



NDA 214231/S-004

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING  
REQUIREMENT**

Zealand Pharma US, Inc.  
Attention: Christopher R. DeFusco, PhD  
Head of US Regulatory Affairs  
50 Milk Street, 16th Floor  
Boston, MA 02109

Dear Dr. DeFusco:

Please refer to your supplemental new drug application (sNDA) dated and received December 19, 2025, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zegalogue (dasiglucagon) injection.

This Prior Approval sNDA provides for the following changes to the Zegalogue Prescribing Information and Patient Package Insert:

1. Expansion of the indication for the treatment of severe hypoglycemia in pediatric and adult patients with diabetes who weigh at least 20 kg based on the results from study ZP4207-21052, titled, *A Phase 3, Single-Administration, Open-Label Trial to Assess the Efficacy, Safety, Pharmacokinetics, and Pharmacodynamics of Dasiglucagon When Administered as a Rescue Therapy for Severe Hypoglycemia in Pediatric Patients Below 6 Years of Age with Type 1 Diabetes.*
2. Updates to subsection 13.1 *Carcinogenesis, Mutagenesis, Impairment of Fertility* of the Prescribing Information to reflect the results of carcinogenicity study 18-051 titled *Carcinogenicity Study by Subcutaneous Administration to CByB6F1-Tg(HRAS)2Jic Mice for 26 Weeks.*

**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 with minor editorial revisions listed below and reflected in the enclosed labeling.

- Added left vertical lines indicating changes in the Full Prescribing Information to section 1 *Indications and Usage* and section 2 *Dosage and Administration* subsection 2.2 *Recommended Dosage*.

**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, Patient Package Insert, and Instructions for Use), 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 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.

This product is appropriately labeled for use for pediatric patients who weigh at least 20 kg.

Your deferred pediatric study required under section 505B(a) of the FDCA is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81(b)(2)(vii) and section 505B(a)(3)(C) of the FDCA. This required study is listed below.

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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>.

4034-2 Develop an age-appropriate presentation for administration of Zegalogue  
(b) (4) mg to pediatric patients (b) (4).

Final Report Submission: December 2028

Submit nonclinical and chemistry, manufacturing, and controls protocols to your NDA.

Reports of these required pediatric postmarketing studies must be submitted as a new drug application (NDA)/biologics license application (BLA) or as a supplement to your approved NDA/BLA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

### **FULFILLMENT OF POSTMARKETING REQUIREMENT**

Your submission dated December 19, 2025, contains the final report for PMR 4034-1, listed in our March 22, 2021, approval letter.

4034-1 Conduct an open-label pediatric study to evaluate the safety, efficacy, and pharmacokinetics/pharmacodynamics of dasiglucagon in pediatric patients ages 1 year to <6 years with type 1 diabetes mellitus.

We have reviewed your submission and conclude that the above requirement was fulfilled.

We remind you that there is a postmarketing requirement 4034-2 cited in this approval letter that is still open.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs*.

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>3</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>4</sup>

<sup>3</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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-related information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety-related 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).

### **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).

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>5</sup>

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<sup>5</sup> <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>

If you have any questions, contact Georgia Rogers, Regulatory Project Manager, at [Georgia.Rogers@fda.hhs.gov](mailto:Georgia.Rogers@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Raymond E. Soccio, MD, PhD  
Supervisory Physician (Acting)  
Division of Diabetes, Lipid Disorders, and Obesity  
Office of Cardiology, Hematology, Endocrinology, and  
Nephrology  
Office of New Drugs  
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
  - Instructions for Use (Autoinjector) (version approved on March 22, 2021)
  - Instruction for Use (Prefilled Syringe (version approved on March 22, 2021)

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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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RAYMOND E SOCCIO  
06/18/2026 04:31:01 PM