CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

206111Orig1s000

OTHER ACTION LETTERS

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 206111

COMPLETE RESPONSE

Boehringer Ingelheim Pharmaceuticals, Inc.
Attention: Joachim Troost, M.D.
Senior Associate Director, Regulatory Affairs
900 Ridgebury Road
P.O. Box 368
Ridgefield, CT 06877

Dear Dr. Troost:

Please refer to your New Drug Application (NDA) dated and received August 4, 2014, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Synjardy (empagliflozin and metformin hydrochloride) tablets.

We acknowledge receipt of your amendments dated August 8, October 3, 8, and 9, December 3, and 10, 2014, January 14, 16, 22, and 30, March 2, 11 (2), and 30, April 17, May 12, 21, and 26, 2015.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

CLINICAL/STATISTICAL:

Deficiency

We have been unable to reach agreement on the proposed labeling (21 CFR 314.125). Specifically, we have concluded that [redacted] (b) (4) does not support [redacted] (b) (4) and that [redacted] (b) (4) is misleading for the following reasons:

[redacted] (b) (4)

We view the 52-week efficacy data (b) (4) reliable, robust and as sufficient to inform the safe and effective use of the product in this setting.

Resolution of deficiency

To address this deficiency, you will need to submit labeling which adequately addresses our concern that (b) (4) could be misleading.

PRESCRIBING INFORMATION

Submit draft labeling that incorporates the suggested revisions in our June 2, 2015, labeling communication. Prior to resubmitting the labeling, use the SRPI checklist to correct any formatting errors to ensure conformance with the format items in regulations and guidances. 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.

To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should include annotations that support any proposed changes.

CARTON AND CONTAINER LABELING

Please resubmit draft carton and container labels that are identical to the carton and container labels submitted on May 21, 2015.

PROPRIETARY NAME

Please refer to correspondence dated, October 23, 2014, which addresses the proposed proprietary name, Synjardy. This name was found acceptable pending approval of the application in the current review cycle. Please resubmit the proposed proprietary name when you respond to the application deficiencies.

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

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 314.65. You may also request an extension of time in which to resubmit the application. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

You may request a meeting or teleconference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA Guidance for Industry, "Formal Meetings Between FDA and Sponsors or Applicants," May 2009 at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, call Michael G. White, Ph.D., Regulatory Project Manager, at (240) 402-6149.

Sincerely,

{See appended electronic signature page}

Jean-Marc Guettier, M.D.
Director
Division of Metabolism and Endocrinology 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/

JEAN-MARC P GUETTIER
06/04/2015