

## Draft Guidance on Buprenorphine

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

**Active Ingredient:** Buprenorphine

**Dosage Form; Route:** Film, extended release; transdermal

**Recommended Studies:** Three studies

1. Type of study: Bioequivalence (BE) study with pharmacokinetic (PK) endpoints  
Design: Single-dose, two-treatment, two-period crossover in vivo  
Strength: 20 mcg/hr  
Subjects: Males and non-pregnant, non-lactating females, general population

Additional comments:

- In this document, this dosage form is referred to as a transdermal delivery system (TDS) and includes products that may be described elsewhere or known as *patches* or *extended release films*.
- An opioid antagonist, such as naltrexone hydrochloride oral tablet, 50 mg, should be used to minimize opioid-related adverse events. The opioid antagonist should be administered well in advance of dosing to achieve adequate blockade of opioid receptors. A physician who is an expert in the administration of opioids should be consulted for the appropriate dose and regimen of an opioid antagonist for a single dose of buprenorphine TDS, 20 mcg/hr, worn for 7 days.
- Unless otherwise justified, the buprenorphine TDS should be applied to the same anatomical site on all subjects, selected from among those recommended for dosing in the approved labeling for the reference listed drug (RLD) product, and worn for 7 days. Applicants should randomize subjects to receive either the test or RLD product in a given study period. When possible, the TDS administered in the second study period should be applied to the same anatomical site as in the first study period, but on the contralateral side of the body.
- Contact of the TDS with the skin is essential for the in vivo performance of the TDS, and the PK may be altered when a TDS loses its adherence to the skin. Therefore, the adhesion of each TDS should be monitored and recorded throughout the PK study. The PK samples should be collected and analyzed from all subjects at all sampling times regardless of the adhesion scores of the TDS. Provisions should be included in the study protocol to ensure that deliberate actions with the intent to re-apply a detached area of the TDS, to apply pressure to the TDS, or to reinforce TDS adhesion with the skin (e.g., overlays) are avoided throughout the study.

- The applicant should follow FDA’s current thinking in the guidance “Bioequivalence Studies with Pharmacokinetic Endpoints for Drugs Submitted Under an ANDA” for the design and conduct of the PK BE study.

**Analytes to measure (in appropriate biological fluid):** Buprenorphine in plasma

**Bioequivalence based on (90% CI):** Buprenorphine

**Waiver request of in vivo testing:** The 5 mcg/hr, 7.5 mcg/hr, 10 mcg/hr and 15 mcg/hr strengths of the TDS may be considered for a waiver of in vivo BE testing based on (i) an acceptable BE study with the 20 mcg/hr strength TDS, (ii) acceptable in vitro dissolution testing of all strengths, and (iii) proportional similarity of the TDS formulation across all strengths.

NOTE: The proportional similarity of the TDS formulation across all strengths means i) that the amounts of active and inactive ingredients per unit of active surface area are identical for the different strengths of the test product, and ii) that the ratios of the active surface areas of each strength of the test product compared to the 20 mcg/hr strength of the test product are the same as the corresponding ratios for the active surface areas of each strength of the RLD product compared to the 20 mcg/hr strength of the RLD product.

**Dissolution test method and sampling times:** Comparative dissolution testing should be conducted on 12 dosage units each, of all strengths of the test and RLD products. Information on a dissolution method for this drug product can be found on the FDA Dissolution Methods web site, accessible at:  
<http://www.accessdata.fda.gov/scripts/cder/dissolution/>.

2. Type of study: Adhesion study  
 Design: Single-dose, two-treatment, two-period crossover in vivo  
 Strength: 20 mcg/hr  
 Subjects: Males and non-pregnant, non-lactating females, general population

Additional comments:

- See comments above for use of an opioid antagonist to reduce the risk of any opioid related adverse events during the study.
- The applicant may elect to evaluate the PK BE (study 1) and the adhesion (study 2) in a single study with a combined purpose, or in independent studies. In either case, the studies should be adequately powered to evaluate the BE, and independently, the comparative assessment of adhesion.
- The applicant should follow FDA’s current thinking in the guidance “Assessing Adhesion With Transdermal and Topical Delivery Systems for ANDAs” for the

design and conduct of the independent adhesion study or the combined study to evaluate both PK BE and adhesion.

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3. Type of study: Skin irritation and sensitization study  
Design: Randomized, evaluator-blinded, within-subject repeat in vivo  
Strength: Vehicle TDS and positive control (TDS containing the active pharmaceutical ingredient should not be used in this study due to safety concerns)  
Subjects: Males and non-pregnant, non-lactating females, general population

Additional comments:

- All test articles (i.e., vehicle TDS<sup>1</sup>, positive control of low irritancy<sup>2</sup> and optional negative control<sup>3</sup>) should be applied simultaneously to each subject at different positions on an application site recommended for dosing in the approved labeling for the RLD product.
- Sequential TDS applications should be made to the same application site every 7 days, for a total of 21 consecutive days. The TDS applied on Day 15 should be removed on Day 22.
- The applicant should follow FDA's current thinking in the guidance "Assessing the Irritation and Sensitization Potential of Transdermal and Topical Delivery Systems for ANDAs" for the design and conduct of the skin irritation and sensitization study.

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<sup>1</sup> The vehicle TDS should contain all of the inactive ingredients in the test product and be identical to the test product in every manner except for the absence of the active ingredient.

<sup>2</sup> Safety concerns preclude the use of comparative studies with the test and the RLD products, therefore, the test product can be evaluated by testing a vehicle TDS versus a positive control TDS that produces mild irritation (e.g., ≤ 0.1% sodium lauryl sulfate)

<sup>3</sup> An example of the optional negative control treatment is an occlusive cover or device with normal saline applied on a polyester pad under the cover or within the device chamber.