

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

Application Number 74977

Trade Name Acyclovir Capsules 200mg

Generic Name Acyclovir Capsules 200mg

Sponsor Lipha Pharmaceuticals, Inc.

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION 74976

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CENTER FOR DRUG EVALUATION AND RESEARCH

Application Number 74976

APPROVAL LETTER

ANDA 74-977

Lipha Pharmaceuticals, Inc.
U.S. Agent for: Genpharm, Inc.
Attention: Anita Goodman, M.D.
9 West 57th Street, Suite 3825
New York, NY 10019-2701

APR 13 1998

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Dear Madam:

This is in reference to your abbreviated new drug application dated September 27, 1996, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act, for Acyclovir Capsules, 200 mg.

Reference is also made to your amendments dated January 16, January 22, February 5, June 2, September 8, and October 1, 1997; and January 6, February 20 and April 9, 1998.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the application is approved. The Division of Bioequivalence has determined your Acyclovir Capsules 200 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Zovirax® Capsules, 200 mg of Glaxo Wellcome Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

Under 21 CFR 314.70, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the proposed or final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-240). Please do not use Form FD-2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-240) with a completed Form FD-2253 at the time of their initial use.

Validation of the regulatory methods has not been completed. It is the policy of the Office not to withhold approval until the validation is complete. We acknowledge your commitment to satisfactorily resolve any deficiencies which may be identified.

Sincerely yours,

DL
Douglas L. Sporn
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

Jan
4-13-98

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER 74976

FINAL PRINTED LABELING

ACYCLOVIR
CAPSULE

LOT:

Mfg. By:
Genpharm Inc.
Toronto, Canada
M8Z 2S6

ACYCLOVIR
CAPSULE
200 mg

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Genpharm Inc.
Toronto, Canada
M8Z 2S6

ACYCLOVIR
CAPSULE
200 mg

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CAPSULE
200 mg

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Toronto, Canada
M8Z 2S6

GENPHARM

Each capsule contains:
Acyclovir 200 mg

Store at 15° to 25°C (59° to 77°F).
Dispense in a tight, light-resistant
container as defined in the U.S.P.

For indications, dosage, precautions, etc.,
see accompanying package insert.

Package not child resistant.

Printed in Canada 003-785 REV. #00

NDC 55567-034-18 100 Capsules

ACYCLOVIR

Capsules

200 mg

Caution: Federal law prohibits
dispensing without prescription



Manufactured by:
GENPHARM INC.
Toronto, Canada
M8Z 2S6
1-800-661-7134

APR 13 1998



APPROVED

For indications, dosage, precautions, etc., see enclosed package insert. This package is not child resistant. If dispensed for outpatient use, a child resistant container should be utilized.

Store at 15° to 25°C (59° to 77°F) and protect from light and moisture.

APPROVED

APR 13 1996

003-787 REV #00



NDC 55567-034-06

UNIT DOSE
10 strips of
10 blisters

ACYCLOVIR

CAPSULES

200 mg

Caution: Federal law prohibits dispensing without prescription
This unit-dose package is not child resistant

GENPHARM INC.

100 Capsules
Unit Dose

GENPHARM INC.

**100 Capsules
Unit Dose**

**Caution: Federal law prohibits dispensing without prescription
This unit-dose package is not child resistant**

200 mg

CAPSULES

ACYCLOVIR

**UNIT DOSE
10 strips of
10 blisters**

NDC 55567-034-06

**100 Capsules
Unit Dose**

**Manufactured by:
GENPHARM INC.
Toronto, Canada M8Z 2S6
1-800-661-7134**



Caution: Federal law prohibits dispensing without prescription

200 mg

CAPSULES

ACYCLOVIR

**UNIT DOSE
10 strips of
10 blisters**

NDC 55567-034-06

ACYCLOVIR Capsules

ACYCLOVIR Tablets



00378602

00378602



DESCRIPTION

Acyclovir is an antiviral drug. Acyclovir Capsules and Tablets are formulations for oral administration. Each capsule of acyclovir contains 200 mg of acyclovir and the inactive ingredients pregelatinized starch, lactose monohydrate, magnesium stearate, and sodium lauryl sulfate. The capsule shell consists of gelatin, FD&C Blue No. 1, titanium dioxide, silicon dioxide and sodium lauryl sulphate. Printed with edible black ink. The contents of the edible black ink are synthetic black iron oxide, FD&C Blue No. 2 Aluminum lake, FD&C Red No. 40 Aluminum lake, FD&C Blue No. 1 Aluminum lake, and D&C Yellow No. 10 Aluminum lake.

Each 800 mg tablet of acyclovir contains 800 mg of acyclovir and the inactive ingredients FD&C Blue No. 2 Aluminum Lake, magnesium stearate, microcrystalline cellulose, povidone, and sodium starch glycolate.

Each 400 mg tablet of acyclovir contains 400 mg of acyclovir and the inactive ingredients magnesium stearate, microcrystalline cellulose, povidone, and sodium starch glycolate.

The chemical name of acyclovir is 2-amino-1,9-dihydro-9-[(2-hydroxyethoxy)methyl]6-H-purin-6-one; it has the following structural formula:



Chemical formula: $C_8H_{11}N_5O_3$

Acyclovir is a white to off-white crystalline powder with a molecular weight of 225.21. The maximum solubility in water at 37°C is 2.5 mg/mL. The pKa's of acyclovir are 2.27 and 9.25.

VIROLOGY:

Mechanism of Antiviral Action: Acyclovir is a synthetic purine nucleoside analogue with *in vitro* and *in vivo* inhibitory activity against herpes simplex virus types 1 (HSV-1), 2 (HSV-2), and varicella-zoster virus (VZV). In cell culture, acyclovir's highest antiviral activity is against HSV-1, followed in decreasing order of potency against HSV-2 and VZV.

The inhibitory activity of acyclovir is highly selective due to its affinity for the enzyme thymidine kinase (TK) encoded by HSV and VZV. This viral enzyme converts acyclovir into acyclovir monophosphate, a nucleotide analogue. The monophosphate is further converted into diphosphate by cellular guanylate kinase and into triphosphate by a number of cellular enzymes. *In vitro*, acyclovir triphosphate stops replication of herpes viral DNA. This is accomplished in three ways: 1) competitive inhibition of viral DNA polymerase, 2) incorporation into and termination of the growing viral DNA chain, and 3) inactivation of the viral DNA polymerase. The greater antiviral activity of acyclovir against HSV compared to VZV is due to its more efficient phosphorylation by the viral TK.

Antiviral Activities: The quantitative relationship between the *in vitro* susceptibility of herpes viruses to antivirals and the clinical response to therapy has not been established in humans, and virus sensitivity testing has not been standardized. Sensitivity testing results, expressed as the concentration of drug required to inhibit by 50% the growth of virus in cell culture (IC_{50}), vary greatly depending upon a number of factors. Using plaque-reduction assays, the IC_{50} against herpes simplex virus isolates ranges from 0.02 to 13.5 mcg/mL for HSV-1 and from 0.01 to 9.9 mcg/mL for HSV-2. The IC_{50} for acyclovir against most laboratory strains and clinical isolates of VZV ranges from 0.12 to 10.8 mcg/mL.

Acyclovir also demonstrates activity against the Oka vaccine strain of VZV with a mean IC_{50} of 1.35 mcg/mL.

Drug Resistance: Resistance of VZV to antiviral nucleoside analogues can result from qualitative or quantitative changes in the viral TK or DNA polymerase. Clinical isolates of VZV with reduced susceptibility to acyclovir have been recovered from patients with AIDS. In these cases, TK-deficient mutants of VZV have been recovered.

Resistance of HSV to antiviral nucleoside analogues occurs by the same mechanisms as resistance to VZV. While most of the acyclovir-resistant mutants isolated thus far from immunocompromised patients have been found to be TK-deficient mutants, other mutants involving the viral TK gene (TK partial and TK altered) and DNA polymerase have also been isolated. TK-negative mutants may cause severe disease in immunocompromised patients. The possibility of viral resistance to acyclovir should be considered in patients who show poor clinical response during therapy.

CLINICAL PHARMACOLOGY:

Pharmacokinetics: The pharmacokinetics of acyclovir after oral administration have been evaluated in healthy volunteers and in immunocompromised patients with herpes simplex or varicella-zoster virus infection. Acyclovir pharmacokinetic parameters are summarized

excretion and renal clearance were correspondingly reduced.

Clinical Trials: Initial Genital Herpes: Double-blind, placebo-controlled studies have demonstrated that orally administered acyclovir significantly reduced the duration of acute infection and duration of lesion healing. The duration of pain and new lesion formation was decreased in some patient groups.

Recurrent Genital Herpes: Double-blind, placebo-controlled studies in patients with frequent recurrences (six or more episodes per year) have shown that orally administered acyclovir given daily for 4 months to 10 years prevented or reduced the frequency and/or severity of recurrences in greater than 95% of patients.

In a study of patients who received acyclovir 400 mg twice daily for 3 years, 45%, 52%, and 63% of patients remained free of recurrences in the first, second, and third years, respectively. Serial analyses of the 3-month recurrence rates for the patients showed that 71% to 87% were recurrence-free in each quarter.

Herpes Zoster Infections: In a double-blind, placebo-controlled study of immunocompetent patients with localized cutaneous zoster infection, acyclovir (800 mg five times daily for 10 days) shortened the times to lesion scabbing, healing, and complete cessation of pain, and reduced the duration of viral shedding and the duration of new lesion formation.

In a similar double-blind, placebo-controlled study, acyclovir (800 mg five times daily for 7 days) shortened the times to complete lesion scabbing, healing, and cessation of pain, reduced the duration of new lesion formation, and reduced the prevalence of localized zoster-associated neurologic symptoms (paresthesia, dysesthesia, or hyperesthesia).

Treatment was begun within 72 hours of rash onset and was most effective if started within the first 48 hours.

Adults greater than 50 years of age showed greater benefit.

Chickenpox: Three randomized, double-blind, placebo-controlled trials were conducted in 993 patients ages 2 to 18 years with chickenpox. All patients were treated within 24 hours after the onset of rash. In two trials, acyclovir was administered at 20 mg/kg four times daily (up to 3,200 mg per day) for 5 days. In the third trial, doses of 10, 15 or 20 mg/kg were administered four times daily for 5 to 7 days. Treatment with acyclovir shortened the time to 50% healing, reduced the maximum number of lesions, reduced the median number of vesicles, decreased the median number of residual lesions on day 28, and decreased the proportion of patients with fever, anorexia, and lethargy by day 2. Treatment with acyclovir did not affect varicella-zoster virus-specific humoral or cellular immune responses at 1 month or 1 year following treatment.

INDICATIONS AND USAGE:

Herpes Zoster Infections: Acyclovir is indicated for the acute treatment of herpes zoster (shingles).

Genital herpes: Acyclovir is indicated for the treatment of initial episodes and the management of recurrent episodes of genital herpes.

Chickenpox: Acyclovir is indicated for the treatment of chickenpox (varicella).

CONTRAINDICATIONS: Acyclovir is contraindicated for

APR 13 1998

changes in the viral DNA. Acyclovir isolates of VZV with reduced susceptibility to acyclovir have been recovered from patients with AIDS. In these cases, TK-deficient mutants of VZV have been recovered.

Resistance of HSV to antiviral nucleoside analogues occurs by the same mechanisms as resistance to VZV. While most of the acyclovir-resistant mutants isolated thus far from immunocompromised patients have been found to be TK-deficient mutants, other mutants involving the viral TK gene (TK partial and TK altered) and DNA polymerase have also been isolated. TK-negative mutants may cause severe disease in immunocompromised patients. The possibility of viral resistance to acyclovir should be considered in patients who show poor clinical response during therapy.

CLINICAL PHARMACOLOGY:

Pharmacokinetics: The pharmacokinetics of acyclovir after oral administration have been evaluated in healthy volunteers and in immunocompromised patients with herpes simplex or varicella-zoster virus infection. Acyclovir pharmacokinetic parameters are summarised in Table 1.

Table 1: Acyclovir Pharmacokinetic Characteristics (Range)

Parameter	Range
Plasma protein binding	9% to 33%
Plasma elimination half-life	2.5 to 3.3 hr
Average oral bioavailability	10% to 20%*

*Bioavailability decreases with increasing dose.

In one multiple-dose, cross-over study in healthy subjects (n=23), it was shown that increases in plasma acyclovir concentrations were less than dose proportional with increasing dose, as shown in Table 2. The decrease in bioavailability is a function of the dose and not the dosage form.

Table 2: Acyclovir Peak and Trough Concentrations at Steady State

Parameter	200 mg	400 mg	800 mg
C _{SS} Max	0.83 mcg/mL	1.21 mcg/mL	1.61 mcg/mL
C _{SS} Trough	0.46 mcg/mL	0.63 mcg/mL	0.83 mcg/mL

There was no effect of food on the absorption of acyclovir (n=6); therefore, Acyclovir Capsules and Tablets may be administered with or without food.

The only known urinary metabolite is 9-[[carboxymethyl]methyl]guanine.

Special Populations: Adults with Impaired Renal Function:

The half-life and total body clearance of acyclovir are dependent on renal function. A dosage adjustment is recommended for patients with reduced renal function (see DOSAGE AND ADMINISTRATION).

Pediatrics: In general, the pharmacokinetics of acyclovir in pediatric patients is similar to that of adults. Mean half-life after oral doses of 300 mg/m² and 600 mg/m² in pediatric patients ages 7 months to 7 years was 2.6 hours (range 1.59 to 3.74 hours).

Drug Interactions: Co-administration of probenecid with intra-venous acyclovir has been shown to increase acyclovir half-life and systemic exposure. Urinary

of 10, 15 or 20 mg/kg were administered for 5 to 7 days. Treatment with acyclovir shortened the time to 50% healing, reduced the maximum number of lesions, reduced the median number of vesicles, decreased the median number of residual lesions on day 28, and decreased the proportion of patients with fever, anorexia, and lethargy by day 2. Treatment with acyclovir did not affect varicella-zoster virus-specific humoral or cellular immune responses at 1 month or 1 year following treatment.

INDICATIONS AND USAGE:

Herpes Zoster Infections: Acyclovir is indicated for the acute treatment of herpes zoster (shingles).

Genital herpes: Acyclovir is indicated for the treatment of initial episodes and the management of recurrent episodes of genital herpes.

Chickenpox: Acyclovir is indicated for the treatment of chickenpox (varicella).

CONTRAINDICATIONS: Acyclovir is contraindicated for patients who develop hypersensitivity or intolerance to the components of the formulations.

WARNINGS: Acyclovir Capsules and Tablets are intended for oral ingestion only.

PRECAUTIONS: Dosage adjustment is recommended when administering acyclovir to patients with renal impairment (see DOSAGE AND ADMINISTRATION). Caution should also be exercised when administering acyclovir to patients receiving potentially nephro-toxic agents since this may increase the risk of renal dysfunction and/or the risk of reversible central nervous system symptoms such as those that have been reported in patients treated with intravenous acyclovir.

Information for Patients: Patients are instructed to consult with their physician if they experience severe or troublesome adverse reactions, they become pregnant or intend to become pregnant, they intend to breastfeed while taking orally administered acyclovir, or they have any other questions.

Herpes Zoster: There are no data on treatment initiated more than 72 hours after onset of the zoster rash. Patients should be advised to initiate treatment as soon as possible after a diagnosis of herpes zoster.

Genital Herpes Infections: Patients should be informed that acyclovir is not a cure for genital herpes. There are no data evaluating whether acyclovir will prevent transmission of infection to others. Because genital herpes is a sexually transmitted disease, patients should avoid contact with lesions or intercourse when lesions and/or symptoms are present to avoid infecting partners.

Genital herpes can also be transmitted in the absence of symptoms through asymptomatic viral shedding. If medical management of a genital herpes recurrence is indicated, patients should be advised to initiate therapy at the first sign or symptom of an episode.

Chickenpox: Chickenpox in otherwise healthy children is usually a self-limited disease of mild to moderate severity. Adolescents and adults tend to have more severe disease. Treatment was initiated within 24 hours of the typical chickenpox rash in the controlled studies, and there is no information regarding the effects of treatment begun later in the disease course.

Drug Interactions: See CLINICAL PHARMACOLOGY: Pharmacokinetics.

Carcinogenesis, Mutagenesis, Impairment of Fertility:

The data presented below include references to peak steady-state plasma acyclovir concentrations observed in humans treated with 800 mg given orally six times a day (dosing appropriate for treatment of herpes zoster) or 200 mg given orally six times a day (dosing appropriate for treatment of genital herpes). Plasma drug concentrations in animal studies are expressed as multiples of human exposure to acyclovir at the higher and lower dosing schedules (see CLINICAL PHARMACOLOGY, Pharmacokinetics).

Acyclovir was tested in lifetime bioassays in rats and mice at single daily doses of up to 450 mg/kg administered by gavage. There was no statistically significant difference in the incidence of tumors between treated and control animals, nor did acyclovir shorten the latency of tumors. Maximum plasma concentrations were three to six times human levels in the mouse bioassay and one to two times human levels in the rat bioassay.

Acyclovir was tested in 16 genetic toxicity assays. No evidence of mutagenicity was observed in four microbial assays. Acyclovir demonstrated mutagenic activity in two *in vitro* cytogenetic assays (one mouse lymphoma cell line and human lymphocytes). No mutagenic activity was observed in five *in vitro* cytogenetic assays (three Chinese hamster ovary cell lines and two mouse lymphoma cell lines).

A positive result was demonstrated in one of two *in vitro* cell transformation assays, and morphologically transformed cells obtained in this assay formed tumors when inoculated into immunosuppressed, syngeneic, weanling mice. No mutagenic activity was demonstrated in another, possibly less sensitive, *in vitro* cell transformation assay.

Acyclovir was clastogenic in Chinese hamsters at 380 to 760 times human dose levels. In rats, acyclovir produced a non-significant increase in chromosomal damage at 62 to 125 times human levels. No activity was observed in a dominant lethal study in mice at 36 to 73 times human levels.

Acyclovir did not impair fertility or reproduction in mice (450 mg/kg/day, p.o.) or in rats (25 mg/kg/day, s.c.). In the mouse study, plasma levels were 9 to 18 times human levels, while in the rat study, they were 8 to 15 times human levels. At higher doses (50 mg/kg/day, s.c.) in rats and rabbits (11 to 22 and 16 to 31 times human levels, respectively) implantation efficacy, but not litter size, was decreased. In a rat peri- and post-natal study at 50 mg/kg/day, s.c., there was a statistically significant decrease in group mean numbers of corpea lutea, total implantation sites, and live fetuses.

No testicular abnormalities were seen in dogs given 50 mg/kg/day, i.v. for 1 month (21 to 41 times human levels) or in dogs given 60 mg/kg/day orally for 1 year (six to 12 times human levels).

Testicular atrophy and aspermatogenesis were observed in rats and dogs at higher dose levels.

Pregnancy: Teratogenic Effects:

Teratogenic Effects: Pregnancy Category B. Acyclovir was not teratogenic in the mouse (450 mg/kg/day, p.o.), rabbit (50 mg/kg/day, s.c. and i.v.), or rat (50 mg/kg/day, s.c.). These exposures resulted in plasma levels 9 and 18, 16 and 106, and 11 and 22 times, respectively, human levels. In a non-standard test, rats were given three s.c. doses of 100 mg/kg acyclovir on gestation day 10, resulting in plasma levels 63 and 125 times human levels. In this test, there were fetal abnormalities, such as head and tail anomalies, and maternal toxicity.

There are no adequate and well-controlled studies in pregnant women. A prospective, epidemiological registry of acyclovir use during pregnancy has been ongoing since 1984. As of June 1996, outcomes of live births have been documented in 494 women exposed to systemic acyclovir during the first trimester of pregnancy. The occurrence rate of birth defects approximates that found in the general population. However, the small size of the registry is insufficient to evaluate the risk for less common defects or to permit reliable and definitive conclusions regarding the safety of acyclovir in pregnant women and their developing fetuses. Acyclovir should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

Nursing Mothers: Acyclovir concentrations have been documented in breast milk in two women following oral administration of acyclovir and ranged from 0.6 to 4.1 times corresponding plasma levels. These concentrations would potentially expose the nursing infant to a dose of acyclovir as high as 0.3 mg/kg/day. Acyclovir should be administered to a nursing mother with caution and only when indicated.

Geriatric Use: Clinical studies of acyclovir did not include sufficient numbers of patients aged 65 and over to determine whether they respond differently than younger patients. Other reported clinical experience has not identified differences in responses between

These events may also occur as part of the underlying disease process. Voluntary reports of adverse events which have been received since market introduction include:

General: fever, headache, pain, peripheral edema, and rarely, anaphylaxis

Nervous: confusion, dizziness, hallucinations, paresthesia, seizure, somnolence (These symptoms may be marked, particularly in older adults)

Digestive: diarrhea, elevated liver function tests, gastrointestinal distress, nausea

Hemic and Lymphatic: leukopenia, lymphadenopathy

Musculoskeletal: myalgia

Skin: alopecia, pruritus, rash, urticaria

Special Senses: visual abnormalities

Urogenital: elevated creatinine

OVERDOSAGE: Patients have ingested intentional overdoses of up to 100 capsules (20 g) of acyclovir, with no unexpected adverse effects. Precipitation of acyclovir in renal tubules may occur when the solubility (2.5 mg/mL) is exceeded in the intratubular fluid. In the event of acute renal failure and anuria, the patient may benefit from hemodialysis until renal function is restored (see DOSAGE AND ADMINISTRATION).

DOSAGE AND ADMINISTRATION:

Acute Treatment of Herpes Zoster: 800 mg every 4 hours orally, five times daily for 7 to 10 days.

Genital Herpes: Treatment of Initial Genital Herpes: 200 mg every 4 hours, five times daily for 10 days.

Chronic Suppressive Therapy for Recurrent Disease: 400 mg two times daily for up to 12 months, followed by re-evaluation. Alternative regimens have included doses ranging from 200 mg three times daily to 200 mg five times daily.

The frequency and severity of episodes of untreated genital herpes may change over time. After 1 year of therapy, the frequency and severity of the patient's genital herpes infection should be re-evaluated to assess the need for continuation of therapy with acyclovir.

Intermittent Therapy: 200 mg every 4 hours, five times daily for 5 days. Therapy should be initiated at the earliest sign or symptom (prodrome) of recurrence.

Treatment of Chickenpox: Children (2 years of age and older): 20 mg/kg per dose orally four times daily (80 mg/kg/day) for 5 days. Children over 40 kg should receive the adult dose for chickenpox.

Adults and Children over 40 kg: 800 mg four times daily for 5 days.

Intravenous acyclovir is indicated for the treatment of varicella-zoster infections in immunocompromised patients.

When therapy is indicated, it should be initiated at the earliest sign or symptom of chickenpox. There is no information about the efficacy of therapy initiated more than 24 hours after onset of signs and symptoms.

Patients With Acute or Chronic Renal Impairment: In patients with renal impairment, the dose of Acyclovir Capsules or Tablets should be modified as shown in Table 3:

Table 3: Dosage Modification for Renal Impairment

Normal Dosage Regimen	Creatinine Clearance (mL/min/1.73 m ²)	Adjusted Dosage Regimen	
		Dose (mg)	Dosing Interval
200 mg every 4 hours	> 10	200	every 4 hours
	0 - 10	200	5 x daily every 12 hours
400 mg every 12 hours	> 10	400	every 12 hours
	0 - 10	200	every 12 hours
800 mg every 4 hours	> 25	800	every 4 hours
	10 - 25	800	5 x daily
	0 - 10	800	every 8 hours every 12 hours

Hemodialysis: For patients who require hemodialysis, the mean plasma half-life of acyclovir during hemodialysis is approximately 5 hours. This results in a 60% decrease in plasma concentrations following a 6-hour dialysis period. Therefore, the patient's dosing schedule should be adjusted so that an additional dose is administered after each dialysis.

Peritoneal Dialysis: No supplemental dose appears to be necessary after adjustment of the dosing interval.

Bioequivalence of Dosage Forms: Acyclovir suspension was shown to be bioequivalent to acyclovir capsules (n=20) and one acyclovir 800 mg tablet was shown to be bioequivalent to four acyclovir 200 mg capsules (n=24).

HOW SUPPLIED: Acyclovir Capsules (blue, opaque cap and body) containing 200 mg of acyclovir and printed with "G" on the cap and "0034" on the body - Bottle of 100 (NDC 55567-034-18) and unit dose pack of 100 (NDC 55567-034-06).

cylovir in pregnant women and their developing fetuses. Acyclovir should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

Nursing Mothers: Acyclovir concentrations have been documented in breast milk in two women following oral administration of acyclovir and ranged from 0.6 to 4.1 times corresponding plasma levels. These concentrations would potentially expose the nursing infant to a dose of acyclovir as high as 0.3 mg/kg/day. Acyclovir should be administered to a nursing mother with caution and only when indicated.

Geriatric Use: Clinical studies of acyclovir did not include sufficient numbers of patients aged 65 and over to determine whether they respond differently than younger patients. Other reported clinical experience has not identified differences in responses between elderly and younger patients. In general, dose selection for an elderly patient should be cautious, usually starting at the low end of the dosing range, reflecting the greater frequency of decreased renal function, and of concomitant disease or other drug therapy.

Pediatric Use: Safety and effectiveness in pediatric patients less than 2 years of age have not been adequately studied.

ADVERSE REACTIONS:

Herpes Simplex: Short-Term Administration: The most frequent adverse events reported during clinical trials of treatment of genital herpes with acyclovir 200 mg administered orally five times daily every 4 hours for 10 days were nausea and/or vomiting in 8 of 298 patient treatments (2.7%). Nausea and/or vomiting occurred in 2 of 287 (0.7%) patients who received placebo.

Long-Term Administration: The most frequent adverse events reported in a clinical trial for the prevention of recurrences with continuous administration of 400 mg (two 200 mg capsules) two times daily for 1 year in 586 patients treated with acyclovir were nausea (4.8%) and diarrhea (2.4%). The 589 control patients receiving intermittent treatment of recurrences with acyclovir for 1 year reported diarrhea (2.7%), nausea (2.4%), and headache (2.2%).

Herpes Zoster: The most frequent adverse event reported during three clinical trials of treatment of herpes zoster (shingles) with 800 mg of oral acyclovir five times daily for 7 to 10 days in 323 patients was malaise (11.5%). The 323 placebo recipients reported malaise (11.1%).

Chickenpox: The most frequent adverse event reported during three clinical trials of treatment of chickenpox with oral acyclovir at doses of 10 to 20 mg/kg four times daily for 5 to 7 days or 800 mg four times daily for 5 days in 495 patients was diarrhea (3.2%). The 498 patients receiving placebo reported diarrhea (2.2%).

Observed During Clinical Practice: Based on clinical practice experience in patients treated with oral Acyclovir in the U.S., spontaneously reported adverse events are uncommon. Data are insufficient to support an estimate of their incidence or to establish causation.

dialysis period. Therefore, the patient's dosing schedule should be adjusted so that an additional dose is administered after each dialysis.

Peritoneal Dialysis: No supplemental dose appears to be necessary after adjustment of the dosing interval.

Bioequivalence of Dosage Forms: Acyclovir suspension was shown to be bioequivalent to acyclovir capsules (n=20) and one acyclovir 800 mg tablet was shown to be bioequivalent to four acyclovir 200 mg capsules (n=24).

HOW SUPPLIED: Acyclovir Capsules (blue, opaque cap and body) containing 200 mg of acyclovir and printed with "G" on the cap and "0034" on the body - Bottle of 100 (NDC 55567-034-18) and unit dose pack of 100 (NDC 55567-034-06).

Store at 15° to 25°C (59° to 77°F) and protect from light and moisture.

Acyclovir Tablets (blue, oval, unscored tablet) containing 800 mg acyclovir and engraved with "G" on one side and "0037" on the other - Bottle of 100 (NDC 55567-037-18) and unit dose pack of 100 (NDC 55567-037-06).

Store at 15° to 25°C (59° to 77°F) and protect from light and moisture.

Acyclovir Tablets (white, 5 sided, unscored tablet) containing 400 mg acyclovir and engraved with "G" over "0036" on one side - Bottle of 100 (NDC 55567-036-18).

Store at 15° to 25°C (59° to 77°F) and protect from light and moisture.

CAUTION: Federal law prohibits dispensing without prescription.

Genpharm Inc.
37 Advance Road,
Etobicoke, Ontario,
Canada M8Z 2S6



Printed in Canada.

003-786 REV.#02

November 26, 1997

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER **74976**

CHEMISTRY REVIEW(S)

1. CHEMISTRY REVIEW NO. 3

2. ANDA 74-977 -

3. NAME AND ADDRESS OF APPLICANT

Genpharm Inc.
85 Advance Road
Etobicoke, Ontario
Canada M8Z 2S9

4. LEGAL BASIS FOR SUBMISSION

The applicant certifies, that to the best of it knowledge, U.S. Patent No. 4,199,574 will expire on April 22, 1997, and the product is not covered by any exclusivity provisions.

Innovator: Glaxo Wellcome - Zovirax[®]

5. SUPPLEMENT(s)
N/A

6. PROPRIETARY NAME
N/A

7. NONPROPRIETARY NAME
Acyclovir

8. SUPPLEMENT(s) PROVIDE(s) FOR:
N/A

9. AMENDMENTS AND OTHER DATES:

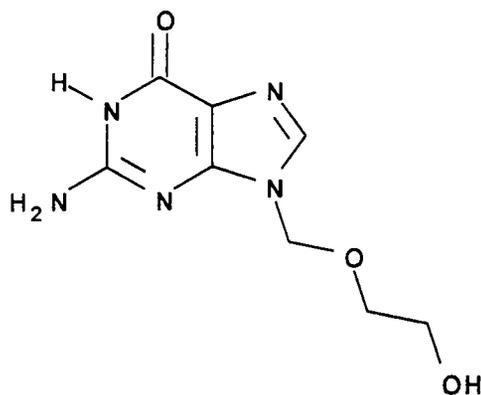
Firm: 9/27/96 - Original.
1/16/97 - O/NC, Bio.
1/22/97 - O/NC, Bio.
2/5/97 - O/NC, Bio.
5/8/97 - O/NC, acknowledge Bio. letter.
6/2/97 - Response to 1st Bio. def. letter.
9/8/97 - Response to phone memo, Bio. information.
10/1/97 - Response to 1st def. letter (chem. & labeling).
1/6/98 - Response to 2nd def. facsimile (chem. & labeling). Subject of this review.
2/20/98 - Response to phone memos. Subject of this review.

FDA: 12/3/96 - Acknowledgment.
4/30/97 - 1st Bio. def. letter.
5/14/97 - 1st def. letter (chem. & labeling).
10/3/97 - Bio, review acceptable.
10/9/97 - Bio. letter, no further questions.
12/9/97 - 2nd def facsimile (chem. & labeling).
2/9/98 - Phone memo, regarding

2/12/98 - Phone memo, clarification.

10. PHARMACOLOGICAL CATEGORY
Antiviral

11. Rx or OTC
R

12. RELATED IND/NDA/DMF(s)13. DOSAGE FORM
Capsule14. POTENCIES
200 mg15. CHEMICAL NAME AND STRUCTUREAcyclovir USP
 $C_8H_{11}N_5O_3$; M.W. = 225.21

Hydroxyethoxy)methyl]guanine. CAS [59277-89-3]

9-[(2-

16. RECORDS AND REPORTS
N/A17. COMMENTS

a. Finished product method validation sent to St. Louis on 10/23/97.

DMF, EER, labeling and Bio. acceptable.

18. CONCLUSIONS AND RECOMMENDATIONS
Approval19. REVIEWER:
Norman GregoryDATE COMPLETED:
1/13/98; 2/24/98

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER **74976**

BIOEQUIVALENCE REVIEW(S)

2.1
TR-97
Sabin

ANDA 74-977

Lipha Pharmaceuticals, Inc.
U.S. Agent for Genpharm, Inc.
Attention: Anita M. Goodman
9 West 57th Street, Suite 3825
New York NY 10019-2701
|||||

OCT - 9 1997

Dear Madam:

Reference is made to your abbreviated new drug application submitted pursuant to Section 505 (j) of the Federal Food, Drug and Cosmetic Act for Acyclovir Capsules, 200 mg.

1. The Division of Bioequivalence has completed its review and has no further questions at this time.
2. The following dissolution testing will need to be incorporated into your stability and quality control programs. The dissolution testing should be conducted in 900 mL of 0.1 N HCL using USP 23 apparatus II(paddle) at 50 rpm. The test product should meet the following specifications:

Not less than of the labeled amount of drug in the dosage form is dissolved in 30 minutes.

Please note that the bioequivalency comments expressed in this letter are preliminary. The above bioequivalency comments may be revised after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling or other scientific or regulatory issues. A revised determination may require additional information and/or studies, or may conclude that the proposed formulation is not approvable.

Sincerely yours,

^

Rabindra N. Patnaik, Ph.D.
Acting Director,
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

OCT -3 1997

Acyclovir
200 mg Capsule
ANDA # 74977
Reviewer: A.J. Jackson
WP # 74977A.697

Genpharm Pharmaceuticals
Ontario, Canada
Submission Date:
June 2, 1997
September 8, 1997

**Review of Correspondence on Fasting and Post-Prandial
Bioequivalence Studies for the 200 mg Capsule and
Dissolution Data**

INTRODUCTION

The firm submitted a study on September 27, 1996 on their Acyclovir capsule which was found to be incomplete. The current submission contains the firm's response to the deficiencies from the study.

Comment 1.

The following subjects in the fasting study exhibited an increase in the terminal phase of their plasma concentration time curves:

Treatment-Test		
Subject	Time	Conc

Treatment-Reference		
Subject	Time	Conc

The firm should explain how they determined that these subjects were in the log-linear phase since the terminal data was increasing.

Response to Comment 1.

Section 2.2.1, details the criteria upon which the terminal elimination phase is determined by the pharmacokineticist. Specifically, the terminal phase is selected based upon an in-depth analysis of the semi-log plasma profiles for each subject, with integration of the following four (4) factors:

- (I) the terminal phase with the greatest r value;
- (ii) the terminal phase with the greatest number of points;
- (iii) the competing principles of absorption, distribution, and elimination; and, (iv) assay variability as it relates to individual concentrations.

A review of the K_{el} values was conducted for Study # 1642, and using linear regression analysis of the terminal data, all subjects in question showed positive K_{el} values, indicating a valid terminal phase with an overall negative slope. The observed increase in the 24-hour plasma acyclovir concentration of the subjects indicated above may be due either to analytical variation, and/or to marginal redistribution of the drug.

FDA Reply:

The firm's explanation is acceptable.

Comment 2.

The data for the subjects in deficiency#1 should be deleted from the estimation of $AUC(0-\infty)$.

Response to Comment 2.

AUC(0-infinity) was recalculated with the following subjects eliminated, and the results are presented in Appendix 2.0. in the submission.

Genpharm formulation (A): Subjects #08, #25, #26, and #32.

Burroughs-Wellcome formulation (B): Subjects #02, #10, #12, and #25.

The appendix also includes the other parameters which were recalculated, namely half-life ($t_{1/2}$), elimination rate constant (K_{el}), and the correlation coefficient (r value) of the most linear portion of the terminal elimination phase. For AUC (0 - infinity), the analysis of variance (ANOVA) on log-transformed data was conducted, and the 90% geometric confidence interval and ratio of means were calculated. For $t_{1/2}$ and K_{el} , the ANOVA on untransformed data was conducted. In addition, the frequency distribution of the regimen differences and regimen ratios among the subjects are presented in Figures A and B for AUC (0 - infinity).

It is noted that the test and reference formulations of acyclovir 200 mg capsules under fasted conditions are bioequivalent, based on the 90% geometric confidence intervals for AUC (0 - t hrs), AUC (0 - infinity), and C_{max} .

FDA Reply:

The firm's response is acceptable and the 90% confidence interval for the recalculated AUC(0-infinity) of 97.14-115.82 is within the acceptable limits.

Comment 3.

The firm should explain why the reported value in the long-term stability study

different from the standard.

Response to Comment 3.

It is unclear why the one of the concentrations showed a large difference from

the theoretical value. However, this was clearly an outlier because in the stability analysis of the concentrations were found to be acceptable (within the

FDA Reply:

The firm's response is acceptable.

Comment 4.

The lot of drug used in the bio-study was 102666 which seemed to be prepared from bulk lot 102130. However, the dissolution data for the test was collected on lot 102707. Is lot 102707 the same or different from the bio-lot? If it is not the same lot the dissolution study must be repeated using the appropriate lot.

Response to Comment 4.

The test batch was packaged into two packaging formats, bottles of 100 and blister strips of 10. Genpharm's SOP on lot numbering requires that a different lot # be assigned for different packaging formats. Summarized below is a breakdown of the lot numbers derived from the bulk lot 102130.

Lot Number		
Batch Size	Bulk Lot	Product
	102130	Bottles of 100's Lot No. 102666
		Blister of 10's Lot No. 102707

FDA Reply:

The firm's explanation is acceptable.

Comment:

1. Since the firm has supplied a letter from the USP dated April 7, 1997 recommending that 0.1 N HCL be used as the dissolution medium, the Division of Bioequivalence will accept this as an interim dissolution medium for this product.
2. The dissolution data in Table 1 for the 200 mg capsule is acceptable.

Recommendation:

1. The bioequivalence study conducted by Genpharm on its Acyclovir, 200 mg, capsule, Lot # 102666, comparing it to Glaxo Wellcome's, 200mg, Zovirax^R capsules, has been found to be acceptable by the Division of Bioequivalence. The study demonstrates that Genpharm's, Acyclovir, 200 mg capsule is bioequivalent to the reference product, Zovirax, 200 mg capsule manufactured by Glaxo-Wellcome.
2. The dissolution testing conducted by Genpharm on its Acyclovir, 200 mg, capsule, Lot # 102666, is acceptable.
3. The dissolution testing should be incorporated into the firm's manufacturing controls and stability program. The dissolution testing should be conducted in 900 ml of 0.1 N HCL using USP 23 apparatus II (paddle) at 50 rpm. The test product should meet the following specifications:

Not less than _____ of the labeled amount of drug in the dosage form is dissolved in 30 minutes.

Andre J. Jackson
Division of Bioequivalence /
Review Branch I

RD INITIALLED YC HUANG
FT INITIALLED YC HUANG

Date: 9/16/97

Concur: _____
Rabindra Patnaik, Ph.D.
Acting Director
Division of Bioequivalence

Date: 10/3/97

cc: ANDA 74-977 (original, duplicate), HFD-600 (Hare),
HFD-630, HFD-652 (Huang, Jackson), Drug File,
Division File, HFD-650 (Director).

Table 1. In Vitro Dissolution Testing

Drug (Generic Name):Acyclovir
 Dose Strength:200 mg
 ANDA No.:74-977
 Firm:Genpharm
 Submission Date:June 2, 1997
 File Name:74977A.697

I. Conditions for Dissolution Testing:

USP XXII Basket: Paddle: x RPM:50
 No. Units Tested: 12
 Medium: 0.1 N HCL Volume:900 ml
 Specifications: NLT in 30 min

Reference Drug: Zovirax.
 Assay Methodology:

II. Results of In Vitro Dissolution Testing:

Sampling Times (Minutes)	Test Product Lot # 102130 Strength(mg) 200			Reference Product Lot # 5T1735 Strength(mg) 200		
	Mean %	Range	%CV	Mean %	Range	%CV
0	0.00	0	0	0	0	0
5	41.9		13.83	45.9		16.21
10	86.5		9.55	94.1		5.71
15	100.9		1.79	98.9		1.89
20	102.2		1.21	99.2		1.27
30	102.4		1.39	99.1		1.47