



NDA 208745/S-002

SUPPLEMENT APPROVAL

Synergy Pharmaceuticals, Inc.
Attn: Evelyn Jaeger
Vice President Regulatory Affairs & Clinical Quality Assurance
420 Lexington Avenue
Suite 2012
New York, NY 10170

Dear Ms. Jaeger:

Please refer to your Supplemental New Drug Application (sNDA), received February 7, 2018, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Trulance™ (plecanatide) 3mg oral tablet.

This “Changes Being Effected” supplemental new drug application proposes to modify the approved label for clarity and consistency as follows:

- Table 4 - Study 3, in the Treatment Difference column an end parenthesis was changed to an end bracket for consistency.
- In Table 4, for Study 3 change to the placebo N to 350 and change to the TRULANCE N to 349. This response was not incorporated in the approved labeling by Synergy; however, these numbers are consistent with the descriptive text in Section 14.2.
- In Table 4, for Study 4, change to the TRULANCE N to 375. This response was not incorporated in the approved labeling by Synergy; however, these numbers are consistent with the descriptive text in Section 14.2.
- In addition, during the verification of the Table 4 N (s), Synergy found one additional data change to the Study 3 Treatment Difference column: [95% CI^a] which should read [6%, 18%] rather than [6%,19%].

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.

We note that your February 7, 2018, submission includes final printed labeling (FPL) for your package insert and Medication Guide. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

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 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/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).

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 package insert(s) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion (OPDP)
5901-B Amundson 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 package insert(s), 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 Evangela Covert, Regulatory Project Manager, at (301) 796-4075.

Sincerely,

{See appended electronic signature page}

Joyce Korvick, M.P.H., M.D.
Deputy Director, Safety
Division of Gastroenterology and Inborn Errors
Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling

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.

/s/

JOYCE A KORVICK
07/25/2018