Meeting Minutes
Docket No. 2006P-0123

Meeting Date: March 22, 2007 **Time:** 3:30 PM **Location:** WO-CSU Bldg. 2, CR 2047

ANDA and Drug Name: ANDA 76-258 (Fentanyl Transdermal System, 12 mcg/hr, 25 mcg/hr, 50 mcg/hr, 75 mcg/hr, and 100 mcg/hr)

External participants: Mylan Laboratories, Inc., Mylan Technologies, Inc. and Johnson & Johnson/Ortho-McNeil, Inc./Janssen L.P./Alza Corporation[1]

Type of meeting: External

Meeting Chair: Gary Buehler, Director, Office of Generic Drugs (OGD)

External participant lead: John O'Donnell, Chief Scientific Officer, Mylan Laboratories Inc.

Meeting Recorder: Debra Catterson, Project Manager, Clinical Review Team, OGD

FDA Attendees, titles and offices (see attached attendance list):

Gary Buehler	Director, OGD
Dena Hixon	Associate Director for Medical Affairs, OGD
Nancy Chang	Medical Officer, Clinical Review Team, OGD
Linda Ulrich	Medical Officer, Clinical Review Team, OGD
Nicole Lee	Reviewer, Clinical Review Team, OGD
Sarah Ho	Reviewer, Clinical Review Team, OGD
Debra Catterson	Project Manager, Clinical Review Team, OGD
Dale Conner	Director, Division of Bioequivalence, OGD
Barbara Davit	Deputy Director, Division of Bioequivalence, OGD
Cecelia Parise	Regulatory Policy Advisor, OGD
Don Hare	Special Assistant, OGD
Florence Fang	Director, Division of Chemistry II, OGD
Richard C. Adams	Deputy Director, Division of Chemistry II, OGD
Lillie Golson	Team Leader, Labeling Review Branch (LRB), OGD
Chan Park	Labeling Reviewer, LRB, OGD
Bob Rappaport	Director, Division of Anesthesia, Analgesia, and Rheumatology Products (DAARP), Office of Drug Evaluation II (ODE II), OND
Sharon Hertz	Deputy Director, DAARP
Suresh Doddapaneni	Clinical Pharmacology Team Leader, DAARP
Eric Duffy	Director, Division of Post-Marketing Evaluation (DPE), Office of New Drug Quality Assessment (ONDQA)
Ramesh Raghavachari	Pharmaceutical Assessment Lead (PAL), DPE, ONDQA
Ravi Harapanhalli	Branch V Chief, Division of Pre-Marketing Evaluation III, ONDQA

[1] Janssen L.P., Alza Corporation, and Otho-McNeil, Inc. are all members of the Johnson & Johnson family of Companies

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Ali Al-Hakim	PAL, Division of Pre-Marketing Evaluation III, ONDQA
Kimberly Compton	Regulatory Project Manager, DAARP
Lauren Lee	Safety Evaluator Team Leader, DDRE, OSE
Gita Akhavan-Toyserkani	Safety Evaluator, DDRE, OSE
Mary Willy	Team Leader Epidemiologist & Senior Risk Analyst, OSE
Denise P. Toyer	Deputy Director, Division of Medication Errors and Technical Support (DMETS), OSE
Richard Abate	Safety Evaluator, DMETS, OSE
Silvia Calderon	Pharmacologist, Controlled Substances Staff
Nakissa Sadrieh	Associate Director for Research Policy and Implementation, OPS
Nancy Boocker	Director, Division of Regulatory Policy I (DRP I), Office of Regulatory Policy (ORP)
Nam Kim	Regulatory Counsel, DRP I, ORP
Toni Stifano	Staff Analyst, DSB, SPCS, OCD
Chandrahas Sahajwalla	Director, Division of Clinical Pharmacology II, OCP, OTS
Leah Ripper	Associate Director for Regulatory Affairs, ODE II

External constituents and affiliation (see attached attendance list):

John O'Donnell	Chief Scientific Officer, Mylan Laboratories Inc.
Frank Sisto	Vice President, Corporate Regulatory Affairs, Mylan Labs.
Russ Rackley	Exec. Dir., Pharmacokinetics/Drug Metabolism, Mylan Pharm.
Peter B. Bottini	Exec. Dir., Product Safety and Risk Mgmt., Mylan Labs.
Andrea Miller	Senior VP, Regulatory Affairs and Administration, Mylan Technologies, Inc.
Brian Roman	Chief Counsel, Mylan Labs.
Diane Burke	Project Manager, Mylan Labs.
Bruce Moskovitz	Therapeutic Area Head, Analgesia and GI, Ortho-McNeil Janssen Scientific Affairs
Kenneth Kostenbader	Senior Benefit Risk Leader, Johnson & Johnson (J&J)
Suneel Gupta	Clinical Pharmacology, Alza Corporation, J&J
Michael Kaufman	Director, Regulatory Affairs, J&J
David Hilfker	Regulatory Affairs, J&J

Discussion Points:

Gary Buehler reminded all that a Citizen Petition submitted by Mylan Laboratories, Inc. (Mylan) regarding overlays for fentanyl transdermal products is pending and that the FDA participants would listen only and would not provide any decisions.

Mylan gave a slide presentation to support their request that all applicants of transdermal fentanyl products be required to do the following:

1. Conduct a study to support the safe and appropriate use of a specified overlay.
2. Amend the respective labeling to provide instructions for the safe and appropriate use of the identified and properly tested overlay.
3. Provide the properly tested overlay to patients in a responsible and controlled manner.

Mylan stated that it receives product complaints regarding its transdermal fentanyl system. A large majority of complaints received by Mylan relate to inadequate patch adhesion, and some of those calls have requested an overlay. Some patients state that they have previously used Duragesic (Fentanyl Transdermal System) and have received overlays from Alza Corporation, the holder of the approved NDA for Duragesic. Mylan does not currently provide an overlay because they have not received approval from FDA to do so. Mylan's current procedure is to educate the patient on the correct application procedure.

Mylan has noted seasonal variability in adhesion complaints, with more requests for overlays during the summer months. They also suggested that the adhesion problem is more prominent with the increasing use of the product by relatively healthy chronic pain patients who are physically active.

Mylan presented data regarding the bioavailability of their product with an overlay. Two different overlays were evaluated in separate studies. Mylan also presented information regarding the transient elevations in fentanyl concentrations that they have observed in their bioequivalence studies.

In response to a question, Mylan stated that they have no information showing that any overlay would affect the bioavailability of fentanyl from any patch. They have received reports of patients using a wide variety of adhesive supports, ranging from band-aids or gauze wraps to duct tape or Super Glue. They believe that a specific type of tape or overlay needs to be specified to ensure the safe use of fentanyl transdermal systems.

J&J briefly summarized the results of their recent overlay study.

J&J also discussed the process by which they have provided overlays to their patients. First they determine whether it is the Duragesic patch. If it is the Sandoz or Mylan patch, they give the patient the appropriate contact information. They reinforce the application instructions. If the patient calls again and is still having problems, they are instructed to use first aid tape, and if they call back again with continued adhesion problems, then they are provided with a 4-month supply of overlays. Patients reporting irritation are referred to their physician.

There was a brief discussion of the difficulty in ensuring consistency in overlays because they are regulated as devices and can change without notification.

The meeting adjourned at approximately 4:29 pm.

Action Items: None.

Signature, minutes preparer: _____
Debra Catterson

Concurrence Chair (or designated signatory): _____
Gary Buehler

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Gary Buehler
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