



NDA 21-252

Axcan Scandipharm Inc.
Attention: Anne M. Tomalin
U.S. Regulatory Affairs
22 Inverness Parkway
Birmingham, AL 35242

Dear Ms. Tomalin:

Please refer to your new drug application (NDA) dated June 29, 2000, received August 31, 2000, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Canasa (mesalamine) Suppositories.

We acknowledge receipt of your presubmission dated April 28, 2000, and your submissions dated June 29; August 15, 29, 30, and 31; September 6 and 8; October 11; November 2 and 9; December 29, 2000; and January 2, 2001.

This new drug application provides for the use of Canasa (mesalamine) Suppositories for the treatment of active ulcerative proctitis, at a dose of 500 mg twice daily. The dose may be increased to 500 mg three times daily if there is an inadequate response after two weeks of therapy.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon enclosed labeling text. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the patient package insert) and submitted draft labeling (immediate container and carton labels submitted December 29, 2000, as modified in the January 3, 2001 teleconference). 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 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. Alternatively, you may submit the FPL electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDAs* (January 1999). For administrative purposes, this submission should be designated "FPL for approved NDA 21-252." Approval of this submission by FDA is not required before the labeling is used.

We remind you of your postmarketing study commitment in your submission dated January 2, 2001. This commitment is listed below.

You have agreed to conduct a clinical efficacy trial in pediatric patients with ulcerative proctitis, aged 12 to 18 years. This study should be of similar design and execution (e.g., randomized, double-blind, placebo-controlled) as the pivotal studies submitted in support of the adult efficacy claim.

Final Report Submission: Within 24 months of the date of this letter

Submit clinical protocols to your IND for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this NDA. 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 this NDA. 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 these postmarketing study commitments must be prominently labeled "**Postmarketing Study Protocol**", "**Postmarketing Study Final Report**", or "**Postmarketing Study Correspondence**."

Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We note that you have not fulfilled the requirements of 21 CFR 314.55 (or 601.27). We are waiving the requirement for pediatric data in patients aged zero to 11 years. We are deferring submission of your pediatric studies in patients aged 12 to 18 years until January 2003, as indicated above.

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 (pediatric exclusivity). 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" (PPSR) in addition to your plans for pediatric drug development described above. We recommend that you submit a Proposed Pediatric Study Request within 120 days from the date of this letter. If you are unable to meet this time frame but are interested in pediatric exclusivity, please notify the division in writing. FDA generally will not accept studies submitted to an NDA before issuance of a Written Request as responsive to a Written Request. Sponsors should obtain a Written

Request before submitting pediatric studies to an NDA. If you do not submit a PPSR or indicate that you are interested in pediatric exclusivity, we will review your pediatric drug development plan and notify you of its adequacy. Please note that satisfaction of the requirements in 21 CFR 314.55 alone may not qualify you for pediatric exclusivity. FDA does not necessarily ask a sponsor to complete the same scope of studies to qualify for pediatric exclusivity as it does to fulfill the requirements of the pediatric rule.

In addition, please submit three copies of the introductory promotional materials that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division 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, Maryland 20857

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

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, call Melodi McNeil, Regulatory Health Project Manager, at (301) 827-7310.

Sincerely,

Lilia Talarico, M.D.
Director
Division of Gastrointestinal and Coagulation Drug
Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosure