CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

215910Orig1s000

PRODUCT QUALITY REVIEW(S)

NDA Executive Summary

1. Application/Product Information

NDA Number	215910		
Applicant Name	Sun Pharma Advanced Research Company, Ltd. (SPARC)		
Drug Product Name	SEZABY (phenobarbital sodium) for injection		
Dosage Form	For injection		
Proposed Strength(s)	100 mg/vial		
Route of Administration	Intravenous		
Maximum Daily Dose	40 mg/kg (loading dose)		
Rx/OTC Dispensed	Rx		
Proposed Indication	Treatment of neonatal seizures		
Drug Product Description	Sterile white to off white lyophilized powder in a 10 mL glass vial		
Co-packaged product information	Not applicable		
Device information	Not applicable		
Storage Temperature/ Conditions	20°C to 25°C. Keep in original carton until use to protect from bright light.		
Review Team	**Discipline**	**Primary**	**Secondary**
	Drug Substance	Jeffrey Medwid	Gaetan Ladouceur
	Drug Product/ Labeling	Eric Bow	Martha Heimann
	Manufacturing	Yan Xu	Tianhong (Tim) Zhou
	Biopharmaceutics	N/A	N/A

	Microbiology	Elizabeth Bearr	Paul Dexter
	Other (specify):	N/A	N/A
	RBPM	Erica Keafer	
	ATL	Martha Heimann	
Consults	Not applicable		

2. Final Overall Recommendation - Approval

3. Action Letter Information

a. Expiration Dating:

24 months for product stored at 20°C to 25°C.

b. Additional Comments for Action

There are no additional comments for the action letter.

4. Basis for Recommendation:

a. Summary of Rationale for Recommendation:

Phenobarbital is a member of the barbiturate class of sedatives that was initially marketed in 1912. Numerous oral phenobarbital products, mostly for combinations of phenobarbital with other active ingredients, were approved prior to 1962 and subsequently withdrawn under DESI.[1] Currently, a few oral and parenteral phenobarbital products are marketed in the U.S. as unapproved drugs.

Neonatal seizures are a rare disorder associated associated with poor outcomes, including death and permanent disability. Phenobarbital is recommended as first-line treatment for treatment of neonatal seizures by the World Health Organization (WHO).[2] However, the unapproved Phenobarbital Sodium Injection products marketed in the U.S. contain propylene glycol, alcohol, and benzyl

[1] Under the Drug Efficacy Study Implementation (DESI) process, the Agency withdrew approval of products were approved, based on safety only, between 1938 and 1962 but lacked substantial evidence of efficacy.
[2] WHO Guidelines on Neonatal Seizures, https://apps.who.int/iris/handle/10665/77756

alcohol. Use of these excipients should be avoided in products intended for treatment of neonates and infants.

The applicant, SPARC, developed an age-appropriate formulation for treatment of neonatal seizures. The product, SEZABY (phenobarbital sodium[3] for injection), consists of sterile, lyophilized phenobarbital sodium with no preservatives or other excipients and is to be reconstituted with 0.9% Sodium Chloride Injection USP to achieve a 10 mg/mL solution.

No drug substance deficiencies were identified during the review of the NDA and supporting drug master file (DMF).

Two issues related to container fill were identified during review of the drug product and proposed labeling as discussed below.

Per CDER MAPP 5019.1 Allowable Excess Volume/Content in Injectable Drug and Biological Products[4], a vial of a solid drug product meets the net container content (e.g., mg per vial) in the labeling and the net container content on the label will be met if: i.) the total volume after reconstitution conforms to USP General Chapter <697> following the reconstitution/constitution procedure in the labeling; and ii.) the labeled concentration following the reconstitution/constitution procedure as described in the labeling is met when the vial is filled with the minimum fill. The product conforms to the latter criterion. However, when reconstituted with 10 mL of 0.9% Sodium Chloride Injection USP, the deliverable volume is approximately (b) (4). Although the net contents could be increased by increasing vial fill weight and reconstitution volume, increasing the reconstitution volume above 10 mL would require two diluent transfers using a 10 mL syringe, with increased risk for microbial contamination or medication errors. Alternatively, use of a larger syringe to transfer the diluent is potentially less accurate as next larger syringe, 20 mL, is graduated in 1 mL increments. However, it is noted that the current vial configuration, when reconstituted per labeling instructions, provides sufficient excess volume to administer the recommended loading dose in the intended patient population. In most cases, onset of neonatal seizures occurs in the first

[3] Under the USP Salt Policy the product would normally be labeled based on the active moiety, phenobarbital. Based on discussions with DMEPA, however, an exception to the Salt Policy is justified based on the potential for medication errors due to confusion with the marketed (unapproved) product, Phenobarbital Sodium Injection USP.

[4] https://www.fda.gov/media/155066/download

1–2 days to the first week of life.[5] As a worst-case scenario, the 97th weight percentile for boys at birth is 4.4 kg.[6] Administration of a 20 mg/kg loading dose would require 8.8 mL of the reconstituted solution. The volume remaining would not be sufficient for a second dose. Therefore, the product is considered appropriate for its intended use.

A second issue related to vial fill is the lack of a smaller vial fill to accommodate maintenance dosing at the recommended maintenance dose of 4.6 mg/kg. A recommendation that for future development the applicant consider (b) (4) (b) (4) was communicated to the sponsor by the Division of Medication Error Prevention and Analysis 2.[7] The applicant has acknowledged the recommendation and will pursue as a post-approval supplement.

Deficiencies related to the manufacturing process and microbiology/sterility assurance were adequately addressed by the applicant during the review cycle.

During review of the NDA, a Form 483 with multiple observations was issued following a site inspection at the drug product manufacturing facility proposed in the original NDA (Sun Pharmaceutical Industries, Halol site). To address the site issue, the applicant proposed an alternate manufacturing site (Sun Pharmaceutical Medicare Ltd, Baska site)[8] and subsequently withdrew Halol site[9] per Agency advice. The applicant has provided adequate CMC/Microbiology information to support the Baska site, including 6 months long-term and accelerated stability data for commercial scale batches. All facilities that will be used to manufacture phenobarbital sodium and SEZABY (phenobarbital sodium for injection) are currently acceptable. Facility status should be confirmed prior to final action.

[5] Panayiotopoulos CP. The Epilepsies: Seizures, Syndromes and Management. Oxfordshire (UK): Bladon Medical Publishing; 2005. Chapter 5, Neonatal Seizures and Neonatal Syndromes. Available from: https://www.ncbi.nlm.nih.gov/books/NBK2599/

[6] https://cdn.who.int/media/docs/default-source/child-growth/child-growth-standards/indicators/weight-for-age/wfa-boys-0-13-percentiles.pdf?sfvrsn=292d03f1_11

[7] B. Weitzmann labeling review, dated 8/29/2022. https://darrts.fda.gov/darrts/ViewDocument?documentId=090140af80681541&showAsPdf=true

[8] SD-12, received 6/3/2022. This was classified as a Major Amendment with a 3-month clock extension.

[9] SD-16, received 6/22/2022

b. Is the overall recommendation in agreement with the individual discipline recommendations? Yes

Recommendation by Subdiscipline:

Drug Substance	**-**	**Adequate**
Drug Product	**-**	**Adequate**
Quality Labeling	**-**	**Adequate**
Manufacturing	**-**	**Adequate**
Biopharmaceutics	**-**	**N/A**
Microbiology	**-**	**Adequate**

Environmental Assessment: Categorical Exclusion - Adequate

QPA for EA(s): No

5. Life-Cycle Considerations

Established Conditions per ICH Q12: No
Comments:

Comparability Protocols (PACMP): No
Comments:

Additional Lifecycle Comments: N/A

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U.S. FOOD & DRUG ADMINISTRATION

CHAPTER IV: LABELING

For more details about the items in this template, please see Chapter IV (Labeling) of the NDA IQA Guide

1.0 PRESCRIBING INFORMATION

Assessment of Product Quality Related Aspects of the Prescribing Information:

1.1 HIGHLIGHTS OF PRESCRIBING INFORMATION

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Product Title in Highlights		
Established name(s)[1]	Adequate	
Route(s) of administration	Adequate	
Dosage Forms and Strengths Heading in Highlights		
Summary of the dosage form(s) and strength(s) in metric system	Adequate	
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored".	N/A	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package.	Adequate	
If the drug product contains an active ingredient that is a salt, clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active	N/A	

[1] Established name = [Drug] [Route of Administration] [Dosage Form]

ingredient (e.g., Tablets: 10 mg of drug-x hydrochloride).		

1.2 FULL PRESCRIBING INFORMATION

1.2.1 Section 2 (DOSAGE AND ADMINISTRATION)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE AND ADMINISTRATION section		
Special instructions for product preparation (e.g., reconstitution and resulting concentration, dilution, compatible diluents, storage conditions needed to maintain the stability of the reconstituted or diluted product)	Adequate	Reconstitution instructions included
Important administration instructions supported by product quality information (e.g., do not crush or chew extended-release tablets, instructions for mixing with food)	N/A	
For parenteral products: include statement: *"Parenteral drug products must be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit"*	Adequate	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. Note the labeling requirement may be applicable to another	N/A	

section of the PI (e.g., Section 11).		
For radioactive products, include radiation dosimetry for the patient and healthcare practitioner(s) who administer the drug	N/A	
For hazardous products, include the statement *"DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures.[x]"* with x numerical citation to "OSHA Hazardous Drugs".	N/A	

1.2.2 Section 3 (DOSAGE FORMS AND STRENGTHS)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE FORMS AND STRENGTHS section		
Available dosage form(s)	Adequate	
Strength(s) in metric system	Adequate	
If the active ingredient is a salt, apply the USP Salt Policy per FDA Guidance. Clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active ingredient (Tablets: 10 mg of drug-x hydrochloride).	N/A	
A description of the identifying characteristics of the dosage forms, including shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable	Adequate	
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored"	N/A	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package type terms include pharmacy bulk package and imaging bulk package.	Adequate	

Section 11 (DESCRIPTION)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DESCRIPTION section		
Proprietary and established name(s)	Adequate	
Dosage form(s) and route(s) of administration	Adequate	
If the active ingredient is a salt, apply the USP Salt Policy and include the equivalency statement per Salt Guidance and MAPP. For example: "TRADENAME contains 100 mg of drug-x (equivalent to 123.7 mg of drug-x hydrochloride)"	Adequate	
List names of all inactive ingredients. Use USP/NF names in alphabetical order. Avoid brand names.	Adequate	
For parenteral injectable dosage forms, include the name and quantities of all inactive ingredients. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect.	Adequate	
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol	N/A	
Sterility statement (if applicable)	Adequate	
Pharmacological/Therapeutic class	Adequate	
Chemical name, structural formula, molecular weight	Adequate	
If radioactive, statement of important nuclear characteristics.	N/A	
Other important chemical or physical properties (such as pKa or pH)	Adequate	

Section 11 (DESCRIPTION) Continued

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
For oral prescription drug products, include gluten statement (if applicable)	N/A	
Remove statements that may be misleading or promotional (e.g., "synthesized and developed by Drug Company X," "structurally unique molecular entity")	Adequate	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. Note the labeling requirement may be applicable to another section of the PI (e.g., Section 2).	N/A	

1.2.4 Section 16 (HOW SUPPLIED/STORAGE AND HANDLING)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
HOW SUPPLIED/STORAGE AND HANDLING section		
Available dosage form(s)	Adequate	
Strength(s) in metric system	Adequate	
Available units (e.g., bottles of 100 tablets)	Adequate	
Identification of dosage forms (e.g., shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable); Include NDC(s)	Adequate	
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored"	N/A	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package.	Adequate	
Special handling about the supplied product (e.g., protect from light, refrigerate). If there is a statement to "Dispense in original container," provide reason why (e.g., to protect from light or moisture, to maintain stability, etc.). For hazardous drugs, state "DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures.[x]" with x numerical citation to "OSHA Hazardous Drugs."	N/A	

Section 16 (HOW SUPPLIED/STORAGE AND HANDLING) (Continued)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Storage conditions. Where applicable, use USP storage range rather than storage at a single temperature.	Adequate	
Latex: If product does not contain latex and manufacturing of product and container did not include use of natural rubber latex or synthetic derivatives of natural rubber latex, state: *"Not made with natural rubber latex. Avoid statements such as "latex-free."*	N/A	
Include information about child-resistant packaging	N/A	

1.2.5 Other Sections of Labeling

There may be other sections of labeling that contain product-quality related information. For example, there are specific required/recommended warnings for certain inactive ingredients [e.g., aspartame, aluminum in large and small volume parenterals, sulfites, FD&C Yellow Number 5 (tartrazine), and benzyl alcohol]. Please notify the prescription drug review division if the product contains any of these inactive ingredients.

Please include your comments about other sections of labeling if they contain product quality information.

1.2.6 Manufacturing Information After Section 17 (for drug products)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Manufacturing Information After Section 17		
Name and location of business (street address, city, state, and zip code) of the manufacturer, distributor, and/or packer	Adequate	

2.0 PATIENT LABELING

Assessment of Product Quality Related Aspects of Patient Labeling (e.g., Medication Guides, Instructions for Use, Patient Information):

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Established name[2]	N/A	
Special preparation instructions (if applicable)	N/A	
Storage and handling information (if applicable)	N/A	
If the product contains a desiccant, ensure the desiccant has a warning (e.g., "Do not eat.") and the size and shape of the desiccant differs from the dosage form.	N/A	
Active ingredient(s) (if applicable)	N/A	
Alphabetical listing of inactive ingredients (if applicable)	N/A	
Name and location of business (street address, city, state, and zip code) of manufacturer, distributor, and/or packer	N/A	

Any deficiencies should be listed at the end in the "ITEMS FOR ADDITIONAL ASSESSMENT."

2 Pages of Draft Labeling have been Withheld in Full as b4 (CCI/TS) immediately following this page

[2] Established name = [Drug] [Route of Administration] [Dosage Form]

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Established name[3], (font size and prominence)	Adequate	
Strength(s) in metric system	Adequate	
Route(s) of administration	Adequate	
If the active ingredient is a salt, include the equivalency statement per Salt Guidance and MAPP.	Adequate	
Net contents (e.g., tablet count, volume of liquid)	Adequate	
"Rx only" displayed on the principal display	Adequate	
NDC	Adequate	
Lot number and expiration date	Adequate	
Storage conditions. If applicable, include a space on the carton labeling for the user to write the new beyond-use-date (BUD).	Adequate	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package, and these products require a "Not for direct infusion" statement.	Adequate	
For parenteral injectable dosage forms, include the name and quantities of all active and inactive ingredients in alphabetical order. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect.	Adequate	
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol	N/A	
Linear Bar code	Adequate	

[3] Established name = [Drug] [Route of Administration] [Dosage Form]

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Name of manufacturer/distributor /packer	Adequate	
If there is a Medication Guide, must include a statement about dispensing a Medication Guide to each patient.	N/A	
No text on Ferrule and Cap overseal, unless a cautionary statement is required.	N/A	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled.	N/A	
When a drug product differs from the relevant USP standard of strength, quality, or purity, as determined by the application of the tests, procedures, and acceptance criteria set forth in the relevant compendium, its difference shall be plainly stated on its label.	N/A	
And others, if space is available.	N/A	

Assessment of Carton and Container Labeling: ***Adequate***

Any deficiencies should be listed at the end in the "ITEMS FOR ADDITIONAL ASSESSMENT."

ITEMS FOR ADDITIONAL ASSESSMENT

Assess consistency of product-quality information in prescription drug labeling (PI, c/c labeling, and FDA-approved patient labeling). See Carton/Container Labeling Specific Resources for a presentation about inappropriate inconsistencies of product quality information between labeling. If there are inappropriate inconsistencies between the labeling (e.g., established name, strength(s), package type term, discard statement, identifying characteristics, storage, reconstitution/dilution instructions), please list these as deficiencies in this section.

Overall Assessment and Recommendation:

Adequate

Primary Labeling Assessor Name and Date: Eric Bow Ph.D. 10/13/2022

Secondary Assessor Name and Date (and Secondary Summary, as needed): Martha Heimann Ph.D. 10/13/2022

Eric Bow

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Martha Heimann

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MICROBIOLOGY

IQA Review Guide Reference

Product Background:

NDA/ANDA: NDA 215910

Drug Product Name / Strength: Phenobarbital sodium for injection / 100 mg/vial

Route of Administration: Intravenous

Applicant Name: Sun Pharma Advanced Research Company, Ltd. (SPARC)

Manufacturing Site: Sun Pharmaceutical Medicare Limited (SPML)

Note to Reviewer: The drug product manufacturer proposed in the original NDA submission, dated 2/17/2022, was Sun Pharmaceuticals Industries Limited, Halol-Baroda Highway, Halol, Gujarat 389350, India. In the 06/22/2022 submission, the applicant withdrew Sun Pharmaceuticals Industries Limited from the application. The applicant added Sun Pharmaceutical Medicare Limited (SPML)-Baska as the drug product manufacturer in the 06/03/2022 submission.

Method of Sterilization: (b) (4)

Review Recommendation: **Adequate**

Theme (ANDA only): **N/A**

Justification (ANDA only): N/A

Review Summary: (b) (4), the bulk drug product is sterile (b) (4) (b) (4) lyophilized (b) (4). Vials are sterilized/depyrogenated (b) (4). Stoppers are (b) (4) depyrogenated and are sterilized (b) (4).

List Submissions Being Reviewed:

Document Description (SD #)	Date Received
ORIG-1/Multiple Categories/Subcategories SD #1	02/17/2022
ORIG-1/Quality/Response to Information Request SD #5	03/31/2022
ORIG-1/Labeling/Package Insert Draft SD#6	04/27/2022
ORIG-1/Multiple Categories/Subcategories SD #7	05/17/2022

ORIG-1/Quality/Response to Information Request SD #12	6/3/2022
ORIG-1/Multiple Categories/Subcategories SD #14	6/10/2022
ORIG-1/Withdrawal Request-Original/Facility	6/22/2022
ORIG-1/Qualtiy/Response to Information Request SD #20	8/17/2022

Highlight Key Outstanding Issues from Last Cycle: N/A

Remarks: The submission dated 2/17/2022 (SD #1) is the original submission. The submissions dated 3/15/2022, 3/25/2022, 3/29/2022, 5/19/2022, 5/23/2022, 6/6/2022, 6/15/2022, 7/15/2022, and 7/19/2022 include clinical information amendments, patent certification, process information, and a change to sponsor contact information. The submission dated 3/31/2022 (SD #5) is the applicant's response to the information request sent 3/28/2022. The submission dated 4/27/2022 (SD #6) contains updated labeling information. The submission dated 5/17/2022 (SD #7) contains the response to the information request issued 5/9/2022. The submission dated 6/3/2022 (SD #12) includes an amendment to include an additional drug product manufacturing site, Sun Pharmaceutical Medicare Limited (SPML). The submission dated 6/10/2022 (SD #14) contains the response to the information request issued 5/27/2022. The submission dated 06/22/2022 withdraws Sun Pharmaceuticals Industries Limited as the drug product manufacturer. The submission dated 8/10/2022 reconfirms withdrawal of Sun Pharmaceuticals Industries Limited. The submission dated 8/17/2022 is in response to the information requestion issued 8/4/2022. Some tables are copied directly from the submission.

Concise Description Outstanding Issues Remaining: None

Supporting Documents:

- DMF (b) (4) and microbiology review D (b) (4) M55R01.pdf (overall adequate), dated 06/07/2021, (b) (4)
- Microbiology review (b) (4) .docx (overall adequate), dated 6/17/2020, for (b) (4)
- Microbiology review (b) (4) MR01.docx (overall adequate), dated 9/29/2020, for (b) (4)
- Microbiology review (b) (4) MR01.docx (overall adequate), dated 12/17/2020, for (b) (4)

List Number of Comparability Protocols (ANDA only): N/A

S Drug Substance – N/A, the drug substance is non-sterile

P.1 Description of the Composition of the Drug Product

- **Description of drug product –**
  (3.2.P.1, description-and-composition.pdf)

The drug product, phenobarbital sodium, USP, 100 mg/vial, is a sterile, lyophilized, injectable, drug product filled into single-dose, 10 mL vials. The vial contents must be reconstituted prior to IV infusion with 10 mL of 0.9% sodium chloride injection, USP, resulting in a clear colorless solution containing 10 mg/mL of phenobarbital sodium.

- **Drug product composition –**
(3.2.P.1, description-and-composition.pdf)

Ingredient	Bulk solution[2] (mg/mL)	(b) (4)	Function
Phenobarbital sodium, USP[1]	(b) (4)		Active
(b) (4)			

(1) Actual quantity of Phenobarbital sodium to be calculated according to its potency.
(2) (b) (4)
(b) (4)

- **Description of container closure system –**
(3.2.P.7, container-closure-system.pdf, cont-closure-sys-alu-seal-specs-atp.pdf, cont-closure-sys-glass-vials-specs-atp.pdf, cont-closure-sys-rubber-stopper-specs-atp.pdf, cont-closure-sys-spml.pdf)

Component	Description	Manufacturer
Glass vials	(b) (4)	
Rubber stopper		
Aluminum (b) (4) seal		

Reviewer's Assessment: ***Adequate***

The applicant has provided an adequate description of the composition of the drug product.

P.2 Pharmaceutical Development

(b) (4)

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Primary Microbiology Reviewer Name and Date: Elizabeth Bearr, Ph.D., 9/27/2022

Secondary Reviewer Name and Date (and Secondary Summary, as needed): Capt. Paul Dexter, M.S., 9/27/2022

Elizabeth Bearr

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Paul Dexter

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/s/

MARTHA R HEIMANN
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