



NDA 22-201

NDA APPROVAL

Ferring Pharmaceuticals, Inc.
Attention: Ronald Hargreaves, Ph.D.
4 Gatehall Drive, Third Floor
Parsippany, NJ 07054

Dear Dr. Hargreaves:

Please refer to your new drug application (NDA) dated February 14, 2008, received February 28, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for degarelix for injection, 80 mg and 120 mg.

We acknowledge receipt of your amendments dated July 7 and 15, August 6, September 25, November 25, December 5, 8, 17, 18 (electronic), 19 (electronic), 22 (electronic), 23 (electronic), and 24 (2 electronic), 2008.

This new drug application provides for the use of degarelix for injection, 80 mg and 120 mg, for the treatment of patients with advanced prostate cancer.

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 content of labeling [21 CFR 314.50(1)] in the enclosed agreed upon labeling.

This application was not referred to the Oncologic Drugs Advisory Committee for review because the key study used an established surrogate endpoint, and the results of the study did not raise significant issues with respect to the efficacy and safety of degarelix in the intended population.

PEDIATRIC RESEARCH EQUITY ACT (PREA)

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 waiving the pediatric study requirement for this application.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Title IX, Subtitle A, Section 901 of the Food and Drug Administration Amendments Act of 2007 (FDAAA) amends the Federal Food, Drug, and Cosmetic Act (FDCA) to authorize FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute (section 505(o)(3)(A), 21 U.S.C. 355(o)(3)(A)). This provision took effect on March 25, 2008.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to identify an unexpected serious risk of hepatic toxicity or long-term safety specific to degarelix.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA has not yet been established and is not sufficient to assess this serious risk.

Finally we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess the serious risk of hepatic toxicity. In addition, long-term safety of degarelix administered at the recommended dosing schedule in the approval has not been established. Therefore, based on appropriate scientific data, FDA has determined that you are required, pursuant to section 505(o)(3) of the FDCA,

1. To complete the ongoing extension study FE200486 CS21A entitled “An Open-Label, Multi-Center, Extension Study, Evaluating the Long-Term Safety and Tolerability of Degarelix One Month Dosing Regimen in Patients with Prostate Cancer Requiring Androgen Ablation Therapy”.

Protocol Submission:	January 2007
Trial Start Date:	March 2007
First Annual Report Submission:	March 2009
Second Annual Report Submission:	March 2010
Third Annual Report Submission:	March 2011
Final Report and Dataset Submission:	June 2012

Submit the protocol to your IND 51,222, with a cross-reference letter to this NDA 22-201. Submit all final report(s) to your NDA. Use the following designators to prominently label all submissions, including supplements, relating to this postmarketing requirement:

- **Required Postmarketing Protocol under 505(o)**
- **Required Postmarketing Final Report under 505(o)**
- **Required Postmarketing Correspondence under 505(o)**

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue.

Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) [or 21 CFR 601.70] requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) [or 21 CFR 601.70] to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii) [or 21 CFR 601.70]. We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format as described at <http://www.fda.gov/oc/datacouncil/spl.html> that is identical to the enclosed labeling (text for the package insert and text for the patient package insert. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "SPL for approved NDA 22-201."

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (October 2005)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission "**Final Printed Carton and Container Labels for approved NDA 22-201.**" Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

We note that you submitted the proposed proprietary name (b) (4) on November 25, 2008, and that it has not been reviewed in this review cycle. Upon receipt of this letter, we recommend that you re-submit your proposed proprietary name to the Agency for our review as a Prior Approval labeling supplement prior to its implementation.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert(s) to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see www.fda.gov/cder/ddmac.

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

METHODS VALIDATION

We have not completed validation of the regulatory methods. However, we expect your continued cooperation to resolve any problems that may be identified.

LETTERS TO HEALTH CARE PROFESSIONALS

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

MedWatch
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

REPORTING REQUIREMENTS

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

MEDWATCH-TO-MANUFACTURER PROGRAM

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.

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If you have any questions, call Carl Huntley, Regulatory Project Manager, at (301) 796-1372.

Sincerely,

{See appended electronic signature page}

Richard Pazdur, M.D.
Director, Office of Oncology Drug Products
Office of New Drugs
Center for Drug Evaluation and Research
Food and Drug Administration

Enclosure

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

/s/

Robert Justice
12/24/2008 04:40:09 PM
signing for Richard Pazdur, M.D.