CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

204300Orig1s000

OTHER ACTION LETTERS

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 204300/Original 1

COMPLETE RESPONSE

Éclat Pharmaceuticals
c/o The Weinberg Group, Inc.
1129 Twentieth St. NW, Suite 600
Washington, DC 20036

Attention: Marla E. Scarola, M.S.
Senior Consultant, The Weinberg Group, Inc.

Dear Ms. Scarola:

Please refer to your New Drug Application (NDA) dated and received February 8, 2013, which was refused to file on April 5, 2013, and resubmitted June 28, 2013, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA)for VAZCULEP (phenylephrine hydrochloride) Injection, 10 mg/mL.

We acknowledge receipt of your amendments dated July 1 and 8, September 18, October 25, November 1, December 20, and 23, 2013, January 6 and 14, February 11, 12, and 13, March 7, 11, 24, 26, and 31, and April 10, 16, and 21, 2014.

NDA 204300 provides for the use of VAZCULEP (phenylephrine hydrochloride) Injection, 10 mg/mL for the following indications which, for administrative purposes, we have designated as follows:

- NDA 204300/Original 1 – treatment of clinically important hypotension resulting primarily from vasodilation in the setting of anesthesia

(b) (4)

The subject of this action letter is NDA 204300/Original 1. (b) (4)

All future submissions to NDA 204300/Original 1 should specify the NDA number and the Original number to which each submission pertains.

We have completed our review of NDA 204300/Original 1, as amended, and have determined that we cannot approve this application in its form. We have described our reason for this action below.

FACILITY INSPECTIONS

During a recent inspection of the (b) (4) manufacturing facility for this application, our field investigator conveyed deficiencies to the representative of the facility. Satisfactory resolution of these deficiencies is required before this application may be approved.

We reserve additional comment on the proposed labeling until NDA 204300/Original 1 is otherwise adequate. If you revise labeling, your response must include updated content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm.

SAFETY UPDATE

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(*b*). The safety update should include data from all nonclinical and clinical studies/trials of the drug under consideration regardless of indication, dosage form, or dose level.

1. Describe in detail any significant changes or findings in the safety profile.

2. When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:

   - Present new safety data from the studies/clinical trials for the proposed indication using the same format as the original NDA submission.
   - Present tabulations of the new safety data combined with the original NDA data.
   - Include tables that compare frequencies of adverse events in the original NDA with the retabulated frequencies described in the bullet above.
   - For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.

3. Present a retabulation of the reasons for premature trial discontinuation by incorporating the drop-outs from the newly completed trials. Describe any new trends or patterns identified.

4. Provide case report forms and narrative summaries for each patient who died during a clinical trial or who did not complete a trial because of an adverse event. In addition, provide narrative summaries for serious adverse events.

5. Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original NDA data.

6. Provide updated exposure information for the clinical studies/trials (e.g., number of subjects, person time).

7. Provide a summary of worldwide experience on the safety of this drug. Include an updated estimate of use for drug marketed in other countries.

8. Provide English translations of current approved foreign labeling not previously submitted.

OTHER

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before [redacted] (b) (4) may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA's "Guidance for Industry - Formal Meetings Between the FDA and Sponsors or Applicants," May 2009 at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf.

If you have any questions, call Kimberly Compton, RPh, Sr. Regulatory Project Manager, at (301) 796-1191.

Sincerely,

{See appended electronic signature page}

Rigoberto Roca, MD
Deputy Director
Division of Anesthesia, Analgesia, and
Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

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
04/28/2014