APPLICATION NUMBER:
22-228

CHEMISTRY REVIEW(S)
NDA 22-288

Bepotastine Besilate 1.5% Ophthalmic Solution

ISTA Pharmaceuticals, Inc.

Shrikant Pagay
ONDQA/OPS/DAIOP
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Chemistry Review Data Sheet

1. NDA #22-288

2. REVIEW #: 3 (Methods validation only)

3. REVIEW DATE: 2-September-2009

4. REVIEWER: Shrikant Pagay

5. PREVIOUS DOCUMENTS:

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<td>Amendment 9/10/08</td>
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6. SUBMISSION(S) BEING REVIEWED:

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7. NAME & ADDRESS OF APPLICANT:

| Name: ISTA Pharmaceuticals Inc |
8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: Bepreve  
b) Non-Proprietary Name (USAN): Bepotastine Besilate  
c) Code Name/# (ONDC only): TAU-284; SNJ-1773  
d) Chem. Type/Submission Priority (ONDC only):  
   • Chem. Type: 1  
   • Submission Priority: S

9. LEGAL BASIS FOR SUBMISSION: 505(b) (1)

10. PHARMACOL. CATEGORY: Allergic Conjunctivitis

11. DOSAGE FORM: Solution

12. STRENGTH/POTENCY: 1.5% by weight

13. ROUTE OF ADMINISTRATION: Ophthalmic

14. Rx/OTC DISPENSED: x_Rx ___OTC

15. **SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):**  
   _____SPOTS product – Form Completed  
   ___x__ Not a SPOTS product
16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Proposed Name:

USAN Name: (+)-4-[(S)-p-Chloro-alpha-2-pyridylbenzyl] oxy]-1-piperidine butyric acid monobenzenesulfonate

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\begin{align*}
\text{Proposed Name:} \\
\text{USAN Name:} & \quad (+)-4-[(S)-p-Chloro-alpha-2-pyridylbenzyl] \text{ oxy}]\ -1\text{-piperidine butyric acid monobenzenesulfonate} \\
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¹ Action codes for DMF Table:
- 1 – DMF Reviewed.
- Other codes indicate why the DMF was not reviewed, as follows:
  - 2 – Type 1 DMF
  - 3 – Reviewed previously and no revision since last review
  - 4 – Sufficient information in application
  - 5 – Authority to reference not granted
  - 6 – DMF not available
  - 7 – Other (explain under "Comments")

² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)
B. Other Documents: None

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18. STATUS: See below

**ONDC:**

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19. ORDER OF REVIEW (OGD Only)

The application submission(s) covered by this review was taken in the date order of receipt. ____ Yes  ____ No  If no, explain reason(s) below:
The Chemistry Review for NDA 22-288

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on Approvability
From the chemistry, manufacturing and controls standpoint, the NDA is recommended for approval. Methods Validation studies from the FDA laboratory are completed and the methods are acceptable.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable - NA

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug Substance
Bepotastine besilate is manufactured by Ube Industries and the information for the NDA is submitted through DMF #19966. Bepotastine besilate is a white crystalline powder with no odor and bitter taste. It is very soluble in (b)(4) but sparingly soluble in (b)(4). It is stable when exposed to light, and optically active. The S-isomer is the active drug and (b)(4) is controlled as an impurity through synthesis. The distribution coefficient in 1-octanol is higher than in aqueous buffer in the pH 5-9 range. There are 10 potential impurities but only one impurity is above 0.1%. Two potential genotoxic impurities (b)(4) are controlled below (b)(4). Residual (b)(4) is controlled below

Bepotastine besilate is stable under long term storage conditions for (25ºC/60% RH) over 5 years.

Drug Product
Bepotastine besilate was originally developed as an oral tablet dosage form and got approval in Japan in 2000 for allergic rhinitis. It is a non-sedating anti-allergic drug. The proposed NDA is an ophthalmic solution indicated for allergic conjunctivitis. Bepotastine besilate ophthalmic solution 1.5% is a sterile solution. It is an aqueous solution to be administered as drops at or near physiological pH range of tears. The formulation contains sodium chloride, monobasic sodium phosphate as dihydrate, benzalkonium chloride, sodium hydroxide and purified water; typically these components are used for (b)(4), preservative action, pH adjustment,
buffering capacity and a vehicle for administration, respectively. It was demonstrated during the formulation development that sodium chloride USP/NF grade. It is manufactured as a solution.

The fill volumes are 1, 2.5, 5, and 10 mL. The release and stability testing includes all the typical tests for sterile ophthalmic solutions (description, assay, impurities, pH, osmolality, particulate matter, preservative assay, microbiological testing). Also, a one-time testing included the following studies: freeze-thaw, weight gain/loss due to water vapor transmission from the container, semi-volatile and volatile leachable material released into the ophthalmic solution from the container and label. Stability data on 23 batches manufactured for clinical, non-clinical and registration studies (Primary and support batch data) supports 12 months shelf life for the 1 mL fill and 18 months for the 2.5, 5 and 10 mL fill sizes.

B. Description of How the Drug Product is Intended to be Used
The drug product is a sterile solution and should be dispensed in its original container. The label should indicate that the solution is for topical use only and not for injection or oral use. Also, the label should indicate not to touch dropper tip to any surface as it may contaminate the contents. The usual dose is to instill one drop in the affected eye twice a day. The product is stored under ambient conditions (15°C to 30°C) and discarded as indicated on the manufacturer’s label at expiration date.

C. Basis for Approvability or Not-Approval Recommendation
The following items are satisfactorily completed for approvability consideration:
DMF for the drug substance is adequate.
All manufacturing, testing and packaging facilities for the drug substance and the drug product received acceptable status from compliance ((EER attached to Review 1)
The drug substance and drug product quality is reproducible based on the batch analysis data for release and stability.
Manufacturing processes for the drug substance and the drug product are well controlled.
ISTA has provided satisfactory response to all deficiencies.
FDA laboratory conducted and the proposed methods for assay and impurities are acceptable.

III. Administrative

A. Reviewer’s Signature
B. Endorsement Block

Chemist Name/Date: Same date as draft review
ChemistryTeamLeaderName/Date
ProjectManagerName/Date

C. CC Block

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

/s/

SHRIKANT N PAGAY  
09/15/2009

NORMAN R SCHMUFF  
09/22/2009
MEMORANDUM

Date: August 13, 2009
To: NDA 22-288

From: Elaine Morefield, Ph.D.
Division Director
Pre-marketing Assessment Division II
ONDQA

Subject: Tertiary review of ONDQA recommendation for NDA 22-288, Bepreve (bepoststine besilate ophthalmic Solution) 1.5%.

I have assessed the ONDQA reviews of NDA 22-288, Bepreve (bepoststine besilate ophthalmic Solution) 1.5%. The sponsor has submitted data assuring that they can produce a quality product. Therefore, I concur with the ONDQA recommendation of approval from the CMC perspective.
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/s/

ELAINE M MOREFIELD
08/13/2009
NDA 22-288

Bepotastine Besilate 1.5% Ophthalmic Solution

ISTA Pharmaceuticals, Inc.

Shrikant Pagay
ONDQA/OPS/DAIOP
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Chemistry Assessment ..........................................................................................11
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2. REVIEW #: 2

3. REVIEW DATE: 6-May-2009

4. REVIEWER: Shrikant Pagay

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   b) Non-Proprietary Name (USAN): Bepotastine Besilate
   c) Code Name/# (ONDC only): TAU-284; SNJ-1773
   d) Chem. Type/Submission Priority (ONDC only):
      • Chem. Type: 1
      • Submission Priority: S

9. LEGAL BASIS FOR SUBMISSION: 505(b) (1)

10. PHARMACOL. CATEGORY: Allergic Conjunctivitis

11. DOSAGE FORM: Solution

12. STRENGTH/POTENCY: 1.5% by weight

13. ROUTE OF ADMINISTRATION: Ophthalmic

14. Rx/OTC DISPENSED: x_Rx ____OTC

15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):
    _____SPOTS product – Form Completed
    ____x____ Not a SPOTS product
16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Proposed Name:

USAN Name: (+) -4-[(S) p-Chloro-alpha -2-pyridylbenzyl] oxy]-1-piperidine butyric acid monobenzenesulfonate

\[
\begin{align*}
\text{C}_21\text{H}_{25}\text{ClN}_2\text{O}_3\cdot\text{C}_6\text{H}_6\text{O}_3\text{S} \\
\text{MW: } 547.06
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\]

Free acid Bepotastine MW. 388.90

17. RELATED/SUPPORTING DOCUMENTS:
### A. DMFs:

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1 Action codes for DMF Table:
1 – DMF Reviewed.
Other codes indicate why the DMF was not reviewed, as follows:
2 – Type 1 DMF
3 – Reviewed previously and no revision since last review
4 – Sufficient information in application
5 – Authority to reference not granted
6 – DMF not available
7 – Other (explain under "Comments")

2 Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)
B. Other Documents: None

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18. STATUS: See below

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19. ORDER OF REVIEW (OGD Only)

The application submission(s) covered by this review was taken in the date order of receipt.  ____ Yes  ____ No  If no, explain reason(s) below:
The Chemistry Review for NDA 22-288

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on Approvability
From the chemistry, manufacturing and controls standpoint, the NDA is recommended for approval. Methods Validation results from the FDA laboratory are pending, but this is not an approvability issue.

B. Recommendation on Phase 4 (Post-Marking) Commitments, Agreements, and/or Risk Management Steps, if Approvable - NA

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug Substance
Bepotastine besilate is manufactured by Ube Industries and the information for the NDA is submitted through DMF #19966. Bepotastine besilate is a white crystalline powder with no odor and bitter taste. It is very soluble in but sparingly soluble in . It is stable when exposed to light, and optically active. The S-isomer is the active drug and is controlled as an impurity through synthesis. The distribution coefficient in 1-octanol is higher than in aqueous buffer in the pH 5-9 range. There are 10 potential impurities but only one impurity is above 0.1%. Two potential genotoxic impurities are controlled below . Residual is controlled below . Bepotastine besilate is stable under long term storage conditions for (25°C/60% RH) over 5 years.

Drug Product
Bepotastine besilate was originally developed as an oral tablet dosage form and got approval in Japan in 2000 for allergic rhinitis. It is a non-sedating anti-allergic drug. The proposed NDA is an ophthalmic solution indicated for allergic conjunctivitis. Bepotastine besilate ophthalmic solution 1.5% is a sterile solution. It is an aqueous solution to be administered as drops at or near physiological pH range of tears. The formulation contains sodium chloride, monobasic sodium phosphate as dihydrate, benzalkonium chloride, sodium hydroxide and purified water; typically these components are used for , preservative action, pH adjustment,
buffering capacity and a vehicle for administration, respectively. It was demonstrated during the formulation development that sodium chloride

All excipients are of USP/NF grade. It is manufactured as a solution. The fill volumes are 1, 2.5, 5, and 10 mL. The release and stability testing includes all the typical tests for sterile ophthalmic solutions (description, assay, impurities, pH, osmolality, particulate matter, preservative assay, microbiological testing). Also, a one time testing included the following studies: freeze-thaw, weight gain/loss due to water vapor transmission from the container, semi-volatile and volatile leachable material released into the ophthalmic solution from the container and label. Stability data on 23 batches manufactured for clinical, non-clinical and registration studies (Primary and support batch data) supports 12 months shelf life for the 1 mL fill and 18 months for the 2.5, 5 and 10 mL fill sizes.

B. Description of How the Drug Product is Intended to be Used
The drug product is a sterile solution and should be dispensed in its original container. The label should indicate that the solution is for topical use only and not for injection or oral use. Also, the label should indicate to not touch dropper tip to any surface as it may contaminate the contents. The usual dose is to instill one drop in the affected eye twice a day. The product is stored under ambient conditions (15°C to 30°C) and discarded as indicated on the manufacturer’s label at expiration date.

C. Basis for Approvability or Not-Approval Recommendation
The following items are satisfactorily completed for approvability consideration:
DMF for the drug substance is adequate.
All manufacturing, testing and packaging facilities for the drug substance and the drug product received acceptable status for compliance ((EER attached to Review 1)
The drug substance and drug product quality is reproducible based on the batch analysis data for release and stability.
Manufacturing processes for the drug substance and the drug product are well controlled.
ISTA has provided satisfactory response to all deficiencies. However, results from FDA laboratory for are pending.

III. Administrative
A. Reviewer’s Signature
B. Endorsement Block

Chemist Name/Date: Same date as draft review
ChemistryTeamLeaderName/Date
ProjectManagerName/Date

C. CC Block

13 Page(s) have been Withheld in Full following this page as B4 (TS)
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This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

SHRIKANT N PAGAY
08/06/2009

NORMAN R SCHMUFF
08/09/2009
NDA 22-288

Bepotastine Besilate 1.5% Ophthalmic Solution

ISTA Pharmaceuticals, Inc.

Shrikant Pagay
ONDQA/OPS/DAIOP
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Chemistry Review Data Sheet

1. NDA #22-288

2. REVIEW #:1

3. REVIEW DATE: 6-May-2009

4. REVIEWER: Shrikant Pagay

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7. NAME & ADDRESS OF APPLICANT:

Name: ISTA Pharmaceuticals Inc
Address: 15295 Alton Parkway, Irvine, CA 92618
Representative: Paul Nowacki, Director, regulatory Affairs
Telephone: 949-789-3109
8. DRUG PRODUCT NAME/CODE/TYPe:
   a) Proprietary Name: Bepreve
   b) Non-Proprietary Name (USAN): Bepotastine Besilate
   c) Code Name/# (ONDC only): TAU-284; SNJ-1773
   d) Chem. Type/Submission Priority (ONDC only):
      • Chem. Type: 1
      • Submission Priority: S

9. LEGAL BASIS FOR SUBMISSION: 505(b) (1)

10. PHARMACOL. CATEGORY: Allergic Conjunctivitis

11. DOSAGE FORM: Solution

12. STRENGTH/POTENCY: 1.5% by weight

13. ROUTE OF ADMINISTRATION: Ophthalmic

14. Rx/OTC DISPENSED: x_Rx ___OTC

15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):
   _____SPOTS product – Form Completed
   _____x___ Not a SPOTS product
16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Proposed Name:

USAN Name: (+) -4-[(S) p-Chloro-alpha -2-pyridylbenzyl] oxy]-1-piperidine butyric acid monobenzenesulfonate

\[
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\text{USAN Name:} & \quad \text{(+)} -4-[(S) \text{ p-Chloro-alpha -2-pyridylbenzyl}] \text{ oxy]-1-piperidine butyric acid monobenzenesulfonate} \\
\end{align*}
\]

\[
\begin{align*}
C_{21} & \quad H_{25} & \quad Cl & \quad N_2 & \quad O_3 & \quad \text{COOH} \\
\cdot & \quad \text{SO}_3H & \quad \text{C}_6H_6 & \quad \text{O}_3 & \quad \text{S} \\
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MW: 547

17. RELATED/SUPPORTING DOCUMENTS:
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1 Action codes for DMF Table:
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2 – Type 1 DMF
3 – Reviewed previously and no revision since last review
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7 – Other (explain under "Comments")

2 Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)
B. Other Documents: None

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18. STATUS: See below

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19. ORDER OF REVIEW (OGD Only)

The application submission(s) covered by this review was taken in the date order of receipt. ____ Yes  ____ No     If no, explain reason(s) below:
The Chemistry Review for A/NDA ##-###

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on Approvability
   From the chemistry, manufacturing and controls standpoint, the NDA is not approved pending response for comments submitted to the sponsor.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

   Drug Substance
   Bepotastine besilate is manufactured by Ube Industries and the information for the NDA is submitted through DMF #19966. Bepotastine besilate is a white crystalline powder with no odor and bitter taste. It is very soluble in but sparingly soluble in . It is stable when exposed to light, and optically active. The S-isomer is the active drug and is controlled as an impurity through synthesis. The distribution coefficient in 1-octanol is higher than in aqueous buffer in the pH 5-9 range. There are 10 potential impurities but only one impurity is above 0.1%. Two potential genotoxic impurities are controlled below . Residual is controlled below . Bepotastine besilate is stable under long term storage conditions for (25ºC/60% RH) over 5 years.

   Drug Product
   Bepotastine besilate was originally developed as an oral tablet dosage form and got approval in Japan in 2000 for allergic rhinitis. It is a non-sedating anti-allergic drug. The proposed NDA is an ophthalmic solution indicated for allergic conjunctivitis. Bepotastine besilate ophthalmic solution 1.5% is a sterile solution. It is an aqueous solution to be administered as drops at or near physiological pH range of tears. The formulation contains sodium chloride, monobasic sodium phosphate as dihydrate, benzalkonium chloride, sodium hydroxide and purified water; typically these components are used for , preservative action, pH adjustment, buffering capacity and a vehicle for administration. It was demonstrated during the
formulation development that sodium chloride All excipients are of USP/NF grade. It is manufactured as a (b)(4) solution. The fill volumes are 1, 2.5, 5, and 10 mL.

The release and stability testing includes all the typical tests for sterile ophthalmic solutions (description, assay, impurities, pH, osmolality, particulate matter, preservative assay, microbiological testing). Also, a one time testing included the following studies: freeze-thaw, weight gain/loss, semi-volatile and volatile leachable. Stability data on 23 batches manufactured for clinical, non-clinical and registration studies (Primary and support batch data) supports 12 months shelf life for the 1 mL fill and 18 months for the 2.5, 5 and 10 mL fill sizes.

B. Description of How the Drug Product is Intended to be Used
The drug product is a sterile solution and should be dispensed in its original container. The label should indicate that the solution is for topical use only and not for injection or oral use. Also, the label should indicate to not touch dropper tip to any surface as it may contaminate the contents. The usual dose is to instill one drop in the affected eye twice a day. The product is stored under ambient conditions (15°C to 30°C) and discarded as indicated on the manufacturer’s label at expiration date.

C. Basis for Approvability or Not-Approval Recommendation
The following items are satisfactorily completed:
DMF for the drug substance is adequate.
All manufacturing, testing and packaging facilities for the drug substance and the drug product received acceptable status for compliance ((Attached EER)
The drug substance and drug product quality is reproducible based on batch analysis data for release and stability.
Manufacturing processes are well controlled.

The only pending issue is Response to FDA comments

III. Administrative

A. Reviewer’s Signature

B. Endorsement Block
ChemistName/Date: Same date as draft review
ChemistryTeamLeaderName/Date
ProjectManagerName/Date
C. CC Block

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/s/
SHRIKANT N PAGAY
07/27/2009

NORMAN R SCHMUFF
07/27/2009
Summary and Critical Issues: Note that NDA and DMF information are discussed in this IQA.

Summary

This NDA dated November 12, 2008 from ISTA Pharmaceutical Inc is an eCTD and was accepted as a 1S submission. Amendments dated December 10, 2008 contains proposed proprietary name, December 11 contains the container leachable study and December 18, 2008 contains the mock-up immediate container label and carton labeling.

Bepotastine besilate, a new molecular entity, is manufactured by Ube Industries Ltd, Japan and all information related to the drug substance is submitted to type II DMF 19,966. It is a salt and express as 1.5% free acid for the drug product in the label. Minimally information on the drug substance is in the NDA.

According to the DMF holder, bepotantine besilate is a white crystalline powder sparingly soluble in ... (b)(4). Reference standard for the drug substance and impurities are mentioned. The starting material was an on-going discussion topic.

Bepotantine besilate reference standard

7 Page(s) have been Withheld in Full following this page as B4 (TS)
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/s/
---------------------
Linda Ng
1/26/2009 12:42:42 PM
CHEMIST

Norman Schmuff
1/29/2009 06:03:40 PM
CHEMIST
NDA FILEABILITY CHECKLIST

NDA Number: 22-288  
Applicant: ISTA Pharmaceuticals,  
Letter Date: November 14, 2008  
Stamp Date: November 14, 2008  
Drug Name: Bupreve (bepotastine Besilate Ophthalmic Solution) 1.5% as acid

IS THE CMC SECTION OF THE APPLICATION FILEABLE? (Yes or No) Yes

The following parameters are necessary in order to initiate a full review, i.e., complete enough to review but may have deficiencies.

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<td>2. Is the section indexed and paginated adequately?</td>
<td>Y</td>
<td></td>
<td>eCTD submission</td>
</tr>
<tr>
<td>3. On its face, is the section legible?</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Are ALL of the facilities (including contract facilities and test laboratories?) identified with full street addresses and CFNs?</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Is a statement provided that all facilities are ready for GMP inspection?</td>
<td>Y</td>
<td></td>
<td>In cover letter</td>
</tr>
<tr>
<td>6. Has an environmental assessment report or categorical exclusion been provided?</td>
<td>Y</td>
<td></td>
<td>M 1.12.14</td>
</tr>
<tr>
<td>7. Does the section contain controls for the drug substance?</td>
<td>Y</td>
<td></td>
<td>Bepotastine besilate manufactured in Ube Industries Ltd, Japan. Type II DMF 19966</td>
</tr>
<tr>
<td>8. Does the section contain controls for the drug product?</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Has stability data and analysis been provided to support the requested expiration date?</td>
<td>Y</td>
<td></td>
<td>One strength with 4 fill sizes of 1, 2.5, 5 and 10 mL. 3 batches 6 months stability RT and accelerated for all fill sizes provided. Has supporting stability data.</td>
</tr>
<tr>
<td>10. Has all information requested during the IND phase, and at the pre-NDA meetings been included?</td>
<td>Y</td>
<td></td>
<td>On-going discussion on starting material. Applicant did not wait for Agency’s response before submitting NDA</td>
</tr>
<tr>
<td>11. Have draft container labels been provided?</td>
<td>Y</td>
<td></td>
<td>In M1 – SPL provided</td>
</tr>
<tr>
<td>12. Has the draft package insert been provided?</td>
<td>Y</td>
<td></td>
<td></td>
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<tr>
<td>13. Has an investigational formulations section been provided?</td>
<td>Y</td>
<td></td>
<td>Discussed in section 2.3.P.2 Pharmaceutical Development.</td>
</tr>
<tr>
<td>14. Is there a Methods Validation package?</td>
<td>Y</td>
<td></td>
<td></td>
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<tr>
<td>15. Is a separate microbiological section included?</td>
<td>Y</td>
<td></td>
<td>Information included. Section not obvious.</td>
</tr>
<tr>
<td>DMF Number</td>
<td>Holder</td>
<td>Description</td>
<td>LOA Included</td>
</tr>
<tr>
<td>------------</td>
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<td>----------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>19966</td>
<td>Ube Industries Ltd</td>
<td>Bepotastine besilate</td>
<td>April 24, 2008</td>
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<td></td>
<td></td>
<td></td>
<td>July 3, 2007</td>
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<td>May 30, 2008</td>
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</table>
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/s/
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Linda Ng
12/3/2008 02:29:22 PM
CHEMIST

Norman Schmuff
12/3/2008 02:47:44 PM
CHEMIST