CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

219840Orig1s000

PRODUCT QUALITY REVIEW(S)

Integrated Quality Assessment (IQA)
of
New Drug Application

NDA 219840

Office of Pharmaceutical Quality

TABLE OF CONTENTS

NDA Executive Summary

1. Application/Product Information

NDA Number	219840		
Applicant Name	Bracco Diagnostics Inc.		
Drug Product Name	E-Z-Disk (barium sulfate) tablets for oral use		
Dosage Form	oral		
Proposed Strength(s)	700 mg		
NDA Classification	Type 3 - New Dosage Form		
Route of Administration	oral		
Maximum Daily Dose	700 mg per image		
Rx/OTC Dispensed	Rx		
Proposed Indication	radiographic contrast agent indicated for the evaluation of esophageal patency in adults and pediatric patients aged 12 years and older.		
Drug Product Description	Packaged in 100 ct bottle		
Co-packaged product information	N/A		
Device information	N/A		
Storage Temperature/ Conditions	25ºC/ (b) (4) %RH stored in the bottle protected from moisture		
Review Team	**Discipline**	**Primary**	**Secondary**
	Drug Substance	Sa Wang	Sithamalli Chandramouli
	Drug Product/ Labeling	Anne Marie Russell	Danae Christodoulou
	Manufacturing	Mina Chang	Erin Kim
	Biopharmaceutics	N/A	N/A

	Microbiology	Mina Chang	Erin Kim
	Environmental Assessment	Anne Marie Russell	Danae Christodoulou
	RBPM	Anika Lalmansingh	
	ATL	Anne Marie Russell	
Consults	N/A		

2. Final Overall Recommendation - Approval.

3. Action Letter Information

a. Expiration Dating: Stability data support an expiry of 48 months at 25ºC/60%RH when stored in the bottle protected from moisture.

b. Additional Comments for Action: N/A

4. Basis for Recommendation:

a. Summary of Rationale for Recommendation:

NDA 219840, as amended, has provided sufficient product quality information to assure the identity, strength, purity, and quality of the proposed drug product E-Z-Disk (barium sulfate) tablets for oral use. The Office of Pharmaceutical Manufacturing Assessment (OPMA) has issued an overall acceptable recommendation for all the facilities on Jan 16, 2025. Therefore, NDA 219840 is recommended for approval from a Product Quality perspective.

b. Is the overall recommendation in agreement with the individual discipline recommendations? Yes

Recommendation by Subdiscipline:

Drug Substance - **Adequate**
Drug Product - Adequate
Quality Labeling - **Pending**
Manufacturing - **Adequate**
Biopharmaceutics - N/A
Microbiology - **Adequate**
Environmental Assessment: Categorical Exclusion - Adequate
QPA for EA(s): No

5. Life-Cycle Considerations

Established Conditions per ICH Q12: No

Comparability Protocols (PACMP): No
Comments: None

Additional Lifecycle Comments: N/A

SUBMISSIONS REVIEWED	SEQ	DOCUMENT RECEIPT	DISCIPLINE	TOPIC
Original Submission	1	Nov 21, 2024	all	New NDA
Quality Amendment	2	March 6, 2025	Manufacturing	various
Quality Amendment	3	April 3, 2025	Manufacturing	various
Quality Amendment	4	April 7, 2025	Drug Product	Response to 74 day letter comments (disintegration)
Quality Amendment	6	April 22, 2025	Microbiology	Microbiological controls
Quality Amendment	7	May 9, 2025	Drug Product	Response to IR#2 comments
Quality Amendment	9	Jun 12, 2025		
Quality Amendment		July 10, 2025	Drug Product	Response to IR#3 comments

Application Technical Lead Name and Date:
Anne Marie Russell, Ph.D.
Office of Product Quality Assessment II / Division of Product Quality Assessment IX

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R Regional Information

Environmental Assessment (EA) –

From the sponsor:

Considering that barium sulfate is:

- a naturally occurring inorganic salt;
- practically insoluble in water and very slightly soluble in acids;
- pharmacologically inactive;

in compliance with the criteria set forth in 21 CFR §25.31 (c):

"*Action on an NDA, ..., for substances that occur naturally in the environment when the action does not alter significantly the concentration or distribution of the substance, its metabolites, or degradation products in the environment*",

and that, according to 21 CFR §25.15 (a) and (d) and 21 CFR§25.21, to our knowledge, no extraordinary circumstances exist which indicate that the proposed action may significantly affect the quality of the human environment;

a categorical exclusion from environmental assessment of E-Z-DISK™, containing barium sulfate as active ingredient, is claimed.

Reviewer's Assessment: Acceptable.

Labeling and Packaging: At this time, labeling and package insert language is not final. Labeling review, revisions and negotiations will be handled through the DIRM clinical team. CMC label recommendations have been communicated to the team.

Prescribing Information (PI)

DP recommendations for the DIRM labeling team:

1. (b) (4) is not supported by quality data – omit from label.
2. The most recent version of Sections 3, 11 and 16 have been edited by CMC.

Container Label

(b) (4)

Methods Verification Package N/A
Comparability Protocols N/A
Post-Approval Commitments (For NDA only) N/A
Lifecycle Management Considerations N/A
List of Deficiencies

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/s/

ANNE M RUSSELL
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