

Pharma

September 25, 2002



VIA FEDERAL EXPRESS

Food and Drug Administration
Dockets Management Branch (HFA-305)
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Rockville, MD 20852

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Docket No. 02D-0350
Guidance for Industry
Handling and Retention of BA and BE Testing Samples

Dear Sir or Madam:

Altana Inc. has prepared the following comments regarding the Draft Guidance for Industry, "Handling and Retention of BA and BE Testing Samples".

General Comments

- While Altana Inc. supports the FDA's efforts to provide guidance regarding the selection and storage of retention samples, further consideration is warranted for each specific dosage form. Altana is a manufacturer of topical dermatological products. The generic drug scandal resulted from the ease of altering solid dosage form products. Altana strongly urges the FDA to adopt a categorical approach, by dosage form, when finalizing the retention sample guidance. In the case of semi-solids, it is not prudent or practical to squeeze out the contents of the Reference Listed Drug aluminum tubes in order to fill tubes of the generic test product. Thus, alteration of samples is unwieldy and highly unlikely.
- Altana supports the FDA's recommendation that the testing facility, not the sponsor, should select the retention samples for BA and BE studies.
- Altana also supports that original sample containers, not bulk containers, should be selected for retention samples.
- Altana suggests that the Guidance should:
 - Clarify the "five times quantity" needed for retention, it is unduly burdensome to expect generic companies to have the testing facilities retain quantities of reference product sufficient to perform testing such as homogeneity or dissolution.
 - Reiterate the length of time required to maintain retention samples as stated in 21 CFR 320.38 and 21 CFR 320.63.

III. Sampling Techniques and Retention For Multiple Studies and Shipments

- This section of the Guidance provides random sampling techniques to be used by the testing facility. It states that the testing facility should randomly select a quantity of samples to conduct the study with the remainder to be retained as the reserve samples. These instructions are in conflict with Section IV of the Guidance, "Responsibilities In Various Study Settings," which states that reserve samples should be randomly selected from the supplies received from the study sponsor and/or drug manufacturer. Altana recommends that the Guidance be clarified by stating that reserve samples be selected first upon receipt of shipment at the testing facility.

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- For blinded studies Altana recommends:
 - The study sponsor maintain the randomization code, not the testing facility. The investigator should not in any way have access to the code as it may compromise the integrity of the study.
 - Including directions for sampling in blocks rather than unit doses. Clinical samples for topical products are routinely sent to the testing facility in randomized blocks containing test, reference and placebo. The Guidance should instruct facilities to select random blocks of samples for retention.

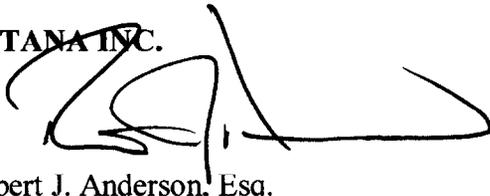
- For multi-site studies Altana recommends:
 - The CRO or a third party should act as the sampler of the random reserve samples. The CRO or third party could then distribute the remaining samples to the clinical sites.
 - Specifying that the total amount of samples required to be reserved for each manufacturer lot should be spread across all clinical sites.

- For multiple shipments, Altana recommends only one set of retained samples be required for the same lots of samples. Subsequent shipments of the same lots should not require retains.

Altana Inc. appreciates the opportunity to provide comments regarding the proposed guidance. If you have any questions or require additional information, please contact me at (631) 454-7677 extension 2085.

Sincerely,

ALTANA INC.



Robert J. Anderson, Esq.
Senior Director, Scientific Affairs

RJA/ab

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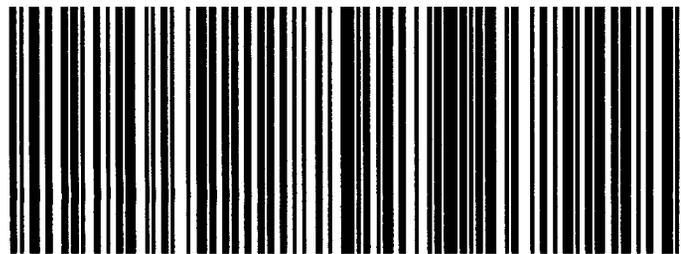
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