate base thereof, does not significantly alter the safety or efficacy profile of the resulting product (Petition at 12-13). Specifically, you state that adding an acid (other than oxalic acid), or its conjugate base, to buffer the oxaliplatin solution may cause the formation of new platinum compounds (Petition at 6). You state that the platinum complexes resulting from these formulation changes may contain a new by-product (i.e., degradation product, degradation impurity) that may affect safety and/or efficacy (Petition at 6-12, citing Dr. Chaney, Dr. Farrell, other authors, and other literature). As an example, you state that a new platinum complex, tartaroplatin, is formed as a result of ligand exchange when tartaric acid is added to oxaliplatin (Petition at 10-11). In the recently submitted Second Supplement, you reported on an effort to analyze impurities present in a generic product containing tartaric acid approved in Europe.

We agree that:

- Adding an acid (other than oxalic acid), or its conjugate base, to buffer the oxaliplatin solution may result in the formation of new platinum complexes under anticipated storage conditions. Oxaliplatin formulations containing an added buffer may undergo chemical exchange reactions in which the conjugate base of the acid displaces the oxalate ligand bound to platinum, forming a new platinum complex.
- New platinum complexes may have an impact on the safety and/or efficacy of the drug product.<sup>5</sup> Therefore, preclinical and/or clinical studies may be necessary if significant amounts of new platinum complexes occur under anticipated storage and use conditions.

---

<sup>5</sup> For example, by-products may have a leaving group ligand bound to platinum that is different from the oxalate leaving group ligand in oxaliplatin. The rate of substitution of this leaving group ligand, in part, affects biological activity and toxicity. By-products with leaving group ligands having fast dissociation rates may give rise to highly toxic complexes (e.g., diaquoPt(DACH)). Conversely, by-products with leaving group ligands having slow disassociation rates may yield inactive and nontoxic complexes (Schwartz, P., et al., "Preparation and antitumor evaluation of water-soluble derivatives of dichloro(1,2-diaminocyclohexane)platinum(II)," *Cancer Treatment Reports* (1977) 61:1519-1525; Cleare, M.J., et al., "Studies on the antitumor activity of Group VIII transition metal complexes. Part I. Platinum(II) complexes," *Bioinorganic Chemistry* (1973) 2:187-210).

- Potential biological activity and toxicity of new platinum complexes cannot be predicted based solely on the determination of structural similarity to other platinum-containing drug products.

However, preclinical and/or clinical studies may not be necessary to demonstrate that an added acid, or its conjugate base, has an impact on the safety or efficacy profile of the resulting oxaliplatin drug product. The need for preclinical and/or clinical safety evaluation is dependent, in part, upon the extent to which new degradation impurities are formed in the product formulation during storage.

Each ANDA or NDA applicant must satisfy various requirements, including the standards for chemistry, manufacturing, and controls (CMC). The purpose of the CMC review is to ensure that the methods used in, or the facilities and controls used for, the manufacture, processing, and packing of the drug product are adequate to assure and preserve its identity, strength, purity, and quality (21 CFR 314.127(a)(1); section 505(j)(4)(A) of the Act). ANDA applicants must submit, with one exception not relevant here, the same type of CMC information as required in an NDA (21 CFR 314.94(a)(9)(i)). The required CMC information includes, among other things, “the specifications necessary to ensure the identity, strength, quality, [and] purity... of the drug product...” (21 CFR 314.50(d)(1)(ii)(a) and 314.94(a)(9)).

FDA’s CMC review carefully evaluates any application submitted under section 505 of the Act referencing Eloxatin injection for any oxaliplatin degradation products that may be generated during the product’s labeled shelf-life. Any degradation impurities or new platinum complexes are evaluated and controlled, as specified for ANDAs in FDA’s draft guidance for industry, *ANDAs: Impurities in Drug Products*<sup>6</sup> (ANDA impurities guidance), and as specified for NDAs in FDA’s ICH<sup>7</sup> guidance for industry, *Q3B(R2) Impurities in New Drug Products* (ICH guidance) (both of these guidance documents are available on FDA’s web site at <http://www.fda.gov/cder/guidance/default.htm>).

As described in the ANDA impurities guidance at 2, we recommend that applicants specify any degradation product observed during stability studies conducted at the recommended storage condition (see also ICH guidance at 2-3). FDA will examine evidence that the analytical procedures have been validated and are suitable for the detection and quantification of degradation products (ANDA impurities guidance at 2-3; ICH guidance at 3-5). FDA will ensure that analytical procedures are validated to demonstrate specificity for the specified and unspecified degradation products (Id.).

The ANDA impurities guidance and the ICH guidance describe the qualification threshold (i.e., the limit above which a degradation product/impurity must be appropriately qualified). In general, a degradant or impurity does not need to be qualified

---

<sup>6</sup> A notice of availability for this draft guidance published in the *Federal Register* on August 29, 2005. When finalized, this guidance will represent FDA’s current thinking on this topic.

<sup>7</sup> International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use.

if it occurs in a concentration below the qualification threshold. *Qualification* is the process of acquiring and evaluating data that establish the biological safety of an individual degradation product or a given degradation profile at the level or levels being considered (ICH guidance at 6; ANDA impurities guidance at 4-5). The ICH guidance spells out qualification thresholds expressed either as a percentage of the drug substance or as the total daily intake of the degradation product based on the amount of drug substance administered per day (maximum daily dose) (e.g., for a maximum daily dose between 100 milligrams (mg) to 2 grams, the qualification threshold is 0.2 percent or 3 mg total daily intake, whichever is lower) (ICH guidance at Attachment 1). Higher or lower thresholds for qualification of degradation products may be appropriate for some individual new drug products based on scientific rationale and the level of concern, including drug class effects and clinical experience (ICH guidance at 6; ANDA impurities guidance at 4-5).

If a degradation product is above the qualification threshold, it is considered qualified when certain conditions are met. A degradation product is qualified, for example, when the observed level and proposed acceptance criterion are comparable (i.e., qualified using comparative analytical studies) to the reference listed drug, when they are justified by the scientific literature, or when they do not exceed the level that has been adequately evaluated in toxicology studies (for other examples, see ICH guidance at 6, Attachment 3 and ANDA impurities guidance, section IV and Attachment 1, at 4-8).

For an aqueous oxaliplatin referencing Eloxatin injection, FDA uses appropriate CMC review to assess specific chemical information and data about whether the added conjugate base of the buffering agent replaces the oxalate ligand in the platinum complex. If new platinum complexes are generated as a result of this ligand exchange reaction, the CMC review evaluates the extent to which these new platinum complexes are generated under anticipated storage conditions. Based on these reviews, we assess whether these new platinum complexes are generated at a level below the qualification threshold, at a level requiring qualification, or at a level that would require preclinical and/or clinical studies.

If an oxaliplatin degradation product is present below the qualification threshold, or is appropriately qualified, as described in the ANDA impurities guidance and the ICH guidance, additional preclinical and/or clinical testing ordinarily would not be needed. Although we agree that it is possible that adding a buffering agent (e.g., tartaric acid) to oxaliplatin may have an impact on the safety and/or efficacy profile of the drug product, FDA will analyze the specific chemical information and stability data contained in each application to determine whether any specific degradation product requires additional preclinical and/or clinical studies to demonstrate its impact on safety or efficacy.<sup>8</sup>

---

<sup>8</sup> The information and data included in your Second Supplement does not alter our analysis or conclusions. The level of any impurity in an Eloxatin product for which approval in the United States is sought (either as an ANDA or as a 505(b)(2) application) would be determined using a validated analytical method, and the standards set forth in the above-referenced ANDA impurities guidance and ICH guidance would be followed.

The Agency will not approve an application submitted under section 505 of the Act for an oxaliplatin product containing an added acid, or its conjugate base, unless, in addition to satisfying all other requirements for approval, the CMC information assures and preserves product identity, strength, quality, and purity. FDA will ensure that these formulations maintain their labeled potency throughout the product shelf-life. If new platinum complexes form as a result of the addition of an acid, or its conjugate base, these oxaliplatin degradation products will be evaluated and controlled in accordance with the recommendations provided in the ANDA impurities guidance or the ICH guidance. Therefore, FDA will ensure that the safety and effectiveness of buffered oxaliplatin would not differ from Eloxatin aqueous solution.

## 2. Added sugar

In the first supplement, you state that the addition of sugars to solutions of oxaliplatin raises the same concerns about by-products (i.e., degradation products, degradation impurities) as those raised by the addition of a buffer (First Supplement at 2). Accordingly, you request that the Agency require that any application for a generic version of oxaliplatin solution that contains an added sugar, citing Eloxatin as the reference listed drug, include preclinical and/or clinical studies to demonstrate safety and efficacy.

To support your argument, in addition to other literature, you submit an internal Sanofi report entitled "Stability of oxaliplatin solution in the presence of dissolved sugars" (the Report) (First Supplement, Appendix A). You state that the Report shows that the addition of sugar to an oxaliplatin aqueous solution causes increases in three types of new platinum complexes (i.e., diaquoPt(DACH), diququoPt(DACH) dimer, and platinum (IV)<sup>9</sup>) in comparison to the control solution (plain aqueous solution) upon testing after 3 months in ambient (room temperature (25°C, 60 percent humidity) and accelerated conditions (40°C, 75 percent humidity) (First Supplement at 5-7). Based on these results, you argue that solutions stored at room temperature for any commercially relevant period of time (e.g., 6 months) would likely generate these complexes above 0.2 percent (First Supplement at 8, citing FDA guidance for industry, *Q1A(R2) Stability Testing of New Drug Substances and Products*). In the recently submitted Second Supplement, you reported on an effort to analyze impurities present in a generic product obtained commercially in Portugal.

Again, we agree with you that there is a possibility that an added sugar (e.g., lactose, glucose) will result in the formation of new platinum complexes, analogous to the potential for an added acid (other than oxalic acid), or its conjugate base, to result in the formation of new platinum complexes. The underlying concepts are also analogous regarding biological activity, toxicity, and the impact on safety and/or efficacy of the drug product.

---

<sup>9</sup> You note that platinum (IV) complex represents a new impurity (First Supplement at 6). FDA would evaluate and control for any platinum (IV) complex, as described in section II.A.1 of this document, as it would any other new platinum complexes.

FDA carefully reviewed the data provided in the Report. The data show that the sugars slowed down the formation of certain platinum complexes (i.e., diaquoPt(DACH) and diquoPt(DACH) dimer) but enhanced the formation of others (i.e., platinum (IV) complex and its related unspecified degradation impurities, as well as other unspecified degradation impurities related to diaquoPt(DACH) complex) under accelerated storage conditions. When stored in ambient conditions for a limited 3 months, none of the listed impurities appear to exceed 0.2 percent and the changes in the levels appear comparable to the control group (water). While these data are useful to FDA to identify specific degradation products and their potential characteristics, the study is not complete, in depth, and/or dispositive. For example, the data provide aggregate percentages of the drug substance for each degradation impurity category, as opposed to providing the percentages for each individual degradation impurity, making it unclear whether individually, any unspecified degradation impurity could have exceeded the qualification threshold under standard long-term and/or accelerated storage conditions. Therefore, we do not believe it is appropriate to assume that similar impurities would develop in solutions stored at room temperature for any commercially relevant period of time. Although FDA considers accelerated data useful for identifying areas of potential concern, we cannot generalize a need for preclinical and/or clinical studies based on the data presented in the Report. The information and data provided with your Second Supplement does not alter our analysis.

To assess whether preclinical and/or clinical studies are necessary, FDA will conduct the CMC review for drug product formulations having an added sugar in an analogous manner to that described in section II.A.1 for buffered oxaliplatin formulations. The CMC review will evaluate any application submitted under section 505(b) of the Act referencing Eloxatin injection for any oxaliplatin degradation impurities that may be generated as a result of ligand exchange during the product's labeled shelf-life. FDA will ensure that the analytical procedures are validated and are suitable for the detection and quantification of degradation products (ICH guidance at 3-5). We will analyze specifications for the proposed drug product, the real-time stability data, and the proposed maximum daily dose. Any new platinum complex degradation product will be evaluated and controlled as specified in the ICH guidance and as discussed in more detail in section II.A.1 of this document. Accordingly, if new platinum complexes or degradation products are appropriately controlled and qualified, we believe that preclinical and/or clinical studies to demonstrate safety and efficacy will not be necessary.<sup>10</sup>

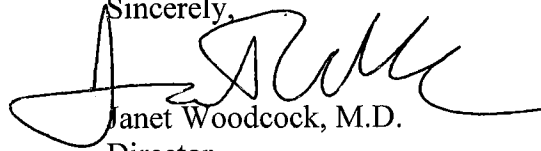
---

<sup>10</sup> The Agency has reviewed and is approving an application under section 505(b)(2) in which the degradation impurity levels were below the ICH qualification threshold.

### III. CONCLUSION

We agree with your petition that the potential exists for oxaliplatin solutions to develop impurities if an acid (other than oxalic acid), or a conjugate base thereof, is added, or if a sugar is added. We also agree that such impurities may have an impact on the safety and/or the efficacy of the product if they occur at certain levels of concentration. We do not believe, however, that this theoretical concern requires preclinical and/or clinical testing in all instances. Instead, we intend to closely examine the degradation impurity levels for all oxaliplatin solutions and ensure that degradation impurity levels are below the threshold described in our guidance documents, or that impurities are appropriately qualified. Otherwise, for the reasons stated above, your petition is denied.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Woodcock', is written over the printed name.

Janet Woodcock, M.D.

Director

Center for Drug Evaluation and Research

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

/s/

-----  
Esther Chuh  
5/29/2009 09:30:18 AM  
CHEMIST



OGD APPROVAL ROUTING SUMMARY

ANDA # 78-815 Applicant Hospira Worldwide, Inc.  
Drug Oxaliplatin Lyophilized Powder for Injection  
mg/vial

Strength(s) 50 mg/vial and 100

APPROVAL ☐ TENTATIVE APPROVAL ☒ SUPPLEMENTAL APPROVAL (NEW STRENGTH) ☐ OTHER ☐

REVIEWER:

DRAFT Package

FINAL Package

1. **Martin Shimer**  
Chief, Reg. Support Branch  
Contains GDEA certification: Yes ☒ No ☐ (required if sub after 6/1/92)  
Patent/Exclusivity Certification: Yes ☒ No ☐  
If Para. IV Certification- did applicant  
Notify patent holder/NDA holder Yes ☒ No ☐  
Was applicant sued w/in 45 days: Yes ☒ No ☐  
Has case been settled: Yes ☐ No ☒  
Is applicant eligible for 180 day  
Generic Drugs Exclusivity for each strength: Yes ☒ No ☐  
Date of latest Labeling Review/Approval Summary \_\_\_\_\_  
Any filing status changes requiring addition Labeling Review Yes ☐ No ☒  
Type of Letter: Full Approval.

Date 24 March 2009

Date \_\_\_\_\_

Initials MHS

Initials \_\_\_\_\_

Determ. of Involvement? Yes ☐ No ☐  
Pediatric Exclusivity System

RLD = \_\_\_\_\_ NDA# \_\_\_\_\_

Date Checked \_\_\_\_\_

Nothing Submitted ☐

Written request issued ☐

Study Submitted ☐

Date settled: \_\_\_\_\_

Comments: ANDA submitted on 2/9/2007 (date corresponding to NCE+ped minus 1 year),  
BOS=Eloxatin for Injection, NDA 21492 in the D/C'd section of the OB (relisting CP 2006P-0291 filed), PIV cert to the '961, '874 and '319 patents. ANDA ack for filing with PIV on 2/9/2007 (LO dated 5/21/2007). MC stamped 8/8/07-RR from Sanofi-aventis U.S. signed and dated 6/12/2007, RR from Sanofi-aventis Malvern PA signed and dated 6/11/2007, RR from Debiopharm in Hackensack NJ signed and dated 6/13/2007, CA 07-CV-03409-FLW-JJH filed in the D of NJ (Trenton) on 7/23/2007 for infringement of the '874 patent.

Since litigation commenced within 45 days of notice the stay of approval is governed by 31 CFR 314.107(b)(3)(i)(B) which is the 7.5 year stay that is calculate from the date of approval of the NDA. That said this stay is further extended by an additional 6 months due to the extension afforded by pediatric exclusivity. This fact appears solely in the statute so the approval letter will need to include language with a statutory citation (I can't provide the citation as someone stole my statute while I was on vacation). SOOO-the 8 year stay is 8/9/2002+8 years=8/9/2010. The OB has already been updated to indicate that NDA 21492 was not D/C'd for S/E reasons.

ANDA is eligible for TA only due to unexpired 8 year stay of approval.

2. **Project Manager**, Esther Chuh Team 2  
Review Support Branch

Date 3/24/2009

Date \_\_\_\_\_

Initials EC

Initials \_\_\_\_\_

Original Rec'd date 2/9/2007  
Date Acceptable for Filing 2/9/2007  
Patent Certification (type) IV  
Date Patent/Exclus.expires 2/9/ 2017  
Citizens' Petition/Legal Case Yes ☐ No ☒  
(If YES, attach email from PM to CP coord)  
First Generic Yes ☐ No ☒  
Priority Approval Yes ☐ No ☒  
(If yes, prepare Draft Press Release, Email it to Cecelia Parise)  
Acceptable Bio reviews tabbed Yes ☐ No ☒  
Bio Review Filed in DFS: Yes ☒ No ☐  
Suitability Petition/Pediatric Waiver  
Pediatric Waiver Request Accepted ☐ Rejected ☐ Pending ☐  
Previously reviewed and tentatively approved ☐ Date \_\_\_\_\_  
Previously reviewed and CGMP def. /NA Minor issued ☐ Date \_\_\_\_\_  
Comments:

EER Status Pending ☐ Acceptable ☒ OAI ☐  
Date of EER Status 10/2/2007  
Date of Office Bio Review 8/2/2007  
Date of Labeling Approv. Sum 2/17/2009  
Date of Sterility Assur. App. 2/2/2009  
Methods Val. Samples Pending Yes ☐ No ☒  
MV Commitment Rcd. from Firm Yes ☐ No ☐  
Modified-release dosage form: Yes ☐ No ☒  
Interim Dissol. Specs in AP Ltr: Yes ☐

3. **Labeling Endorsement**  
Reviewer:

Labeling Team Leader:

Date \_\_\_\_\_  
Name/Initials \_\_\_\_\_

Date \_\_\_\_\_  
Name/Initials \_\_\_\_\_

Comments:

Labeling AC in DFS 5/7/2009 by Angela Payne and John Grace - EC 5/22/2009

4. **David Read** (PP IVs Only) Pre-MMA Language included ☐ Date 15Apr09  
OGD Regulatory Counsel, Post-MMA Language Included ☐ Initials DTR  
Comments: OK.

5. **Div. Dir./Deputy Dir.** Date 5/12/09  
Chemistry Div. I Initials RMP

Comments: CMC is satisfactory for TA.

6. **Frank Holcombe** First Generics Only Date \_\_\_\_\_  
Assoc. Dir. For Chemistry Initials \_\_\_\_\_  
Comments: (First generic drug review)

7. Vacant Date \_\_\_\_\_  
Deputy Dir., DLPS Initials \_\_\_\_\_

8. **Peter Rickman** Date 5/21/2009  
Director, DLPS Initials swpr  
Para.IV Patent Cert: Yes ☒ No ☐; Pending Legal Action: Yes ☒ No ☐; Petition: Yes ☐ No ☒  
Comments: Applicant made PIV patent certs to all listed patents; they were sued within the 45 day period on the '874 patent only; litigation ongoing; M-61 W/H exclusivity expires 7/10/2010 w/peds; no BPCA carveout done; ped info remains in proposed labeling; Labeling acceptable 5/7/2009 per TA Summary; Bio acceptable 8/2/2007; Micro acceptable 2/2/2009; EER acceptable 10/2/2007.

Okay for TA Only

OR

8. **Robert L. West** Date \_\_\_\_\_  
Deputy Director, OGD Initials \_\_\_\_\_  
Para.IV Patent Cert: Yes ☐ No ☐; Pending Legal Action: Yes ☐ No ☐; Petition: Yes ☐ No ☐  
Press Release Acceptable ☐  
Comments:

9. **Gary Buehler** Date \_\_\_\_\_  
Director, OGD Initials \_\_\_\_\_  
Comments:  
First Generic Approval ☐ PD or Clinical for BE ☐ Special Scientific or Reg. Issue ☐  
Press Release Acceptable ☐

10. Project Manager, Esther Chuh Team 2 Date 5/22/2009  
Review Support Branch Initials EC  
\_\_\_\_\_ Date PETS checked for first generic drug (just prior to notification to firm)

Applicant notification:

2:22 PM Time notified of approval by phone

3:05 PM Time approval letter faxed

FDA Notification:

5/22/2009 Date e-mail message sent to "CDER-OGDAPPROVALS" distribution list.

5/22/2009 Date Approval letter copied to \\CDS014\DRUGAPP\ directory.

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

/s/

-----  
Esther Chuh

5/29/2009 05:26:18 PM

# RECORD OF TELEPHONE CONVERSATION

---

**DATE:** 1/9/09 (Initial Contact)

**INITIATED BY:** Lisa S.G. Shelton, Review Microbiologist

**Applicant/Sponsor**

**Name:** Hospira Worldwide, Inc. (formerly Mayne Pharma Limited)

**Address:** 275 N. Field Dr, D-0389, Bldg. H2-2N, Lakeforest, IL 60045-5046

**Representative:** Laurie Wojtko, Sr. Associate, Global Regulatory Affairs

**Telephone:** 224-212-6158

**Clarifying question regarding:**

**ANDA 78-815 Oxaliplatin for Injection, Amendment dated 11/14/08**

In Question 1b, we ask for the location of the lyophilizer or lyophilizers to be specified. The response states that (b) (4)

[REDACTED]

[REDACTED] (b) (4)

**RESPONSE:**

01/09/09 I spoke with Laurie Wojtko. She said she would most likely be able to get the information on Monday or Tuesday and would get back with me.

01/12/09 Laurie called. She clarified that (b) (4)  
[REDACTED]. There was a typographical error in the response. This information will be incorporated into the review.

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

/s/

-----  
Lisa Shelton  
7/23/2009 12:33:34 PM  
MICROBIOLOGIST



September 3, 2009

Mr. Gary Buehler  
Director, Office of Generic Drugs  
Center for Drug Evaluation and Research  
7500 Standish Place  
Metro Park North II  
Rockville, MD 20855

**Re: ANDA 78-815, Oxaliplatin for Injection, 50 mg/vial, 100 mg/vial**

**MINOR AMENDMENT – FULL APPROVAL REQUESTED**

Dear Mr. Buehler,

Hospira, Inc. hereby submits a minor amendment to the above-referenced abbreviated new drug application for Oxaliplatin for Injection, 50 mg/vial and 100 mg/vial. This is in response to the Agency's tentative approval letter dated May 22, 2009. For ease of review a copy of this [May 22, 2009 correspondence](#) is included herein.

We note and acknowledge that the reference listed drug (RLD), Eloxatin for Injection of Sanofi Synthelabo, Inc. is subject to a period of patent protection, U.S. Patent No 5,290,961 (the '961 patent), 5,338,874 (the '874 patent) and 5,420,319 (the '319 patent). We acknowledge that the above referenced ANDA was filed with a Paragraph IV certification. As the court ruled and issued a favorable [summary judgment](#) of non-infringement for the '874 patent on June 18, 2009, Hospira hereby requests final approval of this ANDA. A copy of the [final judgment](#) entered on June 30, 2009 and signed by the U.S. District Court judge has been attached and is intended to support Hospira's request for full approval.

We hereby certify that there have been no changes in the conditions under which the product was tentatively approved.

This amendment is submitted as an electronic hybrid which does not contain an XML backbone. A waiver to Memorandum 27 allowing for the acceptance of electronic submissions that are not in compliance with the guidance "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical applications and Related Submissions Using the eCTD Specifications" was submitted on January 18, 2008 and approved on February 22, 2008. The files contained on the CD have been scanned for viruses using the current version of McAfee VirusScan Enterprise 8.5 virus scanning

Hospira Inc.  
275 North Field Drive  
Dept. 389, Bldg. H2-2  
Lake Forest, IL 60045



software. For electronic signatures a letter of non-repudiation for the undersigned (Laurie Wojtko) is on file with the FDA.

We trust that this submission is complete. If you require any clarification or further information, please feel free to contact me.

Sincerely,

HOSPIRA, INC.

A handwritten signature in cursive script, followed by the date "9-3-09".

Laurie Wojtko  
Sr. Associate, Global Regulatory Affairs  
Hospira, Inc.  
Phone: (224) 212-6158  
Fax: (224) 212-5401  
E-mail: [Laurie.Wojtko@hospira.com](mailto:Laurie.Wojtko@hospira.com)

OGD APPROVAL ROUTING SUMMARY

ANDA # 78-815 Applicant Hospira Worldwide, Inc.  
Drug Oxaliplatin For Injection Strength(s) 50 mg/vial and 100 mg/vial

APPROVAL ☒ TENTATIVE APPROVAL ☐ SUPPLEMENTAL APPROVAL (NEW STRENGTH) ☐ OTHER ☐

REVIEWER:

DRAFT Package

FINAL Package

1. **Martin Shimer** Date 9/28/2009 Date 9/30/09  
Chief, Reg. Support Branch Initials swpr Initials rlw  
Contains GDEA certification: Yes ☒ No ☐ Determ. of Involvement? Yes ☐ No ☒  
(required if sub after 6/1/92) Pediatric Exclusivity System  
RLD = Eloxatin NDA# 21-492  
Patent/Exclusivity Certification: Yes ☒ No ☐ Date Checked Granted  
If Para. IV Certification- did applicant Nothing Submitted ☐  
Notify patent holder/NDA holder Yes ☒ No ☐ Written request issued ☐  
Was applicant sued w/in 45 days: Yes ☒ No ☐ Study Submitted ☐  
Has case been settled: Yes ☒ No ☐ Date settled: 6/30/2009  
Is applicant eligible for 180 day yes  
Generic Drugs Exclusivity for each strength: Yes ☒ No ☐  
Date of latest Labeling Review/Approval Summary \_\_\_\_\_  
Any filing status changes requiring addition Labeling Review Yes ☐ No ☒  
Type of Letter: Approval  
Comments: Comments: ANDA submitted on 2/9/2007 (NCE+ped minus 1 year), BOS=Eloxatin for Injection, NDA 21-492 in the  
D/C'd section of the OB (relisting CP 2006P-0291 filed), applicant made PIV patent certs to the '961, '874 and '319  
patents. ANDA ack for filing with PIV on 2/9/2007. Hospira was sued for infringement of the '874 patent.  
Since litigation commenced within 45 days of notice the stay of approval is governed  
by 31 CFR 314.107(b)(3)(i)(B) which is the 7.5 year stay that is calculated from the date of approval of the NDA.  
This stay of approval is further extended an additional 6 months due to pediatric exclusivity. The 8 year stay (7.5 +  
ped) is 8/9/2002+8 years=8/9/2010. The OB has already been updated to indicate that NDA 21-492 was not D/C'd  
for S/E reasons. Hospira's letter dated 9/3/2009 states that the court ruled and issued a favorable summary judgement  
of non-infringement for the '874 patent on June 30, 2009. This ANDA is eligible for immediate approval.

2. **Project Manager**, Esther Chuh Team 2 Review Support Branch Date 9/29/2009 Date \_\_\_\_\_  
Initials EC Initials \_\_\_\_\_  
Original Rec'd date 2/9/2007 EER Status Pending ☐ Acceptable ☒ OAI ☐  
Date Acceptable for Filing 2/9/2007 Date of EER Status 10/2/2007  
Patent Certification (type) IV Date of Office Bio Review 8/2/2007  
Date Patent/Exclus. expires 2/9/2017 Date of Labeling Approv. Sum 5/7/2009  
Citizens' Petition/Legal Case Yes ☐ No ☒ Date of Sterility Assur. App. 2/2/2009  
(If YES, attach email from PM to CP coord) Methods Val. Samples Pending Yes ☐ No ☒  
First Generic Yes ☐ No ☒ MV Commitment Rcd. from Firm Yes ☐ No ☐  
Priority Approval Yes ☐ No ☒ Modified-release dosage form: Yes ☐ No ☒  
(If yes, prepare Draft Press Release, Email Interim Dissol. Specs in AP Ltr: Yes ☐  
it to Cecelia Parise)  
Acceptable Bio reviews tabbed Yes ☐ No ☒  
Bio Review Filed in DFS: Yes ☒ No ☐



Suitability Petition/Pediatric Waiver

Pediatric Waiver Request Accepted ☐ Rejected ☐ Pending ☐

Previously reviewed and tentatively approved ☐ Date 5/22/2009

Previously reviewed and CGMP def. /NA Minor issued ☐ Date \_\_\_\_\_

Comments:

3. **Labeling Endorsement**

Reviewer:

Date 9/29/2009

Name/Initials Angela Payne

Labeling Team Leader:

Date 9/29/2009

Name/Initials John Grace

Comments:

From: Grace, John F

Sent: Tuesday, September 29, 2009 2:20 PM

To: Payne, Angela; Chuh, Esther

Subject: RE: ANDA 78-815 Oxaliplatin FIJ/ Hospira - Request for Final AP

concur.

---

From: Payne, Angela

Sent: Tuesday, September 29, 2009 2:20 PM

To: Chuh, Esther; Grace, John F

Subject: RE: ANDA 78-815 Oxaliplatin FIJ/ Hospira - Request for Final AP

The labeling approval summary #3 remains acceptable. There are no new changes to the RLD in darrrts, USP, or OB. The applicant submitted FPL

Angela

4. **David Read (PP IVs Only)** Pre-MMA Language included ☐

Date 29Sep09

OGD Regulatory Counsel, Post-MMA Language Included ☐

Initials DTR

Comments: OK.

5. **Div. Dir./Deputy Dir.**

Chemistry Div. I

Date 9/30/09

Initials RMP

Comments: CMC remains satisfactory for the previously TAed application going now for AP.

6. **Frank Holcombe** First Generics Only

Date 9/30/09

Assoc. Dir. For Chemistry

Initials rlw/for

Comments: (First generic drug

review)

**This ANDA was tentatively approved on 5/22/09.**

7. Vacant

Date \_\_\_\_\_

Deputy Dir., DLPS

Initials \_\_\_\_\_  
RLD = Eloxatin for Injection, 50 mg and 100 mg/vial  
Sanofi Synthelabo, Inc. NDA 21-492 (001, 002)

8. Peter Rickman  
Director, DLPS

Date 9/30/09  
Initials rlw/for

Para.IV Patent Cert: Yes ☐ No ☐; Pending Legal Action: Yes ☐ No ☐; Petition: Yes ☐ No ☐  
tentatively approved on May 22, 2009. Final approval was  
blocked at that time by ongoing patent litigation. Refer to the administrative  
sign-off form completed at the time of the tentative approval.

Comments: This ANDa was

On September 3, 2009, Hospira submitted a "minor amendment" to provide for final  
approval of this ANDA. Hospira referred to the final judgment entered by the court  
on June 30, 2009 (summary judgment of non-infringement for the '874 patent). This  
effectively ended the patent litigation. Hospira stated that no changes had been  
made in the conditions under which the product was tentatively approved.

Final-printed labeling remains acceptable for approval (see above).

OR

8. Robert L. West  
Deputy Director, OGD

Date 9/30/09  
Initials RLWest

Para.IV Patent Cert: Yes ☒ No ☐; Pending Legal Action: Yes ☐ No ☒; Petition: Yes ☐ No ☒  
Press Release Acceptable ☐  
Comments: Acceptable EES dated 10/2/07 (Verified 9/30/09). No "OAI" Alerts noted.

Hospira provided paragraph IV certifications to the '961, '874, and '319 patents  
listed in the "Orange Book". Hospira was sued only on the '874 patent. On June 30,  
2009, the court determined that the '874 patent is not infringed. This removes the  
legal barrier to the approval of this ANDA.

This ANDA is recommended for final approval.

9. Gary Buehler  
Director, OGD

Date 9/30/09  
Initials rlw/for

Comments:  
First Generic Approval ☐ PD or Clinical for BE ☐ Special Scientific or Reg.Issue ☐  
Press Release Acceptable ☐

10. Project Manager, Esther Chuh Team 2

Date 9/30/09

Review Support Branch Initials EC  
\_\_\_\_ Date PETS checked for first generic drug (just prior to notification to firm)

Applicant notification:

9/30/09 Time notified of approval by phone

9/30/09 Time approval letter faxed

FDA Notification:

9/30/09 Date e-mail message sent to "CDER-OGDAPPROVALS" distribution list.

9/30/09 Date Approval letter copied to \\CDS014\DRUGAPP\ directory.

EER DATA:

## ORANGE BOOK PRINT OFF :

Patent and Exclusivity Search Results from query on Appl No 021492 Product 001 in the OB\_Disc list.

---

### Patent Data

Appl No	Prod No	Patent No	Patent Expiration	Drug Substance Claim	Drug Product Claim	Patent Use Code	Delist Requested
<a href="#">021492</a>	001	5290961	Jan 12, 2013	Y			
<a href="#">021492</a>	001	5290961*PED	Jul 12, 2013				
<a href="#">021492</a>	001	5338874	Apr 7, 2013	Y			
<a href="#">021492</a>	001	5338874*PED	Oct 7, 2013				
<a href="#">021492</a>	001	5420319	Aug 9, 2016	Y			
<a href="#">021492</a>	001	5420319*PED	Feb 9, 2017				

### Exclusivity Data

Appl No	Prod No	Exclusivity Code	Exclusivity Expiration
<a href="#">021492</a>	001	<a href="#">M-61</a>	Jan 10, 2010
<a href="#">021492</a>	001	<a href="#">PED</a>	Jul 10, 2010

---

Additional information:

1. Patents are published upon receipt by the Orange Book Staff and may not reflect the official receipt date as described in 21 CFR 314.53(d)(5).
  2. Patents listed prior to August 18, 2003 are flagged with method of use claims only as applicable and submitted by the sponsor. These patents may not be flagged with respect to other claims which may apply.
- 

[View a list of all patent use codes](#)

[View a list of all exclusivity codes](#)

[Return to Electronic Orange Book Home Page](#)

---

FDA/Center for Drug Evaluation and Research

Office of Generic Drugs

Division of Labeling and Program Support

Update Frequency:

Orange Book Data - **Monthly**

Generic Drug Product Information & Patent Information - **Daily**

Orange Book Data Updated Through August, 2009

Patent and Generic Drug Product Data Last Updated: September 29, 2009

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

/s/  
-----

EUNJUNG E CHUH  
09/30/2009