DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 209363

Symbiomix Therapeutics, LLC
c/o Salamandra, LLC
Attention: Kaylee White, RAC
Associate Director for Regulatory Affairs
4800 Hampden Lane, Suite 900
Bethesda, MD 20814

Dear Ms. White:

Please refer to your New Drug Application (NDA) dated January 17, 2017, received January 17, 2017, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Solosec (secnidazole) Oral Granules, 2 g.

This new drug application provides for the use of Solosec (secnidazole) oral granules for the treatment of bacterial vaginosis in adult women.

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). Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient 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](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 titled *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*.
For administrative purposes, designate this submission “Final Printed Carton and Container Labels for approved NDA 209363.” Approval of this submission by FDA is not required before the labeling is used.

**MARKET PACKAGE**

Please submit one market package of the drug product when it is available to the following address:

Maureen Dillon-Parker  
Food and Drug Administration  
Center for Drug Evaluation and Research  
White Oak Building 22, Room: 6182  
10903 New Hampshire Avenue  
Silver Spring, Maryland  
Use zip code **20903** if shipping via United States Postal Service (USPS).  
Use zip code **20993** if sending via any carrier other than USPS (e.g., UPS, DHL, FedEx).

**ADVISORY COMMITTEE**

Your application for Solosec was not referred to an FDA advisory committee because there were no issues that would benefit from 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 males of all age groups, females from birth to 12 years and for premenarchal adolescent females from 12 years to less than 18 years of age because necessary studies are impossible or highly impracticable. This is because bacterial vaginosis is not associated with these pediatric groups.

We are deferring submission of your pediatric study in postmenarchal adolescent females ages 12 years to less than 18 years of age until March 2021, because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required under section 505B(a) of the Federal Food, Drug, and Cosmetic Act (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)(C) of the FDCA. This required study is listed below.
3249-1: Conduct an open label, multicenter, safety study of Solosec (secnidazole) oral granules in healthy postmenarchal adolescent females ages 12 years to less than 18 years of age with bacterial vaginosis.

The timetable you submitted on September 6, 2017, states that you will conduct this study according to the following schedule:

- Draft Protocol Submission: 12/2017
- Final Protocol Submission: 03/2018
- Study/Trial Completion: 03/2020
- Final Report Submission: 03/2021

Submit the protocol(s) to your IND 117811, 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, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert, Medication Guide, and patient PI (as applicable) to:

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

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf).

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.
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.

If you have any questions, call Maureen Dillon-Parker, Chief, Regulatory Project Management Staff, at (301) 796-0706.

Sincerely,

{See appended electronic signature page}

John Farley, MD, MPH
Deputy Director
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure(s):
  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/

JOHN J FARLEY
09/15/2017