Contains Nonbinding Recommendations

Draft – Not for Implementation

Draft Guidance on Liraglutide

November 2024

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

In general, FDA's guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

Active Ingredient: Liraglutide

Dosage Form: Solution

Route: Subcutaneous

Strength: 18 mg/3 mL (6 mg/mL)

Recommended Study: Request for waiver of in vivo bioequivalence study requirements

To qualify for a waiver of the in vivo bioequivalence study requirement on the basis that bioequivalence is self-evident under 21 CFR 320.22(b), a generic liraglutide subcutaneous solution for injection product must be qualitatively (Q1)[1] and quantitatively (Q2)[2] the same as the reference listed drug (RLD).

An applicant may seek approval of a drug product that differs from the RLD in preservative, buffer, or antioxidant provided that the applicant identifies and characterizes the differences and provides information demonstrating that the differences do not affect the safety or efficacy of the proposed drug product.[3]

Refer to FDA's guidance for industry, *ANDAs for Certain Highly Purified Synthetic Peptide Drug Products That Refer to Listed Drugs of rDNA Origin*,[a] for additional recommendations on when an application for generic liraglutide injection solution product should be submitted as an abbreviated new drug application (ANDA).

---

[1] Q1 (Qualitative sameness) means that the test product uses the same inactive ingredient(s) as the RLD product.
[2] Q2 (Quantitative sameness) means that concentrations of the inactive ingredient(s) used in the test product are within ± 5% of those used in the RLD product.
[3] Refer to 21 CFR 314.94(a)(9)(iii).

Additional information:

Device:
The RLD is presented in a prefilled pen injector. The pen injector is the device constituent part.

FDA recommends that prospective applicants examine the size and shape, the external critical design attributes, and the external operating principles of the RLD device when designing the test device including:

- Single-patient-use, disposable pen injector with variable-dose format
- Dose selector and dose button
- Needle compatibility

User interface assessment:
An ANDA for this product should include complete comparative analyses so FDA can determine whether any differences in design for the user interface of the proposed generic product, as compared to the RLD, are acceptable and whether the product can be expected to have the same clinical effect and safety profile as the RLD when administered to patients under the conditions specified in the labeling. For additional information, refer to the most recent version of the FDA guidance for industry on *Comparative Analyses and Related Comparative Use Human Factors Studies for a Drug-Device Combination Product Submitted in an ANDA*.[a]

Document History: Recommended March 2020; Revised November 2024

Unique Agency Identifier: PSG_022341

[a] For the most recent version of a guidance, check the FDA guidance website at https://www.fda.gov/regulatory-information/search-fda-guidance-documents.