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APPLICATION NUMBER:

50-207/S-055

MICROBIOLOGY REVIEW

DIVISION OF ANTI-INFECTIVE DRUG PRODUCTS (HFD-520)
CONSULT FOR OFFICE OF GENERIC DRUGS (HFD-615 & HFD-613)
Clinical Microbiology Review of Labeling Supplement

NDA#: 50-207 & 50-297

REVIEW #: 1

DATE COMPLETED: 05/02/01

<u>SUBMISSION/TYPE</u>	<u>DOCUMENT DATE</u>	<u>OGD DATEs</u>	<u>ASSIGNED DATE</u>
50-207/SLR-055 and 50-297SLR-018	02/04/00	04/03/01 & 03/20/01	05/01/01

NAME & ADDRESS OF APPLICANT:

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Abbott Park, Illinois 60064-3500

CONTACT PERSONS:

Mr. Gregg Bosco
PPD Regulatory Affairs

DRUG PRODUCT NAME:

NDA 50-207:

Proprietary, E.E.S.[®]
Non-Proprietary/USAN: erythromycin ethylsuccinate

NDA 50-297:

Proprietary, EryPed[®]
Non-Proprietary/USAN: erythromycin ethylsuccinate

DOSAGE FORM: NDA 50-207: Granules (to be reconstituted with water), Liquids (suspensions), and Tablets.
NDA 50-279: Granules and Liquids (suspensions).

STRENGTH:

Each 5-mL teaspoon of the reconstituted bottle of Granules contains erythromycin ethylsuccinate equivalent to 200 mg of erythromycin.

Each 5-mL teaspoon of the Liquid (suspension) contains erythromycin ethylsuccinate equivalent to either 200 mg or 400 mg of erythromycin.

Each Filmtab[®] (tablet) contains erythromycin ethylsuccinate equivalent to 400 mg of erythromycin.

ROUTE OF ADMINISTRATION: Oral [granules, liquids (suspensions), and tablets].

DISPENSED: Rx OTC

PHARMACOLOGICAL CATEGORY/INDICATION:

Macrolide antibiotic.

The indications listed for erythromycin ethylsuccinate are too numerous to mention. Therefore, refer to the approved package insert labeling on E.E.S.[®] and on EryPed[®] as found in the INDICATIONS AND USAGE section.

REMARKS:

The supplements received are "consults" from the Office of Generic Drugs (OGD) / Labeling Review Branch (HFD-615) and OGD Labeling Review Branch (HFD-613). Also, OGD provides a copy of the Agency's "approval" letter, dated 02/04/00, which was sent to the applicant.

The consult request clarification of the *Staphylococcus aureus* ATCC quality control strain that should be used in the product labels given that both NDAs reference the same organism. It is asked, should they not be consistent?

The regulatory letter sent to the applicant does in fact list the wrong *Staphylococcus aureus* ATCC quality control strain for dilution susceptibility testing (dilution technique). Although the same staphylococcal species is used as a quality control strain, the ATCC numbers differ depending on whether dilution or disk diffusion susceptibility testing (diffusion technique) is to be performed. This error may have been noted if the supplement had been sent to the discipline of Microbiology for Review.

PACKAGE INSERT

(DN 0556 VI, CR 99-02453, May 21, 1999, Nos: 5729, 6306, 6373)

Microbiology

Susceptibility Test Methods

Susceptibility Tests:

Dilution techniques:

Quality Control:

***Microorganism**

MIC (µg/mL)

S. aureus ATCC 25923

0.12-0.5*

The *Staphylococcus aureus* ATCC number is incorrect and the MIC (µg/mL) range is not current. Therefore both should be modified as suggested under the **CONCLUSIONS** section of this review. Refer to the National Committee for Clinical Laboratory Standards. *Performance Standards for Antimicrobial Susceptibility Testing - Eleventh Informational Supplement*. NCCLS Document M100-S11, Vol. 21, No. 1, NCCLS, Wayne, PA, January, 2001.

NDA 50-207/ SLR-055 & NDA 50-297 / SLR-018
ABBOTT LABORATORIES
E.E.S. & EryPad (erythromycin ethylsuccinate)

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Diffusion techniques:

<u>*Microorganism</u>	<u>Zone Diameter (mm)</u>
<i>S. aureus</i> ATCC 25923	22-30

CONCLUSIONS:

The labeling supplements, NDA 50-207/SLR-055 & NDA 50-297/SLR-018, should list both *Staphylococcus aureus* ATCC quality control strains. Strain *Staphylococcus aureus* ATCC 29213 should be listed for dilution susceptibility testing with a range of 0.25 - 1.0 µg/mL. Strain *Staphylococcus aureus* ATCC 25923 should be listed for disk diffusion technique susceptibility testing and list a range of 22-30 mm.

Harold V. Silver
Clinical Microbiology Reviewer
DAIDP/HFD-520

cc: Orig. NDA 50-207
NDA 50-297
HFD-615/RSB/HGreenberg
ATS
HFD-520/TLMicro/ATSheldon
HFD-520/Micro/HVSilver
HFD-520/ActTLMO/JAKorvick
HFD-520/PM/MDillon-Parker
Filename: 50207S55&50297S18FIN.doc
APPROVAL

Concurrence Only:
HFD-520/TLMicro/ATSheldon
RD & Final Initialed 5/2/01

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/s/

Harold Silver
5/7/01 03:47:40 PM
MICROBIOLOGIST

Sign off on supplemental review.

Albert Sheldon
5/14/01 03:07:44 PM
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