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VIA ELECTRONIC SUBMISSION

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 Citizen's Petition is being submitted under the authority of 21 CFR § 10.30, to request that the Commissioner of Food and Drugs designate Acetylcysteine Injection 6gm/30mL product, ANDA 200644, by Fresenius Kabi USA LLC as a reference standard and reference listed drug in FDA's "Approved Drug Products with Therapeutic Equivalence Evaluations" publication (the "FDA's Orange Book") that can serve as the basis for the filing of Abbreviated New Drug Applications ("ANDAs").

I. Action Requested

The Petitioner hereby requests that the Commissioner of Food and Drugs designate the product identified below as another reference standard and reference listed in FDA's Orange Book that can serve as the basis for the filing of ANDAs.

ANDA 200644, Acetylcysteine Injection 6gm/30mL by Fresenius Kabi USA LLC

II. Statement of Grounds

In order to file an ANDA, an applicant is required to cite a product identified in the FDA's Orange Book as a reference listed drug.

The FDA's Orange Book currently designates NDA N021539, ACETADOTE (Acetylcysteine) Injection 6gm/30mL as the reference listed drug.

From the description of the package insert, ACETADOTE is described as follows:

> ACETADOTE is supplied as a sterile solution in vials containing 20% w/v (200 mg/mL) acetylcysteine. The pH of the solution ranges from 6.0 to 7.5. ACETADOTE contains the following inactive ingredients: sodium hydroxide (used for pH adjustment), and Sterile Water for Injection, USP.

The FDA'S Orange Book also includes a number of approved ANDAs for Acetylcysteine Injection 6gm/30mL. See excerpt from FDA's Orange Book below.

Mkt. Status	Active Ingredient	Proprietary Name	Appl. No.	Dosage Form	Route	Strength	TE Code	RLD	RS	Applicant Holder
RX	ACETYLCYSTEINE	ACETADOTE	N021539	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP	RLD	RS	CUMBERLAND PHARMACEUTICALS INC
RX	ACETYLCYSTEINE	ACETYLCYSTEINE	A203173	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP			AKORN INC
RX	ACETYLCYSTEINE	ACETYLCYSTEINE	A207358	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP			AUROBINDO PHARMA LTD
RX	ACETYLCYSTEINE	ACETYLCYSTEINE	A200644	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP			FRESENIUS KABI USA LLC
RX	ACETYLCYSTEINE	ACETYLCYSTEINE	A091684	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP			SAGENT PHARMACEUTICALS INC
RX	ACETYLCYSTEINE	ACETYLCYSTEINE	A208166	INJECTABLE	INTRAVENOUS	6GM/30ML (200MG/ML)	AP			ZYDUS PHARMACEUTICALS USA INC

The approved ANDAs for Acetylcysteine Injection 6gm/30mL, have the following formulation:

> Acetylcysteine injection is supplied as a sterile solution in vials containing 20% w/v (200 mg/mL) acetylcysteine USP. The pH of the solution ranges from 6 to 7.5. Acetylcysteine injection contains the following inactive ingredients: 0.5 mg/mL edetate disodium, sodium hydroxide (used for pH adjustment), and Water for Injection, USP.

The ANDAs include edetate disodium in the formulation for its preservative / heavy metal chelating effects in the formulation. Please see the attachment for a comparative formulation and test results.

The Cumberland Pharmaceuticals, the NDA holder for reference product, ACETADOTE, obtained patent protection for a formulation of the product that does not contain edetate disodium. Previous formulations of the reference product did include edetate disodium.

There is no indication that the previous formulation of the reference product was withdrawn for reasons relating to safety or efficacy. Moreover, all of the currently approved ANDAs for Acetylcysteine Injection 6gm/30mL contain edetate disodium.

The Petitioner is thus hereby requesting that ANDA 200644, Acetylcysteine Injection 6gm/30mL by Fresenius Kabi USA LLC be designated as the reference standard for purposes of comparison testing in support of filing and acceptance of an ANDA.

III. Environmental Impact

Petitioner believes that this petition does not require an environmental impact analysis report under 21 C.F.R. § 25.1(g).

IV. Economic Impact

An economic impact report is required only when requested by the Administration and such report has not been requested under 21 C.F.R. § 10.30(b).

V. Certification

Petitioner certifies that, to the best of its knowledge and belief, this Petition includes all of the 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 Petitioner.

Respectfully Submitted,

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