



NDA 21-471

L'Oreal USA Products, Inc.  
Attention: Jean R. Grieve  
Assistant Vice President, Drug Approval Group  
30 L'Oreal Way  
Clark, NJ 07066

Dear Ms. Grieve:

Please refer to your new drug application (NDA) dated September 27, 2005, received September 28, 2005, and submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for 2% avobenzone, 2% ecamsule, 10% octocrylene and 2% titanium dioxide cream. We note that you propose to market the product by the following distributors with the following trade names:

- Kiehl's UV PROTECTIVE SUNCARE
- Vichy CAPITAL SOLEIL 20
- LaRoche-Posay ANTHELIOS 20
- Lancôme UV EXPERT 20

Per your October 3, 2006 request, ANTHELIOS 20 distributed by LaRoche-Posay is designated as the reference listed drug for this application.

We acknowledge receipt of your submissions dated August 4 and 8, September 22, and October 3, 2006.

The August 8, 2006 submission constituted a complete response to our July 25, 2006 action letter.

This new drug application is indicated to help prevent sunburn and to help provide protection from UVA and UVB rays.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text and with the minor editorial revision listed below. This change can be made at the time of next printing or at 180 days, whichever occurs earlier.

Replace the phrase "oil-free" with the term "non-greasy" in every occurrence on the labels.

The final printed labeling (FPL) must include the revision listed above, be otherwise identical to the enclosed labeling (tube and carton labels submitted September 22, 2006), and must be in the "Drug Facts" format (21 CFR 201.66). These revisions are terms of the NDA approval for the 3.4 oz. (100 g)

product. Marketing the product with FPL that is not identical to the approved labeling text and in the required format may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL 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 but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate these submissions “**FPL for approved NDA 21-471.**” Approval of this submission by FDA is not required before the labeling is used.

If you intend to market this product under additional labeling (e.g., under a different trade name) or increase the package size from 3.4 oz. (100 g), you must submit a prior approval supplement.

The Agency is evaluating further the appropriate labeling statements for OTC sunscreen drug products. We will inform you of any additional changes to the labeling of these products that the Agency deems necessary in the future.

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. We are deferring submission of your pediatric studies for under the age of 6 months until October 9, 2009.

Your deferred pediatric study required under section 2 of the Pediatric Research Equity Act (PREA) is considered a required postmarketing study commitment. The status of this postmarketing study shall be reported annually for each NDA according to 21 CFR 314.81. This commitment is listed below.

1. Deferred pediatric study under PREA for the prevention of sunburn in pediatric patients under the age of 6 months.

Final Report Submission:            October 9, 2009

Submit final study reports to NDA 21-471. For administrative purposes, all submissions related to this pediatric postmarketing study commitment must be clearly designated “**Required Pediatric Study Commitments**”.

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

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at [www.fda.gov/medwatch/report/mmp.htm](http://www.fda.gov/medwatch/report/mmp.htm).

If you have any questions, call Elaine Abraham, Regulatory Project Manager, at (301) 796-0843.

Sincerely,

*{See appended electronic signature page}*

Andrea Leonard-Segal, M.D.  
Director  
Division of Nonprescription Clinical Evaluation  
Office of Nonprescription Products  
Center for Drug Evaluation and Research

Sincerely,

*{See appended electronic signature page}*

Susan Walker, M.D.  
Director  
Division of Dermatologic and Dental Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

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**This is a representation of an electronic record that was signed electronically and  
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/s/

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Andrea Segal  
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Susan Walker  
10/5/2006 11:43:22 AM