Dear Dr. Pratt:

Please refer to your New Drug Application (NDA) dated March 24, 2014, received March 24, 2014, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Triferic® (ferric pyrophosphate citrate) solution, 5.44 mg Fe/mL.

We also refer to our approval letter dated January 23, 2015 which contained the following errors: The description of the PREA PMRs milestones contained a combined “Study/Trial” designation instead of “Trial” and the milestone date omitted the days of the month the milestones were due.

This replacement approval letter incorporates the correction of the errors. The effective approval date will remain January 23, 2015, the date of the original approval letter.

We acknowledge receipt of your amendments dated April 3; May 2; June 2, 3, 10, and 23; July 10, 11, 14, and 23; August 1, 4 (2), 12, 19 (2), 22, and 26; September 5, 16, and 24; October 3 (2), 6, 7 (2), 9, 10, 13, 16, 17, 23, 24, and 30 (2); November 5; December 3, 11, 15, 23, and 29 (3), 2014; and January 13, 16, 20, 21, and 23 (2), 2015.

This new drug application provides for the use of Triferic® (ferric pyrophosphate citrate) 5.44 mg Fe/mL concentrate solution for the replacement of iron to maintain hemoglobin in adult patients with hemodialysis-dependent chronic kidney disease (HDD-CKD).

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](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm).
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, 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 206317.” Approval of this submission by FDA is not required before the labeling is used.

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

**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 deferring submission of your pediatric studies until March 31, 2015, because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required under section 505B(a) of the Federal Food, Drug, and Cosmetic Act is required postmarketing study. The status of this 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.

PMR 2853-1 Complete the trial and submit the final report for the pediatric pharmacokinetic trial entitled “Pharmacokinetics of SFP iron delivered via dialysate in pediatric patients with chronic kidney disease on hemodialysis.”

Final Protocol Submission: 03/31/2015
Trial Completion: 02/28/2017
Final Report Submission: 06/30/2017

Reference ID: 3692540
PMR 2853-2  Efficacy and safety trial of Triferic via hemodialysate in pediatric patients aged less than 18 years with hemodialysis-dependent chronic kidney disease.

Final Protocol Submission:  03/31/2018  
Trial Completion:  07/31/2020  
Final Report Submission:  12/31/2020

Submit the protocols to your IND 051290, with a cross-reference letter to this NDA.

Reports of these required pediatric postmarketing studies 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, 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](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](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](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 Amy Chi, Regulatory Project Manager, at (240) 402-0992.

Sincerely,

{See appended electronic signature page}

Ann T. Farrell, MD
Director
Division of Hematology Products
Office of Hematology and Oncology Products
Center for Drug Evaluation and Research

Enclosures:
  Content of Labeling
  Carton and Container Labeling
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

ANN T FARRELL
01/23/2015