

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

Application Number: 020809

**Trade Name: DICLOFENAC SODIUM OPHTHALMIC
SOLUTION 0.1%**

**Generic Name: DICLOFENAC SODIUM OPHTHALMIC
SOLUTION 0.1%**

Sponsor: ALCON LABORATORIES, INC.

Approval Date: 05/04/98

**INDICATION(s): TREATMENT OF POSTOPERATIVE
INFLAMMATION IN PATIENTS WHO HAVE
UNDERGONE CONTARACT EXTRACTION**

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION: 020809

CONTENTS

	Included	Pending Completion	Not Prepared	Not Required
Approval Letter	X			
Tenative Approval Letter				X
Approvable Letter				X
Printed Labeling	X			
Medical Review(s)	X			
Chemistry Review(s)	X			
EA/FONSI	X			
Pharmacology Review(s)	X			
Statistical Review(s)	X			
Microbiology Review(s)	X			
Clinical Pharmacology	X			
Biopharmaceutics Review(s)				
Bioequivalence Review(s)				X
Administrative/ Correspondence Document(s)	X			

CENTER FOR DRUG EVALUATION AND RESEARCH

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APPROVAL LETTER



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

NDA 20-809

Alcon Laboratories, Inc.
Attention: Susan H. Caballa
Associate Director, Regulatory Affairs
6201 South Freeway
Fort Worth, Texas 76134-2099

MAY 4 1998

Dear Ms. Caballa:

Please refer to your new drug application (NDA) dated December 20, 1996, submitted under section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Diclofenac Sodium Ophthalmic Solution, 0.1%. Reference is also made to our not approvable letter dated July 29, 1997, approvable letter dated January 5, 1998, and tentative approval letter dated March 23, 1998.

We acknowledge receipt of your submissions dated March 12 and 26, and April 3, 6, 21, 22, and 27, 1998.

This new drug application provides for Diclofenac Sodium Ophthalmic Solution, 0.1% for the treatment of postoperative inflammation in patients who have undergone cataract extraction.

We have completed the review of this application, including the submitted draft labeling, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the draft labeling in the submission dated April 27, 1998. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the draft labeling submitted on April 27, 1998. Marketing the product with FPL that is not identical to this draft labeling may render the product misbranded and an unapproved new drug.

Please submit 20 copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FINAL PRINTED LABELING" for approved NDA 20-809. Approval of this submission by FDA is not required before the labeling is used.

Should additional information relating to the safety and effectiveness of the drug become available, revision of that labeling may be required.

NDA 20-809

Page 2

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional material and the package insert directly to:

Division of Drug Marketing, Advertising and
Communications, HFD-40
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

Please submit one market package of the drug product when it is available.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact Lori Gorski, Project Manager, at (301) 827-2090.

Sincerely,

Wiley A. Chambers, M.D.
Deputy Director
Division of Anti-Inflammatory, Analgesic, and
Ophthalmic Drug Products, HFD-550
Office of Drug Evaluation V
Center for Drug Evaluation and Research

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 020809

PRINTED LABELING

NDA 20-809 Draft Labeling

Diclofenac Sodium Ophthalmic Solution, 0.1%

DESCRIPTION

Diclofenac Sodium Ophthalmic Solution, 0.1% is a sterile, topical, nonsteroidal, anti-inflammatory product for ophthalmic use. Diclofenac sodium is designated chemically as 2-[(2,6-dichlorophenyl)amino] benzeneacetic acid, monosodium salt, with an empirical formula of $C_{14}H_{10}Cl_2NO_2Na$. The structural formula of diclofenac sodium is:

[Structure]

Diclofenac Sodium Ophthalmic Solution, 0.1% is available as a sterile solution which contains diclofenac sodium 0.1% (1 mg/mL).

Inactive Ingredients: POLYQUAD® (polyquaternium-1) (0.05 mg/mL), tocophersolan, boric acid, mannitol, hydrochloric acid and/or sodium hydroxide (to adjust pH to 6.7) and purified water.

Diclofenac sodium is a faintly yellow-white to light-beige, slightly hygroscopic crystalline powder. It is freely soluble in methanol, sparingly soluble in water, very slightly soluble in acetonitrile, and insoluble in chloroform and in 0.1 N hydrochloric acid. Its molecular weight is 318.14. Diclofenac Sodium Ophthalmic Solution, 0.1 % is an iso-osmotic solution with an osmolality of about 300 mOsmol/1000g.

CLINICAL PHARMACOLOGY

Animal Studies

Prostaglandins have been shown in many animal models to be mediators of certain kinds of intraocular inflammation. In studies performed in animal eyes, prostaglandins have been shown to produce disruption of the blood-aqueous humor barrier, vasodilation, increased vascular permeability, leukocytosis, and increased intraocular pressure.

Pharmacodynamics

Diclofenac sodium is one of a series of phenylacetic acids that has demonstrated anti-inflammatory and analgesic properties in pharmacological studies. It is thought to inhibit the enzyme cyclooxygenase, which is essential in the biosynthesis of prostaglandins.

Pharmacokinetics

Results from a bioavailability study of another formulation of diclofenac sodium ophthalmic solution established that plasma levels of diclofenac following ocular instillation of two drops of diclofenac sodium ophthalmic solution, 0.1 % to each eye were below the limit of quantitation (10 ng/mL) over a 4-hour period. This study suggests that limited, if any, systemic absorption occurs with diclofenac sodium ophthalmic solution, 0.1%.

NDA 20-809 Draft Labeling

Clinical Trials: Postoperative Anti-Inflammatory Effects

In a clinical therapeutic equivalence study, Diclofenac Sodium Ophthalmic Solution, 0.1% was found to be therapeutically equivalent to Voltaren Ophthalmic® (diclofenac sodium ophthalmic solution) [CIBA Vision Ophthalmics®] in the treatment of signs and symptoms of inflammation resulting from cataract surgery.

INDICATIONS AND USAGE

Diclofenac Sodium Ophthalmic Solution, 0.1% is indicated for the treatment of postoperative inflammation in patients who have undergone cataract extraction.

CONTRAINDICATIONS

Diclofenac Sodium Ophthalmic Solution, 0.1% is contraindicated in patients who are hypersensitive to any component of the medication.

WARNINGS

With some nonsteroidal anti-inflammatory drugs, there exists the potential for increased bleeding time due to interference with thrombocyte aggregation. There have been reports that ocularly applied nonsteroidal anti-inflammatory drugs may cause increased bleeding of ocular tissues (including hyphemas) in conjunction with ocular surgery.

There is the potential for cross-sensitivity to acetylsalicylic acid, phenylacetic acid derivatives, and other nonsteroidal anti-inflammatory agents. Therefore, caution should be used when treating individuals who have previously exhibited sensitivities to these drugs.

PRECAUTIONS

General: It is recommended that Diclofenac Sodium Ophthalmic Solution, 0.1%, like other NSAIDs, be used with caution in surgical patients with known bleeding tendencies or who are receiving other medications that may prolong bleeding time.

Diclofenac Sodium Ophthalmic Solution, 0.1% may slow or delay healing.

Results from clinical studies indicate that Diclofenac Sodium Ophthalmic Solution, 0.1% has no significant effect upon intraocular pressure, however, elevations in intraocular pressure may occur following cataract surgery.

NDA 20-809 Draft Labeling

Carcinogenesis, Mutagenesis, Impairment of Fertility: Long term carcinogenicity studies in rats given oral diclofenac sodium up to 2 mg/kg/day (approximately the human oral dose) revealed no significant increases in tumor incidence. There was a slight increase in benign rat mammary fibroadenomas in mid-dose females (high dose females had excessive mortality) but the increase was not significant for this common rat tumor. A 2-year carcinogenicity study conducted in mice employing oral diclofenac sodium up to 2 mg/kg/day did not reveal any oncogenic potential. Diclofenac sodium did not show mutagenic potential in various mutagenicity studies including the Ames test. Diclofenac sodium administered to male and female rats at 4 mg/kg/day did not affect fertility.

Pregnancy: Teratogenic Effects: Pregnancy Category C. Reproduction studies performed in mice at oral doses up to 5000 times (20 mg/kg/day) and in rats and rabbits at oral doses up to 2500 times (10 mg/kg/day) the human topical dose have revealed no evidence of teratogenicity due to diclofenac sodium, despite the induction of maternal toxicity and fetal toxicity. In rats, maternally toxic doses were associated with dystocia, prolonged gestation, reduced fetal weights and growth, and reduced fetal survival. Diclofenac sodium has been shown to cross the placental barrier in mice and rats.

There are however, no adequate and well-controlled studies in pregnant women. Because animal reproduction studies are not always predictive of human response, this drug should be used during pregnancy only if clearly needed.

Nonteratogenic effects: Because of the known effects of prostaglandin biosynthesis-inhibiting drugs on the fetal cardiovascular system (closure of the ductus arteriosus), the use of Diclofenac Sodium Ophthalmic Solution, 0.1% during late pregnancy should be avoided.

Pediatric Use: Safety and effectiveness in pediatric patients have not been established.

ADVERSE REACTIONS

Ocular: Transient burning and stinging has been reported in approximately 15% of patients with the use of topical diclofenac sodium ophthalmic solution, 0.1%. In cataract studies, keratitis occurred in 28% of patients receiving diclofenac sodium ophthalmic solution, 0.1%, however, most of the cases of keratitis occurred prior to drug therapy. Elevated intraocular pressure following cataract surgery was reported in 15% of patients receiving diclofenac sodium ophthalmic solution, 0.1%. The following adverse reactions were reported in approximately 5% or less of the patients: abnormal vision, anterior chamber reaction, blurred vision, conjunctivitis, corneal deposits, corneal edema, corneal lesions, corneal opacity, discharge, injection, iritis, irritation, itching and ocular allergy.

Systemic: The following adverse reactions were reported in 3% or less of the patients: abdominal pain, asthenia, chills, dizziness, facial edema, fever, headache, insomnia, nausea, pain, rhinitis, viral infection, and vomiting.

NDA 20-809

OVERDOSAGE

Overdosage will not ordinarily cause acute problems. If accidentally ingested, fluids should be taken to dilute the medication.

DOSAGE AND ADMINISTRATION

One drop of Diclofenac Sodium Ophthalmic Solution, 0.1% should be applied to the affected eye four times daily beginning 24 hours after cataract surgery and continuing throughout the first 2 weeks of the postoperative period.

How Supplied: Diclofenac Sodium Ophthalmic Solution, 0.1% is supplied in opaque, plastic 5 mL DROP-TAINER® dispenser (NDC 0065-0231-05).

Store between 59°-86°F (15°-30°C). Protect from light. *Dispense in original, unopened container only.*

Alcon Ophthalmic Logo
Alcon Laboratories, Inc.
Fort Worth, Texas 76134

January 1998