

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

206030Orig1s000

OTHER ACTION LETTERS



NDA 206030

COMPLETE RESPONSE

Lundbeck LLC
Attention: Wendy Tian
Director, US Regulatory Affairs
4 Parkway North
Deerfield, IL 60015

Dear Ms. Tian:

Please refer to your New Drug Application (NDA) dated December 20, 2013, received December 23, 2013, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for CARBELLA (carbamazepine) injection 200 mg/20 mL.

We acknowledge receipt of your amendments dated January 13, 2014; January 16, 2014; January 30, 2014; March 20, 2014; March 27, 2014; April 11, 2014; April 22, 2014; April 23, 2014; June 13, 2014; June 25, 2014; July 10, 2014; July 17, 2014; August 5, 2014; September 5, 2014; September 9, 2014; September 10, 2014; September 29, 2014; October 6, 2014; and October 9, 2014.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

PRODUCT QUALITY

- i) You have not provided the requested critical extractables data from storage of the drug product admixtures in diluent bags. You need to provide the extractable data from the drug product admixtures in diluent bags with a safety evaluation of the exposure levels to the extractable components.
- ii) Your proposed acceptance limit of no more than (b) (4) mOsm/kg for osmolality of the drug product at release and shelf-life is not acceptable considering: a) the statement that osmolality of the drug product is around (b) (4) mOsm/kg (Section 3.2.P.2.3 of Pharmaceutical development) and b) you have not provided osmolality data for any of the drug product batches except for commercial scale development batch #921921. We recommend that you set the acceptance limit for the osmolality of the drug product based on observed levels of the drug product osmolality and provide sufficient data that scientifically justify the acceptance limit for osmolality of the drug product.

Additionally, we acknowledge that you intend to submit the root-cause investigation report for commercial scale development batch #921921 when you respond to the application deficiencies.

LABELING

Please refer to correspondence dated, February 5, 2014, which addresses the proposed proprietary name, CARBELLA. This name was found acceptable pending approval of the application in the current review cycle. Please resubmit the proposed proprietary name when you respond to the application deficiencies.

Submit draft labeling that addresses our proposed revisions in the attached labeling. Your proposed prescribing information (PI) must conform to the content and format regulations found at 21 [CFR 201.56\(a\) and \(d\)](#) and [201.57](#). We encourage you to review the labeling review resources on the [PLR Requirements for Prescribing Information](#) website including:

- The Final Rule (Physician Labeling Rule) on the content and format of the PI for human drug and biological products
- Regulations and related guidance documents
- A sample tool illustrating the format for Highlights and Contents, and
- The Selected Requirements for Prescribing Information (SRPI) – a checklist of 42 important format items from labeling regulations and guidances.

Prior to resubmitting the labeling, use the SRPI checklist to correct any formatting errors to ensure conformance with the format items in regulations and guidances. In addition, submit updated content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at

<http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>.

To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should include annotations that support any proposed changes.

OTHER

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 314.65. You may also request an extension of time in which to resubmit the application. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA Guidance for Industry, “Formal Meetings Between the FDA and Sponsors or Applicants,” May 2009 at

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf>.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, contact Heather Bullock, Regulatory Project Manager, at (301) 796-1126.

Sincerely,

{See appended electronic signature page}

Eric Bastings, MD
Deputy Director
Division of Neurology Products
Office of Drug Evaluation 1
Center for Drug Evaluation and 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/

ERIC P BASTINGS
10/23/2014