

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**204803Orig1s000**

**RISK ASSESSMENT and RISK MITIGATION  
REVIEW(S)**

**Department of Health and Human Services  
Public Health Service  
Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Surveillance and Epidemiology  
Office of Medication Error Prevention and Risk Management**

**Deferral of Risk Evaluation and Mitigation Strategies (REMS) Review**

Date: January 17, 2014

Reviewer/Team Lead: Kimberly Lehrfeld, PharmD, Risk Management Analyst  
Division of Risk Management (DRISK)

Division Director: Claudia Manzo, PharmD  
DRISK

Drug Name(s): Posimir (SABER-Bupivacaine)

Therapeutic Class: Local Anesthetic

Dosage and Route: Solution for administration by instillation of 5mL directly into the surgical incision

Application Type/Number: NDA 204803

Submission Number: 001

Applicant/sponsor: Durect Corporation

OSE RCM #: 2013-1336, 2013-1300

\*\*\* This document contains proprietary and confidential information that should not be released to the public. \*\*\*

This document is to defer comment on the need for a risk evaluation and mitigation strategy (REMS) for Posimir (SABER-Bupivacaine).

On June 3, 2013, the Division of Analgesics, Anesthetics and Addiction Products (DAAAP) requested that the Division of Risk Management (DRISK) review the Risk Management Plan for Posimir (SABER-Bupivacaine) submitted with Posimir (SABER-Bupivacaine) for administration into the surgical incision to produce post-surgical analgesia.

Based on the review of clinical data submitted, the efficacy and safety Posimir (SABER-Bupivacaine) for administration into the surgical incision to produce post-surgical analgesia cannot be established. Until the efficacy and safety profile of Posimir (SABER-Bupivacaine) is established, the benefits and risks of Posimir (SABER-Bupivacaine) cannot be adequately weighed and an appropriate risk management strategy cannot be determined. DAAAP plans to issue a Complete Response letter. Therefore, DRISK defers comment on the need for a REMS at this time.

A final discussion on the appropriate risk management strategy will be undertaken after the sponsor submits a satisfactory response to the Complete Response letter.

Please send DRISK a new consult request at such time. This memo serves to close the existing consult request for Posimir (SABER-Bupivacaine) under NDA 204803.

Please notify DRISK if you have any questions.

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/s/  
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KIMBERLY LEHRFELD  
01/17/2014