ADVICE SUMMARY

APPLICATION FOR REGISTRATION OF A CHEMICAL PRODUCT

Product name: EPI-OTIC EAR AND SKIN CLEANSER FOR DOGS AND CATS
Applicant: VIRBAC (AUSTRALIA) PTY LTD
Product number: 35563
Application number: 40934

Purpose of Application and Description of Use: Variation to label approval to extend claim to include "aids in the treatment of otitis externa in dogs and cats".

Active Constituent(s): LACTIC ACID
SALICYLIC ACID

Regulatory Decision:
To grant the application subject to the following conditions:

Standard Conditions of Registration/Approval

ADVICE

External Efficacy Reviewer

The external reviewer supported the *treatment* but not the *prevention* of otitis externa elements of the proposed new claim.

The reviewer reported: “This submission included three published journal articles. These consisted of field trials of various kinds – a controlled study; a case-series (uncontrolled study); and an equivalence trial. There was one congress proceedings article (an uncontrolled field trial) and one Virbac company document detailing an *in-vitro* study comparing Epi-Otic with a competitor product and a phosphate buffered saline (PBS) control. Study design, experimental conditions, data analysis and validation were adequate. All *in-vivo* studies were performed using dogs. There were no feline studies submitted in the application.

The controlled study (one ear, selected at random, was treated in each dog and compared to the untreated ear) reported that erythema and exudation were still evident in all dogs after seven days of twice-daily treatment. The case-series showed significantly decreased clinical otic parameters when baseline scores were compared to those after 7 and 14 days. However, despite a significant decrease in exudation by 7 days, 80% of the ears still had mild to moderate exudate present after 14 days of treatment and there were no significant differences in median scores of clinical otic parameters when scores were compared from Day 7 and Day 14. The equivalence trial demonstrated statistically significant resolution of the clinical signs of otitis externa after 7- and 14 days of twice daily treatment for both products, but a single score was used in this study to encompass five otic parameters, of which only one was exudate quantity. A number of *in-vitro* studies reported efficacy of the product against *Malassezia pachydermatis* and bacterial species commonly found in dogs with otitis externa (Data numbers 10030, 10033 and 10034). It should be noted that different *in-vitro* parameters were used to assess efficacy in each study, limiting their comparability. *In-vitro* results should be considered in light of the fact that while yeast and/or bacterial overgrowth are important factors in exacerbating otitis externa, there is some debate about the number of organisms per microscopic field that would constitute infection. Also, recurrent canine otitis externa is known to be a complex disease process, often primarily due to allergy. The product appeared well tolerated at the proposed label dose by all clinically affected dogs used in the trials and no adverse effects were reported.”

The external reviewer considered the data presented in the application were not adequate to support the request for the *prevention of otitis externa* aspect of proposed label change. “In summary, the reasons for the recommendation were as follows - The data presented are inadequate since the efficacy studies included did not examine the use of the product for the *prevention* of otitis externa (they only examined the efficacy of the product for the treatment of a current infection) and they did not include any feline studies. Canine otitis externa often has an underlying allergic aetiology. The product should be used only after a thorough veterinary assessment of not only the ears, but also the general health of the dog. In the Reviewer’s opinion, the following wording would be suitable –

- Aids in the treatment of otitis externa in dogs. An ear cleanser designed to remove necrotic tissue and debris and help provide an optimal environment for tissue regeneration. A veterinary examination to assess the ears and general health of the dog is recommended before use.

Under DIRECTIONS FOR USE, the original wording (but not the proposed wording) is suitable i.e.

- Ear cleaning – Aim tip of bottle into ear canal and squeeze to apply solution; gently massage ear. Apply 2 to 3 times a day or as directed by a Veterinarian.”

The APVMA accepted the advice of the reviewer regarding the first two sentences of the suggested wording of the claim. The last sentence “*A veterinary examination to assess the ears and general health of the dog is recommended before use*” was not considered a claim and was more appropriately placed under the
DIRECTIONS FOR USE. The applicant agreed to remove the prevention of otitis externa aspect of the extended claim and provided scientific argument that the product had an existing approved use pattern in cats for which the amended claim of “aids the treatment of otitis externa” could be supported. The applicant agreed to amend the DIRECTIONS FOR USE. As a result of these changes, the APVMA was satisfied that the product would be safe and effective when used according to the label.

Data relied on to provide the advice

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<tr>
<td>10030</td>
<td>S</td>
<td>Lloyd DH, Bond R, Lamport I</td>
<td>Antimicrobial activity in vitro and in vivo of a canine cleanser</td>
<td>1998</td>
<td>Efficacy and Safety</td>
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<td>10032</td>
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<td>Reme CA, Pin D, Collinot C, Cadiergues MC, Joyce JA, Fontaine J</td>
<td>The efficacy of an antiseptic and microbial anti-adhesive ear cleanser in dogs with otitis externa</td>
<td>2006</td>
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<td>Jasmin P, Last R, Schroeder H, Briggs M, Sanquer A</td>
<td>Microbial and clinical assessment of an Antiseptic ear cleanser efficacy in Dogs affected with erythemato-cerminous otitis externa</td>
<td>2003</td>
<td>Efficacy and Safety</td>
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<td>10034</td>
<td>S</td>
<td>Lloyd DH, Lamport Al, Gatto H, Reme C</td>
<td>Potency of two ear cleansers in vitro against Staphylococcus intermedius, Pseudomonas aeruginosa and Malasezzia pachydermatis</td>
<td>10/3/2002</td>
<td>Efficacy and Safety</td>
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*S = Data submitted with the application  
$I = Data inherited (that is, referenced) from another application