



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 204242/S-006

SUPPLEMENT APPROVAL

Orexo US, Inc.
150 Headquarters Plaza, East Tower
Morristown, NJ 07960

Attention: Michael Sumner, MD
Chief Medical Officer

Dear Dr. Sumner:

Please refer to your Supplemental New Drug Application (sNDA) dated and received February 3, 2015, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zubsolv (buprenorphine and naloxone) sublingual tablets.

We acknowledge receipt of your amendments dated April 22, and May 7 and 18, 2015.

This "Prior Approval" supplemental new drug application proposes to add 2.9 mg/0.71 mg buprenorphine/naloxone as a new intermediate tablet strength, and proposed modifications to the approved Zubsolv risk evaluation and mitigation strategy (REMS).

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

WAIVER OF PREGNANCY, LABOR AND DELIVERY, AND NURSING MOTHERS SUBSECTIONS

We are waiving the current requirements of 21 CFR 201.56(d)(1) and 201.57(c)(9)(i) through (iii), regarding the content and format of labeling for subsections 8.1 Pregnancy, 8.2 Labor and Delivery, and 8.3 Nursing Mothers of prescribing information. Your approved labeling for subsections 8.1, 8.2, and 8.3 reflects the content and format requirements of the Pregnancy and Lactation Labeling Rule (79 FR 72063, December 4, 2014) which implements on June 30, 2015.

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, Medication

Guide), with the addition of any labeling changes in pending “Changes Being Effectuated” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eList may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.”

The SPL will be accessible from publicly available labeling repositories.

We request that the labeling approved today be available on your website within 10 days of receipt of this letter.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels 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 204242/S-006.**” 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.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

The REMS for Zubsolv was originally approved on July 3, 2013. A REMS modification was approved on September 4, 2013, incorporating Zubsolv into the Buprenorphine Transmucosal Products for Opioid Dependence (BTOD) REMS. The BTOD REMS was most recently modified on February 12, 2015.

The REMS consists of a Medication Guide, elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

Your proposed modification to the BTOD REMS consists of the following:

Addition of a new strength of Zubsolv: 2.9 mg buprenorphine/ 0.71 mg naloxone to the REMS appended materials

Your proposed modified REMS, submitted on May 18, 2015, and appended to this letter, is approved.

The timetable for submission of assessments of the REMS remains the same as that approved on July 3, 2013.

The BTOD REMS currently includes the products listed on the FDA REMS website, available at <http://www.fda.gov/downloads/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/UCM340947.pdf>.

Other products may be added to the BTOD REMS in the future.

There are no changes to the REMS assessment plan described in our September 4, 2013, letter.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any of goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A). This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks:* A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* A statement about whether the REMS was meeting its goals at the time of that the last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including:* Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications, provide a rationale for why the REMS does not need to be modified.*

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**NDA 204242 REMS CORRESPONDENCE
(insert concise description of content in bold capital letters, e.g.,
UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT
METHODOLOGY)**

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j). A violation of this provision in 505-1(f) could result in enforcement action.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

NDA 204242 REMS ASSESSMENT

**NEW SUPPLEMENT FOR NDA 204242/S-00X
CHANGES BEING EFFECTED IN 30 DAYS**

< other supplement identification >

PROPOSED MINOR REMS MODIFICATION

or

**NEW SUPPLEMENT FOR NDA 204242/S-00X
PRIOR APPROVAL SUPPLEMENT**

< other supplement identification >

PROPOSED MAJOR REMS MODIFICATION

or

**NEW SUPPLEMENT FOR NDA 204242/S-00X
PRIOR APPROVAL SUPPLEMENT
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES
SUBMITTED IN SUPPLEMENT XXX**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 204242/S-00X
REMS ASSESSMENT
< other supplement identification >
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

REMS REVISIONS FOR NDA 204242

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, are only in PDF format, they may be submitted as such, but the preference is to include as many as possible in Word format.

If you do not submit electronically, please send 5 copies of REMS-related submissions.

EXPIRATION DATING PERIOD

Your packaging configurations of 30 sublingual tablets per carton (3 blister cards each with 10 tablets) is granted an 18 month expiration dating period, stored at 20°C-25°C (68°F-77°F) with excursions permitted to 15-30°C (59- 86°F).

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, call Swati Patwardhan, Regulatory Project Manager, at (301) 796-4085.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, MD
Director
Division of Anesthesia, Analgesia,
and Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURES:

Content of Labeling
Carton and Container Labeling
REMS

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

RIGOBERTO A ROCA on behalf of SHARON H HERTZ
06/04/2015