

Draft Guidance on Topiramate

October 2025

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

In general, FDA's guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

Active Ingredient:	Topiramate
Dosage Form:	Capsule, extended release
Route:	Oral
Strengths:	25 mg, 50 mg, 100 mg, 150 mg, 200 mg
Recommended Studies:	Three in vivo bioequivalence studies with pharmacokinetic endpoints
1.	Type of study: Fasting Design: Single-dose, two-treatment, two-period crossover in vivo Strength: 200 mg Subjects: Healthy males and healthy females not of reproductive potential Additional comments: - Exclude geriatric subjects due to increased risk of central nervous system effects. Subjects should be evaluated prior to discharge for cognitive impairment and instructed not to drive or operate machinery until their cognitive function returns to baseline level. - Ensure an adequate washout period between treatments in the crossover study due to the long elimination half-life of topiramate. Alternatively, a parallel study design may be considered.
2.	Type of study: Fed Design: Single-dose, two-treatment, two-period crossover in vivo Strength: 200 mg Subjects: Healthy males and healthy females not of reproductive potential Additional comments: See comments above.

3. Type of study: Fasting, sprinkle-in-applesauce
Design: Single-dose, two-treatment, two-period crossover in vivo
Strength: 200 mg
Subjects: Healthy males and healthy females not of reproductive potential
Additional comments: See comments above. Administer the dose by opening and sprinkling the entire content of the capsule on a spoonful of applesauce in accordance with the approved labeling of the reference listed drug (RLD).

Analyte to measure: Topiramate in plasma

Bioequivalence based on (90% CI): Topiramate

Additional strengths: Bioequivalence of the 25 mg, 50 mg, 100 mg, and 150 mg strengths to the corresponding RLD¹ strengths may be demonstrated based on principles laid out in the most recent version of the FDA guidance for industry on *Bioequivalence Studies with Pharmacokinetic Endpoints for Drugs Submitted Under an Abbreviated New Drug Application*.^a

Dissolution test method and sampling times: For modified release drug products, applicants should develop specific discriminating dissolution methods. Alternatively, applicants may use the dissolution method set forth in any related official United States Pharmacopeia (USP) drug product monograph, or in the FDA's database, <http://www.accessdata.fda.gov/scripts/cder/dissolution/>, provided that applicants submit adequate dissolution data supporting the discriminating ability of such a method. If a new dissolution method is developed, submit the dissolution method development and validation report with the complete information/data supporting the proposed method. Conduct comparative dissolution testing on 12 dosage units for each strength of the test product and RLD. Specifications will be determined upon review of the abbreviated new drug application.

In addition to the method above, submit dissolution profiles on 12 dosage units for each strength of the test product and RLD generated using USP Apparatus 1 at 100 rpm and/or Apparatus 2 at 50 rpm in at least three dissolution media (e.g., pH 1.2, 4.5 and 6.8 buffer). Agitation speeds may be increased if appropriate. It is acceptable to add a small amount of surfactant if necessary. Include early sampling times of 1, 2, and 4 hours and continue every 2 hours until at least 80% of the drug is released to provide assurance against premature release of drug (dose dumping) from the formulation.

Alcohol dose dumping studies: None

¹ If the RLD is not available, refer to the most recent version of the FDA guidance for industry on *Referencing Approved Drug Products in ANDA Submissions*.

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^a For the most recent version of a guidance, check the FDA guidance website at <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.