ANDA 75-390 April 19, 2001

King and Spalding
Attention: Eugene Pfiefer
U.S. Agent for: Alphapharm Pty. Ltd.
1730 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-4706

Dear Sir:

This is in reference to your abbreviated new drug application dated May 14, 1998, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Naproxen Delayed-release Tablets, 375 mg and 500 mg.

Reference is also made to your amendments dated July 19 and August 12, 1999; and February 16 and March 27, 2001.

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 Naproxen Delayed-release Tablets, 375 mg and 500 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (EC-Naprosyn® Delayed-release Tablets, 375 mg and 500 mg of Syntex (USA) Inc LLC). 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:

> The dissolution testing should be conducted in 1000 mL of 0.1N HCl for 120 min (acid stage) and 1000 mL of phosphate buffer pH 6.8 (buffer stage) at 37^0C using USP apparatus II (paddle) at 50 rpm. The test product should meet the following specifications:
>
> Not more than [ ] (Q) of the labeled amount of the drug in the dosage form is dissolved in [ ] min (acid stage).

Not less than [ ]%(Q) of the labeled amount of the drug in the dosage form is dissolved in [ ] minutes (buffer stage).

The “interim” dissolution test(s) and tolerances should be finalized by submitting dissolution data for the first three production size batches. Data should be submitted as a Special Supplement – Changes Being Effected when there are no revisions to the “interim” specifications or when the final specifications are tighter than the “interim” specifications. In all other instances, the information should be submitted in the form of 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 which 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 proposed or final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-40). Please do not use Form FD-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 FD-2253 at the time of their initial use.

Sincerely yours,

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