

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

212860Orig1s000

Trade Name: Triferic AVNU injection

Generic or Proper Name: ferric pyrophosphate citrate

Sponsor: Rockwell Medical, Inc

Approval Date: March 27, 2020

Indication: Provides for the use of Triferic AVNU (ferric pyrophosphate citrate) injection for the replacement of iron to maintain hemoglobin in adult patients with hemodialysis-dependent chronic kidney disease.

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APPROVAL LETTER

NDA 212860

NDA APPROVAL

Rockwell Medical, Inc
Attention: Raymond Pratt, M.D., FACP
Chief Development Officer
30142 S. Wixom Road
Wixom, MI 48393

Dear Dr. Pratt:

Please refer to your new drug application (NDA) dated and received May 28, 2019, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Triferic AVNU (ferric pyrophosphate citrate) injection.

This new drug application provides for the use of Triferic AVNU (ferric pyrophosphate citrate) injection for the replacement of iron to maintain hemoglobin in adult patients with hemodialysis-dependent chronic kidney disease.

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.¹ 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 the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*.²

The SPL will be accessible via publicly available labeling repositories.

¹ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

² 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

We acknowledge your March 20 and 25, 2020, submission containing final printed carton and container labeling.

ADVISORY COMMITTEE

Your application for Triferic AVNU was not referred to an FDA advisory committee because this drug is not the first in its class.

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.

We are deferring submission of your pediatric study because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required under section 505B(a) of the FDCA is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(4)(C) of the FDCA. This required study is listed below.

- 3830-1 Efficacy and safety trial of Triferic via hemodialysate and Triferic AVNU intravenously via pre-dialyzer infusion line or via post-dialyzer infusion line in pediatric patients aged less than 18 years with hemodialysis-dependent chronic kidney disease.

Study Completion: 07/31/2022

Final Report Submission: 12/31/2022

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.³

Submit the protocol(s) to your IND 051290 with a cross-reference letter to this NDA. Reports of this required pediatric postmarketing study must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling

³ See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act* (October 2019).

<https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

changes you believe are warranted based on the data derived from this study. 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 Prescribing Information, Medication Guide, and Patient Package Insert (as applicable) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.⁴

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.⁵ Information and Instructions for completing the form can be found at FDA.gov.⁶ For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.⁷

REPORTING REQUIREMENTS

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

⁴ When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

⁵ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

⁶ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

⁷ <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>

If you have any questions, call Richard Whitehead, M.S., Regulatory Project Manager, at (301) 796-4945.

Sincerely,

{See appended electronic signature page}

Albert Deisseroth, M.D., Ph.D.
Supervisory Associate Director
Division of Non-Malignant Hematology
Office of Cardiology, Hematology,
Endocrinology and Nephrology
Center for Drug Evaluation and Research

ENCLOSURES:

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

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.

/s/

ALBERT B DEISSEROTH
03/27/2020 07:54:15 AM