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Draft Guidance on Monomethyl Fumarate

March 2021

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic.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.

This guidance, which interprets the Agency’s regulations on bioequivalence at 21 CFR part 320, provides product-specific recommendations on, among other things, the design of bioequivalence studies to support abbreviated new drug applications (ANDAs) for the referenced drug product. FDA is publishing this guidance to further facilitate generic drug product availability and to assist the generic pharmaceutical industry with identifying the most appropriate methodology for developing drugs and generating evidence needed to support ANDA approval for generic versions of this product.

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This is a new draft product-specific guidance for industry on generic monomethyl fumarate.

**Active Ingredient:** Monomethyl fumarate

**Dosage Form; Route:** Delayed release capsule; oral

**Recommended Studies:** Two studies

1. **Type of study:** Fasting  
   **Design:** Single-dose, two-treatment, two-period crossover in vivo  
   **Strength:** 95 mg  
   **Subjects:** Males and non-pregnant, non-lactating females, general population  
   **Additional comments:** Exclude subjects with preexisting low lymphocyte counts based on a complete blood cell count test within 6 months.

2. **Type of study:** Fed  
   **Design:** Single-dose, two-treatment, two-period crossover in vivo  
   **Strength:** 95 mg

Recommended Mar 2021
Subjects: Males and non-pregnant, non-lactating females, general population
Additional comments: See comment above.

**Analyte to measure:** Monomethyl fumarate in plasma

**Bioequivalence based on (90% CI):** Monomethyl fumarate

**Additional strengths:** Not applicable

**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/](http://www.accessdata.fda.gov/scripts/cder/dissolution/), provided that applicants submit adequate dissolution data supporting the discriminating ability of such a method. Conduct comparative dissolution testing on 12 dosage units for each of the test and reference products. Specifications will be determined upon review of the abbreviated new drug application.

**Alcohol dose dumping studies:**

Due to concerns of dose dumping of drug from this product when taken with alcohol, conduct additional dissolution testing using various concentrations of ethanol in the dissolution medium as follows:

Testing Conditions: 900 mL, 0.1 N HCl, USP 2 (Paddle) Stationary Basket over the Paddle apparatus at 100 rpm, with or without alcohol;

- **Test 1:** 12 units tested according to the proposed method (with 0.1 N HCl), with data collected every 15 minutes for a total of 2 hours
- **Test 2:** 12 units analyzed by substituting 5% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours
- **Test 3:** 12 units analyzed by substituting 20% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours
- **Test 4:** 12 units analyzed by substituting 40% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours

Conduct testing on both test and reference products accordingly, and provide data on individual unit, means, range and %CV.

**Unique Agency Identifier:** PSG_210296