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22 July 2022

Division of Dockets Management
Food and Drug Administration
(HFA-305) Room 1061
5630 Fishers Lane
Rockville, MD 20852

CITIZEN PETITION

Dear Sir/Madam:

The undersigned submits this petition pursuant to the Federal Food, Drug, and Cosmetic Act and 21 CFR 10.30 requesting the Commissioner of the Food and Drug Administration to designate Fresenius Kabi USA, LLC's (FK USA) Glycopyrrolate Injection, USP approved under 505(b)(2) NDA 214919 as therapeutically equivalent with an 'AP' rating to the reference listed drug (RLD) Robinul®, NDA 017558, by Hikma Pharmaceuticals International Ltd.

A. Action Requested

The petitioner requests that the Commissioner of the Food and Drug Administration designate Glycopyrrolate Injection, 0.6 mg per 3 mL pre-filled syromge, manufactured by FK USA (NDA 214919), as a therapeutic equivalent, with an 'AP' rating, to the reference listed drug (RLD) Robinul®, NDA 017558, by Hikma Pharmaceuticals International Ltd.

B. Statement of Grounds

FK USA's Glycopyrrolate Injection drug product (NDA 214919) is therapeutically and pharmaceutically equivalent to the Reference Listed Drug (RLD), Robinul®, NDA 017558, by Hikma Pharmaceuticals International Ltd, and is expected to have the same clinical effect and safety profile as the RLD. A side-by-side pharmaceutical comparison of FK USA's NDA 214919 and the RLD NDA 017558 is provided in **Table 1** for the reviewer's convenience.

Table 1 Side-by-Side Pharmaceutical Equivalence Comparison of FK USA NDA 214919 and the RLD NDA 017558

	Reference Listed Drug	FK USA's Drug Product
Name	Robinul®	Glycopyrrolate Injection, USP
Dosage Form	Injection, Solution	Injection, Solution
Route of Administration	Intramuscular or Intravenous	Intramuscular or Intravenous
Active Ingredient	Glycopyrrolate	Glycopyrrolate
Strength	0.2 mg/mL	0.6 mg/3mL (0.2 mg/mL)
Inactive Ingredient(s)	Water for Injection	Water for Injection
	Benzyl Alcohol	------
	Hydrochloric Acid	Hydrochloric Acid
	Sodium Hydroxide	Sodium Hydroxide
Indications and Usage	**In Anesthesia:** Robinul® Injection is indicated for use as a preoperative antimuscarinic to reduce salivary, tracheobronchial and pharyngeal secretions; to reduce the volume and free acidity of gastric secretion; and to block cardiac vagal inhibitory reflexes during induction of anesthesia and intubation. When indicated, Robinul ® Injection may be used intraoperatively to counteract surgically or drug-induced or vagal reflexes associated arrhythmias. Glycopyrrolate protects against the peripheral muscarinic effects (e.g., bradycardia and excessive secretions of cholinergic agents such as neostigmine and pyridostigmine given to reverse the neuromuscular blockade to due non-depolarizing muscle relaxants.	**In Anesthesia:** Glycopyrrolate Injection, USP is indicated for use as a preoperative antimuscarinic to reduce salivary, tracheobronchial and pharyngeal secretions; to reduce the volume and free acidity of gastric secretion; and to block cardiac vagal inhibitory reflexes during induction of anesthesia and intubation. When indicated, Glycopyrrolate Injection, USP may be used intraoperatively to counteract surgically or drug-induced or vagal reflexes associated arrhythmias. Glycopyrrolate protects against the peripheral muscarinic effects (e.g., bradycardia and excessive secretions of cholinergic agents such as neostigmine and pyridostigmine given to reverse the neuromuscular blockade to due non-depolarizing muscle relaxants.
	In Peptic Ulcer For use in adults as adjunctive therapy for the treatment of peptic ulcer when rapid anticholinergic effect is desired or when oral medication is not tolerated.	**In Peptic Ulcer** For use in adults as adjunctive therapy for the treatment of peptic ulcer when rapid anticholinergic effect is desired or when oral medication is not tolerated.

The "Approved Drug Products with Therapeutic Equivalence Evaluations", ("The Orange Book"), defines pharmaceutically equivalent drug products as follows:

- as identical dosage forms and route(s) of administration that contain identical amounts of the identical active drug ingredient
- meet the identical compendial or other applicable standards of identity, strength, quality, and purity

The "Approved Drug Products with Therapeutic Equivalence Evaluations", ("The Orange Book"), defines therapeutically equivalent drug products as follows:

- are approved as safe and effective.
- contain identical amounts of the identical active drug ingredient in the identical dosage form and route of administration
- meet compendial or other applicable standards of strength, quality, purity and identity
- are bioequivalent
- are adequately labeled
- manufactured in compliance with cGMP

According to the Orange Book Preface to the 39th Edition, therapeutically equivalent drug products can differ in certain other characteristics, such as shape, scoring configuration, release mechanisms, packaging, excipients, expiration date/time, minor aspects of labeling and storage conditions.

Table 1 demonstrates that the FK USA and RLD drug products are the same. The FK USA drug product has the same active ingredients, conditions of use, dosage form, route of administration, strength and Indications and usage as the RLD.

FK USA's Glycopyrrolate Injection, 505(b)(2) NDA 214919, also relied, in part, on the RLD data and previously published literature for safety and efficacy.

Based on all the above-mentioned reasons, FK USA kindly requests the Agency to grant a therapeutic equivalence rating 'AP' for NDA 214919 Glycopyrrolate Injection, USP.

C. Environmental Impact

In accordance with the requirements set forth in 21 CFR 25.31, FK USA hereby requests a Categorical Exclusion from the requirements to prepare an Environmental Impact Assessment.

D. Economic Impact

Pursuant to 21 CFR 10.30(b) an economic impact analysis will be provided upon request.

E. Certification

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

Sincerely,

Marcela Ruvalcaba

Digitally signed by Marcela Ruvalcaba
DN: c=US, st=Illinois, l=Lake Zurich, o=Fresenius Netcare, ou=IT, cn=Marcela Ruvalcaba, email=marcela.ruvalcaba@fresenius-kabi.com
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