CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-535

APPROVAL LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-535

Galderma Laboratories, L.P.
Attention: Paul M. Clark
Vice President, Regulatory Affairs
14501 N. Freeway
Fort Worth, TX 76177

Dear Mr. Clark:

Please refer to your new drug application (NDA) dated September 25, 2002, received September 27, 2002, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Clobex (clobetasol propionate) Lotion, 0.05%.

We acknowledge receipt of your submissions dated January 10, January 27, January 28, February 6, February 10, February 19 (2), February 27, April 24, May 9, June 10, July 1, July 3, July 7, and July 22, 2003 (facsimile).

This new drug application provides for the use of Clobex (clobetasol propionate) Lotion, 0.05%, for treatment of corticosteroid responsive dermatoses.

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert and text for the patient package insert). Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission **"FPL for approved NDA 21-535."** Approval of this submission by FDA is not required before the labeling is used.

We remind you of your postmarketing study commitments in your submission dated July 22, 2003. These commitments are listed below.

1. The Applicant commits to performing dermal carcinogenicity testing of the drug product.

   Commitment Category: NON-CLINICAL TOXICOLOGY

Protocol Submission: Within 4 months of the date of this letter
Study Start: Within 6 months of the date of the approval of the protocol
Final Report Submission: Within 12 months after the study completion

2. The Applicant commits to a study to evaluate the effects of the drug product on UV-induced skin cancers.

   Commitment Category: NON-CLINICAL TOXICOLOGY

   Protocol Submission: Within 4 months of the date of this letter
   Study Start: Within 6 months of the date of the approval of the protocol
   Final Report Submission: Within 12 months after the study completion

3. The Sponsor commits to performing an HPA axis suppression study in no less than 60 evaluable patients using cosyntropin stimulation testing (conducted as labeled with stimulated serum cortisol levels at 30 minutes with any suppressed patients followed to recovery, stimulation should only be conducted at baseline and at the end of the two or four week treatment period) in adult patients with psoriasis or atopic dermatitis. Clobex Lotion should be applied to lesional skin at the maximum amounts permitted in labeling.

   The minimum number of subjects (separate cohorts for each) committed to are as follows:
   a) no less than 30 evaluable adult patients with psoriasis or atopic dermatitis of no less than 20% BSA after 2 weeks of treatment
   b) no less than 30 evaluable adult patients with psoriasis of no less than 10% BSA after 4 weeks of treatment

   Commitment Category: CLINICAL SAFETY ASSESSMENT
   Protocol Submission: Within 4 months of the date of this letter
   Study Start: Within 6 months of the date of the approval of the protocol
   Final Report Submission: Within 16 months after approval of the protocol

Submit clinical protocols to your IND for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments must be prominently labeled "Postmarketing Study Protocol", "Postmarketing Study Final Report", or "Postmarketing Study Correspondence."

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package insert(s) directly to:

Division of Drug Marketing, Advertising,
and Communications, HFD-42

Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

We have not completed validation of the regulatory methods. However, we expect your continued cooperation to resolve any problems that may be identified.

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

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at www.fda.gov/medwatch/report/mmp.htm.

If you have any questions, call Melinda Harris, M.S., Regulatory Project Manager, at 301-827-2020.

Sincerely,

{See appended electronic signature page}
Jonathan K. Wilkin, M.D.
Director
Division of Dermatologic & Dental Drug Products
Office of Drug Evaluation V
Center for Drug Evaluation & Research

Enclosure (Labeling)

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Jonathan Wilkin
7/24/03 03:15:00 PM