Approval Package for:

APPLICATION NUMBER: ANDA 061212Orig1s012

Name: Bacitracin (Ointment; Opthalmic), 500 Units/GM

Sponsor: Padagis US

Approval Date: May 01, 2013

APPLICATION NUMBER:

ANDA061212Orig1s012 CONTENTS

Reviews / Information Included in this Review

Approval Letter	X
Tentative Approval Letter	
Labeling	X
Labeling Review(s)	X
Proprietary Name Review(s)	
Medical Review(s)	
Chemistry Review(s)	X
Bio Pharm/Tox Review	
Bioequivalence Review(s)	
Statistical Review(s)	
Microbiology Review(s)	X
Other Review(s)	
Administrative & Correspondence Documents	$\overline{\mathbf{X}}$

APPLICATION NUMBER: ANDA061212Orig1s012

APPROVAL LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES



Food and Drug Administration Silver Spring, MD 20993

ANDA 061212/S-012

Fera Pharmaceuticals LLC Attention: John D'Angelo 134 Birch Hill Road, Locust Valley, NY 11560

Dear Sir:

This is in reference to your supplemental new drug application dated December 11, 2009, submitted under section 505(j) of the Federal Food, Drug, and Cosmetic Act regarding your abbreviated new drug application for Bacitracin Ophthalmic Ointment USP, 500 units/g.

Reference is also made to the complete response letter issued by this office on February 25, 2013 and your amendment dated March 06, 2013.

The supplemental application, submitted as a "Supplement-changes Being Effected in 30 Days", provides for a site change for the manufacturing, packaging, and testing of the subject product to (b) (4)

We have completed the review of your supplemental application and it is approved.

We remind you that you must comply with the requirements for an approved abbreviated new drug application described in 21 CFR 314.80-81.

The Generic Drug User Fee Amendments of 2012 (GDUFA) (Public Law 112-144, Title III) established certain provisions with respect to self-identification of facilities and payment of annual facility fees. Your ANDA identifies at least one facility that is subject to the self-identification requirement and payment of an annual facility fee. Self-identification must occur by June 1 of each year for the next fiscal year. Facility fees must be paid each year by the date specified in the Federal Register notice announcing facility fee amounts. All finished dose forms (FDFs) or active pharmaceutical ingredients (APIs) manufactured in a facility that has not met its obligations to self-identify or to pay fees when they are due will be deemed misbranded. This means that it will be a violation of federal law to ship these products in interstate commerce or to import them into the United States. Such violations can result in prosecution of those responsible, injunctions, or seizures of misbranded products. Products misbranded because of failure to self-identify or pay facility fees are subject to being denied entry into the United States.

The material submitted is being retained in our files.

Sincerely yours,

{See appended electronic signature page}

Kathleen Uhl, M.D. Acting Director Office of Generic Drugs Center for Drug Evaluation and Research

Reference ID: 3302454

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/s/		
PAUL SCHWARTZ 05/01/2013 Signed for K. Uhl		

APPLICATION NUMBER: ANDA061212Orig1s012

LABELING

BACITRACIN OPHTHALMIC OINTMENT USP



1000

DESCRIPTION: Each gram of ointment contains 500 units of Bacitracin in a low melting special base containing White Petrolatum and Mineral Oil.

ACTION: The antibiotic, Bacitracin, exerts a profound action against many grampositive pathogens, including the common Streptococci and Staphylococci. It is also destructive for certain gram-negative organisms. It is ineffective against fungi.

INDICATIONS: For the treatment of superficial ocular infections involving the conjunctiva and/or cornea caused by Bacitracin susceptible organisms.

CONTRAINDICATIONS: This product should not be used in patients with a history of hypersensitivity to Bacitracin.

PRECAUTIONS: Bacitracin ophthalmic ointment should not be used in deep-seated ocular infections or in those that are likely to become systemic. The prolonged use of antibiotic containing preparations may result in overgrowth of nonsusceptible organisms particularly fungi. If new infections develop during treatment appropriate antibiotic or chemotherapy should be instituted.

ADVERSE REACTIONS: Bacitracin has such a low incidence of allergenicity that for all practical purposes side reactions are practically non-existent. However, if such reaction should occur, therapy should be discontinued.

DOSAGE AND ADMINISTRATION: The cintment should be applied directly into the conjunctival sac 1 to 3 times daily. In blepharitis all scales and crusts should be carefully removed and the cintment then spread uniformly over the lid margins. Patients should be instructed to take appropriate measures to avoid gross contamination of the cintment when applying the cintment directly to the infected eve.

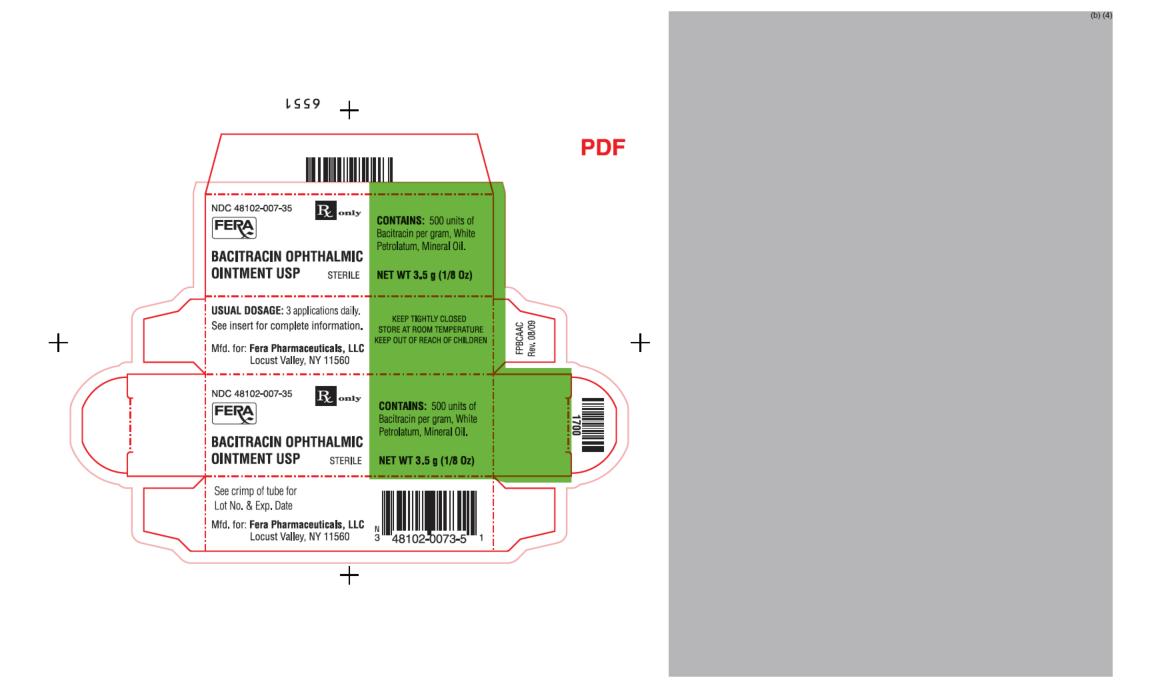
HOW SUPPLIED: 3.5 g (1/8 Oz) sterile tamper proof tubes, NDC 48102-007-35.

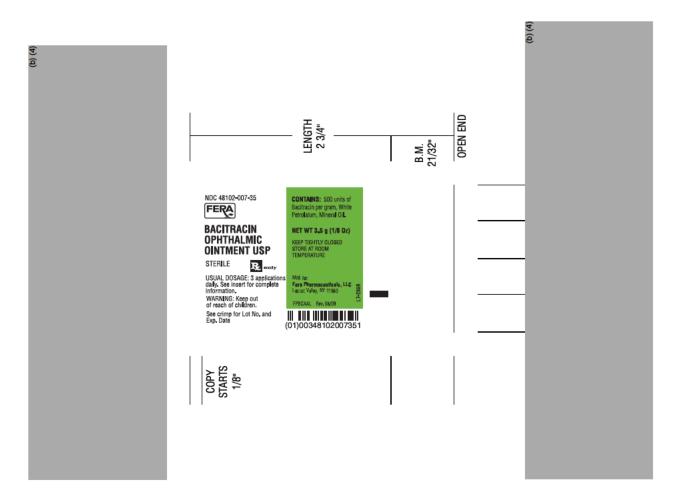


Manufactured for: Fera Pharmaceuticals, LLC Locust Valley, NY 11560

FPBC00N Rev. 08/09







APPLICATION NUMBER: ANDA061212Orig1s012

LABELING REVIEW(s)

Labeling Supplement Review Combined with Chemistry

NO REMS REQUIRED

Application Number: 61-212/S-012 combined with Chemistry

Name of Drug: Bacitracin Ophthalmic Ointment, USP

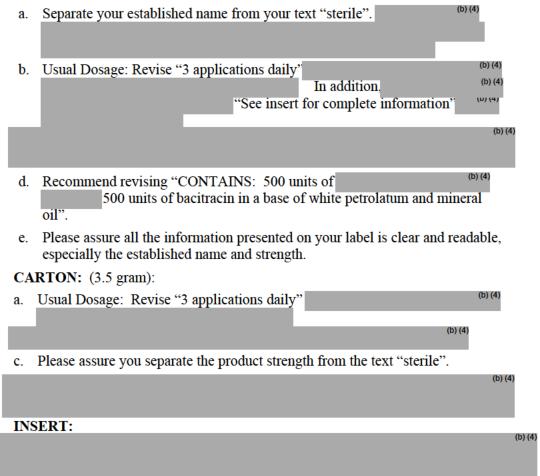
Applicant: Fera Pharmaceuticals, LLC

Material Reviewed: Package Insert, Container, Carton

Submission Date: December 11, 2009 (Received December 15, 2009)

Background and Summary

- 1. This CBE supplement provides for a change in manufacturing, packaging and testing site.
- 2. Firm submitted labels and labeling to revise their manufacturing statement. There was no other changes made to the labels and labeling.
- 3. Future Revisions: YES
 - **CONTAINER:** (3.5 gram):



Review

- 1. <u>Container</u>: Revised manufacturing statement to read as "Manufactured for: Fera Pharmaceuticals, LLC". Satisfactory in FPL as of December 11, 2009 electronic submission.
- 2. <u>Carton:</u> Revised manufacturing statement to read as "Manufactured for: Fera Pharmaceuticals, LLC". Satisfactory in FPL as of December 11, 2009 electronic submission.
- 3. <u>Insert:</u> Revised manufacturing statement to read as "Manufactured for: Fera Pharmaceuticals, LLC". Satisfactory in FPL as of December 11, 2009 electronic submission.

Recommendations

Labeling Supplement is recommended for approval with the above recommended future revisions.

Approve the labeling supplement

{see appended electronic signature}

Beverly Weitzman Labeling Reviewer

Supervisory Comment/Concurrence:

{see appended electronic signature}

John Grace Team Leader

Following this page, 2
Pages of Draft Labeling
have been Withheld in Full
as (b)(4)

Reference ID: 3206310

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/s/

BEVERLY WEITZMAN
10/22/2012

JOHN F GRACE 10/22/2012

APPLICATION NUMBER: ANDA061212Orig1s012

CHEMISTRY REVIEW(s)

Final version for DARRTS 4/29/13 APPROVABLE . CMC, Micro and Labeling and EEs are acceptable

HFD-627/R. Chang/04/15/2013 HFD-627/James Fan/4/19/13 Andre Raw/4/29/13 HFD-617/T. Mazza/4/29/13

Office of Generic Drugs Supplement Review

<u>ANDA:</u> 061212/S-012 REVIEW NO.: 2

NAME AND ADDRESS OF APPLICANT:

Fera Pharmaceuticals 134 Birch Hill Road Locust Valley, NY 11560

PURPOSE OF AMENDMENT/SUPPLEMENT:

The supplemental application provides for a site change for the manufacturing, packaging and testing of the subject product.

DATE OF SUBMISSION:

Original Submission: December 11, 2009

Amendment: April 22, 2010 Amendment: March 06, 2013

PHARMACOLOGICAL CATEGORY:

Antibacterial

TRADE NAME:

N/A

NONPROPRIETARY NAME:

Bacitracin Ophthalmic Ointment USP, 500 units/gm

DOSAGE FORM:

Ointment

STRENGTHS:

500 units/g

RX OR OTC:

RX

Reference ID: 3301247

SAMPLES: N/A	
<u>RELATED IND/NDA/DMF:</u> N/A	
STERILIZATION: Microbiology review is acceptable by Eric Adeeku on 07/16/2010	
LABELING: Acceptable by B. Weitaman on 10/22/2012.	
BIOEQUIVALENCY STATUS: N/A	
ESTABLISHMENT INSPECTION: EER is acceptable on 08/31/2012.	
COMPONENTS/COMPOSITION/MANUFACTURING/CONTROLS: No change	
COMPONENTS AND COMPOSITIONS: No change	
OTHER FIRM: N/A	
	(b) (4

DMF CHECKLIST FOR ANDAs (061212/S-012)

DATE ACTION RESULT OF REVIEW **DMF** DMF # TYPE/SUBJECT/HOLDER CODE REVIEW COMPLETED N/A Comments: ACTION CODES: (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 (5) Authority to reference not in application; granted; (7) Other (explain under "Comments"). (6) DMF not available; Reviewer Signature Date

cc: ANDA 061212/S012 Division File Field Copy

Endorsements:

HFD-627/R. Chang/04/15/2013 HFD-627/James Fan/ HFD-617/T. Mazza/

F/T by:

Approvable

Office of Generic Drugs Supplement Review

ANDA: 061212/S-012

NAME AND ADDRESS OF APPLICANT:

Fera Pharmaceuticals 134 Birch Hill Road Locust Valley, NY 11560

PURPOSE OF AMENDMENT/SUPPLEMENT:

The supplemental application provides for a site change for the manufacturing, packaging and testing of the subject product.

DATE OF SUBMISSION:

Original Submission: December 11, 2009

Amendment: April 22, 2010

PHARMACOLOGICAL CATEGORY:

Antibacterial

TRADE NAME:

N/A

NONPROPRIETARY NAME:

Bacitracin Ophthalmic Ointment USP, 500 units/gm

DOSAGE FORM:

Ointment

STRENGTHS:

500 units/g

RX OR OTC:

RX

SAMPLES:

N/A

RELATED IND/NDA/DMF:

N/A

Reference ID: 3203422

STERILIZATION:

Microbiology review is acceptable by Eric Adeeku on 07/16/2010

LABELING:

The supplement contains labeling information, which is pending review (supplement dated 12/11/2009).

BIOEQUIVALENCY STATUS:

N/A

ESTABLISHMENT INSPECTION:

EER is acceptable on 08/31/2012.

COMPONENTS/COMPOSITION/MANUFACTURING/CONTROLS:

No change

COMPONENTS AND COMPOSITIONS:

No change

OTHER FIRM:

N/A



PACKAGING:

N/A

STABILITY:

Three months accelerated and long term stability data presented (Pack size: 3.5 g and horizontal orientation, Lot #PD09006) are satisfactory.

REMARKS AND CONCLUSION: Not approval is recommended.

RECALLS:

N/A

REVIEWER:

Richard Chang

Date OF REVIEW:

09/29/2012

DMF CHECKLIST FOR ANDAs (061212/S-012)

DATE ACTION RESULT OF REVIEW **DMF** DMF # TYPE/SUBJECT/HOLDER CODE REVIEW COMPLETED N/A Comments: ACTION CODES: (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 (5) Authority to reference not in application; granted; (7) Other (explain under "Comments"). (6) DMF not available; Reviewer Signature Date

cc: ANDA 061212/S012 Division File Field Copy

Endorsements:

HFD-627/R. Chang/09/29/2012 HFD-627/James Fan/ HFD-617/T. Tran/

F/T by:

NOT APPROVAL – Minor Amendment, Labeling information submitted pending review

Reference ID: 3203422

APPLICATION NUMBER: ANDA061212Orig1s012

MICROBIOLOGY REVIEW(s)

Product Quality Microbiology Review

June 23, 2010

ANDA: 061212/S-012

Drug Product Name Proprietary: N/A

Non-proprietary: Bacitracin Ophthalmic Ointment, USP

Review Number: #2

Dates of Submission(s) Covered by this Review

Submit	Received	Review Request	Assigned to Reviewer
04/28/2010	05/04/2010	N/A	05/11/2010
05/26/2010	06/03/2010	N/A	05/27/2010

Submission History (for amendments only)

Date(s) of previous submission(s)	Microbiology Review #	Date(s) of previous Micro Review(s)
12/11/2009	1	03/17/2010

Applicant/Sponsor

Name: Fera Pharmaceuticals LLC

Address: 15R Birch Hill Road, Locust Valley, NY 11560

Representative: Susan McDougal

Telephone: (b) (6)

Name of Reviewer: Eric Adeeku, Ph.D

Conclusion: The submission **is recommended** for approval on the basis of sterility assurance.

Product Quality Microbiology Data Sheet

- **A. 1. TYPE OF SUBMISSION:** CBE-30 supplement amendment
 - **2. SUBMISSION PROVIDES FOR:** The use of an alternate facility for manufacturing, packaging and testing.



- 4. DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY: Sterile Ophthalmic Ointment, 500 IU/g multidose vials
- 5. METHOD(S) OF STERILIZATION: (b) (4)
- 6. PHARMACOLOGICAL CATEGORY: N/A
- **B.** SUPPORTING/RELATED DOCUMENTS:

None

C. REMARKS:

The subject amendment provides responses to the microbiology deficiencies conveyed to the applicant in the Agency's 03/26/2010 deficiency letter.

Further data requested from applicant's representative, Ms. Susan McDougal on 05/13/2010 was provided on 05/27/2010. Please see Tcon Memo attached.

This is an electronic submission.

filename: 061212s12a1.doc

Executive Summary

I. Recommendations

A. Recommendation on Approvability -

The submission is **recommended** for approval on the basis of sterility assurance.

- 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 (b) (4)
 - B. Brief Description of Microbiology Deficiencies None identified.
 - C. Assessment of Risk Due to Microbiology Deficiencies -

No microbiology deficiencies were identified. The applicant demonstrates an adequate level of sterility assurance for the manufacturing process.

III. Administrative

- A. Reviewer's Signature
- B. Endorsement Block

Microbiologist/ Eric Adeeku, Ph.D Microbiology Team Leader/Lynne Ensor, Ph.D.

C. CC Block

cc: Field Copy

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(b) (4

Microbiology Review #2

Acceptable

ANDA 061212/S-012

Application Type/Number	Submission Type/Number	Submitter Name	Product Name	
ANDA-61212	SUPPL-12	ALTANA INC	BACITRACIN	 -
			that was signed on of the electronic	
, ,				
/s/ 				

ELIZABETH T MCNEAL on behalf of MARK D ANDERSON 07/15/2010
Checked file and submission links. All correct.

LYNNE A ENSOR 07/16/2010

Product Quality Microbiology Review

March 17, 2010

ANDA: 061212/S-012

Drug Product Name Proprietary: N/A

Non-proprietary: Bacitracin Ophthalmic Ointment, USP

Review Number: #1

Dates of Submission(s) Covered by this Review

Submit	Received	Review Request	Assigned to Reviewer
12/11/2009	12/15/2009	N/A	01/13/2010

Submission History (for amendments only)

None

Applicant/Sponsor

Name: Fera Pharmaceuticals LLC

Address: 15R Birch Hill Road, Locust Valley, NY 11560

Representative: Susan McDougal

Telephone: (b) (6)

Name of Reviewer: Eric Adeeku, Ph.D

Conclusion: The submission **is not recommended** for approval on the basis of sterility assurance.

Product Quality Microbiology Data Sheet

- **A. 1. TYPE OF SUBMISSION:** CBE-30 supplement
 - **2. SUBMISSION PROVIDES FOR:** The use of an alternate facility for manufacturing, packaging and testing.



- 4. DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY: Sterile Ophthalmic Ointment, 500 (b) (4)
- 5. METHOD(S) OF STERILIZATION: (b) (4)
- 6. PHARMACOLOGICAL CATEGORY: N/A
- B. SUPPORTING/RELATED DOCUMENTS:

None

C. REMARKS:

Supplement providing for a site change for the manufacturing, packaging and testing of the subject drug product, since the ANDA was recently purchased by Fera from Nycomed, (b) (4)

filename: 061212s012.doc

Executive Summary

I. Recommendations

A. Recommendation on Approvability -

The submission is **not recommended** for approval on the basis of sterility assurance. Specific comments and deficiencies are provided in the "Product Quality Microbiology Assessment" and "List of Microbiology Deficiencies and Comments" sections.

- 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 (6)
 - **B.** Brief Description of Microbiology Deficiencies -

Please see section "3. List of microbiology deficiencies and comments" for details.

C. Assessment of Risk Due to Microbiology Deficiencies -

The safety risk associated with the microbiology deficiencies is considered moderate.

III. Administrative

- A. Reviewer's Signature _____
- B. Endorsement Block

Microbiologist/ Eric Adeeku, Ph.D Microbiology Team Leader/Lynne Ensor, Ph.D.

C. CC Block

cc: Field Copy

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Microbiology Review #1

Acceptable

ANDA 061212/S-012

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Application Type/Number	Submission Type/Number SUPPL-12	Submitter Name ALTANA INC	Product Name	
ANDA-61212			BACITRACIN	
			d that was signed on of the electronic	
/s/				
ERIC K ADEEKU 03/24/2010				
ELIZABETH T MO 03/24/2010 Checked file and	CNEAL submission link. Both	correct.		
LYNNE A ENSOF	₹			

03/26/2010

APPLICATION NUMBER: ANDA061212Orig1s012

ADMINISTRATIVE and CORRESPONDENCE DOCUMENTS

Public Health Service

Food and Drug Administration Rockville, MD 20857

ANDA 061212/S-012

COMPLETE RESPONSE

Fera Pharmaceuticals, LLC
Attention: Dietrich Bartel
Regulatory Consultant
15 R Birch Hill Road
Locust Valley, NY 11560

Dear Sir:

Please refer to your Supplemental Abbreviated New Drug Application (sANDA) 061212/S-012, dated December 11, 2009, received on December 15, 2009, submitted under section 505(j) of the Federal Food, Drug, and Cosmetic Act, regarding your abbreviated new drug application (ANDA) for Bacitracin Ophthalmic Ointment USP, 500 units/gram.

We acknowledge receipt of your amendments dated April 22, April 28, and May 26, 2010.

This supplemental application, submitted as a "Changes Being Effected in 30 Days" provides for a site change for the manufacturing, packaging, and testing of the subject product.

We have completed our review of this sANDA, as amended, and have determined that we cannot approve this supplement in the present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

PRODUCT QUALITY

- 1. Please provide a copy of the executed exhibit batch record and the location of new manufacturing, packaging, and testing site.
- 2. Please provide your updated drug product release specification along with a CoA for your Exhibit batch.

MICROBIOLOGY

The Division of Microbiology has no further questions at this time.

Reference ID: 3265961

LABELING

The Labeling Review Branch has no further questions/comments at this time based on your labeling submission dated (December 11, 2009).

OTHER

A partial response to this letter will not be processed as a resubmission and will not start a new review cycle. The resubmission to this will be considered to represent a **MINOR** AMENDMENT. The designation as a **RESUBMISSION/AFTER ACTION MINOR** / **COMPLETE RESPONSE AMENDMENT** should appear prominently in your cover letter. In addition, please designate in bold on your cover letter each review discipline (Product Quality (CMC), Labeling, Bioequivalence, Microbiology, Clinical) you are providing responses to.

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the sANDA under 21 CFR 314.65. You may also request an extension of time in which to resubmit the sANDA. A resubmission response must fully address all the deficiencies listed.

If you have any questions, please call Esther Chuh, Pharm.D., Regulatory Project Manager, at (240) 276-8530.

Sincerely yours,

{See appended electronic signature page}

Gregory P. Geba, M.D., M.P.H. Director Office of Generic Drugs Center for Drug Evaluation and Research

Reference ID: 3265961

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/s/
PAUL SCHWARTZ 02/25/2013 Signed for G. Geba

Fera Pharmaceuticals Attention: Dietrich Bartel 134 Birch Hill Road, Locust Valley, NY 11560

Dear Sir:

This is in reference to your supplemental new drug application dated December 11, 2009, submitted under section 505(j) of the Federal Food, Drug, and Cosmetic Act regarding your abbreviated new drug application for Bacitracin Ophthalmic Ointment USP, 500 units/g.

Reference is also made to your amendment dated April 22, 2010.

The supplemental application, submitted as a "Supplement-changes Being Effected in 30 Days", provides for a site change for the manufacturing, packaging, and testing of the subject product.

The supplemental application is deficient and, therefore, not approvable under Section 505 of the Act for the following reasons:

- 1. Please provide a copy of the executed exhibit batch record and the location of new manufacturing, packaging, and testing site.
- 2. Please provide your updated drug product release specification along with a CoA for your Exhibit batch.

The file on this supplemental application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw this supplemental application. Your amendment should respond to all the deficiencies listed. A partial reply will not be considered for review, nor will the review clock be reactivated until all the deficiencies have been addressed. The response to this letter will be considered as a MINOR amendment and should be so designated in your cover letter.

If you have substantial disagreement with our reason for not approving this supplemental application, you may request an opportunity for a hearing.

Sincerely yours,

{See appended electronic signature page}

Andre Raw, Ph.D.
Director
Division of Chemistry I
Office of Generic Drugs
Center for Drug Evaluation and Research

cc: ANDA 061212/S-012 Division File Field Copy

Endorsements:

HFD-627/R. Chang/09/20/2012 HFD-627/James Fan/ HFD-617/Trang Tran/10/15/12

F/T by:

TYPE OF LETTER: NOT APPROVAL – Minor Amendment. Labeling information submitted is pending review. Micro & EES are AC.

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/s/

RICHARD R CHANG

TRANG Q TRAN 10/15/2012

10/15/2012

JAMES M FAN 10/15/2012