

Division of Dockets Management
Department of Health and Human Services
Food & Drug Administration
5630 Fishers Lane, Rm. 1061,
Rockville, MD 20852

ANDA Suitability Petition for Rufinamide Tablets, 800mg

February 4th, 2020

Dear Sir or Madam,

Reguliance LLC hereby submits this ANDA Suitability Petition on behalf of Medichem, S.A., in accordance with 21 CFR 314.93, 21 CFR 10.30 and 21 CFR 10.20, to request the FDA Commissioner to determine that the drug product, Rufinamide 800 mg Tablets, is suitable for submission as an abbreviated new drug application (ANDA) under 21 CFR 505(j) of the Federal Food, Drug and Cosmetic Act.

A. Action Requested

This Suitability Petition requests the FDA Commissioner to take action declaring that the drug product, Rufinamide 800 mg film-coated tablets, is suitable for submission as an ANDA. The Reference Listed Drug (RLD) upon which this petition is based is Banzel (Rufinamide) Tablets, NDA 021911, and is marketed in 200 mg and 400 mg strengths under.

The change from the RLD for which this petition seeks a finding of ANDA suitability is the submission of a new 800 mg tablet strength of Rufinamide Tablets in an ANDA.

B. Statement of Grounds

- a) The Reference Listed Drug (RLD) is currently available as Banzel (Rufinamide) Tablets, in 200 mg and 400 mg strengths as identified in the Orange Book. The relevant copy of the pages from the current Electronic Edition of the *Approved Drug Products with Therapeutic Equivalence Evaluations* (Orange Book) for Banzel is provided as ***Attachment 1***.

- b) According to Banzel (RLD) labeling, Rufinamide is indicated for adjunctive treatment of seizures associated with Lennox-Gastaut syndrome in children ≥ 4 years of age and in adults.

Adult treatment should be initiated at a daily dose of 400-800 mg/day administered in two equally divided doses. The dose should be increased by 400-800 mg/day every 2 days until a maximum daily dose of 3200 mg/day, administered in two equally divided doses, is reached. A copy of the most recent labeling for Banzel (revised 11/20199) is provided as *Attachment 2*.

As the proposed new 800 mg strength does not change in any manner the RLD recommended dosage regimen, the proposed labelling for Medichem Rufinamide Tablets in 200 mg, 400 mg and 800 mg strengths is identical to the RLD labeling, except for removal of all information concerning the oral suspension dosage form, which will not be offered by Medichem.

Banzel (Rufinamide) Tablets and Banzel (Rufinamide) Oral Suspension have different NDA numbers but share a single labelling, which is why the provisions related to the suspension have been eliminated in the Medichem proposed labelling.

Labeling for the proposed Medichem Rufinamide Tablets is provided as *Attachment 3*.

- c) Medichem's proposed new 800 mg strength of Rufinamide tablets does not pose questions of safety or effectiveness since the proposed strength is within the recommended product doses stated in the approved RLD labeling. The active ingredient, dosage form, uses and route of administration of the proposed strength are the same as those of the RLD.

Rufinamide 800 mg tablet can be expected to have the same therapeutic effect as the RLD when administered to patients for each condition of use in the reference listed drug's labeling for which the applicant seeks approval.

- d) The proposed Medichem 800 mg tablets will be scored on both sides, matching this Banzel Tablets feature, to provide convenient half-tablet dosing as needed.

When the required dose is from 1600 mg/day to 3200 mg/day, it is necessary to administer 400 mg x 2 tablets b.i.d. or even 400 mg x 4 b.i.d. according to the approved RLD labelling. The availability of Medichem Rufinamide 800 mg tablets could reduce the number of tablets required daily by as much as one-half, enhancing patient compliance in these situations.

For dose titration and for lower maintenance doses, Medichem, S.A. has developed also Rufinamide Tablets in 200 mg and 400 mg strengths.

- e) Medichem Rufinamide Tablets are smaller than RLD to improve patient compliance since they would be easier to swallow. See size comparison with RLD in **Table 1** below:

Table 1

STRENGTH	DIMENSIONS	BANZEL® Tablets (RLD)	Medichem Rufinamide Tablets	COMMENTS General: Medichem tablets are more compact size relative to corresponding RLD tablet strengths, improving ease of swallowing.
200 mg	Height	4.4 mm	5.0	Medichem 200 mg tablet is smaller than the RLD. By volume, the Medichem tablet is approx. 26% smaller than the RLD 200 mg.
	Width	6.1 mm	6.0	
	Length	15.1 mm	10.0	
	Volume (approx.)*	0.41 cm ³	0.30 cm ³	
400 mg	Height	5.9	5.0	Medichem 400 mg tablet is smaller than the RLD. By volume, the Medichem tablet is approx. 10% smaller than the RLD 200 mg.
	Width	7.6	9.5	
	Length	18.2	15.5	
	Volume (approx.)*	0.82 cm ³	0.74 cm ³	
800 mg	Height	N/A	9.5	Medichem 800 mg tablet is less than 2x the Medichem 400 mg tablet by volume. The Medichem 800 mg tablet is only ~ 70% larger than RLD 400 mg by volume. The Medichem 800 mg tablets are well under the “largest dimension” limit of 22 mm recommended in the FDA Guidance “ <i>Size, Shape and Other Physical Attributes of Generic Tablets and Capsules</i> ”, issued by the Office of Generics Drugs - June 2015. In addition, the Medichem Rufinamide 800 mg is smaller than other common approved antiepileptic tablets like Gabapentin 800 mg.
	Width	N/A	8.5	
	Length	N/A	17.2	
	Volume (approx.)*	N/A	1.39 cm ³	

* Volumes do not account for minor variation due to rounded surfaces.

As summarized above, MEDICHEM, S.A. requests that the FDA Commissioner find that the proposed Rufinamide tablets, 800 mg, drug product is suitable for submission in an ANDA.

C. Environmental Impact

According to Title 21 of CFR Sec. 25.31: (a) Action on an abbreviated application, if the action does not increase the use of the active moiety, is categorically excluded and, therefore, ordinarily do not require the preparation of an EA or an EIS.

Under the proposed ANDA, Rufinamide 800 mg tablet will be used as a substitute when the administration of two 400 mg tablets of the RLD are proposed in the approved Banzel RLD labeling and therefore this action does not increase the use of Rufinamide active substance.

Therefore, MEDICHEM, S.A. claims a categorical exclusion under 21 C.F.R. § 25.31.

D. Economic impact

Not requested.

E. Certification

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that includes representative data and information known to the petitioner which is unfavourable to the petition.

Enclosures

Attachment 1: Copy of *Approved Drug Products with Therapeutic Equivalence Evaluations* (Orange Book) page for Banzel

Attachment 2: Labeling for Banzel RLD (Revised 11/2019)

Attachment 3: Labeling for the proposed Medichem Rufinamide Tablets



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