



NDA 206976

**NDA APPROVAL**

Institut Biochimique SA (IBSA)  
c/o Clarence E. Jones  
4249 Via Encanto  
Thousand Oaks, CA 91320

Attention: Clarence E. Jones, PhD  
IBSA U.S. Agent

Dear Dr. Jones:

Please refer to your New Drug Application (NDA) dated and received March 4, 2015, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for LICART (diclofenac epolamine) topical system, 1.3%.

We acknowledge receipt on June 25, 2018, of your June 23, 2018, amendment, which constituted a complete response to our March 24, 2017, action letter.

This new drug application provides for the use of LICART (diclofenac epolamine) topical system for the topical treatment of acute pain due to minor strains, sprains, and contusions.

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.

#### **WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

#### **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 and Medication Guide) 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 *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 CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling 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 (April 2018, Revision 5)*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 206976.**” Approval of this submission by FDA is not required before the labeling is used.

### **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.

We are waiving the pediatric study requirements for ages less than 6 years because the condition is uncommon in pediatric patients less than 6 years of age, and there are too few patients to study.

We are deferring submission of your pediatric study for ages 6 to less than 17 years for this application because this product is ready for approval for use in adults, and the pediatric study has not been completed.

Your deferred pediatric study required by 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 Federal Food, Drug, and Cosmetic Act/FDCA. This required study is listed below.

- 3537-1      An open-label pharmacokinetics and safety study of diclofenac epolamine topical system in pediatric patients aged 6 to less than 17 years with acute pain due to minor strains, sprains, and contusions.
- Final Protocol Submission:    02/2019  
Study Completion:                12/2021  
Final Report Submission:        12/2022

Submit the protocol(s) to your PIND 111538, 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 this study. 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 Prescribing Information, Medication Guide, and Patient Package Insert (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 Prescribing Information, 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>.

### **EXPIRY DATING PERIOD**

A 24-month expiry dating period is granted for LICART (diclofenac epolamine) topical system when stored in the original envelope at 20-25 °C (68-77 °F) with excursions of 15-30 °C (59-86 °F) permitted.

**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 Sandy Truong, Regulatory Project Manager, at 301-796-5719.

Sincerely,

*{See appended electronic signature page}*

Sharon Hertz, MD  
Director  
Division of Anesthesia, Analgesia,  
and Addiction Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

ENCLOSURES:

Content of Labeling  
Prescribing Information  
Medication Guide  
Carton and Container Labeling

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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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SHARON H HERTZ  
12/19/2018