



NDA 204677

**NDA APPROVAL**

Piramal Imaging SA  
c/o CBR International Corp.  
Attention: Andrew Stephens, M.D., Ph.D.  
Authorized U.S. Agent  
2905 Wilderness Place, Suite 202  
Boulder, CO 80301

Dear Dr. Stephens:

Please refer to your New Drug Application (NDA) dated December 21, 2012, received December 21, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Neuraceq (florbetaben F18 injection), 50 to 5000 MBq/mL (1.4 to 135 mCi/mL).

We acknowledge receipt of your amendments dated:

January 10, 2013	April 26, 2013	September 20, 2013	December 6, 2013
February 1, 2013	May 7, 2013 (2)	September 24, 2013	December 11, 2013
February 12, 2013	May 10, 2013	September 25, 2013	December 13, 2013
February 15, 2013	May 31, 2013	September 26, 2013	January 14, 2014
February 28, 2013	June 7, 2013	October 1, 2013 (2)	January 16, 2014
March 1, 2013	June 20, 2013	October 11, 2013	January 23, 2014
March 6, 2013	July 2, 2013	October 15, 2013	February 18, 2014
April 8, 2013	August 6, 2013	November 6, 2013	February 28, 2014
April 15, 2013	September 18, 2013 (2)	November 22, 2013	March 12, 2014
April 22, 2013	September 19, 2013	December 4, 2013	March 18, 2014

This new drug application provides for the use of Neuraceq (florbetaben F18 injection) as a radioactive diagnostic agent for Positron Emission Tomography (PET) imaging of the brain to estimate  $\beta$  amyloid neuritic plaque density in adult patients with cognitive impairment who are being evaluated for Alzheimer's disease or other causes of cognitive decline.

We have completed our review of this 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). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

## **CARTON AND IMMEDIATE CONTAINER LABELS**

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels and carton and immediate container labels submitted on March 18, 2014, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 204677.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

## **ADVISORY COMMITTEE**

Your application for Neuraceq (florbetaben F18 injection) was not referred to an FDA advisory committee because outside expertise was not necessary; there were no controversial issues that would benefit from an advisory committee discussion.

## **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(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric studies requirement for this application because necessary studies are impossible or highly impracticable. The pathophysiology of the disease occurs only in the adult population.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. 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).

### **MEDWATCH-TO-MANUFACTURER PROGRAM**

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at

<http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm>.

### **POST APPROVAL FEEDBACK MEETING**

New molecular entities and new biologics qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from

improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

### **PDUFA V APPLICANT INTERVIEW**

FDA has contracted with Eastern Research Group, Inc. (ERG) to conduct an independent interim and final assessment of the Program for Enhanced Review Transparency and Communication for NME NDAs and Original BLAs under PDUFA V ('the Program'). The PDUFA V Commitment Letter states that these assessments will include interviews with applicants following FDA action on applications reviewed in the Program. For this purpose, first-cycle actions include approvals, complete responses, and withdrawals after filing. The purpose of the interview is to better understand applicant experiences with the Program and its ability to improve transparency and communication during FDA review.

ERG will contact you to schedule a PDUFA V applicant interview and provide specifics about the interview process. Your responses during the interview will be confidential with respect to the FDA review team. ERG has signed a non-disclosure agreement and will not disclose any identifying information to anyone outside their project team. They will report only anonymized results and findings in the interim and final assessments. Members of the FDA review team will be interviewed by ERG separately. While your participation in the interview is voluntary, your feedback will be helpful to these assessments.

If you have any questions, call Ms. Sharon Thomas, Regulatory Project Manager, at (301) 796-1994.

Sincerely,

*{See appended electronic signature page}*

Sandra Kweder, M.D., F.A.C.P  
RADM (Ret.) U.S. Public Health Service  
Director (acting)  
Office of Drug Evaluation IV  
Center for Drug Evaluation and Research

Enclosures:  
Content of Labeling  
Carton and Container Labeling

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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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SANDRA L KWEDER  
03/19/2014