CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

022343Orig1s000

OTHER ACTION LETTERS

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 22343 **TENTATIVE APPROVAL**

Aurobindo Pharma USA, Inc.
Attn: Blessy Johns
U.S. Agent for Aurobindo Pharma Limited
2400 Route 130 North
Dayton, NJ 08810

Dear Ms. Johns:

Please refer to your New Drug Application (NDA) 22343 dated and received May 25, 2012, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Efavirenz, Lamivudine and Tenofovir Disoproxil Fumarate Tablets, 600 mg/300 mg/300 mg. This application was considered complete for review based on the receipt date of your submission dated August 27, 2012.

We also acknowledge receipt of your submissions dated:

June 6, 2012	August 27, 2012	December 21, 2012
February 22, 2013	March 14, 2013	March 22, 2013
June 19, 2013	June 21, 2013	

This NDA provides for the use of Efavirenz, Lamivudine and Tenofovir Disoproxil Fumarate Tablets, 600 mg/300 mg/300 mg (b) (4) for the treatment of HIV-1 infection in adults and (b) (4) weighing at least 40 kg.

This NDA was reviewed under the President's Emergency Plan for AIDS Relief (PEPFAR).

We completed our review of this application. It is **tentatively approved** under 21 CFR 314.105 for use as recommended in the agreed-upon labeling (refer to the enclosed text for the package insert, patient package insert, immediate container, carton, and bulk package labels). Also refer to the agreed-upon revised labeling emailed on June 21, 2013, for the package insert and patient package insert. Based on the data provided, the expiration dating period for Efavirenz, Lamivudine and Tenofovir Disoproxil Fumarate Tablets, 600 mg/300 mg/300 mg is 24 months when packaged in HDPE bottles as 30 count (with child-resistant closure) and (b) (4), both with heat sealed liner and (b) (4) desiccant, and bulk package (b) (4) when stored below 30ºC.

This determination is based upon information available to the Agency at this time [i.e., information in your application and the status of current good manufacturing practices (cGMPs) of the facilities used in manufacturing and testing of the drug product]. This determination is subject to change on the basis of any new information that may come to our attention.

The listed reference drug products [Sustiva® (efavirenz), Epivir® (lamivudine) and Viread® (tenofovir disoproxil fumarate)] upon which you base your application are subject to a period of patents' protection and therefore, final approval of your application under section 505(c)(3) of the Act [21 U.S.C. 355(c)(3)] may not be made effective until the period has expired. If you have questions as to when this date will be, please contact the Agency at the information provided below.

Two or six months prior to the expiration of the patents' protection, as appropriate, submit an amendment to this application identifying changes, if any, in the conditions under which your product was tentatively approved. Any changes to the conditions outlined in this NDA require our review before final approval and the goal date for our review will be set accordingly. Your amendment should include updated labeling, chemistry, manufacturing and controls data, and a safety update. This amendment should include draft final printed labels and labeling which comply with all U.S. regulations (uniqueness of drug product appearance per 21 CFR 206; child-resistant packaging per 16 CFR 1700, etc.). This amendment should be designated clearly in your cover letter as a "**FINAL APPROVAL REQUESTED**."

We remind you that you are expected to comply with the reporting requirements provided in 21 CFR 314.80 and 314.81. If the product is to be mass distributed in developing countries, a system of collecting and reporting adverse drug reactions by the distributor would be desirable (e.g., through governmental or nongovernmental agencies distributing the products).

We remind you that, should you intend to market this product in the United States after the period of patents' protection, you are required to comply with all applicable U.S. legislation, including the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), which requires that all NDAs, Biological License Applications (BLAs), or supplemental applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration contain a pediatric assessment unless this requirement is waived, deferred, or inapplicable. A pediatric assessment contains data gathered from pediatric studies using appropriate formulations for each age group for which the assessment is required, and other data that are adequate to: 1) assess the safety and effectiveness of the product for the claimed indications in all relevant pediatric subpopulations and 2) support dosing and administration for each pediatric subpopulation for which the product has been assessed to be safe and effective. You must also join the antiretroviral pregnancy registry at that time and make the appropriate labeling change that references the existence of the pregnancy registry. In addition, an updated package insert (PI) must be submitted under the Structured Product Labeling requirements (http://www.fda.gov/oc/datacouncil/spl.html) as defined by the Physician's Labeling Rule [21 CFR 201.56, 201.57].

Until we issue a final approval letter, this NDA is not deemed approved. If you believe that there are grounds for issuing the final approval letter before the period of patents' protection has expired, you should amend your application accordingly.

Please note that this drug product may not be marketed in the United States without final Agency approval under Section 505 of the Act. The introduction or delivery for introduction into interstate commerce of this drug product before the final approval date is prohibited under Section 501 of the Act and 21 U.S.C. 331(d).

If you have any questions, please contact David Araojo, Pharm.D., Senior Program Consultant, at (301) 796-0669 or email at david.araojo@fda.hhs.gov.

Sincerely yours,

{See appended electronic signature page}

Jeffrey Murray, M.D., M.P.H.
Deputy Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosures: PI, PPI, immediate container, carton, and bulk labels

58 Page(s) of Draft Labeling have been Withheld in Full as b4 (CCI/TS) immediately following this page

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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.

/s/

JEFFREY S MURRAY
06/26/2013