



NDA 202207/S-002

SUPPLEMENT APPROVAL

Navidea Biopharmaceuticals, Inc.
Attention: William Regan
Senior Vice President, Global Regulatory Strategy
5600 Blazer Parkway
Suite 200
Dublin, OH 43017-7550

Dear Mr. Regan:

Please refer to your Supplemental New Drug Application (sNDA) dated December 16, 2013, received December 16, 2013, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Lymphoseek (Tilmanocept) powder for injection, 250 mcg per vial.

We acknowledge receipt of your amendment(s) dated December 26, 2013; January 9, 2014; January 22, 2014; April 2, 2014; May 9, 2014; May 21, 2014; June 12, 2014; June 27, 2014; August 8, 2014; August 25, 2014; September 23, 2014 and October 2, 2014.

This “Prior Approval” supplemental new drug application provides for the use of Lymphoseek (Tilmanocept) indicated with or without scintigraphic imaging for:

- Lymphatic mapping using a handheld gamma counter to locate lymph nodes draining a primary tumor site in patients with solid tumors for which this procedure is a component of intraoperative management.
- Guiding sentinel lymph node biopsy using a handheld gamma counter in patients with clinically node negative squamous cell carcinoma of the oral cavity, breast cancer or melanoma.

APPROVAL & LABELING

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.

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) with the addition of any labeling changes in pending “Changes Being Effectuated” (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 that includes labeling changes 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

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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for ages 0 to less than 1 month because necessary studies are impossible or highly impracticable in this age group due to the rarity of solid tumors occurring in infants 0 to 1 month of age.

We are deferring submission of your pediatric study for ages 1 month to 16 years for this application until March 2018 because the product is ready for approval for use in adults and pediatric studies have not been completed.

Your deferred pediatric study required under section 505B(a) of the FDCA is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the FDCA. This required study is listed below.

2789-1: Deferred pediatric study under PREA evaluating the use of Lymphoseek guided lymphatic mapping and sentinel lymph node biopsy in the treatment of solid tumors in pediatric patients ages 1 month to 16 years of age.

Draft Protocol submission: January 31, 2015
Final Protocol submission: April 30, 2015
Study Completion: September 30, 2017
Final Report Submission: March 31, 2018

Submit the protocol to your IND 61757, with a cross-reference letter to this NDA.

Reports of this required pediatric postmarketing study must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

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/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>. Information and Instructions for completing the form can be found at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. 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 Alberta Davis-Warren, Regulatory Project Manager, at (301) 796-3908.

Sincerely,

{See appended electronic signature page}

Libero Marzella, M.D., Ph.D.
Director
Division of Medical Imaging Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research

ENCLOSURE:
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/

LIBERO L MARZELLA
10/14/2014