CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-623

APPROVAL LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-623

Zars, Inc
1142 West 2320 South, Suite A
Salt Lake City, UT 84119

Attention: T. Andrew Crockett
Director, Regulatory Affairs

Dear Mr. Crockett:

Please refer to your new drug application (NDA) dated March 31, 2003, received April 4, 2003, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Synera (lidocaine 70 mg and tetracaine 70 mg) topical patch.

We acknowledge receipt of your submissions dated May 12, July 11, August 1, September 9 and 15, and December 29 and 30, 2003, February 11, March 8, April 2, May 7, June 17, and December 17, 2004, January 10 and 28, February 3 and 22, March 17, April 5, June 6, 7, 10, 16, 17(2), 20, 21, and 22, 2005.

The December 17, 2004, submission constituted a complete response to our February 4, 2004, action letter.

This new drug application provides for the use of Synera (lidocaine 70 mg and tetracaine 70 mg) topical patch for use on intact skin to provide local dermal analgesia for superficial venous access and superficial dermatological procedures such as excision, electrodessication and shave biopsy of skin lesions.

We have completed our review of this application, as amended and 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 labeling submitted on June 22, 2005 (package insert and **immediate** container and carton labels). Marketing the product(s) 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 21-623.**" Approval of this submission by FDA is not required before the labeling is used.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. We are deferring submission of your pediatric studies for ages 0 to 4 months until December 2006.

Your deferred pediatric studies required under section 2 of the Pediatric Research Equity Act (PREA) are considered required postmarketing study commitments. The status of this postmarketing study shall be reported annually according to 21 CFR 314.81. This commitment is listed below.

1. Deferred pediatric study under PREA for use on intact skin to provide local dermal analgesia for superficial venous access and superficial dermatological procedures such as excision, electrodessication and shave biopsy of skin lesions in pediatric patients ages 0 to 4 months.

DESCRIPTION	Conduct a study evaluating systemic exposure of lidocaine and tetracaine in neonates and infants.
Protocol Submission:	already submitted
Study Start:	December 23, 2005
Final Report Submission:	December 31, 2006

Submit final study reports to this NDA. For administrative purposes, all submissions related to this pediatric postmarketing study commitment must be clearly designated "**Required Pediatric Study Commitments**."

We remind you of the following agreements.

1. The current drug release rate specification is considered to be an interim specification. You have agreed to conduct additional experiments to determine the release properties of lidocaine and tetracaine from the Synera patch using [redacted] concentrations. You have agreed to conduct these experiments within one year of commercial production and submit a "Prior Approval" supplement to change the specifications.

2. You have agreed to submit a "Prior Approval" labeling supplement that includes data supporting the use of the Synera patch in the home setting.

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 the Division of Anesthesia, Analgesia, and Rheumatology Products and two copies of both the promotional materials and the package insert 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).

If you have any questions, call Allison Meyer, Regulatory Project Manager, at (301) 827-7426.

Sincerely,

{See appended electronic signature page}

Bob Rappaport, MD
Director
Division of Anesthesia, Analgesia,
and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure

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

/s/

Bob Rappaport
6/23/05 07:03:02 PM