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)

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.
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 betalactamases, 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 betalactamase producing bacteria normally resistant to it and other betalactam antibiotics. Thus, piperacillin/tazobactam combines the properties of a broad spectrum antibiotic and a betalactamase 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 (NIG 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 substances. 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.

Stability
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
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 pre-sterilised 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.
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.

Specific measures concerning the prevention of the transmission of animal spongiform encephalopathies

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, 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
Cmax   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
t½     Half-life
tmax   Time for maximum concentration
TSE    Transmissible Spongiform Encephalopathy
USP    Pharmacopoeia in the United States
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