March 13, 2003

Document Control Unit (HFV-199)
Center for Veterinary Medicine
Food and Drug Administration
7500 Standish Place
Rockville, MD 20855

Re: Apramycin Sulfate Soluble Powder

Subject: Suitability Petition

Enclosed are four copies of a Suitability Petition submitted by Cross Vetpharm Group, Ltd. for Apramycin Sulfate Soluble Powder. Cross Vetpharm Group hereby requests the Commissioner to permit the filing of an Abbreviated New Animal Drug Application (ANADA) for a proposed product that differs from the approved pioneer product Apralan (Apramycin sulfate), sponsored by Elanco Animal Health [A Division of Eli Lilly and Company], under NADA 106-964.

Permission is hereby requested to allow the addition of the excipient Sucrose in the proposed ANADA, not found in the pioneer product. We have included in this Suitability Petition information required as defined in the June 7, 1989, second policy letter on the implementation of the Generic Animal Drug and Patent Term Restoration Act.

Also included is a letter dated September 13, 2002, signed by Mr. Donal Tierney, Chief Executive, Cross Vetpharm Group, Ltd. authorizing me to act on their behalf.

Should you have any questions regarding this Suitability Petition, I can be reached at the number printed below.

Sincerely,

Linda M. Duple

Linda M. Duple
Regulatory Affairs Coordinator

Enclosures

2836 Dolliver Park Ave. • Lehigh, IA 50557
(515) 359-2248 • FAX (515) 359-2241 • www.bimeda.com

03P-0108

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SUITABILITY PETITION

Submitted by

Cross Vetpharm Group, Ltd.

Broomhill Road

Tallaght,

Dublin 24

Ireland

For

Water Soluble Animal Drug Product Containing The Same Active Ingredient as the Pioneer – Addition of Inactive Ingredient

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ACTION REQUESTED

Cross Vetpharm Group, Inc. requests the Commissioner to permit the filing of an Abbreviated New Animal Drug Application (ANADA) for a proposed product that differs from the approved pioneer product.

Pioneer Product

Brand Name:	Apralan
Company:	Elanco Animal Health, A Division of Eli Lilly and Company
NADA:	046-109
Active Ingredient:	Apramycin sulfate
Species:	Porcine

Permission is hereby requested to add the inert ingredient of Sucrose to aid in flow of product for filling purposes. The pioneer product "Apralan" appears to be 100% active apramycin sulfate. The proposed product will contain the same amount of active ingredient as the pioneer product.

Proposed Product

Brand Name:	To be determined (water soluble powder)
Company:	Cross Vetpharm Group, Ltd.
ANADA:	To be assigned
Active Ingredients:	Apramycin sulfate
Inactive Ingredient:	Sucrose, USP
Species:	Porcine

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STATEMENT OF GROUNDS

In accordance with the Generic Animal Drug Patent Term Restoration Act (GADPTRA), the filing of a Suitability Petition is a mechanism by which companies are allowed to file an ANADA for a product which differs from the approved pioneer product. The second policy letter dated June 7, 1989, specifically allows for a "Change in Strength".

The pioneer product, "Apralan" (Apramycin Sulfate Soluble Powder), is sponsored by Elanco Animal Health, A Division of Eli Lilly and Company, under NADA 106-964. The pioneer product contains apramycin sulfate equivalent to 48 g apramycin activity. It is marketed in (jars) containing 48 g apramycin base with no excipients added.

Cross Vetpharm's proposed product, is a soluble powder intended for oral use that contains the same active ingredient in the same quantity, but proposes the addition of Sucrose, USP. The addition of this excipient is necessary to assure fill uniformity in the use of our filling equipment.

Pioneer label claim –

"Contains apramycin sulfate equivalent to 48 g apramycin activity"

Proposed generic label claim –

"Contains apramycin sulfate equivalent to 48 g apramycin activity"

- Both the pioneer and proposed product will contain the same amount of active ingredient. Apralan labeling contains no net content or weight statement but provides the required activity as will the proposed generic product.
- Both the pioneer and proposed generic product make a true solution at the label concentration.
- The proposed generic product makes a true solution at 128 times more than the label concentration. This worst-case experiment showed the addition of sugar to the formulation did not restrict the solubility of Apramycin at the more dilute Label concentration.
- Apramycin has a number of amino groups that could undergo a Maillard reaction in the presence of reducing sugars. Sucrose was chosen as the excipient, because it is a non-reducing sugar.
- A proposed scaled up scoop [Elanco's has a plastic spoon] will be provided to deliver the same amount of apramycin activity per scoop.
- The pH of the generic product and the pioneer product are comparable.

ENVIRONMENTAL IMPACT

Cross Vetpharm Group requests a waiver of preparing an environmental assessment based on 21 CFR 25.30 (h) Categorical Exclusion. To the best of the petitioner's knowledge no extraordinary circumstances exist which may significantly affect the human environment.

ECONOMIC IMPACT

Cross Vetpharm Group hereby requests a waiver from the requirements of this section for this petition.

CERTIFICATION

The undersigned certifies that to the best knowledge and belief of the undersigned, this petition includes all information and views upon which the petition relies, and that it contains representative data and information known to the petitioner which are unfavorable to this petition.

Linda M. Duple

Linda M. Duple

Regulatory Affairs Coordinator
Bimeda, Inc.
2836 Dolliver Park Avenue
Lehigh, IA 50557

(515) 359-2248

LABELING

PROPOSED LABELING

1. Identification of a *trade name* has not yet been determined.

2. Elanco Animal Health, A Division of Eli Lilly and Company, company name and logo replaced with Bimeda, Inc.

3. Added "Not for Human Use" to the main panel and relocated "Keep Out of Reach of Children from the side panel to the main panel.

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Indications: For the control of porcine colibacillosis (weaning pig scours) caused by strains of *E. coli* sensitive to apramycin.

Dosage: Treated pigs should consume enough medicated water to receive 12.5 mg of apramycin per kg of body weight per day (5.67 mg/lb/day).

CONTINUE TREATMENT FOR 7 DAYS.

Mixing Directions: Use the plastic spoon for measuring the amount of powder to be used. Add to the drinking water at the rate of 375 mg of apramycin per gallon according to the following table. Stir on addition, let stand for 15 minutes to allow particles to dissolve. Stir again to disperse medication.

Total Body Weight to be treated lb Kg	Tradename Soluble Per Day (Plastic spoon leveled full)	Approximate Daily Water Consumption (Gallon)	Apramycin (mg)
264 120	1	4	1,500
1320 600	5	20	7,500
8448 3840	Entire contents	128	48,000

*Number of pigs X average weight

TRADENAME

Apramycin Sulfate Soluble Powder

Contains apramycin sulfate equivalent to 48 g apramycin activity (medicates 128 gallons or 486 liters of drinking water, 8448 lbs. body weight)

An antibiotic for the control of porcine colibacillosis (weaning pig scours).

For Use in Swine Only
Not for Human Use
Keep Out of Reach of Children

Water consumption should be monitored closely to determine that the recommended dosage is being consumed. The drug concentration varies considerably with ambient temperature, humidity and other factors. Prepare fresh medicated water daily. Rusty waterers may cause rapid loss of potency.

Active Drug Ingredient: Apramycin (as apramycin sulfate) 48 g

Warning: Do not slaughter treated swine for 28 days following treatment.

Notice: Organisms vary in their degree of sensitivity to chemotherapeutics. If no improvement is observed after recommended treatment, diagnosis and sensitivity should be reconfirmed.

Storage: Protect from moisture. Keep tightly closed. Store in a cool, dry place.

Manufactured by: Bimeda, Inc.
Le Sueur, MN 56058

PIONEER LABELING

Indications: For the control of porcine colibacillosis (weanling pig scours) caused by strains of *E. coli* sensitive to apramycin.

Dosage: Treated pigs should consume enough medicated water to receive 12.5 mg of apramycin per kg of body weight per day (5.67 mg/lb/day). **CONTINUE TREATMENT FOR 7 DAYS**

Mixing Directions: Use the plastic spoon for measuring the amount of powder to be used. Add to the drinking water at the rate of 375 mg of apramycin per gallon according to the following table. Stir on addition, let stand for 15 minutes to allow particles to dissolve. Stir again to disperse medication.

Total Body Weight to be Treated*		Apralan Soluble Per Day (Plastic spoon leveled full)	Approximate Daily Water Consumption (Gallon)	Apramycin (mg)
lb	Kg			
264	120	1	4	1,500
1320	600	5	20	7,500
8448	3840	Entire Contents	128	48,000

*Number of pigs X average weight

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ELANCO AH 0648-29V

Apralan®

Contains apramycin sulfate equivalent to 48 g apramycin activity (medicates 128 gallons or 486 liters of drinking water, 8448 lbs body weight).

An antibiotic for the control of porcine colibacillosis (weanling pig scours).

Water consumption should be monitored closely to determine that the recommended dosage is being consumed. The drug concentration should be adjusted according to water consumption. Water consumption varies considerably with ambient temperature, humidity and other factors. Prepare fresh medicated water daily. Rusty waterers may cause rapid loss of potency.

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Notice: Organisms vary in their degree of sensitivity to chemotherapeutics. If no improvement is observed after recommended treatment, diagnosis and sensitivity should be reconfirmed.

Storage: Protect from moisture. Keep tightly closed. Store in a cool, dry place.

Warning: Keep out of the reach of children

WS 1651 AMX

Elanco Animal Health
A Division of Eli Lilly and Company
Indianapolis, IN 46285, U.S.A.

Questions or Comments
Call 1-800-428 4441

Lot/Exp date

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CROSS VETPHARM GROUP LTD

Osmonds (Dublin), Bimeda Ireland,
Bimeda Chemicals Export,
Bimeda Inc-Le Sueur, MN ,and Kansas, MO , USA
Bimeda-MTC Animal Health Inc - Ontario, Canada
Cross Vetpharm Group Uk Ltd - Anglesey Wales

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13th September 2002

Dr. Stephen Sundlof
Center or Veterinary Medicine
Food and Drug Administration
7500 Standish Place
Rockville, MD 20855

RE: Authorization Letter – Linda M. Duple, Regulatory Affairs Coordinator, Bimeda, Inc.

Dear Dr. Sundlof:

Please accept this letter as authorization for Linda M. Duple, Regulatory Affairs Coordinator for Bimeda, Inc. to act on behalf of Cross Vetpharm Group in interactions with the Center for Veterinary Medicine. Bimeda, Inc. is a company wholly owned by Cross Vetpharm Group.

Should you have questions, please contact me at 011-353-1-451-5011.

Yours sincerely,

Donal T.M. Tierney
Chief Executive