Draft Guidance on Morphine Sulfate

This draft guidance, once finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the Office of Generic Drugs.

Active ingredient: Morphine Sulfate

Form/Route: Extended Release Capsules/Oral

Recommended studies: 5 studies

1. Type of study: Fasting

Design: Single-dose, two-way, crossover in-vivo

Strength: 80 mg

Subjects: Healthy males and nonpregnant females, general population

Additional Comments: For the healthy subjects recommended for this study, please use a narcotic

antagonist such as naltrexone. You should consult a physician who is an expert in the

administration of opioids for an appropriate dose of narcotic antagonist.

2. Type of study: Fed

Design: Single-dose, two-way, crossover in-vivo

Strength: 80 mg

Subjects: Healthy males and nonpregnant females, general population

Additional comments: Please see comments above.

3. Type of study: Fasting Sprinkle in applesauce

Design: Single-dose, two-way, crossover in-vivo

Strength: 80 mg

Subjects: Healthy males and nonpregnant females, general population

Additional comments: Please see comments above.

4. Type of study: Fed

Design: Single-dose, two-way, crossover *in-vivo*

Strength: 100 mg

Subjects: Healthy males and nonpregnant females, general population

Additional comments: Please see comments above.

5. Type of study: Fasting

Design: Single-dose, two-way, crossover *in-vivo*

Strength: 10 mg

Subjects: Healthy males and nonpregnant females, general population

Additional comments: Please see comments above.

Analytes to measure: Morphine and Morphine-6-glucuronide in plasma

Please submit the metabolite data as supportive evidence of comparable therapeutic outcome. For the metabolite, the following data should be submitted: individual and mean concentrations, individual and mean pharmacokinetic parameters, and geometric means and ratios of means for AUC and Cmax.

Bioequivalence based on (90% CI): Morphine

Waiver request of in-vivo testing: 20 mg, 30 mg, 50 mg, and 60 mg based on (i) acceptable bioequivalence studies on the 80 strength, (ii) proportionally similar across all strengths, and (iii) acceptable in vitro dissolution testing of all strengths.

200 mg based on (i) acceptable bioequivalence study on the 100 strength, (ii) proportionally similar across 100 mg and 200 mg strengths, and (iii) acceptable in vitro dissolution testing of 100 mg and 200 mg strengths.

Dissolution test method and sampling times:

Please note that a **Dissolution Methods Database** is available to the public at the OGD website at http://www.fda.gov/cder/ogd/index.htm. Please find the dissolution information for this product at this website. Please conduct comparative dissolution testing on 12 dosage units each of all strengths of the test and reference products. Specifications will be determined upon review of the application.

In addition to the method above, for modified release products, dissolution profiles on 12 dosage units each of test and reference products generated using USP Apparatus I at 100 rpm and/or Apparatus II at 50 rpm in at least three dissolution media (pH 1.2, 4.5 and 6.8 buffer) should be submitted in the application. Agitation speeds may have to be increased if appropriate. It is acceptable to add a small amount of surfactant, if necessary. Please include early sampling times of 1, 2 and 4 hours and continue every 2 hours until at least 80% of the drug is released, to provide assurance against premature release of drug (dose dumping) from the formulation. Specifications will be determined upon review of the data submitted in the application.

Due to concerns of dose dumping from this drug product when taken with alcohol, please conduct additional dissolution testing using various concentrations of ethanol in the dissolution medium, as follows:

Testing Conditions: 900 mL, 0.1 N HCl, apparatus 1 (basket) @ 100 rpm, with and without the alcohol (see below):

- Test 1: 12 units tested according to the proposed method (with 0.1 N HCl), with data collected every 15 minutes for a total of 2 hours.
- Test 2: 12 units analyzed by substituting 5% (v/v) of test medium with Alcohol USP, and data collection every 15 minutes for a total of 2 hours.
- Test 3: 12 units analyzed by substituting 20% (v/v) of test medium with Alcohol USP, and data collection every 15 minutes for a total of 2 hours.
- Test 4: 12 units analyzed by substituting 40% (v/v) of test medium with Alcohol USP, and data collection every 15 minutes for a total of 2 hours.

Both test and RLD products must be tested accordingly and data must be provided on individual unit, means, range and %CV on both strengths.