



Food and Drug Administration
Rockville MD 20857

I-009332-D-0104-OT

MAY 01 2008

United States Department of the Interior
Fish and Wildlife Service
Aquatic Animal Drug Approval Partnership Program
Attention: David Erdahl, Ph.D.
Branch Chief, AADAP
4050 Bridger Canyon Road
Bozeman, MT 59715

Re: Request for an amended authorization for oxytetracycline dihydrate Type A medicated article

Dear Dr. Erdahl:

We grant your request dated January 10, 2008, as amended on February 25, 2008, for an amended authorization for TERRAMYCIN 200 for Fish (oxytetracycline dihydrate) Type A medicated article. TERRAMYCIN 200 for Fish is proposed for the control of mortality due to various bacterial diseases in a variety of freshwater and marine fish and for the marking of skeletal tissue in a variety of freshwater and marine fish. You requested a categorical exclusion from the requirement to prepare an environmental assessment (EA) and declared that to your knowledge no extraordinary circumstances exist that may significantly affect the human environment. In addition, you provided investigational labeling language.

AUTHORIZATION FOR THE USE OF EDIBLE PRODUCTS

In CVM correspondence dated June 26, 2007 (I-009332-D-0093), we authorized you to slaughter 100 million fish to (1) market for human food use the edible tissues derived from experimental animals or (2) release into public waters for possible human consumption experimental animals. In your submission dated January 10, 2008 (D-0104) and amendment dated February 25, 2008 (T-0105), you requested changes to your authorization to add additional species and remove some temperature restrictions. The use of oxytetracycline administered as a medicated feed as described in your submissions D-0104 and T-0105 is consistent with the public health. You are authorized as follows:

DRUG	TERRAMYCIN 200 for Fish
Dosage Form	Type A medicated article
Route of Administration	Oral
SPECIES	Fish as described in Appendix VIa in your January 10, 2008, submission
Class	All life stages
Number of Animals	Up to 100 million*

<p>MAXIMUM DOSE (or Range) Frequency and Duration</p>	<p>Objective A – Salmonids fed medicated feed containing 2.5 to 3.75 g oxytetracycline per 100 lb of fish per day for 10 days.</p> <p>Objective B – Freshwater and marine fish fed medicated feed containing 10 g oxytetracycline per 100 lb of fish per day for 14 days in water temperatures not below 4 °C.</p> <p>Objective C – Non-salmonid freshwater and marine fish species fed medicated feed containing 2.5 to 3.75 g oxytetracycline per 100 lb of fish per day for 10 days.</p> <p>Objective D – Abalone fed up to 6 g oxytetracycline per 100 lb body weight per day for 14 days.</p> <p>Objective E – Salmonid and non-salmonid fish fed at either the approved drug level (2.5 to 3.75 g OTC) or at 10.0 g oxytetracycline per 100 lb of fish per day for 14 days.</p>
<p>MINIMUM WITHDRAWAL PERIOD</p>	<p>Objective A – 21 days. No withdrawal period is required for fish that will not be catchable for 21 or more days after release, or are illegal for harvest.</p> <p>Objective B – 70 days. No withdrawal period is required for fish that will not be catchable for 70 or more days after release, or are illegal for harvest.</p> <p>Objective C – 40 days. No withdrawal period is required for fish that will not be catchable for 40 or more days after release, or are illegal for harvest.</p> <p>Objective D – 35 days. No withdrawal time is required for abalone that will not be harvestable for 35 or more days after release, or are illegal for harvest.</p>

	<p>Objective E –</p> <p>21 days for salmonids fed at the approved level. No withdrawal period is required for salmonids fed at the approved dose that will not be catchable for 21 or more days after release or are illegal for harvest.</p> <p>40 days for non-salmonids fed at the approved level. No withdrawal period is required for non-salmonids fed at the approved dose that will not be catchable for 40 or more days after release or are illegal for harvest.</p> <p>70 days for fish fed at the high dose (10 g OTC). No withdrawal period is required for fish that will not be catchable for 70 or more days after release or are illegal for harvest.</p>
COMMENTS	The investigational withdrawal periods may be incorporated into grow-out periods for the treated fish.
RENDERING	Fish may be rendered at any time.
*Reference to other authorizations	Counting of fish towards the 100 million authorized starts on June 26, 2007.

Clinical investigations for this INAD cover only the treatment regimens stated above. The combining of this treatment with any other drug will require a separate authorization. Drugs given to control animals must be administered in full compliance with the currently approved use. Your investigators should be made aware of their responsibilities under sections 511.1(b)(7)(ii) and 511.1(c)(1) of the new animal drug regulations.

Clinical tests conducted under the provisions of this letter do not exempt investigational animals and their products from compliance with any other applicable inspection requirements.

In order for us to complete our files, the disposition of all investigational animals and unused drug must be reported to this office, as well as adverse reactions observed. Please refer to this letter by date and INAD number when reporting the details of clinical investigations or the disposition of investigational animals.

ENVIRONMENTAL CONSIDERATIONS

The investigational use of TERRAMYCIN 200 for Fish (oxytetracycline dihydrate) in fish continues to fall within the categorical exclusion in 21 CFR 25.33(e). Therefore, neither an environmental assessment (EA) nor an environmental impact statement is required. A categorical exclusion from preparation of an EA and an environmental impact statement does not relieve you of the responsibility for determining and meeting all Federal, State, and local environmental and occupational laws and regulations that apply to the manufacturing, use, and disposal of the investigational drug.

You are responsible for complying with the Federal Clean Water Act as implemented under the National Pollutant Discharge Elimination System (NPDES), as well as any applicable ground-water pollution requirements, for all investigational sites covered under this INAD. For each of these sites, site investigators may be required to report INAD use of oxytetracycline-medicated feed to the appropriate EPA or State NPDES permitting authority if their facility's effluent is discharged to surface water [see 40 CFR Parts 451.1, 451.2, and 451.3(a)].

Please notify CVM if the scope of your investigation changes (e.g., if additional facilities will treat fish, and/or if the protocol changes in ways which could result in increased drug use and/or environmental exposure).

INVESTIGATIONAL LABELING

We remind you that the investigational new animal drug must be manufactured, processed, packaged, and labeled in such a way as to maintain appropriate standards of identity, strength, quality, and purity as needed for safety and to give significance to investigations made with the drug.

You provided intended investigational labeling language to be included in the file. This labeling is consistent with the requirements set forth in 21 CFR 511.1(a) and (b). The investigational labeling should be affixed to your investigational drug product prior to shipment and this investigational label should be affixed to each individual drug container.

NOTICE OF CLAIMED INVESTIGATIONAL EXEMPTION

The new animal drug regulations, Section 511.1(b)(3) and (4) require the sponsor to submit specific information prior to each shipment or other delivery of the drug for clinical investigation in animals. The agency has devised a form which you as the sponsor may use to report shipments for clinical trials (see enclosure). Three copies of the completed Notice of Claimed Investigational Exemption (NCIE) form should be submitted for each trial. Alternatively, you may file the notice of the drug shipment electronically to CVM. Please refer to the Center's electronic submission information on the CVM website at <http://www.fda.gov/cvm/esubstoc.html>.

You must maintain records of dates, amount of drug received in each shipment, and batch or code mark of each shipment for a period of two years after such shipment and delivery. These records should be made available for inspection and copying upon our request.

COUNTING NUMBERS OF FISH

You should note that this authorization is for a specific number of fish. You should begin counting the number of fish used from the date of the previous authorization (D-0093), June 26, 2007. In the future, it would be helpful if you would supply the total number of animals used along with your annual reports.

Having a specific number of animals, rather than annual numbers, facilitates our tracking of fish numbers under the INAD. We remind you that a fish treated more than once still only counts as a single animal toward the authorization.

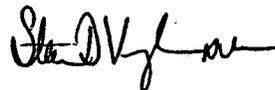
Additional numbers of animals may be requested in the future. A request for additional animals should be made with sufficient lead time to allow us to process an amended authorization.

ANNUAL REPORTING

Please submit annual reports in accordance with the FDA/CVM Aquaculture Workload Plan. Your annual report should comprise: a) a brief summary of the past year's activities (including results of investigations) and accomplishments in each of the technical sections for the NADA; b) certification of accountability of all drugs shipped under the INAD, records maintenance for FDA inspection, compliance with the provisions of 21 CFR 511, including notification of adverse effects relative to humans, target animals, or the environment resulting from the use of the investigational drug; c) a list of all investigators, facilities, and species treated; d) the number of fish treated and the disposition of the fish (released, harvested, other); and e) a copy of the current study protocol(s) noting any modification or revision.

If you submit correspondence relating to this letter, your correspondence should reference the date and the principal submission identifier found at the top of this letter. If you have any questions or comments, please contact Dr. Cindy L. Burnsteel, Acting Director, Division of Therapeutic Drugs for Food Animals, at 240-276-8341.

Sincerely,



Steven D. Vaughn, DVM
Director

Office of New Animal Drug Evaluation
Center for Veterinary Medicine

Enclosure:
Form FDA 3458