Acceptable Commitments for Approval of a PET NDA or ANDA

SNMMI Annual Meeting - June 9, 2014
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Session Objectives

• General Considerations
• Administrative Requirements of ANDA
• Required Commitments/certifications in PET NDA or ANDA’s
• Specific Location of each Commitment
• Common CMC Deficiencies
General Considerations

• First time applications for PET Agents – DMIP
• Abbreviated ANDA’s – FDG, NaF, NH3, Choline - OGD
• Paper Submissions – FDA Binders; CD – SPL Labeling
• 60 day administrative review – to determine if FDA will receive for review (ANDA Checklist)
Required Administrative Items

1.1.2 - Completed Signed FDA Form 356h Form
1.1 - Form FDA 3794 - GDUFA Cover Sheet
1.2 - Cover Letter – Signed & Dated
1.2.1 - FDA Form 3674 - Clinical Trial Certification
1.3.2 - Field Copy Certification - if paper submission
1.3.3 - Debarment Certification/List of Convictions
1.3.4 - Form FDA 3454 – BA/BE Financial Certification
1.3.5 - Patent Information – No relevant patents
1.4.1 - LOA for DMF – stoppers, vials, precursor,
1.12.14 - Environmental Analysis Statement
1.12.15 - Request for Waiver (in vivo BA/BE)
Field/Debarment/Conviction Certification  
(1.3.2; 1.3.3 )

• 1.3.2 - Sponsor states that a true copy has been sent to the office of compliance.
• 1.3.3.1 - Sponsor has not used any debarred persons to prepare application
• 1.3.3.2 – Sponsor has not used services of persons convicted of relevant offenses in last 5 years.
Post-Approval Stability Protocol and Commitment (3.2.P.8.2)

- 3 Stability lots required in original application at Max. strength, inverted*
- Commitment to test one batch per year for stability in accordance with protocol (include protocol in this section).
- Statement to Reject or recall failed batches
- Commitment to Notify the FDA of changes.
cGMP Certification (3.2.P.3.1.5)

- Signed sponsor declaration that the facility, process and equipment will be operated in compliance with applicable cGMP requirements
Reprocessing (3.2.P.3.3.5)

• Reprocessing Statement –
  – Statement that will not reprocess, or
  – Description of under what conditions reprocessing will be carried out along with approved batch record.
Common CMC Deficiencies

• Appearance:
  – Revise specifications to include particulates

• Osmolality:
  – Not required in USP monograph
  – Perform as PQIT (one batch/yr)

• Container/Closure:
  – USP <660> - Type 1 Glass
  – USP <381>, <231>,<87>,<88>, leak test
  – Contact vial mnft or vial/stopper OEM to request LOA to DMF and/or OEM
  – Leak Test - Resealability test in <381>; outside test lab
Common CMC Deficiencies (Con’t)

• Aluminum:
  – Not required in FDG monograph
  – Add spot test and limits for Al$^{+3}$ (10 µg/mL)

• Ammonia N 13:
  – Test for aluminum
    • Al not used in target or in process
  – Chemical impurities
    • Inspect for cations other than NH$_4^+$ or Na$^+$
    • Method validation
Thank you

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