

June 15, 2006

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Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

CITIZEN PETITION



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Kendle Regulatory Affairs/AAC Consulting Group, on behalf of a client, submits this petition, in quadruplicate, under section 505(j)(2)(C) of the Federal Food, Drug, and Cosmetic Act [21 U.S.C. 355(j)(2)(C)] and 21 CFR sections 10.20, 10.30 and 314.93, to request that the Commissioner of Food and Drugs make a determination that an Abbreviated New Drug Application (ANDA) may be submitted for Loperamide Hydrochloride Orally Dissolving Strip, 2 mg.

A. Action Requested

The petitioner seeks a determination from the Commissioner that Loperamide Hydrochloride Orally Dissolving Strip, 2 mg, is suitable for an ANDA based on the Reference Listed Drug (RLD) loperamide hydrochloride oral tablet, 2 mg (Imodium A-D).

B. Statement of Grounds

This petition concerns a change in dosage form from an oral tablet to an orally dissolving strip. The RLD upon which this petition is based is Imodium A-D (Loperamide Hydrochloride) oral tablet [caplet], 2 mg. Imodium A-D was approved by the Food and Drug Administration (FDA) on November 22, 1989, for marketing as an over-the-counter (OTC) drug under NDA 19-860 held by McNeil. A copy of the pertinent pages from the electronic version of the FDA publication "Approved Drug Products with Therapeutic Equivalence Evaluations, 26th Edition (2006)", commonly referred to as the "Orange Book", which lists the approval of Imodium A-D, is included with this petition (Attachment A).

A copy of the approved labeling for the RLD (Attachment B) and a copy of the proposed labeling for the orally dissolving strip product that is the subject of this petition (Attachment C) are included with this petition. The labeling varies only as it relates to the difference in dosage form and the method of administration, and those differences that may be necessary because the products are made by different companies.

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In the past, the agency has approved citizen petitions requesting a change in dosage form, and last year approved a petition (Attachment D) for a similar type of change as here (i.e., oral tablet to oral strip). See Docket No. 2004P-0353/CP1 (July 5, 2005) authorizing the submission of an ANDA for famotidine 10 mg orally dissolving strips (Pepcid AC).

The orally dissolving strip is intended to be placed in the mouth, and will dissolve within a few seconds to form a saliva-drug mixture which will be swallowed and subsequently deliver the drug to the consumer. The active ingredient, strength, route of administration, and recommended use of the proposed OTC drug are the same as those of the listed drug. The products differ only in the physical form of the drug product: an orally dissolving strip instead of a compressed oral tablet.

There are a number of products that are marketed OTC which utilize the dissolving strip technology, and the dosage form is analogous to the many orally dissolving/disintegrating products that have been approved by FDA. The CDER Data Standards Manual recognizes the terms "strip" as an appropriate dosage form (Drug Nomenclature Monograph Number C-DRG-00201).

The proposed change in dosage form – from an oral tablet to an orally dissolving strip – is designed to provide a different dosage form for taking medication for those consumers who find it difficult to, or cannot, use traditional oral tablets, or who prefer an orally dissolving strip. Thus, the major advantages of the proposed product will be ease and convenience of use, improved consumer compliance, and better portability. The proposed dosage form will allow consumers to have greater flexibility in fast, accurate dosing based on their individual needs. The orally dissolving strip is pleasant to taste and experience, and will help consumers safely manage their health.

The labeling of the listed oral tablet whose safety and effectiveness was approved by FDA contains adequate dosing and administration information for the pediatric population. The labeling provides directions for children 12 years and over, children 9-11 years (60-95 pounds), children 6-8 years (48-59 pounds), and children under 6 years (up to 47 pounds). The latter category requires a physician's intervention for proper diagnosis and treatment. In addition, an OTC liquid formulation that is adequately labeled for the pediatric population has been approved by FDA (NDA 19-487) and is being marketed (Imodium A-D Liquid). Therefore, the proposed change in dosage form meets the requirements of the Pediatric Research Equity Act of 2003 (PREA) [21 U.S.C. 355c], and no additional studies are required.

Alternatively, and in accordance with 21 CFR 314.55(c), the petitioner requests a waiver of the requirement to conduct a pediatric assessment under PREA. A waiver may be granted if the drug product does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients, and is not likely to be used in a substantial number of pediatric patients. Under the Best Pharmaceuticals for Children Act, loperamide hydrochloride is not on the list of approved drugs - published by the National Institutes of Health, in consultation with FDA and pediatric experts - for which pediatric studies are needed. Nor is loperamide hydrochloride on

the list of active moieties for which FDA has issued a written request for pediatric studies. In addition, as noted in this petition, the liquid dosage form of loperamide hydrochloride is being marketed for the same indication with FDA-approved labeling for the pediatric population. Under these circumstances, there is a reasonable basis for FDA to conclude that the grounds for a waiver have been met.

For all of the aforementioned reasons, the Commissioner should grant this petition and authorize the submission of an ANDA for Loperamide Hydrochloride Orally Dissolving Strip, 2 mg.

C. Environmental Impact

Pursuant to 21 CFR 25.31(a), this petition qualifies for a categorical exclusion from the requirement for submission of an environmental assessment.

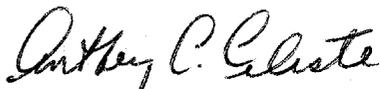
D. Economic Impact

According to 21 CFR 10.30(b), information on economic impact is to be submitted only when requested by the Commissioner following review of this petition. The petitioner agrees to provide economic information if so requested.

E. Certification

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Respectfully submitted,



Anthony C. Celeste
Senior Vice President

Attachments

- A - Approved Drug Products with Therapeutic Equivalence Evaluations (2006)
- B - FDA Approved Labeling for Imodium A-D [caplets]
- C - Proposed Labeling for Loperamide Hydrochloride Orally Dissolving Strip
- D - FDA Letter Dated July 5, 2005