Approval Package for:

APPLICATION NUMBER:

207070Orig1s000

Trade Name: Spiriva Respimat Inhalation Spray, 2.5 mcg

Generic Name: tiotropium bromide

Sponsor: Boehringer Ingelheim Pharmaceuticals, Inc.

Approval Date: September 15, 2015

Indication: For the long-term, once-daily, maintenance treatment of asthma in patients 12 years of age and older.
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Reviews / Information Included in this NDA Review.

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Dear Dr. Van Andel:

Please refer to your New Drug Application (NDA) dated August 15, 2014, received August 15, 2014, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Spiriva Respimat (tiotropium bromide) Inhalation Spray.

We acknowledge receipt of your amendments dated October 9, 21 (2), and 27, November 3, and December 3, and 12, 2014, and January 12, 20, and 28, March 3, and 9, April 10, and 30, May 8, and 15, June 16, July 6, 14, and 23, August 4, 12, and 21, and September 2, 10, and 14, 2015.

NDA 207070 provides for the use of Spiriva Respimat (tiotropium bromide) Inhalation Spray for the following indications which, for administrative purposes, we have designated as follows:

NDA 207070/Original 1 – 2.5 mcg (2 sprays of Spiriva RESPIMAT, 1.25 mcg) indicated for the long-term, once-daily, maintenance treatment of asthma in patients 12 years of age and older.

The subject of this action letter is NDA 207070/Original 1.

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 text.

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 http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the instructions for use). Information on submitting SPL files using eLIST may be found in the guidance for industry SPL Standard for Content of Labeling Technical Qs and As, available at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

**CARTON AND IMMEDIATE-CONTAINER LABELS**

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels submitted on May 8, 2015, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled “Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008).” Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “Final Printed Carton and Container Labels for approved NDA 207070/Original 1.” Approval of this submission by FDA is not required before the labeling is used.

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.

**EXPIRATION DATING PERIOD**

The expiry period is 36 months for the product stored at USP controlled room temperature. The in-use expiry period is 3 months, i.e., 3 months from the date when drug product cartridge is inserted into the RESPIMAT device.

**REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, 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(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for ages less than 6 years because necessary studies are impossible or highly impracticable as young children may have difficulty coordinating drug delivery with the device.
We are deferring submission of your pediatric studies for ages 6 to 11 years for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required by section 505B(a) of FDCA are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the FDCA. These required studies are listed below.

2953-1  Conduct a 12-week, randomized, double-blind, parallel-group, placebo-controlled, efficacy and safety study of tiotropium delivered via the Respimat device in children 6-11 years of age with asthma. The study should evaluate at least two doses of tiotropium and include approximately 125 patients per treatment arm.

Final Report Submission:  October 2016

2953-2  Conduct a 48-week, randomized, double-blind, parallel-group, placebo-controlled, efficacy and safety study of tiotropium delivered via the Respimat device in children 6 to 11 years of age with asthma. The study should evaluate at least two doses of tiotropium and include approximately 125 patients per treatment arm.

Study Completion:  January 2016
Final Report Submission:  October 2016

Reports of these required pediatric postmarketing studies must be submitted as a new drug application (NDA) or as a supplement to your approved NDA 21936 with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS" in large font, bolded type at the beginning of the cover letter of the submission.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266
As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the
package insert, at the time of initial dissemination or publication, accompanied by a Form FDA
2253. Form FDA 2253 is available at
Information and Instructions for completing the form can be found at
For more information about submission of promotional materials to the Office of Prescription
Drug Promotion (OPDP), see
http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA
(21 CFR 314.80 and 314.81). All 15-day alert reports, periodic (including quarterly) adverse
drug experience reports, field alerts, annual reports, supplements, and other submissions should
be addressed to the original NDA 21936 for this drug product, not to this NDA. In the future, do
not make submissions to this NDA except for the final printed labeling requested above.

If you have any questions, call Jessica Lee, Regulatory Project Manager, at (301) 796-3769.

Sincerely,

{See appended electronic signature page}

Badrul A. Chowdhury, MD, PhD
Director
Division of Pulmonary, Allergy, and Rheumatology
Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure(s):
  Content of Labeling
  Carton and Container Labeling
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

BADRUL A CHOWDHURY
09/15/2015