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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Subject: Response to Draft Guidance for Industry: "Q1F Stability Data Package for Registration in Climatic Zones III and IV," International Conference on Harmonization, Federal Register, Friday June 14, 2002, Docket No. 02D-0231

To whom it may concern:

Novartis Pharmaceuticals Corporation, as a global pharmaceutical corporation, is supportive of the goals of the International Conference on Harmonization process, to harmonize the technical requirements for registration of pharmaceutical products. After review of the above-cited guidance, we have the following comments:

Part 2.2:

The Note in paragraph 3 indicates the intention to change the intermediate storage condition for the general case for Climate zones I and II by increasing the humidity storage condition from 30°C/60%RH to 30°C/65%RH. The stated purpose, consolidation with the long term storage condition for Zones III and IV, is commendable. Any reduction in the number of test conditions (and associated stability studies and chambers needed) may be considered useful.

However, it is of concern that this harmonization to the more rigorous humidity test condition in practice will place all product configurations (including those meant for Zones I and II only) into a test environment not reflective of the actual conditions experienced in Climatic Zones I and II. This change will have an impact on appropriate assessment of the suitability of various packaging materials/configurations, long term product specifications and in product expiry period.

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In effect, this grouping of products intended for any of the four Climatic Zones into the same test condition introduces a potential unintended "regulatory creep". Products which exhibit sensitivity to humidity, hygroscopic products and certain packaging configurations such as blisters may be adversely effected by a change from the 60% RH condition to the 65% RH, although the intended market is only Zones I and II.

Conversely, testing for products intended for Zones III and IV is already addressed in Part 2.3 of the draft Guidance in the statements "However, there may be examples in which a product cannot be demonstrated to be stable when stored at 30°C±2°C /65%RH±5%RH. In this case, additional cautionary statements in the labeling can be appropriate."

Therefore, Novartis recommends that the Agency reconsider the intention to consolidate the intermediate 30°C/60%RH stability testing for Zones I and II with the long term 30°C/65%RH stability condition for Zones III and IV. An alternative approach that also conserves test conditions might be to specify a reduced shelf life expiry period for any product intended for market in Climate Zones III and IV, but not specifically tested under the 30°C/65%RH condition. Full expiry in Climate Zones III and IV would only be granted upon the completion of long term testing at the 30°C/65%RH test condition.

These comments are being provided in duplicate in written form and electronically as directed in the Federal Register Notice.

Thank you for the opportunity to comment. If you have any questions, please contact me at (973) 781-3779 or at e-mail: joan.materna@pharma.novartis.com.

Sincerely,

Joan A. Materna

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