*Contains Nonbinding Recommendations*

*Draft – Not for Implementation*

**Draft Guidance on Sodium Phenylbutyrate**

**February 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This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic.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.

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**Active Ingredient:** Sodium phenylbutyrate

**Dosage Form:** Pellets

**Route:** Oral

**Strength:** 84 gm/bot

**Recommended Studies:** Two in vivo bioequivalence studies with pharmacokinetic endpoints

1. Type of study: Fasting
   Design: Single-dose, two-treatment, two-period crossover in vivo
   Strength: 84 gm/bot (at a dose of 5 gm)
   Subjects: Healthy males and non-pregnant, non-lactating females
   Additional comments: None

2. Type of study: Fed
   Design: Single-dose, two-treatment, two-period crossover in vivo
   Strength: 84 gm/bot (at a dose of 5 gm)
   Subjects: Healthy males and non-pregnant, non-lactating females
   Additional comments: None

**Analyte to measure:** Phenylbutyrate in plasma

**Bioequivalence based on (90% CI):** Phenylbutyrate

**Waiver request of in vivo testing:** Not applicable

**Dissolution test method and sampling times:** The dissolution information for this drug product can be found in the FDA's Dissolution Methods database, http://www.accessdata.fda.gov/scripts/cder/dissolution/. Conduct comparative dissolution testing on 12 dosage units each of the test and reference products. Specifications will be determined upon review of the abbreviated new drug application (ANDA).

**Additional information:**

Device:
The reference listed drug (RLD) is presented in a bottle co-packaged with a calibrated measuring spoon. The measuring spoon is the device constituent part.

FDA recommends that prospective applicants examine the size, shape, and dose markings of the RLD device when designing the test device including dose markings calibrated in grams.

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]

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**Document History**: Recommended February 2024

**Unique Agency Identifier:** PSG_216513

[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.