Dear Dr. Fanelli:

Please refer to your Supplemental New Drug Application (sNDA) dated October 16, 2012, received October 19, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for BUTRANS (buprenorphine transdermal system).

We acknowledge receipt of your amendments dated December 13, 2012, and March 29, 2013.

This supplemental new drug application proposes modifications to the approved risk evaluation and mitigation strategy (REMS) for BUTRANS.

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 BUTRANS was originally approved on June 30, 2010, and modified on July 9, 2012. The REMS consists of a Medication Guide, elements to assure safe use, and a timetable for submission of assessments of the REMS. Your proposed modifications to the REMS consist of:

- Revisions to *Section VI. Specific Drug information for ER/LA Opioid Analgesic Products* of the FDA Blueprint
- Revisions to the REMS Website, including the landing page and the webpage listing covered products under the REMS program
- Revisions to individual product Medication Guides for relevant drugs
- Revision to the REMS document to remove ANDA holders from the Timetable for Submission of Assessments
Your proposed modified REMS, submitted on March 29, 2013, and appended to this letter, is approved.

The timetable for submission of assessments of the REMS will remain the same as that approved on July 9, 2012. There are no changes to the REMS assessment plan described in our July 9, 2012 letter.

This REMS uses a single, shared system for the elements to assure safe use and the REMS assessments. This single, shared system, known as the ER/LA Opioid Analgesic REMS Program, currently includes the products listed in Appendix 1. Other products may be added in the future if additional NDAs or ANDAs are approved.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j). A violation of this provision in 505-1(f) could result in enforcement action.

The requirements for assessments of an approved REMS under section 505-1(g)(3) include with respect to each goal included in the strategy, an assessment of the extent to which the approved strategy, including each element of the strategy, is meeting the goal or whether one or more such goals or such elements should be modified.

In addition to the assessments submitted according to the timetable included in the approved REMS, you 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 the FDCA.

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**NDA 021306 REMS CORRESPONDENCE**

*insert concise description of content in bold capital letters, e.g., UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT METHODOLOGY*

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.
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 021306 REMS ASSESSMENT**

**NEW SUPPLEMENT FOR NDA 021306**
**PROPOSED REMS MODIFICATION**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)**
**FOR NDA 021306**
**REMS ASSESSMENT**
**PROPOSED REMS MODIFICATION (if included)**

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

**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 Matthew Sullivan, Senior Regulatory Health Project Manager, at (301) 796-1245.

Sincerely,

{See appended electronic signature page}

Judith A. Racoosin, M.D., M.P.H.
Deputy Director for Safety
Division of Anesthesia, Analgesia, and Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE:
REMS
## Appendix 1 List of applications

<table>
<thead>
<tr>
<th>Application ID</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDA 021260</td>
<td>AVINZA (morphine sulfate) extended-release capsules and its generic equivalent</td>
</tr>
<tr>
<td>NDA 021306</td>
<td>BUTRANS (buprenorphine) Transdermal System for transdermal administration</td>
</tr>
<tr>
<td>NDA 006134</td>
<td>DOLOPHINE (methadone hydrochloride) tablets and its generic equivalents</td>
</tr>
<tr>
<td>ANDA 087997</td>
<td>Methadone Oral Solution and its generic equivalents ANDA 087393</td>
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<td></td>
<td>Methadone Oral Solution and its generic equivalents ANDA 089897</td>
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<td></td>
<td>Methadone Oral Concentrate</td>
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<tr>
<td>NDA 019813</td>
<td>DURAGESIC (Fentanyl Transdermal System) for transdermal administration and its generic equivalents</td>
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<tr>
<td>NDA 022321</td>
<td>EMBEDA (morphine sulfate and naltrexone hydrochloride) extended-release capsules</td>
</tr>
<tr>
<td>NDA 021217</td>
<td>EXALGO (hydromorphone HCl) Extended-Release Tablets</td>
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<tr>
<td>NDA 020616</td>
<td>KADIAN (morphine sulfate) extended-release capsules and its generic equivalent</td>
</tr>
<tr>
<td>NDA 019516</td>
<td>MS CONTIN (morphine sulfate) controlled-release tablets and its generic equivalents</td>
</tr>
<tr>
<td>NDA 200533</td>
<td>NUCYNTA ER (tapentadol) extended-release oral tablets</td>
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<tr>
<td>NDA 201655</td>
<td>OPANA ER (oxymorphone hydrochloride) Extended-Release tablets</td>
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<tr>
<td>NDA 021610</td>
<td>OPANA ER (oxymorphone hydrochloride) Extended-Release tablets and its generic equivalents</td>
</tr>
<tr>
<td>NDA 022272</td>
<td>OXYCONTIN (oxycodone hydrochloride controlled-release) Tablets</td>
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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.

/s/

JUDITH A RACOOSIN
04/15/2013