

DRUG MARKET WITHDRAWAL

IMIQUIMOD CREAM USP 5%

(0.25 g Sachet pack)

(NDC 68462-536-70)

December 30, 2024

Dear Pharmacy, Wholesale and Retail Customer:

This is to inform you that Glenmark is initiating a Market Withdrawal to the Retail level involving the following prescription product batches:

Sr. No.	NDC	Strength	Batch Number	Pack Size	Expiry
1	68462-536-70	5%	19230117	0.25 g Sachet pack	December - 2024
2	68462-536-70	5%	19230225	0.25 g Sachet pack	December - 2024
3	68462-536-70	5%	19230447	0.25 g Sachet pack	January - 2025
4	68462-536-70	5%	19230562	0.25 g Sachet pack	January - 2025
5	68462-536-70	5%	19230688	0.25 g Sachet pack	January - 2025
6	68462-536-70	5%	19230766	0.25 g Sachet pack	January - 2025
7	68462-536-70	5%	19231268	0.25 g Sachet pack	February - 2025
8	68462-536-70	5%	19231312	0.25 g Sachet pack	March - 2025
9	68462-536-70	5%	19231503	0.25 g Sachet pack	March - 2025
10	68462-536-70	5%	19231588	0.25 g Sachet pack	March - 2025
11	68462-536-70	5%	19232359	0.25 g Sachet pack	May - 2025
12	68462-536-70	5%	19232558	0.25 g Sachet pack	May - 2025
13	68462-536-70	5%	19233809	0.25 g Sachet pack	August - 2025
14	68462-536-70	5%	19233971	0.25 g Sachet pack	September - 2025
15	68462-536-70	5%	19234256	0.25 g Sachet pack	September - 2025
16	68462-536-70	5%	19234436	0.25 g Sachet pack	October - 2025
17	68462-536-70	5%	19234677	0.25 g Sachet pack	October - 2025
18	68462-536-70	5%	19234851	0.25 g Sachet pack	November - 2025
19	68462-536-70	5%	19235006	0.25 g Sachet pack	November - 2025
20	68462-536-70	5%	19240226	0.25 g Sachet pack	December - 2025

The Market withdrawal to the *retail level* of the above identified product batches of Imiquimod Cream USP 5% has been initiated by Glenmark out of an abundance of precaution because an

increasing trend of assay result is observed in product Imiquimod Cream USP 5%, Batch # 19230562 during long-term stability study. This batch was charged on stability study as an annual stability monitoring batch for the year 2023. The assay result observed at 18 Months long-term (25°C/60% RH) stability interval is 107% against the specification of NLT 90% and NMT 110% of the labeled amount of Imiquimod. The shelf life of the product is 24 months with the expiry of this Batch # 19230562 as January 2025.

Glenmark changed the laminate (primary packing material) from laminate “PET/ALU/PET/LDPE 4-layer laminate” to alternate new laminate “PAPER/PE/ALU/SURLYN 4-layer laminate”. Upon receipt of PAS approval on November 03, 2021, the change was implemented in February 2022 effective from Batch # 19220797.

The Batch # 19230562 (Manufacturing date: February 2023) was packed with the new laminate PAPER/PE/ALU/SURLYN 4-layer. As of today, in addition to aforementioned batch # 19230562, two batches were charged on stability with the new laminate. Both these batches have completed the stability study till the shelf life of 24 months. Assay results of both the batches at 24 months (shelf life) time point comply with the specification however reported at the higher side of the specification limit.

Since all three batches on stability study with new laminate have shown an increasing trend in Assay results and are nearer to the maximum specification limit of 110% towards the end of shelf life, as an abundance of caution, Glenmark proposes market withdrawal of all the batches of Imiquimod Cream USP 5% that are within-shelf life and packed with new laminate PAPER/PE/ALU/SURLYN 4-layer laminate.

Please see details of product batches listed in above table and refer enclosed product labels for ease in identifying the product.

Please examine your inventory and if you have any inventory available for the batches specified in the above table, you should quarantine such product immediately and not dispense any further product from these lots. Glenmark Pharmaceuticals Inc., USA initiated shipment of this product on 28 February, 2023.

In addition, if you are a wholesaler/ distributor, who has further distributed this product, please identify those retail customers and notify them at once of this Market Withdrawal. Your notification to your retail customers may be enhanced by including a copy of this market withdrawal notification letter. Again, this market withdrawal should be carried out to the retail level only. Because this is not a consumer level market withdrawal, notice to the consumer level is not required.

We are requesting the batches specified in the above table to be returned to Inmar Rx Solutions (address below) using the Postage Paid Product Return label that was provided in your Market Withdrawal Return Packet.

Inmar Rx Solutions
3845 Grand Lakes Way
Grand Prairie, TX 75050

Please complete and return the enclosed response form preferably within 72 hours of receipt of this notification. Please either fax your response to 817-868-5362 or email to Rxrecalls@Inmar.com.

If you have any questions regarding your market withdrawal return please contact Inmar at 877-560-5377

Inmar office hours are Monday through Friday, from 9 am to 5 pm EST.

This market withdrawal is being made with the knowledge of the Food and Drug Administration.

Thank you for your cooperation,

Sincerely,

GLENMARK PHARMACEUTICALS INC., USA

Thomas Callaghan

Executive Director - Regulatory Affairs, North America

US Agent for Glenmark Pharmaceuticals Limited







Enclosure(s):

Product Labels

Market Withdrawal Return Response Form

FOIL WIDTH : 192 MM
1 X 0.25GM STRIP SIZE : 32MM X 54MM
3 X 0.25GM STRIP SIZE : 96MM X 54 MM

Sachet size: 32 mm x 54 mm
 foil width : 192 mm

<p>Imiquimod Cream USP, 5% Not for Ophthalmic Use. For Dermatologic Use Only.</p> <p>Contains 1 Application</p> <p>Discard unused packet</p> <p>Net Wt. 0.25 g</p> 	<p>Imiquimod Cream USP, 5% Not for Ophthalmic Use. For Dermatologic Use Only.</p> <p>Contains 1 Application</p> <p>Discard unused packet</p> <p>Net Wt. 0.25 g</p> 	<p>Imiquimod Cream USP, 5% Not for Ophthalmic Use. For Dermatologic Use Only.</p> <p>Contains 1 Application</p> <p>Discard unused packet</p> <p>Net Wt. 0.25 g</p> 	<p>See Package Insert for Dosage Information</p> <p>Store at 4°C to 25°C (39°F to 77°F).</p> <p>Avoid freezing.</p> <p>Manufactured for: Glenmark Pharmaceuticals Inc., USA Mahwah, NJ 07430</p> <p>Product of India GO/DRUGS/648 03/21</p>  <p>Questions? 1 (888) 721-7115 www.glenmarkpharma-us.com</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">PE586510321-1</p>	<p>See Package Insert for Dosage Information</p> <p>Store at 4°C to 25°C (39°F to 77°F).</p> <p>Avoid freezing.</p> <p>Manufactured for: Glenmark Pharmaceuticals Inc., USA Mahwah, NJ 07430</p> <p>Product of India GO/DRUGS/648 03/21</p>  <p>Questions? 1 (888) 721-7115 www.glenmarkpharma-us.com</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">PE586510321-1</p>	<p>See Package Insert for Dosage Information</p> <p>Store at 4°C to 25°C (39°F to 77°F).</p> <p>Avoid freezing.</p> <p>Manufactured for: Glenmark Pharmaceuticals Inc., USA Mahwah, NJ 07430</p> <p>Product of India GO/DRUGS/648 03/21</p>  <p>Questions? 1 (888) 721-7115 www.glenmarkpharma-us.com</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">PE586510321-1</p>
<p>1 X 0.25GM STRIP SIZE: 32MM X 54MM</p>			<p>3 X 0.25GM STRIP SIZE : 96MM X 54 MM</p>		

FONT TYPE: SWITZERLAND CONDENSED
MINIMUM FONT SIZE: 5.2 PT

DATE: 26-03-2021
VERSION: 01

<p>GLENMARK PHARMACEUTICALS LTD.</p> <p>PRODUCT NAME: IMIQUIMOD CREAM</p> <p>ITEM CODE: PE58651 VERSION: 0321-1</p> <p>PHARMACODE: NA</p> <p>COUNTRY: USA</p> <p>LOCATION: GOA</p> <p>PACK : SACHET</p> <p>ACTUAL SIZE: FOIL WIDTH: 192 mm</p> <p>SPECIFICATION:</p>	DATE:	PANTONE SHADE NO: Black 186 C 2945 C NON PRINTING COLOUR	<p>Dimple Pradhan Digitally signed by Dimple Pradhan Date: 2021.04.23 11:32:28 +05'30'</p> <p>Siddesh Dongrekar Digitally signed by Siddesh Dongrekar 91200296 Manager, Production Date: 2021.04.29 14:46:27 +05'30'</p> <p>Vikram Desai Digitally signed by Vikram Desai (90033648) Sr. Officer QA (90033648) Sr. Officer QA Date: 2021.04.29 14:46:27 +05'30'</p>
	PKG. DEV.:	Item code, Version, Consistency of Design, overprint area, Pack size, Dimensions & Layout	
	RA	Regulatory Text	
	PRODUCTION:	Machine Suitability	
	QA:	Entire Text	
	REMARKS:		
	FCPDC001/01.00		

May Breedlove

Digitally signed by May Breedlove
Date: 2021.04.08 10:58:59 -04'00'

Carole Capella

Digitally signed by Carole Capella
Date: 2021.04.08 11:21:08 -04'00'

Kristin DiStefano

Digitally signed by Kristin DiStefano
Date: 2021.04.08 11:44:15 -04'00'

Carole
Capella

Digitally signed by
Carole Capella
Date: 2021.04.08
11:21:39 -04'00'

SAME SIZE ARTWORK
SIZE: 105 x 18 x 60 mm
(Reverse Tuck-in Flap)

Kristin
DiStefano

Digitally signed by Kristin
DiStefano
Date: 2021.04.08 11:45:06
-04'00'

UNVARNISHED AREA
18 mm x 60 mm FOR
LOT & EXP.

Composition:
Each 0.25 g single-use packet contains
12.5 mg of imiquimod, USP.
Inactive ingredients: isostearic acid, cetyl alcohol,
stearyl alcohol, white petrolatum, polysorbate 60,
sorbitan monostearate, glycerin, xanthan gum,
purified water, benzyl alcohol, methylparaben
and propylparaben.

Usual Dosage: For dosage recommendations,
directions for use and other important prescribing
information, read accompanying insert.

Store at 4°C to 25°C (39°F to 77°F).

Avoid freezing.

Keep out of reach of children.

This package is not child resistant.

Manufactured for:
Glenmark Pharmaceuticals Inc., USA
Mahwah, NJ 07430

Product of India

GO/DRUGS/648

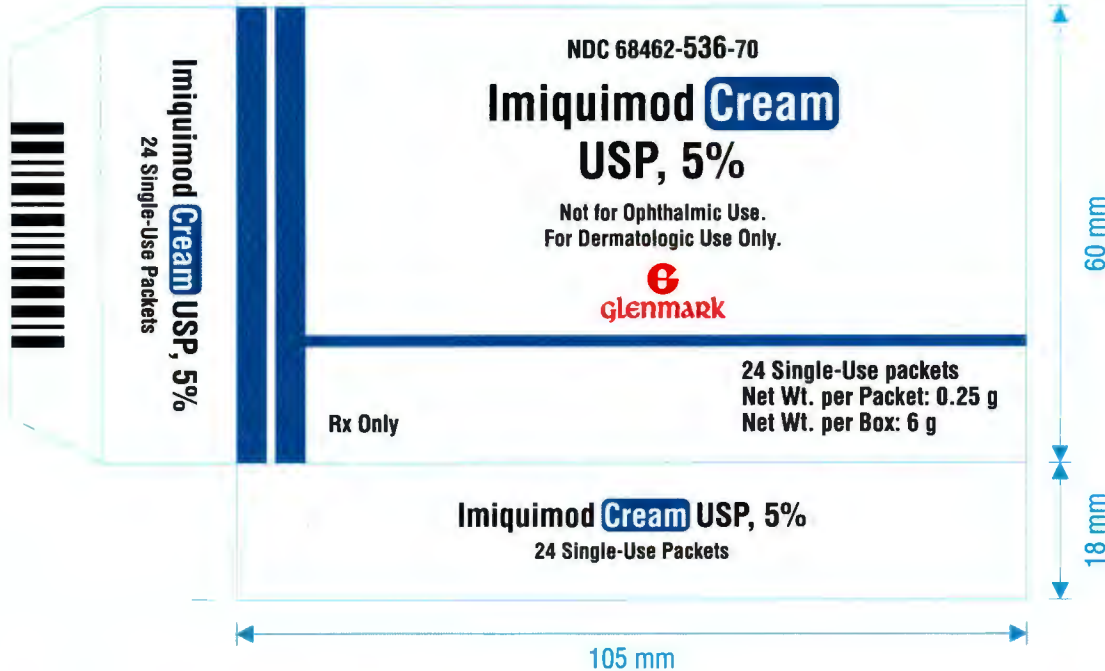
03/21



Questions? 1 (888) 721-7115
www.glenmarkpharma-us.com

PE586520321-1

Imiquimod Cream USP, 5%
24 Single-Use Packets



NDC 68462-536-70

Imiquimod Cream
USP, 5%

Not for Ophthalmic Use.
For Dermatologic Use Only.



24 Single-Use packets
Net Wt. per Packet: 0.25 g
Net Wt. per Box: 6 g

Rx Only

Imiquimod Cream USP, 5%
24 Single-Use Packets

FONT TYPE: SWITZERLAND CONDENSED
MINIMUM FONT SIZE: 6 PT

DATE: 26-03-2021
VERSION: 01

GLENMARK PHARMACEUTICALS LTD.		DATE:	PANTONE SHADE NO:
PRODUCT NAME: IMIQUIMOD CREAM			Black 186 C 2945 C NON PRINTING COLOUR
ITEM CODE: PE58652 VERSION: 0321-1	PKG. DEV.:	Item code, Version, Consistency of Design, overprint area, Pack size, Dimensions & Layout	Dimple Pradhan Digitally signed by Dimple Pradhan Date: 2021.04.23 11:30:21 +05'30'
PHARMACODE: 58652	RA	Regulatory Text	
COUNTRY: USA	PRODUCTION:	Machine Suitability	Siddesh Dongrekar 91200296 Manager Production Digitally signed by Siddesh Dongrekar Date: 2021.04.23 14:00:43 +05'30'
LOCATION: GOA	QA:	Entire Text	Vikram Desai (90033648) Sr. Officer QA Digitally signed by Vikram Desai Date: 2021.04.23 14:45:37 +05'30'
PACK : CARTON	REMARKS:		
ACTUAL SIZE: 105 mm x 18 mm x 60 mm			
SPECIFICATION: 300 GSM ITC Cyber XL with Aqua varnish except for the area marked			

INDICATIONS

CONTRAINDICATIONS

WARNINGS

PRECAUTIONS

ADVERSE REACTIONS

HOW SUPPLIED

STORAGE AND HANDLING

CLINICAL TRIALS

ADVERSE REACTIONS

ADVERSE REACTIONS

ADVERSE REACTIONS

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ADVERSE REACTIONS

11 DESCRIPTION

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14 CLINICAL STUDIES

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16 PATIENT COUNSELING INFORMATION

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17.2 Local Skin Reactions: All Indications
17.3 Systemic Reactions: All Indications
17.4 Patients Being Treated for Actinic Keratosis (AK)
17.6 Patients Being Treated for External Genital Warts

*Sections or subsections omitted from the Full Prescribing Information are not listed.

intra-anal human papilloma viral disease.

6 ADVERSE REACTIONS

Because clinical trials are conducted under widely varying conditions, adverse reaction rates observed in the clinical trials of a drug cannot be directly compared to rates in the clinical trials of another drug and may not reflect the rates observed in practice.

6.1 Clinical Trials Experience: Actinic Keratosis

The data described below reflect exposure to Imiquimod Cream or vehicle in 436 subjects enrolled in two double-blind, vehicle-controlled studies. Subjects applied Imiquimod Cream or vehicle to a 25 cm² contiguous treatment area on the face or scalp 2 times per week for 16 weeks.

Table 1: Selected Adverse Reactions Occurring in >1% of Imiquimod -Treated Subjects and at a Greater Frequency than with Vehicle in the Combined Studies (Actinic Keratosis)

Preferred Term	Imiquimod Cream (n=215)	Vehicle (n=221)
Application Site Reaction	71 (33%)	32 (14%)
Upper Resp Tract Infection	33 (15%)	27 (12%)
Sinusitis	16 (7%)	14 (6%)
Headache	11 (5%)	7 (3%)
Carcinoma Squamous	8 (4%)	5 (2%)
Diarrhea	6 (3%)	2 (1%)
Eczema	4 (2%)	3 (1%)
Back Pain	3 (1%)	2 (1%)
Fatigue	3 (1%)	2 (1%)
Fibrillation Atrial	3 (1%)	2 (1%)
Infection Viral	3 (1%)	2 (1%)
Dizziness	3 (1%)	1 (<1%)
Vomiting	3 (1%)	1 (<1%)
Urinary Tract Infection	3 (1%)	1 (<1%)
Fever	3 (1%)	0 (0%)
Rigors	3 (1%)	0 (0%)
Alopecia	3 (1%)	0 (0%)

Table 2: Application Site Reactions Reported by > 1% of Imiquimod -Treated Subjects and at a Greater Frequency than with Vehicle in the Combined Studies (Actinic Keratosis)

Included Term	Imiquimod Cream n=215	Vehicle n=221
Itching	44 (20%)	17 (8%)
Burning	13 (6%)	4 (2%)
Bleeding	7 (3%)	1 (<1%)
Stinging	6 (3%)	2 (1%)
Pain	6 (3%)	2 (1%)
Induration	5 (2%)	3 (1%)
Tenderness	4 (2%)	3 (1%)
Irritation	4 (2%)	0 (0%)

Local skin reactions were collected independently of the adverse reaction "application site reaction" in an effort to provide a better picture of the specific types of local reactions that might be seen.

The most frequently reported local skin reactions were erythema, flaking/scaling/dryness, and scabbing/crusting.

The prevalence and severity of local skin reactions that occurred during controlled studies are shown in the following table.

Table 3: Local Skin Reactions in the Treatment Area as Assessed by the Investigator (Actinic Keratosis)

	Imiquimod Cream (n=215)		Vehicle (n=220)	
	All Grades*	Severe	All Grades*	Severe
Erythema	209 (97%)	38 (18%)	206 (93%)	5 (2%)
Flaking/Scaling/Dryness	199 (93%)	16 (7%)	199 (91%)	7 (3%)
Scabbing/Crusting	169 (79%)	18 (8%)	92 (42%)	4 (2%)
Edema	106 (49%)	0 (0%)	22 (10%)	0 (0%)
Erosion/Ulceration	103 (48%)	5 (2%)	20 (9%)	0 (0%)
Weeping/Exudate	45 (22%)	0 (0%)	3 (1%)	0 (0%)
Vesicles	19 (9%)	0 (0%)	2 (1%)	0 (0%)

*Mild, Moderate, or Severe

The adverse reactions that most frequently resulted in clinical intervention (e.g., rest periods, withdrawal from study) were local skin and application site reactions. Overall, in the clinical studies, 2% (5/215) of subjects discontinued for local skin/application site reactions. Of the 215 subjects treated, 35 subjects (16%) on Imiquimod Cream and 3 of 220 subjects (1%) on vehicle cream had at least one rest period. Of these Imiquimod Cream subjects, 32 (91%) resumed therapy after a rest period.

In the AK studies, 22 of 678 (3.2%) of Imiquimod -treated subjects developed treatment site infections that required a rest period off Imiquimod Cream and were treated with antibiotics (19 with oral and 3 with topical). Of the 226 Imiquimod subjects with both baseline and 8 week post-treatment biopsy assessments, 6

clinical trials are shown in the following table.

Table 4: Local Skin Reactions in the Treatment Area as Assessed by the Investigator (External Genital Warts)

	Imiquimod Cream				
	Females (n=114)		Males (n=156)		Females (n=114)
	All Grades*	Severe	All Grades*	Severe	All Grades*
Erythema	74 (65%)	4 (4%)	90 (58%)	6 (4%)	21 (21%)
Erosion	35 (31%)	1 (1%)	47 (30%)	2 (1%)	8 (8%)
Excoriation/Flaking	21 (18%)	0 (0%)	40 (26%)	1 (1%)	8 (8%)
Edema	20 (18%)	1 (1%)	19 (12%)	0 (0%)	5 (5%)
Scabbing	4 (4%)	0 (0%)	20 (13%)	0 (0%)	0 (0%)
Induration	6 (5%)	0 (0%)	11 (7%)	0 (0%)	2 (2%)
Ulceration	9 (8%)	3 (3%)	7 (4%)	0 (0%)	1 (1%)
Vesicles	3 (3%)	0 (0%)	3 (2%)	0 (0%)	0 (0%)

*Mild, Moderate, or Severe

Remote site skin reactions were also reported. The severe remote site were erythema (3%), ulceration (2%), and edema (1%); and for mild to moderate, induration, and excoriation/flaking (each 1%).

Selected adverse reactions judged to be probably or possibly related to treatment are shown in the following table.

Table 5: Selected Treatment Related Reactions (External Genital Warts)

	Females	
	Imiquimod Cream (n=117)	Vehicle (n=103)
Application Site Disorders:		
Application Site Reactions	n=117	n=103
Wart Site:		
Itching	38 (32%)	21 (20%)
Burning	30 (26%)	12 (12%)
Pain	9 (8%)	2 (2%)
Soreness	3 (3%)	0 (0%)
Fungal Infection*	13 (11%)	3 (3%)
Systemic Reactions:		
Headache	5 (4%)	3 (3%)
Influenza-like symptoms	4 (3%)	2 (2%)
Myalgia	1 (1%)	0 (0%)

*Incidences reported without regard to causality with Imiquimod Cream

Adverse reactions judged to be possibly or probably related to Imiquimod treatment were 1% of subjects included:

Application Site Disorders: burning, hypopigmentation, irritation, itch, stinging, tenderness

Remote Site Reactions: bleeding, burning, itching, pain, tenderness

Body as a Whole: fatigue, fever, influenza-like symptoms

Central and Peripheral Nervous System Disorders: headache

Gastro-Intestinal System Disorders: diarrhea

Musculo-Skeletal System Disorders: myalgia

6.4 Clinical Trials Experience: Dermal Safety Studies
Provocative repeat insult patch test studies involving induction and challenge with Imiquimod Cream causes photoallergenicity or contact sensitization. Irritancy testing revealed the potential for Imiquimod Cream to cause irritation in the clinical studies [see Adverse Reactions (6)].

6.5 Postmarketing Experience
The following adverse reactions have been identified during post-approval use. These reactions are reported voluntarily from a population of uncertain size; they may not represent a causal relationship to the use of the product. Reliably estimate their frequency or establish a causal relationship to the product.

Application Site Disorders: tingling at the application site.

Body as a Whole: angioedema.

Cardiovascular: capillary leak syndrome, cardiac failure, cardiomyopathy (tachycardia, atrial fibrillation, palpitations), chest pain, ischemia, myocardial infarction.

Endocrine: thyroiditis.

Gastro-Intestinal System Disorders: abdominal pain.

Hematological: decreases in red cell, white cell and platelet counts (including leukopenia, lymphopenia).

Hepatic: abnormal liver function.

Infections and Infestations: herpes simplex.

... In Study 1, the complete clearance rate was 24% (52/217) in the ith 26% (28/106) in the vehicle group. In Study 2, the clearance rates 1 Cream group compared with 28% (35/126) in the vehicle group. efficacy.

... ults, the most frequently reported adverse reaction from 2 studies in 1 was application site reaction. Adverse events which occurred more ects compared with vehicle-treated subjects generally resembled proved for adults and also included otitis media (5% Imiquimod vs. niquimod vs. 2% vehicle).

... ported local skin reaction. Severe local skin reactions reported by ediatric studies included erythema (28%), edema (8%), scabbing/ rasion (2%) and weeping/exudate (2%).

... oss the affected skin of 22 subjects aged 2 to 12 years with extensive l body surface area was observed after single and multiple doses at er week for 4 weeks. The investigator determined the dose applied, sed on the size of the treatment area and the subject's weight. The ncentrations at the end of week 4 was between 0.26 and 1.06 ng/g) was administered 2 packets of study drug per dose, had a C_{max} of idren aged 2 to 5 years received doses of 12.5 mg (one packet) or 1 had median multiple-dose peak serum drug levels of approximately an aged 6 to 12 years received doses of 12.5 mg, 25 mg, or 37.5 mg iple dose serum drug levels of approximately 0.1, 0.15, or 0.3 ng/g ects with evaluable laboratory assessments, the median WBC count an absolute neutrophil count decreased by 1.42*10⁹/L.

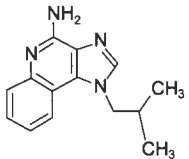
... imiquimod Cream in the AK clinical studies, 127 subjects (59%) were : (28%) were 75 years and older. No overall differences in safety or i these subjects and younger subjects. No other clinical experience ised between the elderly and younger subjects, but greater sensitivity iled out.

... m could result in an increased incidence of severe local skin reactions ic reactions.

... vent reported following multiple oral imiquimod doses of >200 mg >16 packets) was hypotension, which resolved following oral or

... response modifier for topical administration. Each gram contains 50 oil-in-water vanishing cream base consisting of benzyl alcohol, cetyl hyalparaben, polysorbate 60, propylparaben, purified water, sorbitan petrolatum and xanthan gum.

... ethylpropyl)-1-H-imidazo[4,5-c]quinolin-4-amine. Imiquimod, USP and a molecular weight of 240.3 g/mol. Its structural formula is:



... od Cream in treating AK is unknown.

... paring Imiquimod Cream to vehicle, increases from baseline in week CD3, CD4, CD8, CD11c, and CD68 for Imiquimod Cream treated ce of these findings is unknown.

... vity in cell culture. A study in 22 subjects with genital/perianal warts ic shows that Imiquimod Cream induces mRNA encoding cytokines int site. In addition HPV11 mRNA and HPV DNA are significantly ver, the clinical relevance of these findings is unknown.

... ross the affected skin of 58 subjects with AK was observed with a week for 16 weeks. Mean peak serum drug concentrations at the end 2, and 3.5 ng/mL for the applications to face (12.5 mg imiquimod, 1 packets) and hands/arms (75 mg, 6 packets), respectively.

Mean Concentration in Adults Following Administration of the Dose During Week 16 (Actinic Keratosis)

Applied	Mean peak serum imiquimod concentration (C _{max})
	0.1 ng/mL
	0.2 ng/mL
	3.5 ng/mL

... controlled when more than one packet was used. Dose proportion- ears that systemic exposure may be more dependent on surface plied dose. The apparent half-life was approximately 10 times 1-hour apparent half-life seen following subcutaneous dosing, sugn the skin. Mean urinary recoveries of imiquimod and metabolites e applied dose in the group using 75 mg (6 packets) for males and lications per week for 16 weeks.

... was observed across the affected skin of 12 subjects with genital/ of 4.6 mg. Mean peak drug concentration of approximately 0.4 ng/ urinary recoveries of imiquimod and metabolites combined over the 1 as percent of the estimated applied dose, were 0.11 and 2.41% in

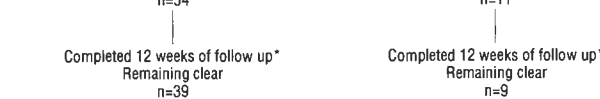
Impairment of Fertility

... y study, imiquimod was administered to Wistar rats on a 2X/week y/day) dosing schedule for 24 months. No treatment related tumors icity study up to the highest doses tested in this study of 6 mg/kg :7X MRHD based on weekly AUC comparisons), 4 mg/kg administered sed on weekly AUC comparisons) or 3 mg/kg administered 7X/week i based on weekly AUC comparisons).

... idy, imiquimod cream (up to 5 mg/kg/application imiquimod or 0.3% e backs of mice 3X/week for 24 months. A statistically significant omas and carcinomas was noted in high dose male mice compared ased on weekly AUC comparisons). An increased number of skin ream control group animals at the treated site only. The quantitative sed in the dermal mouse carcinogenicity study is the same as the eam, minus the active moiety (imiquimod).

... genicity study, the median time to onset of skin tumor formation was hronic topical dosing (3X/week; 40 weeks of treatment followed by rent exposure to UV radiation (5 days per week) with the Imiquimod ect on tumor development beyond the vehicle effect was noted with miquimod, to the vehicle cream.

... utagenic or clastogenic potential based on the results of five in vitro



*The other subjects were either lost to follow-up or experienced recurrences.

Data on complete clearance are listed in the table below. The median time to complete wart clearance was 10 weeks.

Table 8: Complete Clearance Rates (External Genital Warts)- Study EGW1

Treatment	Subjects with Complete Clearance of Warts	Subjects Without Follow-up	Subjects with Warts Remaining at Week 16
Overall			
Imiquimod Cream (n=109)	54 (50%)	19 (17%)	36 (33%)
Vehicle (n=100)	11 (11%)	27 (27%)	62 (62%)
Females			
Imiquimod Cream (n=46)	33 (72%)	5 (11%)	8 (17%)
Vehicle (n=40)	8 (20%)	13 (33%)	19 (48%)
Males			
Imiquimod Cream (n=63)	21 (33%)	14 (22%)	28 (44%)
Vehicle (n=60)	3 (5%)	14 (23%)	43 (72%)

16 HOW SUPPLIED/STORAGE AND HANDLING

Imiquimod Cream USP, 5% is supplied in single-use packets, which contain 250 mg of the cream. Available as: Box of 24 packets NDC 68462-536-70. Store at 4°C to 25°C (39°F to 77°F).

Avoid freezing.

Keep out of reach of children.

17 PATIENT COUNSELING INFORMATION

See FDA-Approved Patient Labeling

17.1 General Information: All Indications

Imiquimod Cream should be used as directed by a physician [see Dosage and Administration (2)]. Imiquimod Cream is for external use only. Contact with the eyes, lips and nostrils should be avoided [see Indications and Usage (1) and Dosage and Administration (2)]. The treatment area should not be bandaged or otherwise occluded. Partially-used packets should be discarded and not reused. The prescriber should demonstrate the proper application technique to maximize the benefit of Imiquimod Cream therapy.

It is recommended that patients wash their hands before and after applying Imiquimod cream.

17.2 Local Skin Reactions: All Indications

Patients may experience local skin reactions during treatment with Imiquimod Cream (even with normal dosing). Potential local skin reactions include erythema, edema, vesicles, erosions/ulcerations, weeping/exudate, flaking/scaling/dryness, and scabbing/crusting. These reactions can range from mild to severe in intensity and may extend beyond the application site onto the surrounding skin. Patients may also experience application site reactions such as itching and/or burning [see Adverse Reactions (6)].

Local skin reactions may be of such intensity that patients may require rest periods from treatment. Treatment with Imiquimod Cream can be resumed after the skin reaction has subsided, as determined by the physician. Patients should contact their physician promptly if they experience any sign or symptom at the application site that restricts or prohibits their daily activity or makes continued application of the cream difficult.

Because of local skin reactions, during treatment and until healed, the treatment area is likely to appear noticeably different from normal skin. Localized hypopigmentation and hyperpigmentation have been reported following use of Imiquimod Cream. These skin color changes may be permanent in some patients.

17.3 Systemic Reactions: All Indications

Patients may experience flu-like systemic signs and symptoms during treatment with Imiquimod Cream (even with normal dosing). Systemic signs and symptoms may include malaise, fever, nausea, myalgias and rigors [see Adverse Reactions (6)]. An interruption of dosing should be considered.

17.4 Patients Being Treated for Actinic Keratosis (AK)

Dosing is 2 times per week for a full 16 weeks, unless otherwise directed by the physician. However, the treatment period should not be extended beyond 16 weeks due to missed doses or rest periods [see Dosage and Administration (2.1)].

It is recommended that the treatment area be washed with mild soap and water 8 hours following Imiquimod Cream application.

Most patients using Imiquimod Cream for the treatment of AK experience erythema, flaking/scaling/dryness and scabbing/crusting at the application site with normal dosing [see Adverse Reactions (6.1)].

Use of sunscreen is encouraged, and patients should minimize or avoid exposure to natural or artificial sunlight (tanning beds or UVA/B treatment) while using Imiquimod Cream [see Warnings and Precautions (5.3)].

Sub-clinical AK lesions may become apparent in the treatment area during treatment and may subsequently resolve [see Clinical Studies (14.1)].

17.6 Patients Being Treated for External Genital Warts

Dosing is 3 times per week to external genital/perianal warts. Imiquimod Cream treatment should continue until there is total clearance of the genital/perianal warts or for a maximum of 16 weeks.

It is recommended that the treatment area be washed with mild soap and water 6 to 10 hours following Imiquimod Cream application.

It is common for patients to experience local skin reactions such as erythema, erosion, excoriation/flaking, and edema at the site of application or surrounding areas. Most skin reactions are mild to moderate.

Sexual (genital, anal, oral) contact should be avoided while Imiquimod Cream is on the skin. Application of Imiquimod Cream in the vagina is considered internal and should be avoided. Female patients should take special care if applying the cream at the opening of the vagina because local skin reactions on the delicate moist surfaces can result in pain or severe swelling, and may cause difficulty in passing urine or inability to urinate.

Uncircumcised males treating warts under the foreskin should retract the foreskin and clean the area daily. New warts may develop during therapy, as Imiquimod Cream is not a cure.

The effect of Imiquimod Cream on the transmission of genital/perianal warts is unknown.

Imiquimod Cream may weaken condoms and vaginal diaphragms, therefore concurrent use is not recommended.

Should severe local skin reaction occur, the cream should be removed by washing the treatment area with mild soap and water.

Rx Only

Manufactured by:
Glenmark Pharmaceuticals Limited
Colvale – Bardez, Goa 403 513, India

Manufactured for:

glenmark
Glenmark Pharmaceuticals Inc., USA
Mahwah, NJ 07430

Questions? 1 (888) 721-7115
www.glenmarkpharma-us.com

March 2021

Patient Information

- Wash the area under the cream that will be applied with mild soap and warts under their penis foreskin must pull their foreskin back and clean the area daily during treatment.
- Allow the area to dry for at least 10 minutes.
- Wash your hands.
- Open a new packet of Imiquimod Cream.
- Apply a thin layer of Imiquimod Cream only to the affected area. That is needed to cover the affected area.
- Rub the cream into your skin until you cannot see the Imiquimod Cream, wash your hands well.
- Leave the cream on the treated area for the amount of time your health care provider says. If Imiquimod Cream is left on the skin is different from normal skin. If Imiquimod Cream is used to treat. Do not take a bath or get the treated area wet.
- After the right amount of time has passed, wash the treated area with mild soap and water.
- If you get Imiquimod Cream in your mouth or in your eyes, rinse immediately with water.

What should I avoid while using Imiquimod Cream?

- Do not cover the treated area with bandages or other closed dressings.
- Do not use sunlamps or tanning beds, and avoid sunlight as much as possible while using Imiquimod Cream. Use sunscreen and wear protective clothing if you must be outdoors.
- Do not have sexual contact including genital, anal, or oral sex while using Imiquimod Cream or the skin around your anus. Imiquimod Cream may weaken condoms and vaginal diaphragms, therefore concurrent use is not recommended.

What are the possible side effects of Imiquimod Cream?

Imiquimod Cream may cause serious side effects including:

- **Local skin reactions**, including:
 - skin drainage (weeping)
 - ulcers
 - severe swelling near the vagina. This may lead to pain or trouble urinating. Female patients should take special care to avoid the opening of the vagina.
- **Flu-like symptoms**: tiredness, fever, nausea, muscle pain and chills.

Tell your healthcare provider right away if you have any of the symptoms listed below.

The most common side effects of Imiquimod Cream include:

- itching
- burning
- redness
- flaking and scaling
- dryness
- scabbing and crusting
- swelling
- skin that becomes sore, blisters, or changes in skin color

Tell your healthcare provider if you have any side effect that bothers you. These are not all the possible side effects of Imiquimod Cream. For more information, talk to your healthcare provider or pharmacist.

Call your doctor for medical advice about side effects. You may report side effects to the FDA.

How do I store Imiquimod Cream?

- Store imiquimod cream at 4°C to 25°C (39°F to 77°F).
- Do not freeze.
- Safely throw away unused imiquimod cream or partially used imiquimod cream.

Keep Imiquimod Cream and all medicines out of the reach of children.

General information about the safe and effective use of imiquimod cream

Medicines are sometimes prescribed for purposes other than those listed on the label. Do not use Imiquimod Cream for a condition for which it was not prescribed to other people, even if they have the same symptoms you have. It is not recommended to use Imiquimod Cream for any other purpose.

This Patient Information leaflet summarizes the most important information about Imiquimod Cream. If you would like more information, talk with your healthcare provider or pharmacist for information about Imiquimod Cream that is written for you.

What are the ingredients in imiquimod cream?

Active ingredient: imiquimod, USP

Inactive ingredients: benzyl alcohol, cetyl alcohol, glycerin, isostearic acid, propylparaben, purified water, sorbitan monostearate, stearyl alcohol, xanthan gum.

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March 2021

MARKET WITHDRAWAL RETURN RESPONSE FORM
IMIQUIMOD CREAM USP 5%, 0.25 g Sachet pack
NDC 68462-536-70
Retail Level
12/30/2024

Please fill out this form completely. By doing so, this will acknowledge that you have read and understand the withdrawal instructions and have taken the appropriate action.

Customer Name:	DEA#:
<i>DEA # is required, if it is not provided, the processing of your form will be delayed.</i>	

Address: _____

City:	State:	Zip:
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Contact Name (Please Print): _____

Telephone#:	Email:
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Contact Signature:	Date:
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DEBIT MEMO# (If unsure, leave blank): _____

Wholesaler Information if not directly purchased from Glenmark Pharmaceuticals Inc.:

Wholesaler Name:	DEA#:
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City:	State:	Zip:
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I have checked my stock and communicated to my customers at the appropriate level:

I confirm that all locations that received the impacted products have been notified to the Retail level _____ (Initial and date)

I do not have any stock of the market withdrawn items. OR

I have quarantined and listed in the box below the quantity of market withdrawn units and I will be returning to Inmar, as soon as possible. Upon receipt of this Response Form, Inmar will issue return authorization label(s) Please indicate the # of needed box labels_____.

Sr. No.	Item Description	NDC#	Lot# / Pack Size	Exp. Date	Total Full/Sealed and Partial/Open Pack
1	IMIQUIMOD CREAM USP 5%	68462-536-70	19230117 0.25 g Sachet pack	December - 2024	
2	IMIQUIMOD CREAM USP 5%	68462-536-70	19230225 0.25 g Sachet pack	December - 2024	
3	IMIQUIMOD CREAM USP 5%	68462-536-70	19230447 0.25 g Sachet pack	January - 2025	
4	IMIQUIMOD CREAM USP 5%	68462-536-70	19230562 0.25 g Sachet pack	January - 2025	
5	IMIQUIMOD CREAM USP 5%	68462-536-70	19230688 0.25 g Sachet pack	January - 2025	
6	IMIQUIMOD CREAM USP 5%	68462-536-70	19230766 0.25 g Sachet pack	January - 2025	
7	IMIQUIMOD CREAM USP 5%	68462-536-70	19231268 0.25 g Sachet pack	February - 2025	
8	IMIQUIMOD CREAM USP 5%	68462-536-70	19231312 0.25 g Sachet pack	March - 2025	
9	IMIQUIMOD CREAM USP 5%	68462-536-70	19231503 0.25 g Sachet pack	March - 2025	
10	IMIQUIMOD CREAM USP 5%	68462-536-70	19231588 0.25 g Sachet pack	March - 2025	
11	IMIQUIMOD CREAM USP 5%	68462-536-70	19232359 0.25 g Sachet pack	May - 2025	
12	IMIQUIMOD CREAM USP 5%	68462-536-70	19232558 0.25 g Sachet pack	May - 2025	
13	IMIQUIMOD CREAM USP 5%	68462-536-70	19233809 0.25 g Sachet pack	August - 2025	
14	IMIQUIMOD CREAM USP 5%	68462-536-70	19233971 0.25 g Sachet pack	September - 2025	
15	IMIQUIMOD CREAM USP 5%	68462-536-70	19234256 0.25 g Sachet pack	September - 2025	
16	IMIQUIMOD CREAM USP 5%	68462-536-70	19234436 0.25 g Sachet pack	October - 2025	
17	IMIQUIMOD CREAM USP 5%	68462-536-70	19234677 0.25 g Sachet pack	October - 2025	
18	IMIQUIMOD CREAM USP 5%	68462-536-70	19234851 0.25 g Sachet pack	November - 2025	
19	IMIQUIMOD CREAM USP 5%	68462-536-70	19235006 0.25 g Sachet pack	November - 2025	
20	IMIQUIMOD CREAM USP 5%	68462-536-70	19240226 0.25 g Sachet pack	December - 2025	



If you have any questions regarding this form or product return please contact Inmar at 877-560-5377
Office hours 9am to 5pm EST Mon thru Fri.

Please fax this form to: 817-868-5362 or E-mail rxrecalls@inmar.com

Market Withdrawal Event ID N131255 / RCL320-2024