

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

21-597

APPROVAL LETTER



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-597
NDA 20-604/S-026

Serono, Inc.
Attention: Pamela Williamson-Joyce
One Technology Place
Rockland, MA 02370

Dear Ms. Williamson-Joyce:

Please refer to your new drug application (NDA) dated October 31, 2002, received November 1, 2002, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Zorbtive[®] [somatotropin (rDNA origin) for injection].

We acknowledge receipt of your submissions to NDA 21-597 dated December 19, 2002, February 14, April 15, May 2, May 21, May 22, May 30, June 10, June 11, July 15, July 22, August 5, August 27, September 3, September 24, October 15, October 20, November 12, November 18, November 24, November 25, and November 26, 2003.

We also acknowledge receipt of your submissions to NDA 20-604/S-026 dated October 31, 2002, September 24, November 24, and November 25, 2003.

This new drug application provides for the use of Zorbtive[®] [somatotropin (rDNA origin) for injection] for the treatment of Short Bowel Syndrome in patients receiving specialized nutritional support.

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

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert) and to the submitted labeling (text for the vial labels and cartons submitted on November 24, 2003). Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL according to the Guidance for Industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved NDA 21-597.**" Approval of this submission by FDA is not required before the labeling is used.

We remind you of your postmarketing commitment in your submission dated November 24, 2003. This commitment is listed below.

Description:	educational plan for caregivers who treat Short Bowel Syndrome (SBS) patients and for SBS patients
Submission of program final forms:	Within 3 months of the date of this letter
Program start:	Within 4 months of the date of this letter
Program follow-up final report submission:	Within 24 months of the date of this letter (including interim reports to assess program success every 6 months during this 24 month period).

Submit clinical protocols to your IND for this product. Submit the final educational program, nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to NDA 20-604. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to NDA 20-604. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to this postmarketing study commitment must be prominently labeled "**Postmarketing Study Protocol**", "**Postmarketing Study Final Report**", or "**Postmarketing Study Correspondence.**"

We also remind you of your agreement on November 25, 2003, to develop a patient package insert (PPI) and to submit the PPI within 30 days of the date of this letter. The PPI should be submitted as a labeling supplement.

FDA's Pediatric Rule [at 21 CFR 314.55/21 CFR 601.27] was challenged in court. On October 17, 2002, the court ruled that FDA did not have the authority to issue the Pediatric Rule and has barred FDA from enforcing it. Although the government decided not to pursue an appeal in the courts, it will work with Congress in an effort to enact legislation requiring pharmaceutical manufacturers to conduct appropriate pediatric clinical trials. In addition, third party interveners have decided to appeal the court's decision striking down the rule. Therefore, we encourage you to submit a pediatric plan that describes development of your product in the pediatric population where it may be used. Please be aware that whether or not this pediatric plan and subsequent submission of pediatric data will be required depends upon passage of legislation or the success of the third party appeal. In any event, we hope you will decide to submit a pediatric plan and conduct the appropriate pediatric studies to provide important information on the safe and effective use of this drug in the relevant pediatric populations.

The pediatric exclusivity provisions of FDAMA as reauthorized by the Best Pharmaceuticals for Children Act are not affected by the court's ruling. Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products. You should refer to the Guidance for Industry on Qualifying for Pediatric Exclusivity (available on our web site at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request". FDA generally does not consider studies submitted to an NDA before issuance of a Written Request as responsive to the Written Request. Applicants should obtain a Written Request before submitting pediatric studies to an NDA.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Metabolic and Endocrine Drug Products and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Please submit one market package of the drug product when it is available.

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

All 15-day alert reports, periodic (including quarterly) adverse drug experience reports, field alerts, annual reports, supplements, and other submissions should be addressed to the original NDA 20-604 for this drug product, not to this NDA. In the future, do not make submissions to this NDA except for the final printed labeling requested above.

If you have any questions, call Alice Kacuba, RN, MSN, RAC, Regulatory Health Project Manager, at (301) 827-9334.

Sincerely,

{See appended electronic signature page}

Robert L. Justice, M.D., M.S.
Director
Division of Gastrointestinal & Coagulation Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosure