

PUBLIC ASSESSMENT REPORT of the Medicines Evaluation Board in the Netherlands

Piperacillin/Tazobactam Kabi 2 g/ 0.25 g, powder for solution for injection or infusion

Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion

Fresenius Kabi Nederland B.V., the Netherlands

piperacilline (as sodium) / tazobactam (as sodium)

This assessment report is published by the MEB pursuant Article 21 (3) and (4) of Directive 2001/83/EC. The report comments on the registration dossier that was submitted to the MEB and its fellow –organisations in all concerned EU member states.

It reflects the scientific conclusion reached by the MEB and all concerned member states at the end of the evaluation process and provides a summary of the grounds for approval of a marketing authorisation.

This report is intended for all those involved with the safe and proper use of the medicinal product, i.e. healthcare professionals, patients and their family and carers. Some knowledge of medicines and diseases is expected of the latter category as the language in this report may be difficult for laymen to understand.

This assessment report shall be updated by a following addendum whenever new information becomes available.

General information on the Public Assessment Reports can be found on the website of the MEB.

To the best of the MEB's knowledge, this report does not contain any information that should not have been made available to the public. The MAH has checked this report for the absence of any confidential information.

EU-procedure number: NL/H/0963/01-02/DC Registration number in the Netherlands: RVG 100288, 100289

14 December 2009

Pharmacotherapeutic group: combinations of penicillins, incl. beta-lactamase inhibitors

ATC code: J01CR05
Route of administration: intravenous

Therapeutic indication: moderate to severe systemic and/or local bacterial infections with

betalactamase producing bacteria

Prescription status: prescription only
Date of authorisation in NL: 24 September 2009

Concerned Member States: Decentralised procedure with AT, BE, BG, CY, CZ, DE, DK, EL,

ES, FI, FR, HU, IE, NO, PL, PT, RO, SE, SK and UK

Application type/legal basis: Directive 2001/83/EC, Article 10(1)

For product information for healthcare professionals and users, including information on pack sizes and presentations, see Summary of Product Characteristics (SPC), package leaflet and labelling.

$$\frac{\mathbf{C} \quad \mathbf{B} \quad \mathbf{G}}{M \quad E^{\quad B}}$$

I INTRODUCTION

Based on the review of the quality, safety and efficacy data, the member states have granted a marketing authorisation for Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion from Fresenius Kabi Nederland B.V. The date of authorisation was on 24 September 2009 in the Netherlands.

The product is indicated for the treatment of the moderate to severe systemic and/or local bacterial infections in which betalactamase producing bacteria are suspected or have been detected, such as:

Adults/Adolescents and the Elderly

- Nosocomial pneumonia;
- Complicated urinary tract infections (including pyelonephritis);
- Intra-abdominal infections;
- Skin and soft tissue infections:
- Bacterial infections in neutropenic patients.

Children (2 to 12 years)

Bacterial infections in neutropenic children.

A comprehensive description of the indications and posology is given in the SPC.

Piperacillin, a broad spectrum, semisynthetic penicillin active against many Gram-positive and Gram-negative aerobic and anaerobic bacteria, exerts bactericidal activity by inhibition of both septum and cell wall synthesis. Tazobactam, a triazolylmethyl penicillanic acid sulphone, is a potent inhibitor of many beta-lactamases, in particular the plasmid mediated enzymes which commonly cause resistance to penicillins and cephalosporins including third-generation cephalosporins. The presence of tazobactam in the piperacillin/tazobactam formulation enhances and extends the antibiotic spectrum of piperacillin to include many beta-lactamase producing bacteria normally resistant to it and other beta-lactam antibiotics. Thus, piperacillin/tazobactam combines the properties of a broad spectrum antibiotic and a beta-lactamase inhibitor.

This decentralised procedure concerns a generic application claiming essential similarity with the innovator products Tazocin 2 g/250 mg and 4 g/500 mg, powder for solution for infusion (NL license RVG 15326, 15328 respectively) which have been registered in the Netherlands by Wyeth Pharmaceuticals B.V. since 1993. In addition, reference is made to Tazocin authorisations in the individual member states (reference product). The reference product is marketed in the EU under different names: Tazocin®, Tazocilline®, Tazocel®, Tazonam® and Tazobac®. The composition and the pharmaceutical form of Piperacillin/Tazobactam Kabi are identical to the reference product.

The marketing authorisation is granted based on article 10(1) of Directive 2001/83/EC.

This type of application refers to information that is contained in the pharmacological-toxicological and clinical part of the dossier of the authorisation of the reference product. A reference product is a medicinal product authorised and marketed on the basis of a full dossier, i.e. including chemical, biological, pharmaceutical, pharmacological-toxicological and clinical data. This information is not fully available in the public domain. Authorisations for generic products are therefore linked to the 'original' authorised medicinal product, which is legally allowed once the data protection time of the dossier of the reference product has expired. As Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion are products for aqueous parenteral use, these are exempted for biostudy (NfG CPMP/EWP/QWP 1401/98). The current products can be used instead of their reference products.

No scientific advice has been given to the MAH with respect to these products.



No paediatric development programme has been submitted, as this is not required for generic medicinal products.

II SCIENTIFIC OVERVIEW AND DISCUSSION

II.1 Quality aspects

Compliance with Good Manufacturing Practice

The MEB has been assured that acceptable standards of GMP (see Directive 2003/94/EC) are in place for these product types at all sites responsible for the manufacturing of the active substance as well as for the manufacturing and assembly of this product prior to granting its national authorisation.

Active substances

The active substances are piperacillin and tazobactam, both of which are established active substance. Piperacillin is described in the European Pharmacopoeia (Ph.Eur.*). Tazobactam is not, but a draft USP* monograph has been published. Piperacillin is a white or almost white powder which is slightly soluble in water. Tazobactam is a white or almost white crystalline powder which is moderately soluble in water.

The Active Substance Master File (ASMF) procedure is used for both active substances. The main objective of the ASMF procedure, commonly known as the European Drug Master File (EDMF) procedure, is to allow valuable confidential intellectual property or 'know-how' of the manufacturer of the active substance (ASM) to be protected, while at the same time allowing the applicant or marketing authorisation holder (MAH) to take full responsibility for the medicinal product, the quality and quality control of the active substance. Competent Authorities/EMEA thus have access to the complete information that is necessary to evaluate the suitability of the use of the active substance in the medicinal product.

Manufacture

The sterile mixture in ratio 8:1 is prepared from the two active ingredients. Both substances are used without delay in the manufacturing process of the sterile mixture. The solution is sterilised by filtration and transferred and lyophilised. Both substances have been adequately characterized. In general sufficient information has been provided on the synthesis. Also, for the starting material and solvents acceptable specifications have been adopted.

Specification

The mixture specification is acceptable in view of the route of synthesis and the various ICH guidelines, additional requirements for residual solvents, bacterial endotoxins and microbiological quality. There are two specified impurities, which are not listed in the transparent list of the Ph.Eur. monograph for piperacillin sodium. Both impurities are qualified at a level of NMT 2.0%. Therefore, the two specified impurities can be considered sufficiently qualified for the purpose.

Batch analytical data demonstrating compliance with the specification have been provided for three batches. Several commitments have been made regarding the active substances. These are stated on page 6 of this report.

<u>Stability</u>

Stability data have been obtained during storage at 25°C/60% RH and 40°C/75% RH. The mixture was adequately stored. Based on the data provided, the recommended retest period of 2 year is justified. The approved storage conditions are 'Do not store above 25 °C' and the substance must be stored in the original package.

* Ph.Eur. and USP are official handbooks (pharmacopoeias) in which methods of analysis with specifications for substances are laid down by the authorities of the EU and USA, respectively.

Medicinal Product

Composition

$$\frac{\mathbf{C} \quad \mathbf{B} \quad \mathbf{G}}{M \quad E^{B}}$$

Piperacillin/Tazobactam Kabi 2 g/ 0.25 g contains as active substance 2 g of piperacillin (as sodium salt) and 0.25 g of tazobactam (as sodium salt) per vial, and is a white to off-white, sterile, lyophilised powder for solution for injection or infusion.

Piperacillin/Tazobactam Kabi 4 g/ 0.5 g contains as active substance 4 g of piperacillin (as sodium salt) and 0.5 g of tazobactam (as sodium salt) per vial, and is a white to off-white, sterile, lyophilised powder for solution for injection or infusion.

The powder for solution for injection or infusion is packed in colourless glass vials (type II) closed with a chlorobutyl rubber stopper.

No excipients are used.

Pharmaceutical development

Piperacillin and tazobactam do not present polymorphism. Tazobactam has two chiral carbons, but no diastereoisomers are present due to a stereoselective fermentation process. The mixture of the two active substances is prepared through an aseptic lyophilisation procedure starting from piperacillin acid form and tazobactam acid form. The product is an established pharmaceutical form and its development is adequately described in accordance with the relevant European guidelines.

Manufacturing process

The manufacturing process has been sufficiently described. The mixture is aseptically filled in the presterilised vials. The manufacturing process has been validated according to relevant European/ICH guidelines.

Microbiological attributes

The sterility and bacterial endotoxins level are checked according to the Ph.Eur. The limit for bacterial endotoxins is set. The container closure system is suitable to prevent microbial contamination.

Product specification

The finished product specifications are adequate to control the relevant parameters for the dosage form. The product specifications include requirements for appearance, identification, uniformity of mass, colour, water content, pH, assay, uniformity of dosage units, related substances, sterility, endotoxins and particulate contamination. Moreover, requirements for clarity (of solution), reconstitution time and osmolarity are included. Satisfactory validation data for the analytical methods have been provided. Batch analysis has been performed on three pilot scale batches. The batch analysis results show that the finished product meets the proposed specifications. The MAH committed to perform a study in 10 ml sodium chloride 0.9% and to submit data for the reconstitution/dilution before the product is marketed. Also, the commitment was made to submit the certificate of analysis of a third production batch of the 2 g/250 mg strength as soon as available.

Overages/overfill

No overage is applied because the stability studies performed assure the product complies with the specifications at the estimated shelf-life. The recovery of the drug in the worst case, which corresponds to the most concentrated usable solution, has been studied. The results show that the primary container (glass container + rubber stopper) allows almost complete recovery of the liquid (> 97 %) and therefore no overfill is applied. This is deemed acceptable.

Stability tests on the finished product

Stability data on the product is provided from two pilot scale batches of each strength, tested in compliance with applicable EU guidelines. The batches were stored at 25°C/60% RH, 30°C/65% RH and 40°C/75% RH. Based on the submitted data, a shelf life was granted of 24 months when stored below 25°C. Compatibility of the drug product with the different diluents is demonstrated. Although the reconstituted solutions are usually immediately used because of chemical instability, the stability data demonstrate an in-use shelf-life of 24 hours at 2-8°C.

$$\frac{c \ B \ G}{M \ E^{\ B}}$$

The MAH committed to examine the pilot batches will until 36 months at long-term conditions. The first three industrial batches of each dosage will be placed on stability studies at long-term (shelf-life) and accelerated (6 months) conditions after approval.

<u>Specific measures concerning the prevention of the transmission of animal spongiform encephalopathies</u>
There are no substances of ruminant animal origin present in the product nor have any been used in the manufacturing of this product, so a theoretical risk of transmitting TSE can be excluded.

II.2 Non clinical aspects

These products are generic formulations of Tazocin 2 g/250 mg and 4 g/500 mg, powder for solution for infusion, which are available on the European market. No new preclinical data have been submitted, and therefore the application has not undergone preclinical assessment. This is acceptable for this type of application.

Environmental risk assessment

The product is intended as a substitute for other identical products on the market. The approval of these products will not result in an increase in the total quantity of piperacilline or tazobactam released into the environment. These do not contain any component, which results in an additional hazard to the environment during storage, distribution, use and disposal.

II.3 Clinical aspects

Piperacillin and tazobactam are well-known active substances with established efficacy and tolerability.

Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion are parenteral formulations and therefore fulfil the exemption mentioned in the Note for Guidance on bioequivalence "5.1.6 parenteral solutions", which states that a bioequivalence study is not required if the product is administered as an aqueous intravenous solution containing the same active substance in the same concentration as the currently authorized reference medicinal product (NfG CPMP/EWP/QWP 1401/98). The quantitative composition of Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g is entirely the same as the originator. Therefore, these may be considered as therapeutic equivalent, with the same efficacy/safety profile as known for the active substance of the reference medicinal product. The current products can be used instead of their reference products.

Risk management plan

The combination of piperacillin and tazobactam has been authorised since 1992, and there is now more than 10 years post-authorisation experience with the active substance. The safety profile of piperacillin/tazobactam can be considered to be well established and no product specific pharmacovigilance issues were identified pre- or postauthorisation which are not adequately covered by the current SPC. The MAH has a pharmacovigilance system at their disposal, which is based on the current European legislation. The MAH has submitted a Risk Management Plan, addressing the implications for safe use of the proposed generic product and discussing the process to detect any potential risks arising as a result of the different product compatibilities between the MAH's product and the innovator product.

Product information

SPC

The content of the SPC approved during the decentralised procedure is in accordance with the SPC established during procedure UK/H/0908/001-002/DC, for another generic piperacillin/tazobactam product.

Readability test

A readability test was performed for the PIL as submitted for procedure UK/H/0908/001-002/DC, with which the PIL for the current procedure has been harmonised. This package leaflet was approved. Hence,

no reassessment of the readability test was performed, as the member states agreed that the current PIL is in line with the above mentioned PIL.



III OVERALL CONCLUSION AND BENEFIT-RISK ASSESSMENT

Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion have a proven chemical-pharmaceutical quality and are generic forms of Tazocin 2 g/250 mg and 4 g/500 mg, powder for solution for infusion. Tazocin is a well-known medicinal product with an established favourable efficacy and safety profile.

Since both the reference and current product are intended for parenteral use, no bioequivalence study is deemed necessary.

The MAH has provided written confirmation that systems and services are in place to ensure compliance with their pharmacovigilance obligations.

The SPC, package leaflet and labelling are in the agreed templates and are in agreement with other piperacillin/tazobactam containing products.

The Board followed the advice of the assessors.

There was no discussion in the CMD(h). Agreement between member states was reached during a written procedure. The concerned member states, on the basis of the data submitted, considered that essential similarity has been demonstrated for Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g, powder for solution for injection or infusion with the reference products, and have therefore granted a marketing authorisation. The decentralised procedure was finished on 24 July 2008. Piperacillin/Tazobactam Kabi 2 g/ 0.25 g and Piperacillin/Tazobactam Kabi 4 g/ 0.5 g were authorised in the Netherlands on 24 September 2009.

A European harmonised birth date has been allocated (2 July 1992) and subsequently the first data lock point for piperacillin/tazobactam is 30 September 2009. The first PSUR will cover the period from July 2008 to September 2009, after which the PSUR submission cycle is 3 years.

The date for the first renewal will be: 22 June 2013

The following post-approval commitments have been made during the procedure:

Quality - medicinal product

- The MAH committed to perform a study in 10 ml sodium chloride 0.9% and to submit data for the reconstitution/dilution before the product is marketed. This commitment has been fulfilled.
- The MAH committed to submit the certificate of analysis of a third production batch of the 2g/250 mg strength as soon as available. This commitment has been fulfilled.

Pharmacovigilance

- The MAH committed to submit a Risk Management Plan, addressing the implications for safe use of the proposed generic product and discussing the process to detect any potential risks arising as a result of the different product compatibilities between the MAH's product and the innovator product. This commitment has been fulfilled by submission of variation NL/H/0963/001-002/II/002. See "Steps taken after finalisation of the finished product".
- The MAH committed to adopt the EUCAST Breakpoints when available and perform a PK/PD Monte Carlo Simulation on data for children <12 yrs of age to support the indication for abdominal infections in children with an adequate posology and to update the product information accordingly by means of a proper variation procedure. To maintain the harmonization and consistency achieved so far, the updated product information from UK/H/908/001-002/DC will be considered.

List of abbreviations

ASMF Active Substance Master File

ATC Anatomical Therapeutic Chemical classification

AUC Area Under the Curve BP British Pharmacopoeia

CEP Certificate of Suitability to the monographs of the European Pharmacopoeia

CHMP Committee for Medicinal Products for Human Use

CI Confidence Interval

C_{max} Maximum plasma concentration

CMD(h) Coordination group for Mutual recognition and Decentralised procedure for

human medicinal products

CV Coefficient of Variation EDMF European Drug Master File

EDQM European Directorate for the Quality of Medicines

EU European Union
GCP Good Clinical Practice
GLP Good Laboratory Practice
GMP Good Manufacturing Practice

ICH International Conference of Harmonisation

MAH Marketing Authorisation Holder

MEB Medicines Evaluation Board in the Netherlands

OTC Over The Counter (to be supplied without prescription)

PAR Public Assessment Report Ph.Eur. European Pharmacopoeia

PIL Package Leaflet

PSUR Periodic Safety Update Report

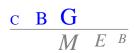
SD Standard Deviation

SPC Summary of Product Characteristics

 $t_{1/2}$ Half-life

 t_{max} Time for maximum concentration

TSE Transmissible Spongiform Encephalopathy USP Pharmacopoeia in the United States



STEPS TAKEN AFTER THE FINALISATION OF THE INITIAL PROCEDURE - SUMMARY

Scope	Procedure number	Type of modification	Date of start of the	Date of end of the	Approval/ non	Assessment report
			procedure	procedure	approval	attached
Post Approval Commitment Toxicological Qualification Impurities	NL/H/0963/001 -002/II/001	II	13-10-2008	24-4-2009	Approval	N
Submission of a Risk Management Plan	NL/H/0963/001 -002/II/002	II	6-11-2008	18-6-2009	Approval	N
Addition of an additional SOM.	NL/H/0963/001 -002/II/003	II	19-12-2008	26-6-2009	Approval	N
Change to batch release arrangements and quality control testing of the finished product; replacement or addition of a manufacturer responsible for batch release; including batch control/testing	NL/H/0963/001 -002/IA/004	IA	15-1-2009	29-1-2009	Approval	N
Change in test procedure of the finished product; other changes to a test procedure, including replacement or addition of a test procedure	NL/H/0963/001 -002/IB/005	IB	13-1-2009	12-2-2009	Approval	N
Change (replacement, addition or deletion) in supplier of packaging components or devices (when mentioned in the dossier); replacement or addition of a supplier	NL/H/0963/001 -002/IB/006	IΒ	13-1-2009	12-2-2009	Approval	N
Update of FPS at release and end of shelf-life.	NL/H/0963/001 -002/II/007	II	19-12-2008	26-6-2009	Approval	N
Quality change to substance tazobactam.	NL/H/0963/001 -002/II/008	II	19-12-2008	26-6-2009	Approval	N