DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

ANDA 76-356

APR 11 2003

Barr Laboratories, Inc.
Attention: Salvatore P. Peritore
2 Quaker Road
P.O. Box 2900
Pomona, NY 10970

RECEIVED
APR 12 2003
4/11/03
N.C. TANTILLO

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated February 6, 2002, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Claravis™ Capsules (Isotretinoin Capsules USP, 10 mg).

Reference is also made to your amendments dated June 10, July 16, July 18, October 17, October 18, November 12, November 18, November 22, November 27, and December 20, 2002; and January 27, January 28, March 11, March 18, March 25, March 27, and March 31, 2003.

The listed drug (RLD) referenced in your application, Accutane® Capsules of HLR Technology (HLR), is subject to a period of exclusivity. As noted in the agency's publication entitled Approved Drug Products with Therapeutic Equivalence Evaluations, the "Orange Book", HLR's three-year exclusivity with respect to labeling providing for the use of Accutane® Capsules in the pediatric patient population, (M-12), will expire on November 2, 2005. Section 11 of the Best Pharmaceuticals for Children Act (BPCA), signed into law in January 2002, allows certain portions of HLR's labeling which is the subject of pediatric exclusivity protection to be omitted from the labeling of products approved under Section 505(j). The BCPA also permits the incorporation of language in the labeling of products approved under Section 505(j) that informs health care practitioners that HLR's drug product has been approved for pediatric use. The agency has determined that the final printed labeling you have submitted is in compliance with the BCPA with respect to pediatric use protected by exclusivity.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Claravis™ Capsules, 10 mg, to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Accutane® Capsules, 10 mg, of HLR Technology).

Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application. The "interim" dissolution specifications are as follows:

> Dissolution testing should be conducted in 900 mL of 0.05M potassium phosphate buffer, dibasic, pH 7.8, containing 0.5% solid LDAO, at 37°C using USP apparatus I (basket, with 20 mesh) at 100 rpm. The test product should meet the following "interim" specification:
>
> > Not less than 80% of the labeled amount of isotretinoin in the dosage form is dissolved in 90 minutes.
>
> The "interim" dissolution test(s) and tolerances should be finalized by submitting dissolution data for the first three production size batches. Data to finalize the dissolution specification should be submitted in a "Special Supplement - Changes Being Effected" if there are no revisions to the "interim" specifications, or when the final specification is tighter than the "interim" specification. In all other instances, the data should be submitted as a Prior Approval Supplement.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

We request that you submit, in duplicate, any proposed advertising or promotional copy that you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print.

Submit both copies together with a copy of the final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-40). Please do not use Form FDA 2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-40) with a completed Form FDA 2253 at the time of their initial use.

Sincerely yours,

Gary Buehler
Director
Office of Generic Drugs
Center for Drug Evaluation and Research