CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-074

CORRESPONDENCE

3M Health Care

3M Center
St. Paul, MN 55144-1000
612 733 1110

RTIFIED MAIL/RETURN RECEIPT REQUESTED

June 26, 2000

NDA ORIG AMENDMENT

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

BC Withdrawn 7.6.00

Dear Dr. Chikami:

RE: **NDA 21-074, Amendment 012**
3M CHG Hand Prep (Chlorhexidine Gluconate Hand Prep)

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to the June 23, 2000 correspondence citing the application as not-approvable per 21 CFR 315.125.

suant to 21 CFR 314.120(a)(1), we are hereby notifying the Agency of our intent to file an amendment oon as soon as the manufacturing site has been reinspected following correction of all cited deficiencies at facility. The amendment will contain responses to all deficiencies noted in the June 23, 2000 letter.

If there are any questions about our intent to respond, please contact me at 651-736-3731.

Sincerely,

3M HEALTH CARE

Teresa Skog

Teresa M. Skog, RAC
Regulatory Affairs Product Manager
3M Center 275-5W-06
St. Paul, MN 55144-1000

Desk copy to: Maureen Dillon-Parker
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
HFD-520, Room S-306
Rockville, MD 20850

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BL 6.15.00 BC 6-23-00

3M Health Care
St. Paul, MN 55144-1000
651 733 1110

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3M

August 9, 2000

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 013
3M CHG Hand Prep (Chlorhexidine Gluconate Hand Prep)
General Correspondence to Provide 3M's Minutes to July 20, 2000 Label Negotiation Teleconference

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to our July 20, 2000 label negotiation teleconference with the Agency.

This correspondence is to provide 3M's minutes to the above referenced teleconference. We request that a copy of the Agency's minutes to this teleconference be provided to us as soon as they are available.

This amendment 013 to pending NDA 21-074 is being submitted in duplicate for incorporation into our file. If you have any questions or require additional information regarding this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

3M Health Care

3M Center
St. Paul, MN 55144-1000
651 733 1110

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August 24, 2000

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 014
3M CHG Hand Prep (Chlorhexidine Gluconate Hand Prep)
General Correspondence to Provide Revised Draft Labeling with Specifications, Per Agreements Made at July 20, 2000 Label Negotiation Teleconference

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to our July 20, 2000 label negotiation teleconference with the Agency, during which it was agreed that 3M would provide revised draft labeling and labeling specifications for the Drug Facts panel in compliance with 21 CFR 201.66 for OTC review and approval.

This correspondence is to provide the revised draft labeling and labeling specifications as described above. Upon OTC review, we would appreciate receiving word of acceptance of the draft labeling, or any additional comments, so that final printed labeling can be generated.

Please note that one additional revision has been made to the back panel label for the wedge shaped bottle. To better accommodate the Drug Facts text, the installation and removal instructions have been removed from this label, and will be screened directly onto the wall bracket.

This amendment 014 to pending NDA 21-074 is being submitted in duplicate for review and

incorporation into our file. If you have any questions or require additional information regarding this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

Enclosure

C: Maureen Dillon-Parker
Project Manager
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Rockville, MD 20850
Fax: (301) 827-2325

3M Health Care

3M Center
St. Paul, MN 55144-1000
651 733 1110

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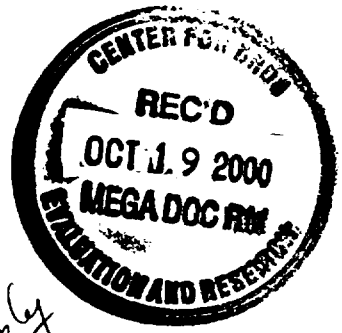

October 17, 2000

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Hand delivered
DCKastid
11-9-00

MR

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 015
3M CHG Hand Prep (Chlorhexidine Gluconate Hand Prep)
General Correspondence to Provide Plan for NDA Amendment in Support of Change in Drug Product Manufacturer and Request for Follow-up Teleconference

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to the Agency's June 23, 2000 "Not Approvable" Letter to NDA 21-074. As stated in the Agency's letter, due to cGMP deficiencies cited during the Philadelphia District inspection of the [redacted] facility from March 21 to April 13, 2000, the application was found to be inadequate, and therefore not approvable. It is furthermore stated that correction of the deficiencies must be completed and a satisfactory inspection will be required before NDA 21-074 may be approved.

This correspondence is to provide a plan for amending NDA 21-074 to list [redacted] as the new drug product manufacturing and analytical testing site. Please note that upon the FDA finding the NDA to be approvable based on [redacted] as the drug product manufacturer, if at that time [redacted] is still not considered by the FDA to be in compliance with cGMP, [redacted] would be withdrawn from the NDA.

In support of approval of [redacted] as the drug product manufacturing site, and analytical testing site (to include raw material, in-process, finished product and stability testing), the following would be provided as an amendment to the pending NDA:

- [redacted] facilities information, debarment and cGMP certification statements
- Side-by-side manufacturing flow diagrams demonstrating that the manufacturing process when moved from [redacted] will not change (see attached).
- Side-by-side equipment comparisons demonstrating that similar manufacturing equipment is used [redacted]
- Master and executed manufacturing batch production record for 1 lot of product

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- In-process and finished product testing for lot of product manufactured and tested at [redacted]
- Stability plan with T_0 data for lot of product manufactured at [redacted] (see attached proposed stability packaging configuration for the NDA registration batch).
- Post –approval stability commitment for long-term stability on the first three full-scale validation lots.

With respect to the above referenced stability plan, 3M requests that NDA approval for manufacturing at [redacted] be granted based on T_0 data, with a commitment from 3M to provide remaining accelerated and long term stability data for the registration lot as they become available. A post-approval stability commitment would also be provided. This request is supported by the facts that no manufacturing process or equipment changes would be made and that Avagard is a solution dosage form and is consistent with SUPAC guidelines for Non-sterile Semisolid Dosage Forms.

3M requests the opportunity to discuss this plan with the review chemist and other FDA team members as appropriate. We will follow-up with Ms. Maureen Dillon-Parker, FDA Project Manager to schedule this teleconference at the Agency's earliest convenience.

This amendment 015 to pending NDA 21-074 is being submitted in duplicate for review and incorporation into our file. If you have any questions or require additional information regarding this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

Enclosures

C: Maureen Dillon-Parker
Project Manager
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Rockville, MD 20850
Fax: (301) 827-2325

3M Health Care

3M Center
St. Paul, MN 55144-1000
651 733 1110

C

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3M January 10, 2001

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 016
3M CHG Hand Prep (Chlorhexidine Gluconate Hand Prep)
General Correspondence to Provide Introductory Promotional Materials

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to the Agency's June 23, 2000 "Not Approvable" Letter to NDA 21-074.

As requested in the Agency's letter, one copy of each of the Avagard™ launch promotional materials are herewith provided. A copy of the product package insert is also included. Two copies of each of these materials have been forwarded to the Division of Drug Marketing and Advertising for their review as well.

This amendment 016 to pending NDA 21-074 is being submitted for review and incorporation into our file. If you have any questions or require additional information regarding this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

Enclosures

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651 733 1110

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3M

February 21, 2001

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

BC

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 017
3M™ Avagard™ Surgical and Healthcare Personnel Hand Antiseptic
Response to June 23, 2000 Not Approvable Letter

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to the Agency's June 23, 2000 "Not Approvable" Letter to NDA 21-074.

In response to the Agency's "Not Approvable" letter, the following is submitted in support of NDA approval:

CHEMISTRY

1. The Philadelphia District Office completed their re-inspection of [redacted] on January 17 through February 16, 2001. Per a February 21, 2001 telephone communication from Debra Pagano, Pre-approval Program Manager, the Philadelphia District FDA has recommended approval of NDA 21-074 manufactured at [redacted]

CLINICAL

2. Pursuant to the Agency's findings that the indication of preoperative patient antiseptic was not approvable because of a lack of substantial evidence consisting of adequate and well-controlled investigations, 3M hereby withdraws this indication from the NDA. Avagard™ Hand Antiseptic will only be indicated for use as a Surgical Hand Antiseptic and Healthcare Personnel Hand Antiseptic.

LABELING

3. Twelve sets of Final Printed Labeling are provided which incorporate all FDA labeling comments as agreed to at our July 20, 2000 labeling negotiations teleconference and as further provided by the Division of Over-the-Counter Drug Product in their December 18, 2000 fax communication. Labeling specifications are also provided.

DUPLICATE

Please note that twelve copies of the drug package insert are also provided. As previously discussed with the Agency, and as described in the NDA, since Avagard Hand Antiseptic is an OTC drug, the package insert will not accompany or be provided with the product, as is typical for a prescription drug product. Rather, this document was prepared as a means of providing additional clinical/product information to customers upon request.

Introductory promotional materials have been submitted to the Division of Drug Marketing, Advertising and Communications and to the Division of Anti-Infective Drug Products as Amendment 016, dated January 11, 2001.

This amendment 017 to pending NDA 21-074 is being submitted in duplicate (with one set of twelve copies of final printed labeling, and twelve copies of the package insert) for review and incorporation into our file. If you have any questions or require additional information regarding this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

Enclosures

C: Maureen Dillon-Parker
Project Manager
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Rockville, MD 20850
Fax: (301) 827-2325

3M Health Care

3M Center
St. Paul, MN 55144-1000
651 733 1110

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3M

March 14, 2001

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA [illegible] AMENDMENT

BC

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 018
3M™ Avagard™ Surgical and Healthcare Personnel Hand Antiseptic
Chemistry, Manufacturing and Controls Information – Updated Stability Data

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to the March 14, 2001 telephone communication from Mr. Milton Sloan, Review Chemist, during which updated drug product stability data was requested.

In response to Mr. Sloan's request, the following information is provided:

MRI Project #	Lot Numbers Included
Project No. 304927.1.001 Progress Report 6 Initial through Month 24 Test Intervals	JAN 98 001 (placebo study)
	JAN98 003
	JAN98 004
Project No. 305281.1.001 Progress Report 6 Initial through Month 24 Test Intervals	JUL98 001

This amendment 018 to pending NDA 21-074 is being submitted in duplicate for review and incorporation into our file. This amendment is also being faxed directly to the attention of Mr. Sloan,

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3M Health Care
3M Center
St. Paul, MN 55144-1000
651 733 1110

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May 22, 2001

Gary K. Chikami, MD
Director, Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Chikami:

RE: NDA 21-074; Amendment 019
3M™ Avagard™ Surgical and Healthcare Personnel Hand Antiseptic
Product Labeling - Revised Package Insert

Reference is made to pending NDA 21-074 for the above listed drug product.

Reference is also made to a May 22, 2001 telephone communication from Maureen Dillon-Parker, FDA Project Manager, during which it was requested that the Avagard™ package insert be revised per comments made by the reviewer from the Division of Over-the Counter Drugs. Specifically, the OTC reviewer's comment requested that the package insert be revised so that the section, "Information for the User" appears after the "How Supplied" section, and before the "References" section.

This amendment is to provide 12 final printed copies of the Avagard™ package insert, revised per the OTC reviewer's comments. As previously discussed with the Agency, and as described in the NDA, since Avagard™ Hand Antiseptic is an OTC drug, the package insert will not accompany or be provided with the product, as is typical for a prescription drug product. Rather, this document was prepared as a means of providing additional clinical/product information to customers upon request.

This amendment 019 to pending NDA 21-074 is being submitted in duplicate for review and incorporation into our file. This amendment is also being faxed directly to the attention of Maureen Dillon-Parker, for her attention. If you have any questions or require additional information regarding

ORIGINAL

this submission, please contact me at (651) 737-9117.

Sincerely,

3M HEALTH CARE

Dianne L. Gibbs, RAC
Regulatory Affairs Specialist
3M Center 275-5W-06
St. Paul, MN 55144-1000

Enclosures

C: Maureen Dillon-Parker
Project Manager
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV, (HFD-520)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Rockville, MD 20850
Fax: (301) 827-2325