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

#### CITIZEN PETITON

Dear Sir or Madam:

The undersigned submits this petition pursuant to Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act (FDC Act), and in accordance with 21 C.F.R.314.93, 10.20, and 10.30, to request that the Commissioner of Food and Drugs Administration (FDA) determine an additional strength (different total drug content) of Vancomycin Hydrochloride for Injection, USP, ADD-Vantage® Vial, is suitable for submission and subsequent FDA review as an Abbreviated New Drug Application (ANDA).

# A. ACTION REQUESTED

This petitioner requests that FDA determine that Vancomycin Hydrochloride for Injection, USP, ADD-Vantage® Vial, 1.25 grams (base)/vial is suitable for ANDA submission as an additional strength.

#### **B. STATEMENT OF GROUNDS**

Section 505(j)(2)(C) of the FDC Act permits the submission of an ANDA for a new drug product that differs in strength from the referenced drug, provided that FDA has approved a petition seeking permission to file such an application. This petition requests permission to seek approval, through the ANDA process, for an additional strength of a currently approved drug product.

The referenced drug upon which this petition is based in Hospira, Inc.'s (Hospira) currently approved Vancomycin Hydrochloride for Injection, USP, ADD-Vantage® Vial, 1 gram (base)/vial, ANDA 062933. In addition to the 1 gram strength referenced drug, a 750 mg strength is approved under ANDA 062933. A copy of the ANDA 062933 entry from the current electronic edition of the Approved Drug Products with Therapeutic Equivalence Evaluations (the Orange Book) is included as **Attachment 1**.

This petition seeks permission from FDA to submit a supplemental ANDA 062933 for a product that differs from the referenced drug by increasing the strength (total drug content) from 1 gram (base)/vial to 1.25 grams (base)/vial.

The active ingredient, formulation, dosage form, route of administration, dosage and administration, and indications and usage of the proposed product would be the same as those of the referenced drug. The proposed product would differ only in strength (total drug content) from the referenced drug. The product concentration after reconstitution is 5 mg/mL.

The proposed drug product would be intended for use only as described in the Indications and Usage and Dosage and Administration sections of the currently approved labeling for the referenced drug. The labeling for the proposed drug product would be essentially identical to that of the referenced drug and would differ only with respect to the proposed strength and manufacturer-specific information.

Draft labeling of the proposed product is included as **Attachment 2** (the draft labeling assumes the petitioner will obtain approval for all approved strengths of

Vancomycin Hydrochloride for Injection, USP, ADD-Vantage® Vial). The labeling for the referenced drug is included in **Attachment 3**.

The proposed increase in strength is consistent with FDA's approved labeling for the referenced drug. The current labeling for the referenced drug instructs using a minimum dose of 15 mg/kg in patients with mild to moderate renal impairment and an initial dose of 15 mg/kg in functionally anephric patients. The 1.25 gram presentation would be appropriate for patients who weigh up to 83 kg, where a 1 gram dose is not sufficient for their body weight.

The proposed strength would not pose questions of safety or effectiveness because the use, dose, and route of administration of the proposed product would be the same as those of the referenced drug.

For the foregoing reasons, the undersigned requests that FDA approve this petition and permit the proposed additional strength (different total drug content) to be addressed through the ANDA process.

## C. ENVIRONMENTAL IMPACT

The petitioner requests a categorical exclusion under 21 C.F.R. § 25.31.

## D. ECONOMIC IMPACT

In accordance with 21 CFR 10.30(b), the petitioner will, upon request, submit economic impact information.

## **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 is unfavorable to the petition.

Sincerely,

Maria Hinklin

**Associate Director** 

**Global Regulatory Affairs** 

Maria Hinklin