ANDA 090279/S-028

PRIOR APPROVAL SUPPLEMENT
APPROVAL - NEW STRENGTH

Advagen Pharma Limited
U.S. Agent for Rubicon Research Limited
Attention: Daliya Bharati
Director- Regulatory Affairs and Intellectual Property

Dear Daliya Bharati:

This letter is in reference to your supplemental abbreviated new drug application (sANDA) received for review on June 13, 2025, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for Buprenorphine Sublingual Tablets, 2 mg and 8 mg.[1]

Reference is also made to any amendments submitted prior to the issuance of this letter.

Reference is also made to the ANDA Suitability Petition (FDA-2024-P-2909/CP1) submitted on June 17, 2024, under Section 505(j)(2)(C) of the FD&C Act, and approved on October 15, 2024. This petition requested the Agency make a determination as to whether an application for Buprenorphine Sublingual Tablets, 4 mg and 12 mg, was suitable for submission as a sANDA. This determination was necessary because it involves a change in strength from that of the reference listed drug (RLD), Subutex Sublingual Tablets, 2 mg and 8 mg, of Indivior Inc. (Indivior) NDA - 020732.

The sANDA, submitted as a “Prior Approval Supplement,” provides for:

> Inclusion of additional strengths of Buprenorphine Sublingual Tablets, 4 mg and 12 mg.

We have completed the review of this sANDA and have concluded that adequate information has been presented to demonstrate that the drug meets the requirements for approval under the FD&C Act. Accordingly, the sANDA is **approved**, effective on the date of this letter. We have determined that Buprenorphine Sublingual Tablets, 4 mg and 12 mg, can be expected to have the same therapeutic effect as that of the listed drug product upon which the Agency relied as the basis of safety and effectiveness.

RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS

Your proposed modifications to the REMS consist of the addition of the new 4 mg and 12 mg strengths to be included in the Important Safety Information brochures for

Prescribers and Pharmacists, and updates to the REMS website to align with other listed products.

In accordance with section 505-1(g)(4)(B) of the FD&C Act, we have determined that your approved REMS for BTOD was modified to minimize the burden on the health care delivery system of complying with the REMS.

This determination is based on the need to incorporate additional approved strengths, 4 mg and 12 mg, of Buprenorphine Sublingual Tablets into the BTOD SS REMS materials.

Your REMS, received on November 25, 2025, is approved and will be posted on the FDA REMS website: http://www.fda.gov/rems.

The modified REMS for BTOD REMS consists of a Medication Guide, elements to assure safe use, and an implementation system.

Other products may be added in the future if additional NDAs or ANDAs are approved.

Under section 505-1(g)(2)(C) of the FD&C Act, FDA can require the submission of a REMS assessment if FDA determines an assessment is needed to evaluate whether the REMS should be modified to ensure the benefits of the drug outweigh the risks or to minimize the burden on the healthcare delivery system of complying with the REMS.

We remind you that you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any goal or element of the REMS, as described in section 505-1(g)(4) of the FD&C Act.

We remind you that section 505-1(f)(8) of the FD&C Act prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j) of the FD&C Act. A violation of this provision in 505-1(f) of the FD&C Act could result in enforcement action.

Prominently identify any submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

ANDA 090279 REMS ASSESSMENT
CROSS REFERENCE TO THE REMS DMF

or

NEW SUPPLEMENT FOR ANDA 090279/S-000
CHANGES BEING EFFECTED IN 30 DAYS
PROPOSED MINOR REMS MODIFICATION
CROSS REFERENCE TO THE REMS DMF

or

NEW SUPPLEMENT FOR ANDA 090279/S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED MAJOR REMS MODIFICATION
CROSS REFERENCE TO THE REMS DMF

or

NEW SUPPLEMENT FOR ANDA 090279/S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABELING CHANGES SUBMITTED IN SUPPLEMENT XXX
CROSS REFERENCE TO THE REMS DMF

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

REMS REVISIONS FOR ANDA 090279
CROSS REFERENCE TO THE REMS DMF

The BTOD REMS uses a Type V DMF for shared system REMS submissions. Please refer to the draft guidance for industry *Use of a Drug Master File for Shared System REMS Submissions*,[2] for instructions on how to submit and reference the shared system REMS DMF.

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 standard 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 at https://www.uspnf.com/.

REQUIREMENTS AND RECOMMENDATIONS POST APPROVAL

Under applicable statutes, regulations, and guidances, your ANDA may be subject to certain requirements and recommendations post approval, including requirements regarding changes to approved ANDAs, postmarketing reporting, promotional materials, and annual facility fees, among others. For information on post-approval requirements and recommendations for ANDAs and a list of resources for ANDA holders, we refer you to https://www.fda.gov/drugs/abbreviated-new-drug-application-anda/requirements-and-resources-approved-andas.

Sincerely yours,

{See appended electronic signature page}

For Kendra S. Stewart, R.Ph., Pharm.D.
CAPT, United States Public Health Service
Director
Office of Regulatory Operations
Office of Generic Drugs
Center for Drug Evaluation and Research

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[1] We note that the RLD upon which you have based this sANDA, Indivior's Subutex Sublingual Tablets, 2 mg and 8 mg, are no longer being marketed in the United States and are currently listed in the discontinued section of FDA's *Approved Drug Products With Therapeutic Equivalence Evaluations* (the "Orange Book"). The Agency has determined that Indivior's Subutex Sublingual Tablets, 2 mg and 8 mg, were not withdrawn from sale for reasons of safety or effectiveness. FDA published this determination in the *Federal Register* (80 FR 8088; February 13, 2015). This determination allows the Agency to approve ANDAs for the discontinued drug products.

[2] We update guidances periodically. To make sure you have the most recent version of a guidance, check the FDA Drugs guidance web page at https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.

Catherine Poole

Digitally signed by Catherine Poole
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