CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
22-211

MICROBIOLOGY REVIEW(S)
Date: August 21, 2009

To: Gorski Lori, Project Manager

From: Vinayak Pawar, OPS, NDMS

Re: Product Quality Microbiology Comment sent to Sirion Therapeutics in Division’s letter dated July 20, 2009.

Comment: Bacterial Endotoxins testing is required for ophthalmic products. Please provide assurance that Ganciclovir Ophthalmic Gel has no more than ≤ EU/mg of endotoxin in the product. Provide test methods you used to assay the endotoxin content in the product.

Response: Sirion responded in a letter dated August 6, 2009. The sponsor provided Control of Drug Product Specifications section (3.2.P.5.1) which included a USP LAL Method MTM-200033 indicating an acceptable specification for Ganciclovir at ≤ EU/mL. This response is acceptable.
Application Type/Number: NDA-22211
Submission Type/Number: ORIG-1
Submitter Name: SIRION THERAPEUTICS
Product Name: ZIRGAN (GANCICLOVIR OPHTHALMIC GEL) 0.15%

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/s/

VINAYAK B PAWAR
09/08/2009

JAMES L MCVEY
09/09/2009
I concur.
Product Quality Microbiology Review

July 29, 2009

NDA: 22-211/N-000

Drug Product Name
Proprietary: Ganciclovir
Non-proprietary: ganciclovir ophthalmic gel 0.15%

Review Number: 1

Dates of Submission(s) Covered by this Review

<table>
<thead>
<tr>
<th>Letter</th>
<th>Stamp</th>
<th>Review Request</th>
<th>Assigned to Reviewer</th>
</tr>
</thead>
</table>

Applicant/Sponsor
Name: Sirion Therapeutics
Address: 9314 E Broadway Ave., Tampa, FL 33619
Representative: Christine, Miller, Pharm D, Sr. VP, Drug Development.
Telephone: 813-496-7328 ext 236

Name of Reviewer: Vinayak. B. Pawar, Ph.D.

Conclusion: The NDA is approvable pending resolution of the deficiency listed in section 3 of this review.
Product Quality Microbiology Data Sheet

A.  1. TYPE OF SUBMISSION: Original NDA

2. SUBMISSION PROVIDES FOR: Ganciclovir, ophthalmic gel

3. MANUFACTURING SITE: Allied Medical Products, Irvine, CA

4. DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY: Ophthalmic Gel containing 0.15% Ganciclovir.

5. METHOD(S) OF STERILIZATION: 

6. PHARMACOLOGICAL CATEGORY: Indicated for the topical treatment of acute herpetic keratitis.

B. SUPPORTING/RELATED DOCUMENTS: None

C. REMARKS: The consult for review of this Original NDA 22-211 (electronic submission dated June 25, 2008) was submitted on December 3, 2008. This NDA from IND 75,762 was granted an orphan status for a product intended for the treatment of acute herpetic keratitis. In an IQA was filed by Linda NG on August 13, 2008 she states that the consult for this NDA was sent to NDMS staff by Lori Gorski on July 30, 2008. However, the request for this review was sent through an email dated December 3, 2008.

filename: C:\my documents\review\NDA\N022211R1
Executive Summary

I. Recommendations

A. Recommendation on Approvability – The NDA is approvable pending resolution of the deficiency listed in section 3 of this review.

B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable – N/A

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology – The drug product is formulated at 1.5 mg of Ganciclovir per gram of clear colorless gel with benzalkonium chloride as preservative. The bulk formulation is sterilized in

b(4)

B. Brief Description of Microbiology Deficiencies - None

C. Assessment of Risk Due to Microbiology Deficiencies – N/A

III. Administrative

A. Reviewer's Signature

Vinayak B. Pawar, Ph.D.
CDER/OPS/NDMS

B. Endorsement Block

Stephen Langille, Ph.D.
CDER/OPS/NDMS

C. CC Block

N/A
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<th>Drug Name / Subject</th>
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/s/

VINAYAK B PAWAR
08/04/2009

STEPHEN E LANGILLE
08/05/2009