DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville, MD 20857

NDA 20-741/S-013

Novo Nordisk Pharmaceuticals, Inc.
Attention: Barry Reit, Ph.D.
Vice President, Regulatory Affairs
100 College Road West
Princeton, NJ 08540

Dear Dr. Reit:

Please refer to your supplemental new drug application dated December 20, 2001, received December 21, 2001, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Prandin® (repaglinide) Tablets.

We acknowledge receipt of your amendments submitted:

February 14, 2002
March 1, 2002 (2)
March 12, 2002
April 16, 2002
June 6, 2002
September 25, 2002
October 11, 2002
October 16, 2002

This supplemental new drug application provides for the use of Prandin® (repaglinide) Tablets in combination with a thiazolidinedione to lower blood glucose in patients with type 2 diabetes whose hyperglycemia cannot be controlled by diet and exercise plus monotherapy with any of the following agents: metformin, sulfonylureas, repaglinide, or thiazolidinediones. This supplement also provides for the addition of pharmacokinetic information on the co-administration of clarithromycin and repaglinide to the CLINICAL PHARMACOLOGY and PRECAUTIONS sections of the package insert.

We completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) must be identical to the enclosed submitted labeling (package insert submitted October 16, 2002).

Please submit the FPL electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – NDA. Alternatively, you may 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. For administrative purposes, this submission should be designated "FPL for approved supplement NDA 20-741/S-013.” Approval of this submission by FDA is not required before the labeling is used.

The text in italics below addresses the application of FDA’s Pediatric Rule at [21 CFR 314.55/21 CFR 601.27] to this NDA. The Pediatric Rule has been challenged in court. On October 17, 2002, the court ruled that FDA did not have the authority to issue the Pediatric Rule and has barred FDA from enforcing it. The government has not yet decided whether to seek a stay of the court’s order. In
addition, the government has not yet decided whether to appeal the decision; an appeal must be filed within 60 days. Therefore, this letter contains a description of the pediatric studies that would be required under the Pediatric Rule, if the Pediatric Rule remained in effect and/or were upheld on appeal. Please be aware that whether or not these pediatric studies will be required will depend upon the resolution of the litigation. FDA will notify you as soon as possible as to whether this application will be subject to the requirements of the Pediatric Rule as described below. In any event, we hope you will decide to conduct these pediatric studies to provide important information on the safe and effective use of this drug in the relevant pediatric populations.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens must contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (21 CFR 314.55). Based on the information submitted, we are waiving the pediatric study requirement for the evaluation of the use of repaglinide in combination with a thiazolidinedione for patients less than 10 years of age. We are deferring submission of pediatric studies for this indication for patients between the ages of 10 to 16 years, inclusive, until March 1, 2006.

If you issue a letter communicating important information about this drug product (i.e., a “Dear Health Care Professional” letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HF-2
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call James Cross, Regulatory Project Manager, at (301) 827-6381.

Sincerely,

[See appended electronic signature page]

David G. Orloff, M.D.
Director
Division of Metabolic and Endocrine Drug Products, HFD-510
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

David Orloff
10/21/02 12:43:38 PM