

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

75-260

APPLICATION NUMBER:

ADMINISTRATIVE DOCUMENTS

ANDA APPROVAL SUMMARY

ANDA: 75-260	CHEMIST: Gil Kang	DATE: January 7, 1999
DRUG PRODUCT: Tretinoin Topical Solution, USP		
FIRM: Morton Grove Pharmaceuticals, Inc.		
DOSAGE FORM: Solution	STRENGTH: 0.4733 mg/mL EQ to 0.5 mg/g (0.05%)	
cGMP: EER was found acceptable on January 26, 1998.		
BIO: The request of a waiver of the Bio study was reviewed by Dr. Jahnvi S. Kharidia and it is granted on March 24, 1998.		
VALIDATION - (Description of dosage form same as firm's): USP product		
STABILITY: The firm has provided 19 months satisfactory controlled room temperature stability data for 0.4733 mg/mL Tretinoin topical solution in 1 oz amber Boston round bottle. The stability data support an expiration period of 19 months .		
LABELING: Labeling review was found satisfactory by L. Golson on October 7, 1998.		
STERILIZATION VALIDATION (If applicable): N/A		
SIZE OF BIO BATCH (Firm's source of NDS ok?): The firm has submitted the blank batch record for the intended production batch size gallons batch of Tretinoin topical solution. The size of bio-batch (Lot #A0192) is and packaged for bottles. The drug substance was manufactured by		
SIZE OF STABILITY BATCHES (If different from bio batch, were they Manufactured via the same process?): N/A		
PROPOSED PRODUCTION BATCH - MANUFACTURING PROCESS THE SAME?: Manufacturing process is same.		
Signature of chemist: Gil Kang 1/12/99	Signature of supervisor: P. S. [Signature] 1/12/99	

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Record of Telephone conversation

ANDA: 75-260

Product: Tretinoin Topical Solution, USP

FDA participants: Gil Kang (reviewer), Paul Schwartz (team leader)

Becton Dickinson: Mary Murphy (Regulatory affairs associate)

Date: December 21, 1998

Morton grove Pharmaceuticals, Inc. was called to discuss following issues regarding facsimile amendment dated November 30, 1998.

1. Agency asked to update the residual solvents information provided from DMF holder. MGP had provided with the outdated information obtained from DMF holder dated 4/27/93.
2. Agency asked to provide 18 months room temperature stability data if it is on schedule to propose 18 months expiration date.

MGP will fax the information as Telephone Amendment.

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

ANDA Number: 75-260

Date of Submission: November 24,
1997

Applicant's Name: Morton Grove Pharmaceuticals, Inc.

Established Name: Tretinoin Solution USP, 0.05%

Labeling Deficiencies:

1. GENERAL

Replace the "Caution: Federal law..." statement with "Rx only" or "R only" on the labels and labeling. We refer you to the Guidance for Industry, "Implementation of Section 126, Elimination of Certain Labeling Requirements, of the Food and Drug Administration Modernization Act of 1997", at the internet site: <http://www.fda.gov/cder/guidance/index.htm> for guidance.

2. CONTAINER - 28 mL

Please assure that the established name and strength statement appear most prominently.

3. CARTON - 28 mL x 1's

a. Refer to the comment under CONTAINER.

b. Enclose the "Pharmacist: Unless..." statement in a box to increase the prominence.

4. INSERT

a. GENERAL COMMENTS

Replace "Tretinoin Topical Solution" with "tretinoin topical solution" throughout the text. Please note that USAN names are common nouns and should be treated as such in the text of labeling (i.e., lower case). Upper case may be used when the USAN name stands alone as on labels or the title of a package insert.

b. DESCRIPTION

i. First paragraph, first sentence:

Tretinoin topical solution is used for...

ii. First paragraph, second sentence:

... Alcohol 55% (v/v). [add "v/v"]

iii. We encourage the inclusion of the molecular weight and formula.

c. PRECAUTIONS - Second paragraph, first sentence:

Tretinoin preparation for acne treatment...

d. ADVERSE REACTIONS - Penultimate and ultimate sentences:

Replace "this product" with tretinoin".

e. DOSAGE AND ADMINISTRATION

i. First paragraph, First sentence:

Tretinoin topical solution, 0.05% should be ...

ii. Last paragraph:

... with tretinoin preparation for acne may use...

f. HOW SUPPLIED

We encourage you to include the NDC number.

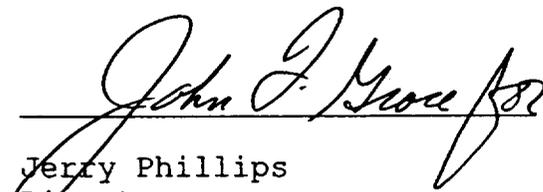
5. PATIENT INSTRUCTION SHEET

Satisfactory in draft

Please revise your labels and labeling, as instructed above, and submit in final print.

Please note that the Agency reserves the right to request further changes in your labels and/or labeling based upon changes in the approved labeling of the listed drug or upon further review of the application prior to approval.

To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with the last submitted labeling with all differences annotated and explained.

A handwritten signature in cursive script, appearing to read "John J. George for", written over a horizontal line.

Jerry Phillips
Director

Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

MAR 24 1998

Tretinoin Topical Solution, USP
0.4733 mg/mL (equivalent to 0.05%)
ANDA # 75-260
Reviewer: Jahnvi S. Kharidia

Morton Grove Pharmaceuticals, Inc.
6451 West Main Street
Morton Grove, Illinois 60053
Submission Date:
24 Nov, 1997

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Review of a Waiver Request

Objective:

The firm is requesting a waiver of *in vivo* bioequivalence requirements for its Tretinoin Topical Solution, USP (0.4733 mg/mL, equivalent to 0.05%). The reference listed product is Retin-A® Liquid (0.05%) manufactured by Johnson and Johnson (Dermatological Division, Ortho Pharmaceutical Corporation). The firm has submitted comparative physical characteristics of the test and reference products.

Formula Comparison (Not to be released under FOI):

Comparative Formulation - Test Product vs. Retin-A®

Ingredients	Test Product		Retin-A® Liquid*
	amount/mL	%	%
Tretinoin, USP Dehydrated Alcohol, USP Butylated Hydroxytoluene Polyethylene Glycol 400, NF			
Physical Characteristics			
Color:			N
Clarity			clear
pH			
Specific Gravity			
Viscosity			

* Source: COMIS DATABASE

Comment:

1. The test product is a topical solution and it contains the same active ingredient (Tretinoin, USP) in the same concentration (0.05%) as the reference listed drug, Retin-A® Liquid.

incline

1-1

2. The physical characteristics of the test and reference products are very similar.
3. A waiver for *in vivo* bioequivalent study is granted pursuant to Title 21 CFR 320.22 (b)(3) of Bioavailability/Bioequivalence Regulations.

Recommendation:

The Division of Bioequivalence agrees that the information submitted by Morton Grove Pharmaceuticals demonstrates that Tretinoin Topical Solution, 0.05%, falls under 21 CFR Section 320.22 (b)(3) of the Bioavailability/Bioequivalence Regulations. The waiver of *in vivo* bioequivalence study for the test product is granted. From the bioequivalence point of view, the Division of Bioequivalence deems the test product to be bioequivalent to Retin-A® Liquid, 0.05% manufactured by Johnson and Johnson Company.

Jahnavi S. Kharidia
Jahnavi S. Kharidia, Ph.D.
Review Branch III
The Division of Bioequivalence

RD INITIALED MMAKARY

FT INITIALED MMAKARY

Moheb H. Makary, Ph.D.

Acting Team Leader, Branch III

Division of Bioequivalence

Moheb H. Makary Date *3/13/98*

Concur: *Dale P. Conner* Date *3/24/98*

Dale P. Conner, Pharm. D.

Director

Division of Bioequivalence