DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service

Food and Drug Administration
Rockville MD 20857

NDA 20-522/S-017

Genetech, Inc.
Attention: Robert L. Garnick, Ph.D.
Senior Vice President, Quality, Regulatory Affairs, and Corporate Compliance
1 DNA Way
South San Francisco, CA 94080-4990

Dear Dr. Garnick:

Please refer to your supplemental new drug application dated November 29, 2001, received November 30, 2001, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Nurtropin AQ (somatropin [rDNA origin] injection).

We acknowledge receipt of your submissions dated January 31 (containing product specific data that was not present in your original submission) and April 16, 2002, (two submissions) containing revised labeling.

This supplemental new drug application proposes:

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(2) A new "Nutropin AQ Pen Cartridge" container which contains 10 mg of somatropin per cartridge.
(3) To add a multi-dose device for exclusive use with the Nutropin AQ Pen Cartridge.

We refer to your March 28 and April 16, 2002, electronic mail and facsimile communication regarding your labeling revision commitments. These are outlined in attachment document 1 (Package Insert).

We have completed the review of this supplemental 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 labeling text. Accordingly, the supplemental application is approved effective on the date of this letter.

The final printed labeling (FPL) for the following labeling:

DEVICE LABELING

- Nutropin AQ Pen™ Pen Device Label
- Nutropin AQ Pen™ Pen Case Labeling
- Nutropin AQ Pen™ Pen Instructions for use with the Nutropin AQ Pen™ Cartridge (full-size and folding)
- Nutropin AQ Pen™ Pen Folding Carton

DRUG PRODUCT LABELING

- Nutropin AQ Pen™ Cartridge Tyvek Lidstock (cover for the blister container which holds the cartridge)
- Nutropin AQ Package Insert
- Nutropin AQ Pen™ Cartridge Label
- Nutropin AQ Pen™ Cartridge Folding Carton

must be identical to that submitted November 29, 2001, modified in the March 25 and 27, 2002 correspondences, revised as follows:

General Comments

- The dosage should be expressed in terms of total drug content. Revise to read as follows:
  10 mg/2ml
  (5 mg/ml)
- Include the route of administration of all labels and labeling.

Nutropin AQ Package Insert (as revised on March 27, 2002)

- The package insert does not contain patient instructions. Revise the package insert to include patient instructions for use and provide it with each cartridge of Nutropin AQ.
- Revise the abbreviation "IU" to read "international units" throughout the entire text of the document

  Dosage and Administration Section
  - Pediatric Growth Hormone Deficiency subsection—Revise "0.30 mg/kg" to read "0.3 mg/kg."

In addition, please include the Nutropin AQ Pen™ Pen Instructions for use with the Nutropin AQ Pen™ Cartridge in the Nutropin AQ Cartridge Folding Carton.

Nutropin AQ Pen™ Cartridge Folding Carton (as revised on March 27, 2002)

- Revise the net quantity statement to read "1x 2ml cartridge (10 mg per cartridge)" or "10 mg per 2 ml cartridge".
- Relocate the "Rx Only" to the front panel

Nutropin AQ Pen™ Pen Instructions for use with the Nutropin AQ Pen™ Cartridge (full-size and folding)

Caution section

Directly following the sentence, "The dosage scale located beside the window of the cartridge holder should not be used as a dose measurement" add " It should only be used to estimate the dosage remaining in the cartridge."

Revise "Always refer to the LCD and/or audible clicks of the dose knob for setting an injection…" to read "Always refer to the LCD, not audible clicks, for setting an injection…" Include a statement regarding what the clicks are.

- Part I. Instruction #3, revise "turn the black dose knob completely back to its starting position by turning the knob until it no longer turns" to include the terms "clockwise" and "counter-clockwise" where appropriate.

- Part IV. Commonly Asked Questions, Revise the question "What happens if I click my Nutropin AQ Pen more than 40 times?" to read "What is the maximum dose the Nutropin AQ Pen can deliver in one shot? The maximum dose that may be delivered in one shot is 4 mg (40 clicks). If you attempt to dose more than 4 mg at a time, the drug will either be forced out of the needle and wasted or excess pressure will be placed upon the cartridge.

The final printed labeling (FPL) must be identical, and include the revisions indicated, to the submitted draft labeling (package insert submitted November 29, 2001, immediate container and carton labels submitted November 29, 2001). These revisions are terms of the approval of this application.

Please submit the copies of final printed labeling (FPL) electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA* (January 1999). 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. Please individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved supplement NDA 20-522/S-017." Approval of this submission by FDA is not required before the labeling is used.

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

If a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter) is issued to physicians and others responsible for patient care, we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HF-2
FDA
5600 Fishers Lane
Rockville, MD 20857

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 Monika Johnson, Pharm.D., Regulatory Project Manager, at (301) 827-6370.

Sincerely,

{See appended electronic signature page}

David G. Orloff, M.D.
Director
Division of Metabolic and Endocrine Drug 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/

Monika Johnson

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