Dear Ms. Dass:

Please refer to your Supplemental Biologics License Application (sBLA), dated June 7, 2012, received June 7, 2012, submitted under section 351 of the Public Health Service Act for Botox (onabotulinumtoxinA).

We acknowledge receipt of your risk evaluation and mitigation strategy (REMS) assessment dated February 1, 2011. After consultation between the Office of Surveillance and Epidemiology and the Office of New Drugs, we found the REMS assessment to be complete.

This Prior Approval supplement to your biologics license application proposes to eliminate the requirement for the Medication Guide as an element of the REMS.

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter.

**RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for Botox (onabotulinumtoxinA) was originally approved on July 31, 2009, and the most recent REMS modification was approved on August 24, 2011. The REMS consists of a Medication Guide, a communication plan, and a timetable for submission of assessments of the REMS.

Your proposed modification to the REMS consists of eliminating the requirement for the Medication Guide as an element of the REMS.

We have determined that maintaining the Medication Guide as part of the approved labeling is adequate to address the serious and significant public health concern and meets the standard in 21 CFR 208.1, and therefore, it is no longer necessary to include the Medication Guide as an
element of the approved REMS to ensure that the benefits of Botox (onabotulinumtoxinA) outweigh the risks.

Because the assessment demonstrates that the communication plan has been completed and has met its goals, we have determined that it is no longer necessary to include it as an element of the approved REMS to ensure that the benefits of the drug outweigh the risks.

Therefore, a REMS is no longer required for Botox (onabotulinumtoxinA).

We remind you that the Medication Guide will continue to be part of the approved labeling for Botox (onabotulinumtoxinA) in accordance with 21 CFR 208.

**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](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](http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm).

**REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

In addition, we request that you submit all reported medication errors, including potential medication errors and those that resulted in no adverse event or a non-serious adverse event, and reported complaints surrounding conversion of units between botulinum toxin products, as part of the periodic Safety Update Reports (PSURs).
If you have any questions, call Karen Abraham-Burrell, PharmD, Regulatory Project Manager, at (301) 796-2721.

Sincerely,

{See appended electronic signature page}

Russell G. Katz, MD
Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research
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
07/16/2012