CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21252

CHEMISTRY REVIEW(S)

OCT - 4 2000

DIVISION OF GASTROINTESTINAL AND COAGULATION DRUG PRODUCTS
Review of Chemistry, Manufacturing, and Controls

NDA: 21-252 **DATE REVIEWED:** October 3, 2000

REVIEW #: 1 **REVIEWER:** Maria Elena Ysern, MSc

SUBMISSION TYPE	DOCUMENT DATE	CDER DATE	ASSIGNED DATE
ORIGINAL	28 April, 2000	2 May, 2000	22 May, 2000
BC Amendment	15 Aug, 2000	15 Aug, 2000	21 Aug, 2000
BC Amendment	6 Sep, 2000	7 Sep, 2000	15 Sep, 2000

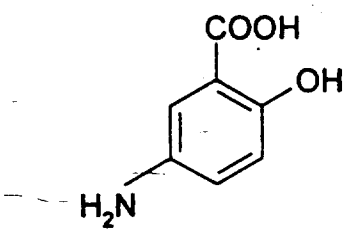
NAME & ADDRESS OF APPLICANT: Axcan Scandipharm Inc. (Axcan Pharma U.S. Inc.)
22 Inverness Parkway
Birmingham, AL 35242

DRUG PRODUCT NAME
Proprietary: FIV-ASA
Established: Mesalamine
Code Name/#: ---------
Chem.Type/Ther.Class: 5P
Chemical Abstract Number: 89-57-6
Synonyms: 5-ASA, Fisalamine, Mesalazine- INN, BAN

PHARMACOL. CATEGORY/INDICATION: Antiinflammatory. Treatment of active ulcerative proctitis.

DOSAGE FORM: Suppositories
STRENGTHS: 500 mg
ROUTE OF ADMINISTRATION: rectal
Rx/OTC: Rx
SPECIAL PRODUCTS: No

CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:



Molecular weight: 153.14
Molecular Formula: $C_7H_7NO_3$
Chemical name: 5-amino-2-hydroxybenzoic acid, 5-aminosalicylic acid

SUPPORTING DOCUMENTS:

Type/Number	Subject	Holder	Status	Review Date	Letter Date
DMF	Drug Substance		Inadequate	Sep 21, 2000	Sep 22, 2000
DMF	Drug Substance		Inadequate	Sep 21, 2000	Sep 25, 2000
DMF	Container Closure component		Inadequate	Sep 7, 2000	Sep 13, 2000

RELATED DOCUMENTS (if applicable): None

CONSULTS:
Consult to the Biopharm Division for review of dissolution method and specifications. Consult pending.

Consult to OPDRA: The division consulted the trade name "FIV-ASA". The applicant is considering changing the trade name to [redacted] Consults pending.

Establishment Evaluation Request (EER) was sent 03-Jul-2000. Overall evaluation is pending.

REMARKS:

During the development process of FIV-ASA, Scandipharm U.S.Inc. was acquired by Axcan Pharma (February 2000) and the two companies are now one. The name of the new company is Axcan Scandipharm Inc.

FIV-ASA (mesalamine) Suppositories are already on the Canadian market under the name Salofalk ® in strengths of 250 and 500 mg. [redacted] Salofalk® and FIV-ASA are identical formulation, method of manufacturing and packaging components.

CONCLUSIONS & RECOMMENDATIONS:
This NDA is APPROVABLE from the standpoint of CMC with a 24 months expiration period, pending resolution of the deficiencies listed in the draft letter to the sponsor. An adequate overall inspection of the different facilities and the recommendations from the Biopharmaceutic division are pending. The DMFs related to this NDA will also need to be Adequate before approval.

/S/ 10/4/00
Maria E. Ysern, MSc
Review Chemist, HFD-180

/S/ 10/4/00
Liang Zhou, PhD
Chemistry Team Leader, HFD-180

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DIVISION OF GASTROINTESTINAL AND COAGULATION DRUG PRODUCTS
Review of Chemistry, Manufacturing, and Controls

NDA: 21-252 **DATE REVIEWED:** Dec 2, 2000

REVIEW #: 2 **REVIEWER:** Maria Elena Ysem, MSc

SUBMISSION TYPE	DOCUMENT DATE	CDER DATE	ASSIGNED DATE
BC Amendment	Nov 9, 2000	Nov 13, 2000	Nov 14, 2000

NAME & ADDRESS OF APPLICANT: Axcan Scandipharm Inc. (Axcan Pharma U.S. Inc.)
22 Inverness Parkway
Birmingham, AL 35242

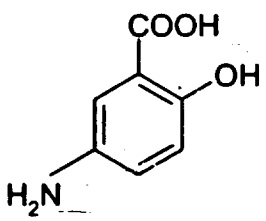
DRUG PRODUCT NAME

Proprietary:	FIV-ASA
Established:	Mesalamine
Code Name/#:	---------
Chem.Type/Ther.Class:	5P
Chemical Abstract Number:	89-57-6
Synonyms:	5-ASA, Fisalamine, Mesalazine- INN, BAN

PHARMACOL. CATEGORY/INDICATION: Antiinflammatory. Treatment of active ulcerative proctitis.

DOSAGE FORM:	Suppositories
STRENGTHS:	500 mg
ROUTE OF ADMINISTRATION:	rectal
Rx/OTC:	Rx
SPECIAL PRODUCTS:	No

CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:



Molecular weight: 153.14
Molecular Formula: $C_7H_7NO_3$
Chemical name: 5-amino-2-hydroxybenzoic acid, 5-aminosalicylic acid

SUPPORTING DOCUMENTS:

Type/Number	Subject	Holder	Status	Review Date	Letter Date
DMF	Drug Substance		Adequate	Nov 3, 2000	-------
DMF	Drug Substance		Inadequate Inadequate	Sep 21,2000 Dec 1, 2000	Sep 25,2000 Called
DMF	Container Closure component		Inadequate	Sep 7, 2000	Sep 13,2000

RELATED DOCUMENTS (if applicable): None

CONSULTS:
Consult to the Biopharm Division for review of dissolution method and specifications. Consult pending.

Consult to OPDRA: The division consulted the trade name "FIV-ASA". The applicant is considering changing the trade name to "Can-Asa". OPDRA has no objection to the use of the proprietary name, Canasa. They also identified several areas of possible improvement in the carton and insert labeling, refer to these comments in the review notes.

Establishment Evaluation Request (EER) was sent 03-Jul-2000. Overall evaluation is pending.

REMARKS:
This amendment provides the response to the FDA information request letter dated October 13, 2000.

CONCLUSIONS & RECOMMENDATIONS:
This NDA is APPROVABLE from the standpoint of CMC with a 15 months expiration period. An adequate overall inspection of the different facilities and the recommendations from the Biopharmaceutic division are pending. The DMFs related to this NDA will also need to be Adequate before approval.

Maria E. Ysern, MSc
Review Chemist, HFD-180

Liang Zhou, PhD
Chemistry Team Leader, HFD-180

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