



NDA 203231/S-015, S-016, S-017

## **SUPPLEMENT APPROVAL**

InfoRLife SA  
c/o Sagent Pharmaceuticals  
1901 N. Roselle Road, Suite 450  
Schaumburg, IL 60195

Attention: Jeffrey P. Scheithe  
Associate Director, Regulatory Affairs

Dear Mr. Scheithe:

Please refer to your supplemental new drug applications (sNDAs) dated and received on July 6, 2017 (S-015), February 16, 2018 (S-016), and June 28, 2019 (S-017), submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zoledronic Acid Injection, 4 mg/100 mL.

Changes Being Effected supplemental new drug application S-015 provides for updates to the Adverse Reactions section (Section 6) and Patient Counseling Information (Section 17) of the Full Prescribing Information to align with revisions made to the Reference Listed Drug labeling.

Changes Being Effected supplemental new drug application S-016 provides for updates to the Dosage and Administration section (Section 2) of the Full Prescribing Information to add instructions for Preparation for Administration.

Prior Approval supplemental new drug application S-017 provides for revisions to the Full Prescribing Information to comply with the Pregnancy and Lactation Labeling Rule (PLLR). These revisions also align with the Reference Listed Drug labeling.

### **APPROVAL & LABELING**

We have completed our review of these applications. They are approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

## **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 FDA.gov.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information), 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 *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

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 Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), 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.

## **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-*

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<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

*Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.*<sup>3</sup>

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 FDA.gov.<sup>4</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>5</sup>

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4).

**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 Christy Cottrell, Chief, Project Management Staff, at 301-796-4256.

Sincerely,

*{See appended electronic signature page}*

Amna Ibrahim, MD  
Deputy Director  
Division of Oncology 1  
Office of Oncologic Diseases  
Center for Drug Evaluation and Research

ENCLOSURE(S):

- Content of Labeling

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<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at

<https://www.fda.gov/media/128163/download>.

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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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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