Dear Dr. Sundaram:

Please refer to your new drug application (NDA), dated and received August 21, 2020, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for sodium phenylacetate and sodium benzoate injection.

This NDA provides for the use of sodium phenylacetate and sodium benzoate injection as adjunctive therapy for the treatment of acute hyperammonemia and associated encephalopathy in pediatric and adult patients with deficiencies in enzymes of the urea cycle.

APPROVAL & LABELING

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.

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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information) 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.**

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 and carton and container labeling submitted on April 9,
2021, 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
**Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications.** For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 215025.**” Approval of this submission by FDA is not required before the labeling is used.

**DATING PERIOD**

Based on the stability data submitted to date, the expiry dating period for sodium
phenylacetate and sodium benzoate injection shall be 24 months from the date of
manufacture when stored at 20°C to 25°C.

**ADVISORY COMMITTEE**

Your application for sodium phenylacetate and sodium benzoate was not referred to an
FDA advisory committee because this drug is not the first in its class.

**PROPRIETARY NAME**

If you intend to have a proprietary name for this product, the name and its use in the
labeling must conform to the specifications under 21 CFR 201.10 and 201.15. We
recommend that you submit a request for a proposed proprietary name review. (See the
guidance for industry **Contents of a Complete Submission for the Evaluation of Proprietary Names.** and **PDUFA Reauthorization Performance Goals and Procedures Fiscal Years 2018 through 2022.**)

**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

2 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](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).
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-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs.*

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 FDA.gov. Information and Instructions for completing the form can be found at FDA.gov.

**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 Avinash Kalsi, Regulatory Project Manager, at (301) 348-1432.

Sincerely,

*See appended electronic signature page*

Patroula Smpokou, M.D.
Deputy Director
Division of Rare Diseases and Medical Genetics (DRDMG)
Office of Rare Diseases, Pediatrics, Urologic and Reproductive Medicine (ORPURM)
Center for Drug Evaluation and Research

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3 For the most recent version of a guidance, check the FDA guidance web page at [https://www.fda.gov/media/128163/download](https://www.fda.gov/media/128163/download).


ENCLOSURES:
- Content of Labeling
  - Prescribing Information
- Carton and Container 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/

PATROULA I SMPOKOU
06/10/2021 02:30:27 PM