



NDA 210136

TENTATIVE APPROVAL

Braeburn Pharmaceuticals Inc.
47 Hulfish Street
Suite 441
Princeton, NJ 08542

Attention: Susan Franks, PhD
Senior Vice President, Head of Regulatory Affairs

Dear Dr. Franks:

Please refer to your New Drug Application (NDA) dated and received July 19, 2017, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for BRIXADI (buprenorphine) extended-release injection for subcutaneous use, 8 mg, 16 mg, 24 mg, 32 mg, (weekly); 64 mg, 96 mg, and 128 mg (monthly).

We acknowledge receipt of your amendment dated June 26, 2018, which constituted a complete response to our January 19, 2018, action letter.

This NDA provides for the use of BRIXADI (buprenorphine) extended-release injection for the treatment of moderate to severe opioid use disorder in patients who have initiated treatment with a single dose of transmucosal buprenorphine product or who are already being treated with buprenorphine.

We have completed our review of this application, as amended. It is tentatively approved under 21 CFR 314.105 for use as recommended in the agreed-upon enclosed labeling (text for the Prescribing Information, Medication Guide, and carton and container labeling). This determination is based upon information available to the Agency at this time, [i.e., information in your application and the status of current good manufacturing practices (cGMPs) of the facilities used in the manufacture and testing of the drug product]. This determination is subject to change on the basis of any new information that may come to our attention.

Final approval of your application is subject to expiration of a period of patent protection and/or exclusivity. Therefore, final approval of your application under section 505(c)(3) of the Act [21 U.S.C. 355(c)(3)] may not be granted before the period has expired.

To obtain final approval of this application, submit an amendment two or six months prior to the: 1.) expiration of the exclusivity protection or 2.) date you believe that your NDA will be eligible for final approval, as appropriate. In your cover letter, clearly identify your amendment as **“REQUEST FOR FINAL APPROVAL”**. This amendment should provide the

legal/regulatory basis for your request for final approval and should include a copy of any relevant court order or judgment settlement, or licensing agreement, as appropriate. In addition to a safety update, the amendment should also identify changes, if any, in the conditions under which your product was tentatively approved, i.e., updated labeling; chemistry, manufacturing, and controls data; and risk evaluation and mitigation strategy (REMS). If there are no changes, clearly state so in your cover letter. Any changes require our review before final approval and the goal date for our review will be set accordingly.

Until we issue a final approval letter, this NDA is not approved.

Please note that this drug product may not be marketed in the United States without final agency approval under Section 505 of the Act. The introduction or delivery for introduction into interstate commerce of this drug product before the final approval date is prohibited under Section 501 of the Act and 21 U.S.C. 331(d).

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 note that if this application is ultimately approved, you will need to meet these requirements.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the FDCA authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

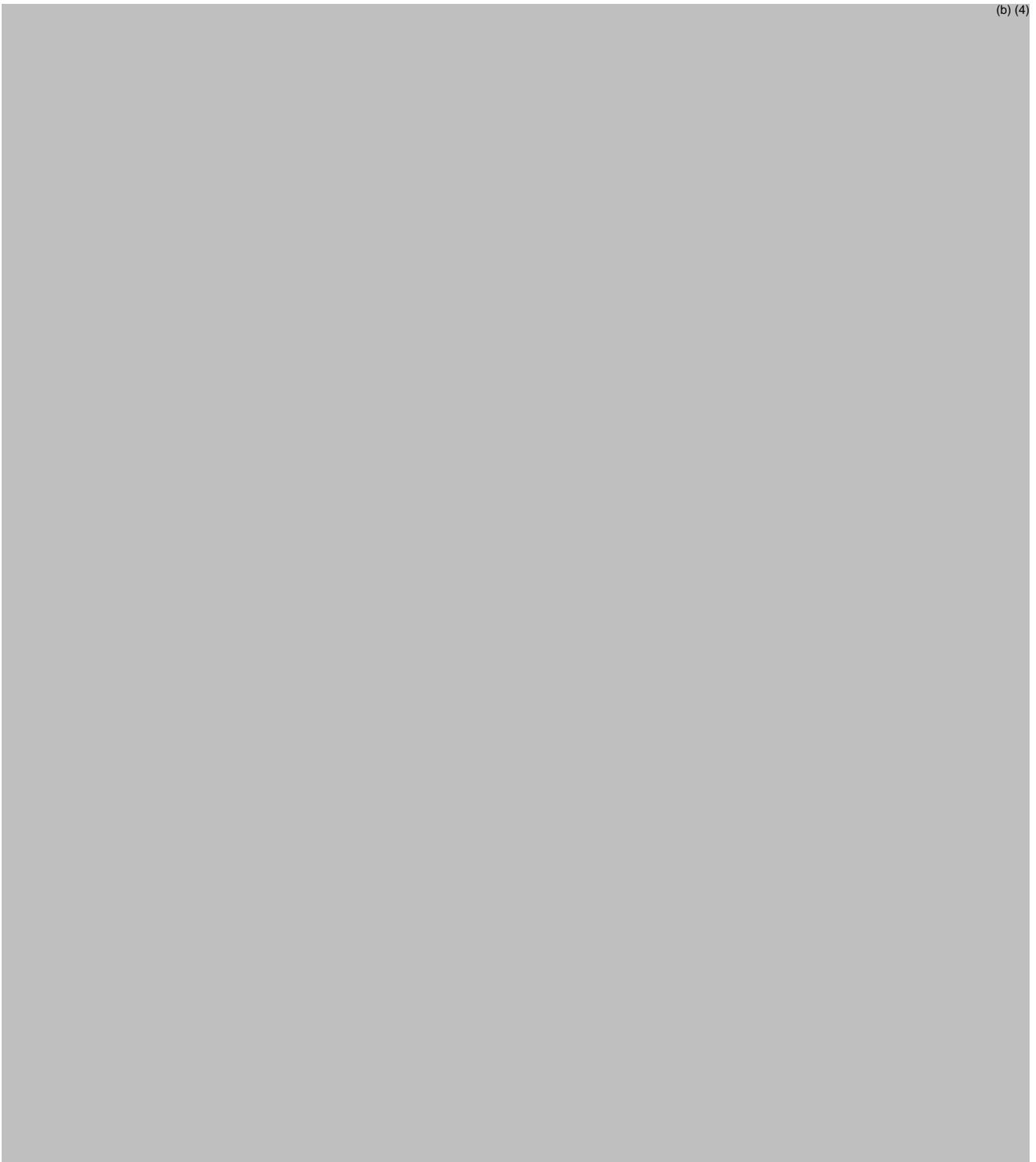
We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to:



Furthermore, the new pharmacovigilance system that FDA is required to establish under Section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

(b) (4)

Therefore, based on appropriate scientific data, FDA has determined that if your application is approved, you will be required to participate in the conduct of the following postmarketing studies:



(b) (4)

We have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess the following known serious risks:

(b) (4)

If this application is ultimately approved, submit the protocols to your IND 114082, with a cross reference letter to this NDA. Submit all final reports to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

REQUIRED POSTMARKETING PROTOCOL UNDER 505(o)
REQUIRED POSTMARKETING FINAL REPORT UNDER 505(o)
REQUIRED POSTMARKETING CORRESPONDENCE UNDER 505(o)

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Section 505-1 of the FDCA authorizes FDA to require the submission of a risk evaluation and mitigation strategy (REMS) if FDA determines that such a strategy is necessary to ensure that the benefits of the drug outweigh the risks [section 505-1(a)].

As noted in our Complete Response letter dated January 19, 2018, in accordance with section 505-1 of FDCA, we have determined that a REMS is necessary for BRIXADI to ensure the benefits of the drug outweigh the risk of serious harm or death that could result with intravenous self-administration.

Your proposed REMS, submitted on December 17, 2018, amended and appended to this letter, can be approved with your application. The REMS consists of elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

If your application is ultimately approved, your REMS must be fully operational before you introduce BRIXADI into interstate commerce. Furthermore, our letter of approval will provide the details of the assessment plan for BRIXADI.

If you have any questions, call Matthew Sullivan, Supervisory Regulatory Health Project Manager, at (301) 796-1245.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, M.D.
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
Instructions for Use
Carton and Container Labeling
REMS

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/

SHARON H HERTZ
12/21/2018