



NDA 021205/S-023

**SUPPLEMENT APPROVAL**

GlaxoSmithKline  
Attention: Susan L. Watts, Ph.D.  
Director - US Infectious Diseases  
Global Regulatory Affairs  
Room 5.5381.5C  
5 Moore Drive  
PO Box 13398  
Research Triangle Park, NC 27709-3398

Dear Dr. Watts:

Please refer to your Supplemental New Drug Application (sNDA) dated and received June 30, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for TRIZIVIR<sup>®</sup> (abacavir sulfate, lamivudine, and zidovudine) Tablets.

We acknowledge receipt of your amendments dated September 2, 2010, October 14, 2010, and February 28, 2011 and your risk evaluation and mitigation strategy (REMS) assessment dated March 18, 2011.

This Prior Approval supplemental new drug application proposes the following changes:

1. Conversion of the full prescribing information to Physician Labeling Rule (PLR) format in accordance with 21 CFR 314.70(b)(2)(v)
2. Revisions to the Medication Guide
3. A proposed modification to the approved REMS

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text and with the minor editorial revisions listed below.

1. In the **HIGHLIGHTS OF PRESCRIBING INFORMATION** section, under the **USE IN SPECIFIC POPULATIONS** subsection, the proposed labeling was revised from:

to:

Pregnancy registry available (8.1).

(b) (4)

## **RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for TRIZIVIR<sup>®</sup> (abacavir sulfate, lamivudine, and zidovudine) Tablets was originally approved on March 9, 2009 and a REMS modification was approved on August 4, 2010. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS. Your proposed modification to the REMS consists of a revised Medication Guide based on conversion of the package insert to PLR format.

Your proposed modified REMS, submitted on March 18, 2011, and appended to this letter, is approved.

The timetable for submission of assessments of the REMS will remain the same as that approved on August 4, 2010.

There are no changes to the REMS assessment plan described in our March 9, 2009 letter.

We remind you that assessments of an approved REMS must include, under section 505-1(g)(3)(B) and (C), information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. With respect to any such postapproval study, you must include the status of such study, including whether any difficulties completing the study have been encountered. With respect to any such postapproval clinical trial, you must include the status of such clinical trial, including whether enrollment has begun, the number of participants enrolled, the expected completion date, whether any difficulties completing the clinical trial have been encountered, and registration information with respect to requirements under subsections (i) and (j) of section 402 of the Public Health Service Act. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)(vii) and including any material or significant updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

In addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

If you currently distribute or plan to distribute an authorized generic product under this NDA, you must submit a complete proposed REMS that relates only to the authorized generic product. Submit a proposed REMS, REMS supporting document, and any required appended documents as a prior approval supplement. Approval of the proposed REMS is required before you may market your authorized generic product.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

**NDA 021205 REMS ASSESSMENT**

**NEW SUPPLEMENT FOR NDA 021205  
PROPOSED REMS MODIFICATION  
REMS ASSESSMENT**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)  
FOR NDA 021205  
REMS ASSESSMENT  
PROPOSED REMS MODIFICATION (if included)**

If you do not submit electronically, please send 5 copies of REMS-related submissions.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is identical to the enclosed labeling (text for the package insert and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements and any annual reportable changes not included in the enclosed labeling. Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format that includes the changes approved in this supplemental application.

We request that the revised labeling approved today be available on your website within 10 days of receipt of this letter.

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) 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

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/opacom/morechoices/fdaforms/cder.html>; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

### **LETTERS TO HEALTH CARE PROFESSIONALS**

If you decide to 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, at least 24 hours prior to issuing the letter, an electronic copy of the letter to this NDA to the following address:

MedWatch Program  
Office of Special Health Issues  
Food and Drug Administration  
10903 New Hampshire Ave  
Building 32, Mail Stop 5353  
Silver Spring, MD 20993

### **REPORTING REQUIREMENTS**

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 Robert G. Kosko, Jr., Pharm.D., M.P.H., Regulatory Project Manager, at (301) 796-3979.

Sincerely,

*{See appended electronic signature page}*

Debra Birnkrant, M.D.  
Director  
Division of Antiviral Products  
Office of Antimicrobial Products  
Center for Drug Evaluation and Research

### **ENCLOSURES:**

Content of Labeling  
REMS

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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KENDALL A MARCUS  
03/31/2011