



NDA 218524

**NDA APPROVAL**

Baxter Healthcare Corporation  
Attention: Ravi Bhalodia  
Senior Manager, Regulatory Affairs  
One Baxter Parkway  
Deerfield, IL 60015

Dear Ravi Bhalodia:

Please refer to your new drug application (NDA) received May 31, 2023, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for Sodium Bicarbonate Injection.

We acknowledge receipt of your amendment dated April 09, 2026, which constituted a complete response to our March 29, 2024, action letter.

This NDA provides for the use of sodium bicarbonate injection to raise plasma pH in adult and pediatric patients with clinically significant metabolic acidosis, and to alkalinize the urine in drug poisoning in adult and pediatric patients in cases in which urinary drug elimination is enhanced by urinary alkalinization.

**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.

**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.<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 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.

<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>.

## **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 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 218524.**” 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 Bicarbonate Injection shall be 24 months from the date of manufacture when stored at 20°C to 25°C.

## **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 guidance for industry *Contents of a Complete Submission for the Evaluation of Proprietary Names*, and *PDUFA Reauthorization Performance Goals and Procedures Fiscal Years 2023 through 2027*.)

## **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.

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

## **REPORTING REQUIREMENTS**

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

## **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>5</sup>.

If you have any questions, contact Silvia (Sarai) Bartlett Regulatory Health Project Manager, at (301) 796-7715.

Sincerely,

*{See appended electronic signature page}*

Selena DeConti, PharmD, MPH  
Deputy Director for Safety  
Division of Cardiology and Nephrology  
Office of Cardiology, Hematology,  
Endocrinology, and Nephrology  
Office of New Drugs  
Center for Drug Evaluation and Research

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<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>

<sup>5</sup> <https://www.uspnf.com/>

ENCLOSURE(S):

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

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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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