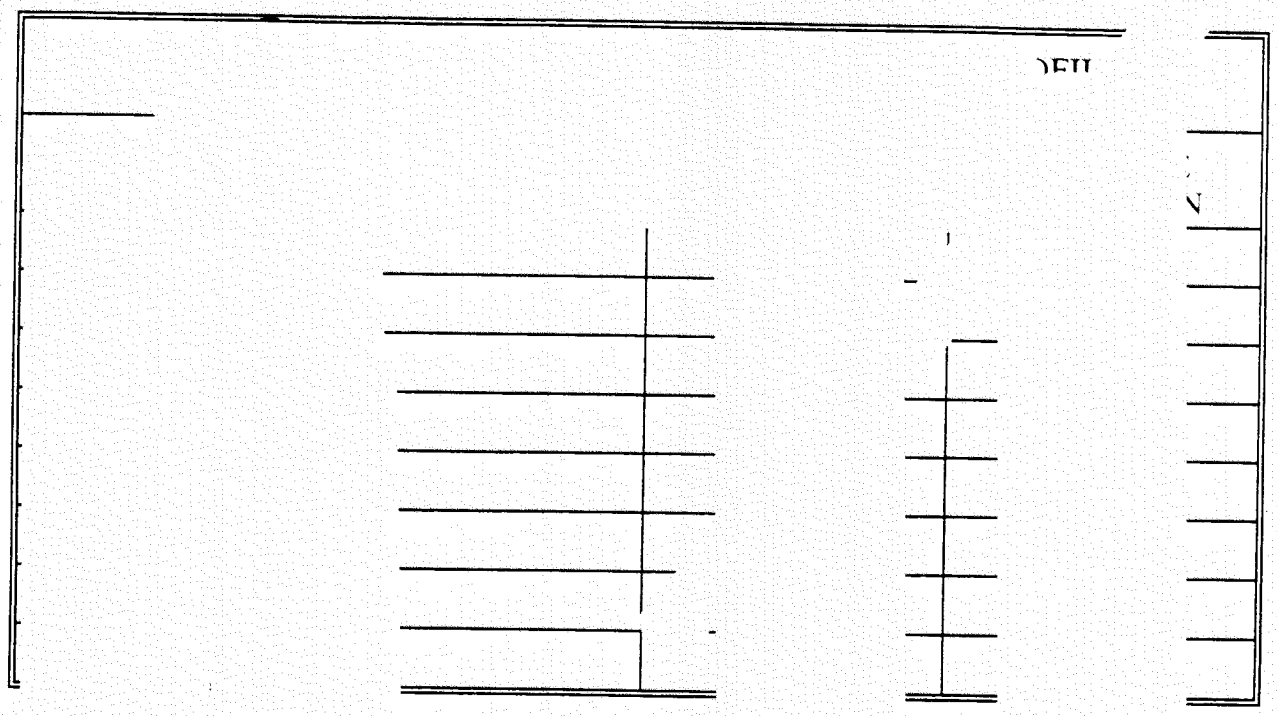
Pgs 2-6 redacted
in whole.

chemistry



We have enclosed a representative rity under Attachment 7.

Please note that during stability testing, we report a value for both individual and total impurities as compared to nicotine. The stability summary sheets also report the relative retention times of the individual impurity peaks.

In addition to our response, we note and acknowledge that the product is an official article in the compendia and validation of our analytical methods will not be requested.

FIELD COPY CERTIFICATION

Pursuant to 21 CFR 314.96(b), we certify that a field copy of this amendment has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

-Continued-

We believe that this response adequately addresses each of the cited deficiencies. Should any additional information be required, please do not hesitate to contact us.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

Attachments

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

Orig

7/6/94 VAI Cavosi

ANDA 74-507

June 23, 1994

Douglas Sporn
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Document Control Room
Metro Park North II
HFD-600, Room 150
7500 Standish Place
Rockville, MD 20855-2773

RE: NICOTINE POLACRILEX GUM, 2 mg
Additional Information

Dear Mr. Sporn:

Reference is made to our Abbreviated New Drug Application (ANDA) dated June 16, 1994 and submitted pursuant to 21 CFR, part 314, subpart C and Section 505 (j) of the Federal Food, Drug and Cosmetic Act for the above mentioned product.

Reference is also made to our telephone conversation dated June 22, 1994, with Ms. Cecelia M. Parise, Consumer Safety Officer, Office of Generic Drugs.

As a result of our discussion, enclosed please find the following information:

1) Please be advised that pursuant to 21 CFR 314.96(b), Circa Pharmaceuticals, Inc. certifies that a true copy of the information included in the archival and review copies of the original ANDA were submitted to Mr. Edward T. Warner, District Director, Food and Drug Administration (NYK-DO), 850 Third Avenue, Brooklyn, New York 11232-1593. A copy of the letter sent with the field copy is enclosed for your reference.

2) A copy of the blister labeling for the reference product, Nicorette®, manufactured by Marion Merrell Dow.

-Continued-

3) A copy of the carton labeling for the reference product, Nicorette®, manufactured by Marion Merrell Dow.

Pursuant to 21 CFR 314.96(b), we certify that a true copy of this additional information has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

Thank you for your attention. If there are any questions or problems, please do not hesitate to contact us immediately.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio

Joyce Anne DelGaudio
Director, Regulatory Affairs

ENCLS:
jad/s

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Pursuant to 21 CFR 314.96(b), we certify that a true copy of this additional information has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
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Brooklyn, New York 11232-1593

Thank you for your attention. If there are any questions or problems, please do not hesitate to contact us immediately.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio

Joyce Anne DelGaudio
Director, Regulatory Affairs

ENCLS:
jad/s

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

August 1, 1995

AMENDMENT
N/A

Douglas Sporn
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Metro Park North II
Room 204, HFD 637
7500 Standish Place
Rockville, MD 20855

RE: **Nicotine Polacrilex Gum, 2 mg ANDA 74-507**
NEW CORRESPONDENCE: AMENDMENT IN RESPONSE TO PREAPPROVAL INSPECTION.

Dear Mr. Sporn:

Reference is made to the above mentioned ANDA, submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act. Reference is also made to a July 31, 1995 telephone communication with Mr. Tim Ames, Consumer Safety Officer, Office of Generic Drugs (OGD), and myself. The purpose of this call was to inform the OGD that we had received our preapproval inspection for the above mentioned ANDA. Observations made by the investigator during the inspection resulted in the revision of certain documents that had been submitted in the ANDA. Mr. Ames requested that these revised documents be submitted as soon as possible.

The preapproval inspection was conducted at Circa Pharmaceuticals, Inc., from May 9 through May 26, 1995. A Form FDA 483 was issued at the conclusion of this inspection, on May 26, 1995. The observations were responded to in a letter to the New York District Office, Brooklyn, dated June 6, 1995. The following is an item-by-item response to the observations that pertained to our ANDA 74-507 for nicotine polacrilex gum, 2 mg. The location of the Attachment under which the revised documents can be found is also included.

Pgs. 2-6 redacted in whole.

Commercial manufacturing process
raw material acceptance criteria.

FIELD COPY CERTIFICATION

Pursuant to 21 CFR 314.96(b), we certify that a true copy of this amendment has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

A Table of Contents has been enclosed to facilitate the review of this amendment. Should any additional information be required, please do not hesitate to contact us.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

Attachments

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

August 1, 1995

AMENDMENT
N/A

Douglas Sporn
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Metro Park North II
Room 204, HFD 637
7500 Standish Place
Rockville, MD 20855

RE: **Nicotine Polacrilex Gum, 2 mg ANDA 74-507**
NEW CORRESPONDENCE: AMENDMENT IN RESPONSE TO PREAPPROVAL INSPECTION.

Dear Mr. Sporn:

Reference is made to the above mentioned ANDA, submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act. Reference is also made to a July 31, 1995 telephone communication with Mr. Tim Ames, Consumer Safety Officer, Office of Generic Drugs (OGD), and myself. The purpose of this call was to inform the OGD that we had received our preapproval inspection for the above mentioned ANDA. Observations made by the investigator during the inspection resulted in the revision of certain documents that had been submitted in the ANDA. Mr. Ames requested that these revised documents be submitted as soon as possible.

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Observation 1:

specifie

GENERIC DRUGS

8-2-95

Pgs. 2-6 redacted
in whole.

FIELD COPY CERTIFICATION

Pursuant to 21 CFR 314.96(b), we certify that a true copy of this amendment has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

A Table of Contents has been enclosed to facilitate the review of this amendment. Should any additional information be required, please do not hesitate to contact us.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

Attachments

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

March 14, 1995

Douglas Sporn
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Metro Park North II
Room 204, HFD 637
7500 Standish Place
Rockville, MD 20855

AMENDMENT
NDA

RE: **Nicotine Polacrilex Gum, 2 mg ANDA 74-507**
MAJOR AMENDMENT

Dear Mr. Sporn:

We refer to the January 18, 1995 letter from the Division of Chemistry II providing comments on our Abbreviated New Drug Application dated June 16, 1994, submitted pursuant to Section 505(j) of the Food, Drug, and Cosmetic Act, for Nicotine Polacrilex Gum, 2 mg. The following is an item-by-item response:

Pgs. 2-22 redacted in whole.

chemistry

FIELD COPY CERTIFICATION

Pursuant to 21 CFR 314.96(b), we certify that a field copy of this amendment has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

A Table of Contents has been enclosed to facilitate the review of this amendment. We believe that this response adequately addresses each of the cited deficiencies. We have also enclosed three copies of the methods validation package for the Chromatographic Impurities in Nicotine Polacrilex Gum, 2 mg lavor in a separate binder, labeled accordingly. Should any additional information be required, please do not hesitate to contact us.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

Attachments

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

Orig

7/6/94 WAI Cavosi

ANDA 74-507

June 23, 1994

Douglas Sporn
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Document Control Room
Metro Park North II
HFD-600, Room 150
7500 Standish Place
Rockville, MD 20855-2773

RE: NICOTINE POLACRILEX GUM, 2 mg
Additional Information

Dear Mr. Sporn:

Reference is made to our Abbreviated New Drug Application (ANDA) dated June 16, 1994 and submitted pursuant to 21 CFR, part 314, subpart C and Section 505 (j) of the Federal Food, Drug and Cosmetic Act for the above mentioned product.

Reference is also made to our telephone conversation dated June 22, 1994, with Ms. Cecelia M. Parise, Consumer Safety Officer, Office of Generic Drugs.

As a result of our discussion, enclosed please find the following information:

1) Please be advised that pursuant to 21 CFR 314.96(b), Circa Pharmaceuticals, Inc. certifies that a true copy of the information included in the archival and review copies of the original ANDA were submitted to Mr. Edward T. Warner, District Director, Food and Drug Administration (NYK-DO), 850 Third Avenue, Brooklyn, New York 11232-1593. A copy of the letter sent with the field copy is enclosed for your reference.

2) A copy of the blister labeling for the reference product, Nicorette®, manufactured by Marion Merrell Dow.

-Continued-

3) A copy of the carton labeling for the reference product, Nicorette®, manufactured by Marion Merrell Dow.

Pursuant to 21 CFR 314.96(b), we certify that a true copy of this additional information has been sent by overnight courier to:

Mr. Edward T. Warner, District Director
Food and Drug Administration (NYK-DO)
850 Third Avenue
Brooklyn, New York 11232-1593

Thank you for your attention. If there are any questions or problems, please do not hesitate to contact us immediately.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

ENCLS:
jad/s

CIRCA PHARMACEUTICALS, INC.
33 RALPH AVENUE P.O. BOX 30 COPIAGUE, NY 11726-0030
(516) 842-8383 FAX (516) 842-8630

April 23, 1996

Mr. Douglas Sporn
Director
Office of Generic Drugs
Center for Drug Evaluation and Research
FOOD AND DRUG ADMINISTRATION
Document Control Room
HFD-600, Room 150
Metro Park North II
7500 Standish Place
Rockville, MD 20855-2773

RE: NICOTINE POLACRILEX GUM, 2 MG; ANDA 74-507
MAJOR AMENDMENT

Dear Mr. Sporn:

We refer to the December 4, 1995 letter from the Division of Chemistry II providing comments on our Abbreviated New Drug Application dated June 16, 1994, and our amendments dated March 14, and August 1, 1995, submitted pursuant to Section 505(j) of the Food, Drug and Cosmetic Act for Nicotine Polacrilex Gum, 2 mg. We hereby submit this major amendment as a response to the December 4 deficiency letter.

Additionally, on February 9, 1996, the reference listed drug product, Nicorette®, was approved for Over-The-Counter (OTC) marketing status. Therefore, with this amendment, we respectfully request a change in the proposed marketing status of our ANDA 74-507 from a Prescription Drug Product to an Over-The-Counter Product. Our FDA form 356h has been appropriately revised to reflect this change in marketing status.

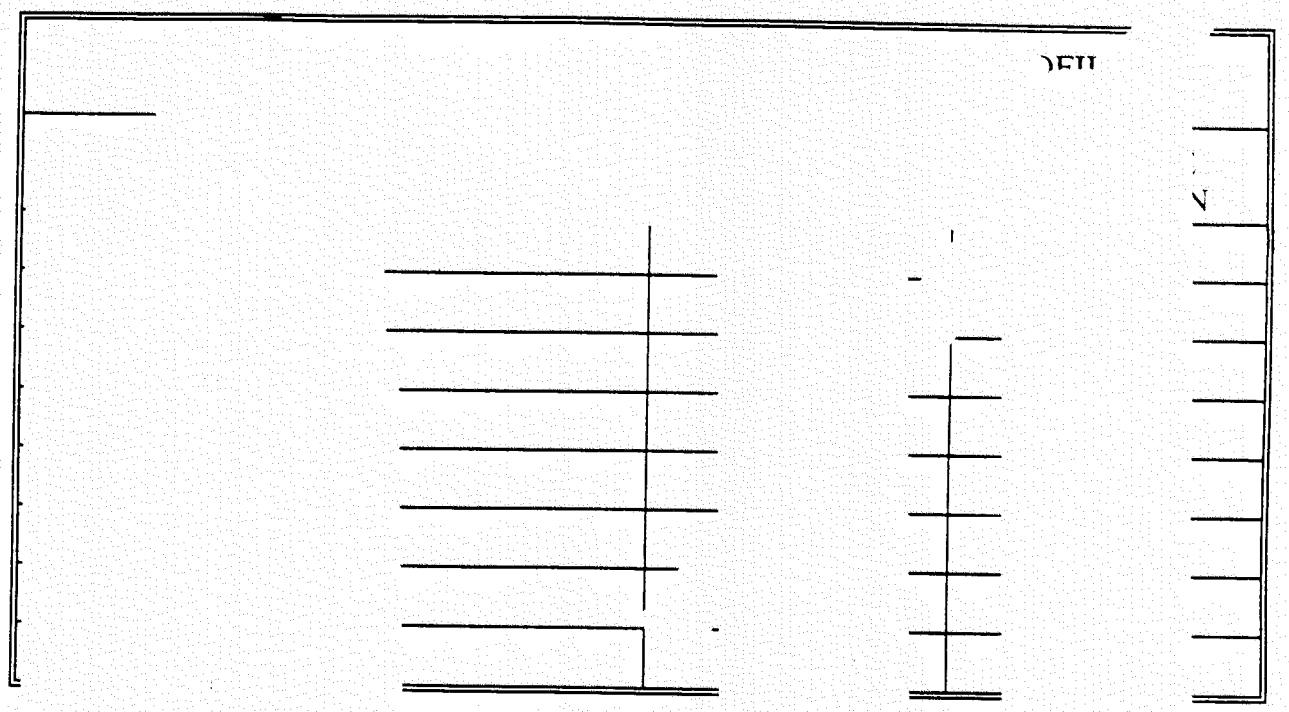
In further support of this change we have enclosed draft labeling for our drug product, identical to the newly approved labeling for the reference listed drug product. The draft labeling can be found under Attachment 1.

The following is an item-by-item response of the chemistry deficiencies. Please refer to Attachment #1 for the new, OTC, draft labeling. This has been submitted in lieu of a response to the labeling deficiencies noted for our drug product intended for prescription marketing status.

-Continued-

Pgs 2-6 redacted
in whole.

chemistry



We have enclosed a representative rity under Attachment 7.

Please note that during stability testing, we report a value for both individual and total impurities as compared to nicotine. The stability summary sheets also report the relative retention times of the individual impurity peaks.

In addition to our response, we note and acknowledge that the product is an official article in the compendia and validation of our analytical methods will not be requested.

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-Continued-

We believe that this response adequately addresses each of the cited deficiencies. Should any additional information be required, please do not hesitate to contact us.

Sincerely,
CIRCA PHARMACEUTICALS, INC.

Joyce Anne DelGaudio
Director, Regulatory Affairs

Attachments