CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-770

APPROVABLE LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-770

Allergan, Inc.
Attention: Lewis Gryziewicz, R.Ph.
Director, Pharmaceutical Regulatory Affairs
2525 Dupont Drive
P.O. Box 19534
Irvine, CA 92623-9534

Dear Mr. Gryziewicz:

Please refer to your new drug application (NDA) dated May 27, 2004, received June 1, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Alphagan [redacted] (brimonidine tartrate ophthalmic solution) 0.1%.

We acknowledge receipt of your submissions dated July 15 and 27, and September 17, 29, and 30, 2004, and February 24, and March 8, 2005.

We also acknowledge receipt of your submissions dated March 11 and 17, 2005. These submissions were not reviewed for this action. You may incorporate these submissions by specific reference as part of your response to the deficiencies cited in this letter.

We completed our review of this application, as amended, and it is approvable. Before the application may be approved, however, it will be necessary for you to address the following deficiencies:

1. [redacted]

2.

3.

4. The agency disagrees with your contention that a media fill acceptance criteria of 0.1% contaminated units with a 95% confidence level is acceptable. You should adjust these acceptance criteria to rates reflecting the expectations for current manufacturing technology.

5. During a recent inspection of the manufacturing facility for this application, our field investigator conveyed deficiencies to the facility's representative. Satisfactory resolution of these deficiencies is required before this application may be approved, and all facilities must be in compliance with cGMPs.

In addition, it will be necessary for you to submit revised draft labeling consistent in content with that attached to this letter and to submit a completed form FDA-3542a concerning patents for this product.

If additional information relating to the safety or effectiveness of this drug becomes available, revision of the labeling may be required.

Under 21 CFR 314.50(d)(5)(vi)(*b*), we request that you update your NDA by submitting all safety information you now have regarding your new drug.

Within 10 days after the date of this letter, you are required to amend this application, notify us of your intent to file an amendment, or follow one of your other options under 21 CFR 314.110. If you do not follow one of these options, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. Any amendment should respond to all the deficiencies listed. We will not process a partial reply as a major amendment nor will the review clock be reactivated until all deficiencies have been addressed.

Under 21 CFR 314.102(d), you may request an informal meeting or telephone conference with this division to discuss what steps need to be taken before the application may be approved.

The drug product may not be legally marketed until you have been notified in writing that the application is approved.

If you have any questions, call Michael Puglisi, Project Manager, at (301) 827-2090.

Sincerely,

{See appended electronic signature page}

Wiley A. Chambers, M.D.
Deputy Director
Division of Anti-Inflammatory, Analgesic
and Ophthalmic Drug Products, HFD-550
Office of Drug Evaluation V
Center for Drug Evaluation and Research

5 Page(s) Withheld

_____ Trade Secret / Confidential

✓ Draft Labeling

_____ Deliberative Process

Withheld Track Number: Approvable Letter- 1

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

/s/

Wiley Chambers
4/1/05 08:48:14 AM