CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

022462Orig1s000

MICROBIOLOGY REVIEW(S)

Product Quality Microbiology Review

01 December 2009

NDA: **22-462/N000**

Drug Product Name
Proprietary: Baclofen Injection (Intrathecal)
Non-proprietary: baclofen

Review Number: 1

Dates of Submission(s) Covered by this Review

Submit	Received	Review Request	Assigned to Reviewer
27-MAR-209	30-MAR-2009	07-APR-2009	27-APR-2009
19-NOV-2009	20-NOV-2009	NA	NA

Submission History (for amendments only) – NA

Applicant/Sponsor
Name: CNS Therapeutics
Address: 539 Bielenberg Drive, Suite 200
Woodbury, MN 55125
Representative: John J. Foster, Chief Executive Officer
Telephone: (651) 501-5175

Name of Reviewer: Denise A. Miller

Conclusion: Approve

Product Quality Microbiology Data Sheet

A. 1. TYPE OF SUBMISSION: Original Application

2. SUBMISSION PROVIDES FOR: Aseptic fill of syringes and vials (b) (4)

3. MANUFACTURING SITE:

(b) (4)

4. DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:

Dosage form: Solution for Injection
Route of Administration: Intrathecal (to be administered with a pump)
Strengths:

Prefilled Syringe: 1.25 mL at 0.05 mg/mL
20 mL Vials: 20 mL at 0.5 mg/mL, 2 mg/mL (b) (4)
(b) ( )

5. METHOD(S) OF STERILIZATION: (b) (4) aseptic fills for syringes

6. PHARMACOLOGICAL CATEGORY: Management of severe spasticity of spinal cord and cerebral origin

B. SUPPORTING/RELATED DOCUMENTS:

DMF (b) (4)

Reviewed by OGD and found adequate (M. Stevens-Riley review 501mic8a1 dated 09-OCT-2009). There have been no DMF updates since this review.

DMF (b) (4)

Reviewed by OGD and found adequate (S. Donald review 11648mic11.doc dated 15 DEC 08). There have been no DMF updates since this review.

C. REMARKS:

This application was a paper submission in CTD format. Electronic copies were provided on CD rom.
An e-mail response to Information Request (IR) dated 10-NOV-2009 was received 12-NOV-2009 with a follow up amendment to the application submitted on 19-NOV-2009.

filename: N022462N000R1.doc

Executive Summary

I. Recommendations

A. Recommendation on Approvability - Recommend to approve from quality microbiology standpoint.

B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable - NA

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology - New drug application using aseptic filling (b) (4)

B. Brief Description of Microbiology Deficiencies – There are no deficiencies identified; however there is a comment to be forwarded to the sponsor. See page 19.

C. Assessment of Risk Due to Microbiology Deficiencies - NA

III. Administrative

A. Reviewer's Signature _____
Denise A. Miller, Microbiologist

B. Endorsement Block _____
Bryan S. Riley, Ph.D.

C. CC Block
N/A

16 Page(s) has been Withheld in Full as B4 (CCI/TS) immediately following this page

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
NDA-22462	ORIG-1	CNS THERAPEUTICS INC	BACLOFEN INTRATHECAL INJ 0.05 MG/ML/0.5

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

/s/

DENISE A MILLER
12/02/2009

BRYAN S RILEY
12/02/2009
I concur.

PRODUCT QUALITY MICROBIOLOGY FILING CHECKLIST

NDA Number: 22-462 **Applicant: CNS Therapeutics** **Letter Date:** 27-MAR-2009

Drug Name: Baclofen Intrathecal Injection **NDA Type:** 505(b)(2) **Stamp Date:** 30-MAR-2009

The following are necessary to initiate a review of the NDA application:

	Content Parameter	Yes	No	Comments
1	Is the product quality microbiology information described in the NDA and organized in a manner to allow substantive review to begin? Is it legible, indexed, and/or paginated adequately?	√		
2	Has the applicant submitted an overall description of the manufacturing processes and microbiological controls used in the manufacture of the drug product?	√		
3	Has the applicant submitted protocols and results of validation studies concerning microbiological control processes used in the manufacture of the drug product?	√		
4	Are any study reports or published articles in a foreign language? If yes, has the translated version been included in the submission for review?		√	
5	Has the applicant submitted preservative effectiveness studies (if applicable) and container-closure integrity studies?	√		PE= NA CC = submitted for vials syringes is pending
6	Has the applicant submitted microbiological specifications for the drug product and a description of the test methods?	√		
7	Has the applicant submitted the results of analytical method verification studies?	√		
8	Has the applicant submitted all special/critical studies/data requested during pre-submission meetings and/or discussions?	NA		
9	Is this NDA fileable? If not, then describe why.	√		

Additional Comments: This is a paper/CD-ROM mixed submission in CTD format. Module 1 was provided on paper in a white binder; however all the modules were provided on CD-ROM. The syringe container closure study will need to be provided.

Denise Miller, Microbiologist Date

Bryan S. Riley, Ph.D. Date

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

/s/

Denise Miller
5/12/2009 02:04:17 PM
MICROBIOLOGIST

Bryan Riley
5/12/2009 06:40:56 PM
MICROBIOLOGIST
I concur.