Dear Mr. Pace:

Please refer to your Supplemental New Drug Applications (sNDAs) dated November 10, 2017 and received on November 13, 2017, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ZIAGEN® (abacavir) tablets, for oral use and ZIAGEN® (abacavir) oral solution.

We also refer to your sNDAs dated and received on March 26, 2018.

These Prior Approval supplemental new drug applications provide for the following revisions to labeling:

- **BOXED WARNING:** Removal of Lactic Acidosis and Severe Hepatomegaly with Steatosis
- **DOSAGE FORMS AND STRENGTHS and HOW SUPPLIED/STORAGE AND HANDLING:** Updated to include color changes in solution over time.
- **WARNINGS AND PRECAUTIONS, subsection 5.2 Lactic Acidosis and Severe Hepatomegaly with Steatosis:** Updated information to include female sex and obesity as risk factors.
- **WARNINGS AND PRECAUTIONS, subsection 5.4 Myocardial Infarction:** Information related to the risk of myocardial infarction was updated.
- **WARNINGS AND PRECAUTIONS:** Removal of information on Fat Redistribution
- **CLINICAL PHARMACOLOGY, Pharmacokinetics section was updated to include abacavir transporter data
- Corresponding changes made to the PATIENT COUNSELING INFORMATION and Medication Guide
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 and Medication Guide), with the addition of any labeling changes in pending “Changes Being Effected” (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/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include 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).

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 CAPT Anitra Johnson, DHSc, MSN, RN, Regulatory Project Manager, at (301) 796-4876.
Sincerely,

[See appended electronic signature page]
Debra Birnkrant, M.D.
Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

ENCLOSURE(S):
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/

POONAM MISHRA
05/09/2018
on behalf of Debra Birnkrant, MD