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February 23, 2006

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

CITIZEN PETITION

This petition is submitted, in duplicate, 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 10.30 and 314.93, to request the Commissioner of Food and Drugs to determine that the drug product loperamide hydrochloride 2 mg orally dissolving film strip is suitable for an Abbreviated New Drug Application (ANDA). The petitioning company focuses on the development and manufacture of film-based drug delivery systems.

A. Action Requested

The petitioner seeks a determination that loperamide hydrochloride 2 mg orally dissolving film strip is suitable for an ANDA based on the reference listed drug loperamide hydrochloride 2 mg oral chewable tablet (Imodium A-D).

B. Statement of Grounds

This petition concerns a change in dosage form from an oral chewable tablet to an orally dissolving film strip. The reference listed drug was approved by FDA for marketing as an over-the-counter (OTC) drug under NDA 20-448 held by McNeil Consumer Products Company (July 24, 1997). A copy of the pertinent pages from the FDA publication "Approved Drug Products with Therapeutic Equivalence Evaluations, 26th Edition (2006)", which lists the approval of this OTC drug, is included with this petition (Attachment A).

In the past, the agency has approved citizen petitions requesting a change in dosage form, and last year approved a petition (Attachment B) for a similar type of change as here (i.e., oral chewable 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 film strip is shaped like a postage stamp. It is intended to be placed on the tongue, dissolve within a few seconds and swallowed to deliver the drug to the consumer.

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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 film strip instead of a compressed oral chewable tablet.

The dosage form will contain inactive ingredients that are generally recognized as safe (GRAS) for use in food or have been used in previously approved drug products.

There are a number of products that are marketed OTC which utilize the dissolving film 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 "film" and "strip" as appropriate dosage forms (Drug Nomenclature Monograph Number C-DRG-00201).

The proposed change in dosage form – from an oral chewable tablet to an orally dissolving film strip – is designed to provide a different dosage form for taking medication for those consumers who find it difficult to, or cannot, use chewable tablets or traditional oral tablets, or who prefer an orally dissolving film 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 film strip is pleasant to taste and experience, and will help consumers safely manage their health.

It appears that the listed drug, while approved by FDA nearly nine years ago, has not been marketed by McNeil. The listed drug is not included in McNeil promotional material, or in standard reference sources for OTC drugs. The listed drug is not included in the Discontinued Drug Product List in the Orange Book. Petitioner therefore requests that the agency determine that the listed drug has not been withdrawn from sale for safety or effectiveness reasons.

While the listed drug is not marketed, McNeil does in fact market other OTC dosage forms of loperamide hydrochloride, including a 2 mg oral tablet that was approved by FDA under NDA 19-860 (Nov. 22, 1989). The oral tablet, like the chewable tablet, has been designated by FDA as a reference listed drug, and for bioequivalence purposes in an ANDA would be used to compare the orally dissolving filmstrip.

A copy of the approved labeling for the listed drug (Attachment C) and a copy of the proposed labeling for the drug product that is the subject of this petition (Attachment D) are included with this petition. The copy of the approved labeling for the listed drug is the final printed labeling from the drug approval package for this product that is on the FDA website. The final printed labeling in the NDA does not comply with the current format and content requirements for OTC drug product labeling, 21 CFR 201.66. Those standardized requirements – called Drug Facts - were established on March 17, 1999 (64 Fed. Reg. 13254), almost two years after the NDA for the listed drug was approved. Under these circumstances, the proposed labeling for the orally dissolving film strip product is consistent with the FDA approved labeling of the listed drug, but utilizes the Drug Facts format and content in accordance with 21 CFR 201.66. The labeling varies only as it relates to the difference in dosage form and the method of administration, those

differences that may be necessary because the products are made by different companies, and the Drug Facts requirements.
For your convenience in comparing labeling and determining whether an ANDA may be submitted for an orally dissolving film strip, this petition also includes a copy of the OTC labeling for the listed oral tablet dosage form of loperamide hydrochloride 2 mg that is currently marketed (Attachment E). That labeling is in Drug Facts format.

The labeling of the listed oral chewable tablet drug 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, children 6-8 years, and children under 6 years. In addition, a liquid dosage form adequately labeled for the pediatric population has been approved by FDA and is being marketed, and loperamide hydrochloride is not on the list of active moieties for which FDA has issued a written request for pediatric studies under the Best Pharmaceuticals for Children Act. Therefore, the proposed change in dosage form meets the requirements of the Pediatric Research Equity Act [21 U.S.C. 355c], and no additional studies are required.

For all of the aforementioned reasons, the Commissioner should grant this petition and authorize the submission of an ANDA for loperamide hydrochloride 2 mg orally dissolving film strip.

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.

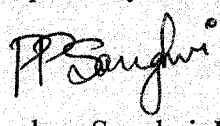
D. Economic Impact

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,



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Attachments (A-E)