



NDA 203314/S-009

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING COMMITMENT**

Novo Nordisk Inc.  
Attention: Nina Liang, Ph.D.  
Associate Director, Regulatory Affairs  
800 Scudders Mill Rd.  
Plainsboro, NJ 08536

Dear Dr. Liang:

Please refer to your Supplemental New Drug Application (sNDA) dated and received October 27, 2017, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Tresiba (insulin degludec) injection, 100 units/mL and 200 units/mL.

This Prior Approval supplemental new drug application provides for an update to section 6.2, Immunogenicity, of the prescribing information (PI).

**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 and with the minor editorial revisions listed below.

1. Line numbers removed throughout the PI.
2. Revision date added at the end of highlights.

**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 prescribing information, patient package insert, and text for the instructions for use), 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 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).

### **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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.

Because none of these criteria apply to your application, you are exempt from this requirement.

### **FULFILLMENT OF POSTMARKETING COMMITMENT**

This supplemental application contained the final report for the following postmarketing commitment listed in the September 25, 2015, approval letter.

- 2954-4 To assess the incidence and titers of anti-degludec antibodies in sera from patients treated with Tresiba (insulin degludec injection) in Tresiba (insulin degludec injection) clinical trials and determine whether they are associated with differences in pharmacokinetics parameters (e.g. exposure), efficacy (e.g. hemoglobin A1c, insulin dose), and safety (e.g. hypoglycemia and hypersensitivity). The clinical samples should not be tested until the results from the PMC for anti-degludec antibody assay development and validation have been submitted to and reviewed by the Agency.

We have reviewed your supplemental application, as amended, and conclude that the above commitment was fulfilled.

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our September 25, 2015, letter.

## **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 prescribing information to:

OPDP Regulatory Project Manager  
Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion (OPDP)  
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> ).

You must submit final promotional materials and prescribing information, 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 Callie Cappel-Lynch, Regulatory Project Manager, at (301) 796-8436.

Sincerely,

*{See appended electronic signature page}*

William Chong, M.D.  
Director (Acting)  
Division of Metabolism and Endocrinology Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

ENCLOSURES:

Prescribing Information

Patient Package Insert (previously approved December 16, 2016)

Instructions for Use (U-100) (previously approved December 16, 2016)

Instructions for Use (U-200) (previously approved December 16, 2016)

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**This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.**  
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/s/  
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WILLIAM H CHONG  
08/09/2018