DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 22-346

Pharmacare Limited
Attention: Leanne Wentworth, Regulatory Affairs Manager
Building 12, Healthcare Park
Woodlands Drive
Woodmead, Johannesburg, 2158
South Africa

Dear Ms. Wentworth:

Please refer to your new drug application (NDA) 22-346 dated April 28, 2008, received on April 29, 2008, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for the following drug products:

- Stavudine, Lamivudine and Nevirapine Tablets, 30 mg/150 mg/200 mg
- Stavudine, Lamivudine and Nevirapine Tablets, 40 mg/150 mg/200 mg

We acknowledge receipt of your submissions dated:

May 23, 2008 July 21, 2008 December 15, 2008

This NDA provides for the use of Stavudine, Lamivudine and Nevirapine Tablets, 30 mg/150 mg/200 mg and Stavudine, Lamivudine and Nevirapine Tablets, 40 mg/150 mg/200 mg for the treatment of HIV-1 infection.

We completed our review of this application. It is **tentatively approved** under 21 CFR 314.105 for use as recommended in the labeling (refer to the enclosed text for the package insert, medication guide, and immediate container and carton labels). Also refer to the agreed-upon labels emailed to the Agency on February 26, 2009 for the revised immediate container and carton labels**.** Based on the data provided, the expiration dating period is 24 months for Stavudine, Lamivudine and Nevirapine Tablets (both formulations) in HDPE containers, closed by a snap cap with a tear-off tamper-evident strip or by a screw cap, when stored below 25°C (77°F).

The tentative approval is predicated upon information available to the Agency at this time (i.e. information in your application and the status of current good manufacturing practices of the facilities used in manufacturing and testing of the drug products) and is, therefore, subject to change on the basis of any new information that may come to our attention.

The listed reference drug products upon which you base your application are subject to a period of patent protection and therefore, final approval of your application under section 505(b) may not be made effective until the period has expired. If you have questions as to when this date will be please contact the Agency at the information provided below.

At least 180 days prior to the expiration of patent protection or when requested, please submit a "**MINOR AMENDMENT – FINAL APPROVAL REQUESTED**" as an amendment to this application identifying changes, if any, in the conditions under which your products were tentatively approved. This information should include updated labeling, chemistry, manufacturing and controls data, and a safety update. This amendment should include draft final printed labels and labeling, which comply with all United States regulations (uniqueness of drug product appearance per 21 CFR 206; child-resistant packaging per 16 CFR 1700, etc.). Please note that all labels (i.e., immediate container, carton and bulk pack labels) for products to be marketed in the United States should also contain the phrase 'Rx only.' This amendment should be submitted even if none of these changes were made. This amendment should be designated clearly in your cover letter as a "**MINOR AMENDMENT – FINAL APPROVAL REQUESTED**."

Failure to submit this amendment will prompt a review of this application that may result in rescission of the tentative approval status of your application, or may result in a delay in the issuance of the final approval letter.

Any significant change in the conditions outlined in this NDA requires our review before final approval may be granted.

We remind you that you are expected to comply with the reporting requirements provided in 21 CFR 314.80 and 314.81. If the combination products are to be mass distributed in developing countries, a system of collecting and reporting adverse drug reactions by the distributor would be desirable (e.g., through governmental or nongovernmental agencies distributing the products).

We remind you that, should you intend to market these products in the United States after the period of patent protection, you are required to join the antiretroviral pregnancy registry at that time and make the appropriate labeling change that references the existence of the pregnancy registry. In addition, an updated package insert (PI) must be submitted under the Structured Product Labeling requirements (http://www.fda.gov/oc/datacouncil/spl.html) as defined by the Physician's Labeling Rule [21 CFR 201.56, 201.57].

Before we issue a final approval letter, this NDA is not deemed approved. If you believe that there are grounds for issuing the final approval letter before the period of patent protection has expired, you should amend your application accordingly.

These products may be considered misbranded under the Federal Food, Drug, and Cosmetic Act if it is marketed in the U.S. before final approval.

If you have any questions, please call Monica Zeballos, Pharm.D., Senior Program Consultant, at (301) 796-0840 or via email at monica.zeballos@fda.hhs.gov.

Sincerely yours,

{See appended electronic signature page}

Jeffrey Murray, M.D., M.P.H.
Deputy Director
Division of Antiviral Products
Office Antimicrobial Products
Center for Drug Evaluation and Research

Attachments: Draft PI, Medication Guide, immediate container & carton labels

CC: Teresa Tung, U.S. Agent for Pharmacare Limited
Lachman Consultant Services, Inc.,
1600 Stewart Avenue
Westbury, NY 11590

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

/s/

Jeffrey Murray

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