Dear Mr. Mangas:

Please refer to both of your Supplemental New Drug Applications (sNDAs) dated December 2, 2012, received December 2, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Neupro (rotigotine transdermal) Patch.


We also refer to our approval letter dated April 2, 2012 which contained the following error: REQUIRED PEDIATRIC ASSESSMENTS section did not list “Final Protocol Submission” and “Study Completion” milestone dates for each required study.

This replacement approval letter incorporates the correction of the error. The effective approval date will remain April 2, 2012, the date of the original approval letter.

The “Prior Approval” supplemental new drug application S-001 proposes an added indication to treat “the signs and symptoms of moderate to severe primary Restless Legs Syndrome (RLS)” and supplemental application S-002 proposes an added indication to treat “the signs and symptoms of advanced Parkinson’s disease (APD).”
We have completed our review of these supplemental applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at

http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the package insert and text for the patient package insert), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as 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, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

**REQUIRED PEDIATRIC ASSESSMENTS**

**S-001 Restless Leg Syndrome**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the requirement to study RLS in children ages 12 years and younger because prevalence estimates for children in this age group with primary RLS requiring treatment is low,
making clinical trials impractical. The efficacy of rotigotine in children with secondary RLS has not been studied.

We are deferring submission of your pediatric studies for ages 13 to 17 years for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act. These required studies are listed below.

1885-1  Conduct a PK/PD study in adolescents ages = 13 years to 17 years with moderate to severe symptoms of primary Restless Legs Syndrome.

| Final Protocol Submission: | June 2012 |
| Study Completion:          | April 2014 |
| Final Report Submission:   | November 2014 |

1885-2  Conduct a clinical trial to assess the efficacy and safety of rotigotine transdermal (Neupro) in adolescents ≥13 years to 17 years with moderate to severe symptoms of primary Restless Legs Syndrome. Develop age appropriate dose(s) in order to then identify the lowest maximally effective dose in this age group.

| Final Protocol Submission: | September 2015 |
| Study Completion:          | July 2024       |
| Final Report Submission:   | February 2025   |

1885-3  Conduct a long-term safety study of adolescents ages =13 years to 17 years with moderate to severe symptoms of primary Restless Legs Syndrome. The study must provide a descriptive analysis of safety data in pediatric patients during at least 12 months of continuous treatment with rotigotine transdermal at individualized doses in association with the trial described in the pediatric efficacy study.

| Final Protocol Submission: | June 2012 |
| Study Completion:          | September 2026 |
| Final Report Submission:   | April 2027 |

Submit final study reports to this NDA. For administrative purposes, all submissions related to these required pediatric postmarketing studies must be clearly designated “Required Pediatric Assessment(s)”. 

Reference ID: 3111730
S-002 Advanced Parkinson’s disease

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable. Studies are impossible or highly impracticable because Parkinson’s disease typically occurs in adults over the age of 40 and it does not occur in the pediatric population.

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
Office of Prescription Drug Promotion (OPDP)
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 Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

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 Stacy Metz, PharmD, Regulatory Project Manager, at (301) 796-2139.

Sincerely,

{See appended electronic signature page}

Russell Katz, M.D.
Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

RUSSELL G KATZ
04/02/2012

Reference ID: 3111730