NDA 050793/S-031

SUPPLEMENT APPROVAL

Padagis US LLC
c/o Padagis Israel Pharmaceuticals Ltd.
Attention: Tzach Bachar
Director, Regulatory Affairs
3940 Quebec Avenue North
Minneapolis, MN 55427

Dear Tzach Bachar:

Please refer to your supplemental new drug application (sNDA) dated and received, May 18, 2023, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Clindesse (clindamycin phosphate) Vaginal Cream, 2%.

This "Changes Being Effected" sNDA provides for updates to the **ADVERSE REACTIONS (6)** section, **Other Clindamycin Formulations (6.2)** subsection of the Prescribing Information (PI) to include the addition of "Immune System: Drug reaction with eosinophilia and systemic symptoms (DRESS) cases have been reported." Minor editorial revisions were also made throughout the PI and the Patient Information.

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.

We remind you that your labeling is noncompliant with the requirements of the Pregnancy and Lactation Labeling Rule (PLLR), and that you should submit labeling to conform to these requirements as soon as possible. We refer to the requirements for pregnancy and lactation labeling and the implementation plan for complying with those requirements, published in the *Federal Register* in December 2014 [*Content and Format of Labeling for Human Prescription Drug and Biological Products; Requirements for Pregnancy and Lactation Labeling*, 79 FR 233, December 4, 2014, see 21 CFR 201.56(a and d) and 201.57 (c)(9)(i, ii, and iii)]. Your original application approved on November 30, 2004, required that you submit a Prior Approval Supplement to comply with PLLR by June 30, 2020. Please refer to the guidance for industry, *Pregnancy, Lactation, and Reproductive Potential: Labeling for Human Prescription Drug and Biological Products-Content and Format*.[1]

[1] https://www.fda.gov/regulatory-information/search-fda-guidance-documents/pregnancy-lactation-and-reproductive-potential-labeling-human-prescription-drug-and-biological

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.[2] Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information, Patient Package Insert), with the addition of any labeling changes in pending "Changes Being Effected" (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*.[3]

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).

PATENT LISTING REQUIREMENTS

Pursuant to 21 CFR 314.53(d)(2) and 314.70(f), certain changes to an approved NDA submitted in a supplement require you to submit patent information for listing in the Orange Book upon approval of the supplement. You must submit the patent information required by 21 CFR 314.53(d)(2)(i)(A) through (C) and 314.53(d)(2)(ii)(A) and (C), as applicable, to FDA on Form FDA 3542 within 30 days after the date of approval of the supplement for the patent information to be timely filed (see 21 CFR 314.53(c)(2)(ii)). You also must ensure that any changes to your approved NDA that require the submission of a request to remove patent information from the Orange Book are submitted to FDA at the time of approval of the supplement pursuant to 21 CFR 314.53(d)(2)(ii)(B) and 314.53(f)(2)(iv).

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

---

[2] http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm
[3] 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.

If you have any questions, call Deborah Kim, PharmD, RAC, Senior Regulatory Project Manager, at (301) 796-9053.

Sincerely,

{See appended electronic signature page}

Dmitri Iarikov, MD, PhD
Deputy Director
Division of Anti-Infectives
Office of Infectious Diseases
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert

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/

DMITRI IARIKOV
11/03/2023 05:48:07 PM