



NDA 205098

**NDA APPROVAL**

Provensis Ltd  
Attention: Andreia Collier  
5 Fleet Place  
London  
EC4M 7RD  
UK

Dear Ms. Collier:

Please refer to your New Drug Application (NDA) dated February 1, 2013, received February 4, 2013, submitted under section 505(b)(1) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Varithena, (polidocanol) injectable foam 1%.

We acknowledge receipt of your amendments dated February 13, 28, March 5 (2), 11, 13, 18, 21 April 8, 15, 16, 23, 24, May 1, 2, 13, 15, 16 (2), 23, 24, June 3, 4, 11, 14, 25, July 5, 8, 11, 16, 24 (2), August 2, 7, 28, September 3, 4, 13, 19, 20, 24 (2), October 14, 16, 22, 23, November 13, 22 and 25(2), 2013.

This new drug application provides for the use of Varithena (polidocanol) injectable foam for the treatment of incompetent great saphenous veins, accessory saphenous veins and visible varicosities of the great saphenous vein (GSV) system above and below the knee. Varithena improves the symptoms of superficial venous incompetence and the appearance of visible varicosities.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/U>

[CM072392.pdf](#).

The SPL will be accessible via publicly available labeling repositories.

### **CARTON AND IMMEDIATE CONTAINER LABELS**

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels and carton and immediate container labels submitted on November 25, 2013, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission **“Final Printed Carton and Container Labels for approved NDA 205098”** Approval of this submission by FDA is not required before the labeling is used.

Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

### **ADVISORY COMMITTEE**

Your application for Varithena was not referred to an FDA advisory committee because this drug is not the first in its class and outside expertise was not necessary; there were no controversial issues that would benefit from advisory committee discussion.

### **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

### **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, please call Michael Monteleone, Regulatory Project Manager, at (301) 796-1952.

Sincerely,

*{See appended electronic signature page}*

Norman Stockbridge, MD, PhD  
Director  
Division of Cardiovascular and Renal Products  
Office of Drug Evaluation I  
Center for Drug Evaluation and Research

Cc:  
BTG International Inc.  
Attention: Pamela Deans  
US Agent for Provensis Ltd  
Five Tower Bridge, Suite 800  
300 Barr Harbor Drive  
West Conshohocken, PA 19428-2998

Enclosure(s):  
Content of Labeling  
Carton and Container Labeling

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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NORMAN L STOCKBRIDGE  
11/25/2013