

HFA-305

Approval Date: APR 21 2003

FREEDOM OF INFORMATION SUMMARY
SUPPLEMENT TO AN ORIGINAL ABBREVIATED NEW
ANIMAL DRUG APPLICATION (ANADA)

ANADA 200-346

COMPONENT[®] TE-200 (Trenbolone Acetate and Estradiol)

Indications for use: For increased rate of weight gain and improved feed efficiency for steers fed in confinement for slaughter.

Sponsored by:

**Ivy Laboratories,
Division of Ivy Animal Health, Inc.
8857 Bond Street
Overland Park, KS 66214**

ANADA 200-346

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FREEDOM OF INFORMATION SUMMARY

Component[®] TE-200 Ear Implant for Steers Fed in Confinement for Slaughter

1. GENERAL INFORMATION

- a. *File Number:* ANADA 200-346
- b. *Sponsor:* Ivy Laboratories,
Division of Ivy Animal Health, Inc.
8857 Bond Street
Overland Park, KS 66214

Drug Labeler Code: 021641
- c. *Established Names:* Trenbolone acetate and estradiol
- d. *Propriety Names:* Component[®] TE-200
- e. *Dosage Form:* Implantation (ear implant) as per 21 CFR 522.2477.
- f. *How Supplied:* As an implant made up of 10 pellets with each pellet containing 20 mg trenbolone acetate and 2 mg estradiol.
- g. *How Dispensed:* OTC
- h. *Amount of Active Ingredients:* Trenbolone acetate: 200 mg trenbolone acetate activity.
Estradiol: 20 mg estradiol activity.
- i. *Route of Administration:* Subcutaneous ear implant
- j. *Species/Class:* Steers fed in confinement for slaughter
- k. *Recommended Dosage:* One implant containing 200 mg trenbolone acetate and 20 mg estradiol per animal.
- l. *Pharmacological Category:* Steroid hormone [a natural occurring estrogen, estradiol and a synthetic testosterone, trenbolone acetate].
- m. *Indications:* For increased rate of weight gain and improved feed efficiency for steers fed in confinement for slaughter.
- n. *Pioneer Product:* Revalor[®]-200 (trenbolone acetate and estradiol);
NADA 140-992; Intervet, Inc.

- o. *Effect of Supplement:* Component[®] TE-200 for steers is a supplement to the original ANADA 200-346 for Component[®] TE-H. Component[®] TE-200 is a higher dose of Component[®] TE-H, with each pellet in Component[®] TE-200 (a total of 10 pellets) containing 20 mg trenbolone acetate and 2 mg estradiol in the same formulation as each pellet in Component[®] TE-H (total of 7 pellets).

2. TARGET ANIMAL SAFETY AND DRUG EFFECTIVENESS

Under the provisions of the Federal Food, Drug, and Cosmetic Act, as amended by the Generic Animal Drug and Patent Term Restoration Act, (53 FR 50460, December 15, 1988, First GADPTRA Policy Letter) an abbreviated new animal drug application (ANADA) may be submitted for a generic version of an approved new animal drug (pioneer product). New target animal safety, drug effectiveness data, and human food safety data (other than tissue residue data) are not required for approval of an ANADA.

Ordinarily, the ANADA sponsor is required to show that the generic product is bioequivalent to the pioneer. The requirements for the *in vivo* blood level bioequivalence study may be waived for certain generic products. An ANADA relies on the target animal safety, drug effectiveness, and human food safety data in the pioneer's new animal drug application. ANADAs for drug products for food-producing animals will generally be required to include *in vivo* bioequivalence and tissue residue studies. If a waiver of the *in vivo* bioequivalence and/or tissue residue study is granted for a food animal product, then the withdrawal period established for the pioneer product will be assigned to the generic product. (55 FR 24645, June 18, 1990; Fifth GADPTRA Policy Letter; Bioequivalence Guideline, October 9, 2002).

Based upon the formulation characteristics of the generic product, Ivy Laboratories, Division of Ivy Animal Health, Inc. was granted a waiver on January 28, 2003, from the requirement of an *in vivo* bioequivalence study for Component[®] TE-200 (ANADA 200-346). The generic product contains the same active ingredients in the same concentration and dosage form as the pioneer product, and contains no inactive ingredients that may significantly affect the absorption of the active ingredient. The pioneer product, Revalor[®]-200 (Trenbolone acetate and Estradiol), sponsored by Intervet, Inc. (NADA 140-992), was approved on November 29, 1999.

3. HUMAN SAFETY

- Allowable Incremental Increases and Tolerances for Residues:

The allowable incremental increases established for the pioneer product apply to the generic product. Estradiol is regulated under 21 CFR 556.240. No residues of estradiol, resulting from the use of estradiol or any of the related esters, are permitted in the uncooked edible tissues of heifers in excess of the following increments above the concentrations of estradiol naturally present in untreated animals: 120 ppt for muscle, 240 ppt for liver, 360 ppt for kidney, and 480 ppt for fat.

The tolerances established for the pioneer product apply to the generic product. Trenbolone acetate is regulated under 21 CFR 556.739. The Acceptable Daily Intake (ADI) for total residues of trenbolone is 0.4 micrograms per kilogram body weight per day. A tolerance for trenbolone residues in uncooked edible tissues of cattle is not needed.

- **Withdrawal Time:**

When a generic product demonstrates bioequivalence to the pioneer product in a blood level study where the duration of the study exceeds the withdrawal time assigned to the pioneer product, the generic product is assigned the withdrawal time established for the pioneer product. The zero withdrawal is established for implants containing trenbolone acetate and estradiol.

- **Regulatory Method for Residues:**

A regulatory method is not required.

4. AGENCY CONCLUSIONS

This ANADA submitted under section 512(b) of the Federal Food, Drug, and Cosmetic Act satisfies the requirements of section 512(n) of the act and demonstrates that Component[®] TE-200 (trenbolone acetate and estradiol), when used under its proposed conditions of use, is safe and effective for its labeled indications.

5. ATTACHMENTS

Facsimile generic labeling (ANADA 200-346) and currently approved pioneer labeling (NADA 140-992) are attached as indicated below:

Box Label (Generic)
Foil Pouch Label (Generic)
Package Insert (Generic)
Box Label (Pioneer)
Cartridge Label (Pioneer)
Package Insert (Pioneer)

Copies of applicable labels may be obtained by writing to the:

Food and Drug Administration
Freedom of Information Staff (HFI-35)
5600 Fishers Lane
Rockville, MD 20857

Or requests may be sent via fax to: (301) 443-1726. If there are problems sending a fax, call (301) 827-6567.

**RESTRICTED DRUG – USE ONLY AS DIRECTED (CALIFORNIA) – FOR USE IN ANIMALS ONLY
NOT FOR HUMAN USE – KEEP OUT OF REACH OF CHILDREN**

Storage Conditions: Store in a refrigerator (2°-8°C, 36°-46°F) and protect from sunlight
Use before the expiration date

Manufactured by a non-sterilizing process.

COMPONENT T -200

BRAND IMPLANTS

FOR STEERS

fed in confinement for slaughter

trenbolone acetate 200 mg and
estradiol USP 20 mg



COMPONENT™ TE 200 contains trenbolone acetate and estradiol for increased rate of weight gain and improved feed efficiency in a slow-release delivery system.

Contents: 5 foil pouches each containing 1 cartridge belt* with 20 cells. Each cartridge cell contains 1 implant dose. Each dose consists of trenbolone acetate 200 mg and estradiol 20 mg.

Dosage: Administer 1 Implant per animal. See package insert for detailed instructions.

* Patented by Ivy Animal Health, Inc. ANADA 200-346, Approved by FDA

100 IMPLANTS



WARNING: Not to be used in animals intended for subsequent breeding, or in dairy animals. Implant one dose — 10 pellets (entire contents of one cartridge cell) — in the ear subcutaneously. Any other site of implantation is in violation of Federal Law. DO NOT attempt to salvage implantation site for animal feed or human food.

NOTE: Studies have demonstrated that administration of COMPONENT™ TE-200 can result in decreased marbling scores when compared to non-implanted steers

Important: Read the enclosed instruction brochure. Use as illustrated with a CAREFUL CLEAN TECHNIQUE. Never take short cuts at the expense of CLEANLINESS.

COMPONENT and COMPONENT One Gun are registered trademarks of Ivy Animal Health, Inc.

Manufactured for VetLife by Ivy Laboratories • Overland Park, KS 66214, USA
VetLife and Ivy Laboratories are divisions of Ivy Animal Health, Inc.

01 13 03 00

COMPONENT
T-200
trenbolone acetate 200 mg
and estradiol USP 20 mg
FOR STEERS
fed in confinement for slaughter

3.125"



1/4" Seal Area

9.5"

COMPONENT T -200

BRAND IMPLANTS

FOR STEERS

fed in confinement for slaughter

trenbolone acetate 200 mg
and estradiol USP 20 mg



TEAR HERE

COMPONENT® TE-200 contains trenbolone acetate and estradiol for increased rate of weight gain and improved feed efficiency in a slow-release delivery system.

Contains: One Cartridge Belt* of 20 implants sealed in a sanitary foil pouch.

Dosage: Administer 1 implant per animal. See package insert for detailed instructions.

Manufactured by a non-sterilizing process.

* Patented by Iy Animal Health, Inc. ANADA 200-346, Approved by FDA



One 20-Dose Cartridge Belt

18.8/5"

9.375"

TEAR HERE

WARNING: Not to be used in animals intended for subsequent breeding, or in dairy animals. Implant one dose — 10 pellets (entire contents of one cartridge cell) — in the ear subcutaneously. Any other site of implantation is in violation of Federal Law. DO NOT attempt to salvage implantation site for animal feed or human food.

**RESTRICTED DRUG — USE ONLY AS DIRECTED (CALIFORNIA) — FOR USE IN ANIMALS ONLY
NOT FOR HUMAN USE — KEEP OUT OF REACH OF CHILDREN**

Note: Studies have demonstrated that administration of COMPONENT® TE-200 can result in decreased marbling scores when compared to non-implanted steers.

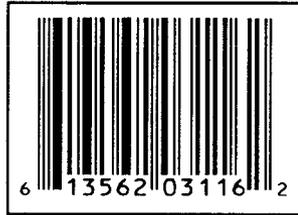
Important: Read the enclosed instruction brochure. Use as illustrated with a CAREFUL CLEAN TECHNIQUE. Never take short cuts at the expense of CLEANLINESS.

Storage Conditions: Store in a refrigerator (2°-8°C, 36°-46°F) and protect from sunlight. Use before the expiration date.

COMPONENT is a registered trademark of Ivy Animal Health, Inc

Manufactured for **VetLife** by Ivy Laboratories • Overland Park, KS 66214, USA
VetLife and Ivy Laboratories are divisions of Ivy Animal Health, Inc.
01 13 02 00

PURCHASE SEAL 20 IMPLANTS



EXP

LOT



COMPONENT
BRAND IMPLANTS

VetLife

TE-200

FOR STEERS

fed in confinement for slaughter

trenbolone acetate 200 mg and
estradiol USP 20 mg

20 dose CARTRIDGE BELT*

For use with the COMPONENT One Gun®**
For Use In Animals Only

Each CARTRIDGE BELT holds 20 doses of COMPONENT® TE-200 implants. Each dose of 10 pellets contains a total of 200 mg of trenbolone acetate and 20 mg estradiol. COMPONENT® TE-200 implants are recommended for use in steers fed in confinement for slaughter for INCREASED RATE OF WEIGHT GAIN AND IMPROVED FEED EFFICIENCY.

INDICATIONS FOR USE: This product contains trenbolone acetate and estradiol for increased rate of weight gain and improved feed efficiency in a slow-release delivery system.

NOTE: Studies have demonstrated that administration of COMPONENT® TE-200 can result in decreased marbling scores when compared to non-implanted steers.

DOSAGE: Administer 1 implant per animal according to the following instructions.

GENERAL INSTRUCTIONS: Study the instructions which should be followed carefully at all times, avoiding short cuts. Skin infection can be avoided by properly preparing implant site and implanter. During fly season use fly repellent on implant site. One designated team member should always do the implanting. Cleanliness of hands and instruments is important at all times.

WARNING

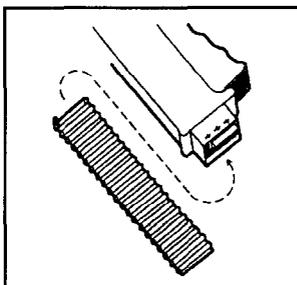
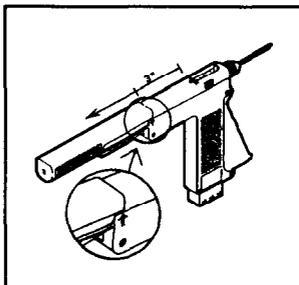
Not to be used in animals intended for subsequent breeding, or in dairy animals. Implant one dose — 10 pellets (entire contents of one cartridge cell) — in the ear subcutaneously. Any other site of implantation is in violation of Federal Law. DO NOT attempt to salvage implantation site for animal feed or human food.

RESTRICTED DRUG — USE ONLY AS DIRECTED (CALIFORNIA) —
FOR USE IN ANIMALS ONLY — NOT FOR HUMAN USE —
KEEP OUT OF REACH OF CHILDREN

IMPLANTING INSTRUCTIONS:

Loading the Implanter

Load the Implanter following the instructions supplied with each Implanter



Restrain the Animal

Speed of implantation as well as safety of handlers is best achieved by restraining animal in a squeeze chute using head restraint. When implanting horned cattle, better control is obtained with additional use of nose tongs.



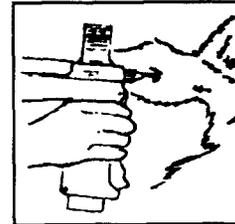
Prepare the Implant Site

Scrub the back side of the ear (implant site) with a piece of clean absorbent cotton which has been soaked with topical germicidal solution. Follow manufacturer's directions on germicide for correct strength and preparation of solution. Avoid getting in animal's eyes.



Where to Implant

The full contents of the cartridge should be implanted beneath the skin on the back side of the middle one-third of the ear illustrated in the drawing. The implant must not be closer to the head than the edge of the auricular cartilage ring farthest from the head. The location for insertion of the needle is a point towards the tip of the ear at least a needle length away from the intended deposition site. Avoid injuring the large arteries, veins and cartilage of the ear.



Insert the Needle

With one hand firmly grasp the ear. With other hand insert needle point through the skin and ease forward on a lateral plane until the entire length of the needle is under skin.

Implant the Pellets

After inserting the needle fully in the correct implant position, squeeze the trigger fully. As the needle is withdrawn from the ear, the controlled-pressure plunger action properly deposits the implant in the needle track. This procedure should prevent breakage or crushing of pellets if otherwise forced into contact with tough fibrous-tissue underlying the skin. The length and total contact area of a single dose is designed to permit absorption of the hormones after implantation to stimulate good weight gain. Broken or crushed pellets may interfere with rates of gain.

Clean the Needle

Clean the implanter needle with alcohol or a properly diluted germicidal solution prior to implanting the next animal.

Storage Conditions

Store in a refrigerator (2°-8°C; 36°-46°F) and protect from sunlight. Use before the expiration date printed on the foil pouch.

ANADA 200-346, Approved by FDA

Manufactured by a non-sterilizing process.

*U.S. Patent No. 4,531,938

**U.S. Patent Nos. 4,762,515 and 5,522,797 - Ivy Animal Health, Inc.

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Manufactured for VetLife by Ivy Laboratories • Overland Park, KS 66214, USA
VetLife and Ivy Laboratories are divisions of Ivy Animal Health, Inc



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PACKAGE QUANTITIES:

Box of 10 x 10 implants
Contains 100 doses in ten cartridges with ten implants per cartridge
each dose contains 10 small yellow pellets. Each pellet contains 20 mg
of levonorgestrel and 2 mg estradiol.

STORAGE CONDITIONS

Store in a refrigerator (2-8 C/36-47 F) and protect from sunlight. Use
before the expiration date printed on the box and on the cartridge.

USES:

This product is a low-dose, progestin-free, combined levonorgestrel and
estradiol implant which increases rate of weight gain and
improves feed efficiency in feedlot steers.

NOTE:

Studies have demonstrated that the administration of Revalor-200
can result in decreased marketing scores when compared to non-
implanted steers.

482000-A

(levonorgestrel acetate and estradiol)

Revalor-200

FOR FEEDLOT STEERS

Box of 10 x 10 Cartridge Implants

Manufactured by a non-sterile process.
The name and logo Hoechst are registered trademarks of Hoechst AG.

Hoechst Roussel Vet

Revalor-200 is a registered trademark of Hoechst Roussel Vet S.A.



Revalor-200

(trenbolone acetate and estradiol)

FOR FEEDLOT STEERS

Box of 10 x 10 Cartridge Implants

Manufactured by a non-sterilizing process
The name and logo Hoechst are registered trademarks of Hoechst AG

Hoechst Roussel Vet

Revalor-200 is a registered trademark of Hoechst Roussel Vet, S A



Hoechst
Hoechst Roussel Vet
A member of the Hoechst Group
Hoechst Roussel Vet
Clinton, NJ 08809
Distributed by
Hoechst Roussel Vet, S A
Made in France by

or animal food.
Federal Law. Do not attempt salvage or implanted site for human
implant pellets in the ear only. Any other location is in violation of
implants. For Animal Treatment Only. Not for Use in Humans.
Not to be used in animals for subsequent breeding, or in dairy

WARNING:
See enclosed package insert
USE DIRECTIONS:

Expiration Date **JUL 2001**
Lot Number **246**

ML 11111



Revalor®-200

(trenbolone acetate
and estradiol)

FOR FEEDLOT STEERS

DESCRIPTION

Revalor®-200 (trenbolone acetate, CAS Registry Number 10161-34-9, and estradiol, CAS Registry Number 50-26-2) is an implant containing 200 mg of trenbolone acetate and 20 mg estradiol. Each implant consists of 10 small yellow pellets. Ten implants are provided in a cartridge.

Manufactured by a non-sterilizing process.

INDICATIONS FOR USE

This product contains trenbolone acetate and estradiol in a slow-release delivery system which increases rate of weight gain and improves feed efficiency in feedlot steers.

NOTE

Studies have demonstrated that the administration of Revalor®-200 can result in decreasing marbling scores when compared to non-implanted steers.

DOSAGE:

Dosage Form:

One implant containing 200 mg trenbolone acetate and 20 mg estradiol is administered to each animal. The 10 pellets which make up the dosage of Revalor®-200 are contained in one division of the multiple dose cartridge. Ten doses are in each cartridge. The cartridge is designed to be used with a special implant gun.

Route of Administration:

The implant is placed under the skin on the posterior aspect of the ear by means of a special implanter available from Hoechst Roussel Vet.



WARNING

Not to be used in animals intended for subsequent breeding, or in dairy animals. For Animal Treatment Only. Not for Use in Humans. Implant pellets in the ear only. Any other location is in violation of Federal Law. Do not attempt salvage of implanted site for human or animal food.

STORAGE CONDITIONS

Store in a refrigerator (2-8° C; 36-47° F) and protect from sunlight. Use before the expiration date printed on the cartridge.

PACKAGE QUANTITIES

Box of 10 x 10 cartridge implants.

Revalor®-200 is a registered trademark of Hoechst Roussel Vet, S.A.

Made in France by:

Hoechst Roussel Vet, S.A.

Distributed by:

Hoechst Roussel Vet

Clinton, NJ 08809

The name and logo Hoechst are registered trademarks of Hoechst AG.

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Hoechst Roussel Vet

Hoechst 

Hoechst Roussel Vet

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A member of the Hoechst Group

Front of Insert

Back of Insert