

NDA 217836

**NDA APPROVAL**

Orasis Pharmaceuticals, Ltd.  
c/o Premier Consulting, L.L.C.  
Attention: Gregory A. Meyer, RAC CQA  
Vice President, Regulatory Affairs  
8000 Jarvis Ave, Suite 100  
Newark, CA 94560

Dear Gregory A. Meyer:

Please refer to your new drug application (NDA) dated and received December 22, 2022, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA), for Qlosi (pilocarpine hydrochloride ophthalmic solution), 0.4% w/v. This NDA provides for the use of Qlosi (pilocarpine hydrochloride ophthalmic solution), 0.4% for the treatment of presbyopia in adults.

### **APPROVAL & LABELING**

We have completed our review of this application. It is 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](http://FDA.gov).<sup>1</sup> 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*.<sup>2</sup> 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, 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 *SPL Standard for Content of Labeling Technical Qs & As*. For administrative purposes, designate this submission "**Final Printed Carton and Container Labeling for approved NDA 217836.**" Approval of this submission by FDA is not required before the labeling is used.

---

<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>.

### **DATING PERIOD**

Based on the stability data submitted to date, the expiry dating period for Qlosi (pilocarpine hydrochloride ophthalmic solution), 0.4% shall be 24 months from the date of manufacture when stored at 2°C to 8°C (36°F to 46°F).

### **ADVISORY COMMITTEE**

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

### **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 are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable because presbyopia does not occur in the pediatric population.

### **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*.<sup>3</sup>

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

### **REPORTING REQUIREMENTS**

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

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at FDA.gov.<sup>6</sup>

---

<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>

<sup>6</sup> <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>

**COMPENDIAL STANDARDS**

A drug with a name recognized in the official United States Pharmacopeia or official National Formulary (USP-NF) generally must comply with the compendial standards for strength, quality, and purity, unless the difference in strength, quality, or purity is plainly stated on its label (see FD&C Act § 501(b), 21 USC 351(b)). FDA typically cannot share application-specific information contained in submitted regulatory filings with third parties, which includes USP-NF. To help ensure that a drug continues to comply with compendial standards, application holders may work directly with USP-NF to revise official USP monographs. More information on the USP-NF is available on USP's website<sup>7</sup>.

If you have any questions, call Jacquelyn Smith, MA, Senior Regulatory Project Manager at (301) 796-1002.

Sincerely,

*{See appended electronic signature page}*

Wiley A. Chambers, MD  
Division Director  
Division of Ophthalmology  
Office of Specialty Medicine  
Center for Drug Evaluation and Research

ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
- Carton and Container Labeling

---

<sup>7</sup> <https://www.uspnf.com/>

-----  
**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/  
-----

WILEY A CHAMBERS  
10/17/2023 12:55:14 PM