

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

218395Orig1s000

PRODUCT QUALITY REVIEW(S)

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Template Revision: 03

Office of Pharmaceutical Quality

New Drug Application (NDA) Integrated Quality Assessment Template

NDA 218395 Executive Summary Assessment 2

1. Application/Product Information

NDA Number	218395		
Applicant Name	Azurity Pharmaceuticals, Inc. (submitted by Slayback Pharma LLC which became a subsidiary of Azurity during the review cycle per a cover letter dated 22 Feb 2024)		
Drug Product Name	Meloxicam Injection		
Dosage Form	Injection		
Proposed Strength(s)	30 mg/mL		
NDA Classification	Type 5 – New Formulation or New Manufacturer		
Route of Administration	Intravenous		
Maximum Daily Dose	30 mg		
Rx/OTC Dispensed	Rx		
Proposed Indication	for use in adults for the management of moderate-to-severe pain, alone or in combination with non-NSAID analgesics		
Drug Product Description	clear, pale yellow to yellow color solution in a glass vial		
Co-packaged product information	N/A		
Device information	N/A		
Storage Temperature/ Conditions	20°C to 25°C		
Review Team	Discipline	Primary	Secondary
	<i>Drug Substance</i>	Zhixing Shan	Donna Christner
	<i>Drug Product/ Labeling</i>	Valerie Amspacher	Julia Pinto

	<i>Manufacturing</i>	Yan Xu	Tianhong (Tim) Zhou
	<i>Biopharmaceutics</i>	N/A	N/A
	<i>Microbiology</i>	N/A	N/A
	<i>Other (specify)</i>	N/A	N/A
	<i>RBPM</i>	Teicher Agosto	
	<i>ATL</i>	Valerie Amspacher	
Consults	N/A		

2. Final Overall Recommendation - Approval

3. Action Letter Information

a. **Expiration Dating:** The proposed 24-months expiration dating period is acceptable when stored at 20°C to 25°C (68°F to 77°F).

b. **Additional Comments for Action**

4. Basis for Recommendation:

a. Summary of Rationale for Recommendation:

CMC recommends approval for this NDA. This recommendation is based on reviews in the previous review cycle by drug substance, drug product, process and facilities and microbiology.

No new CMC information was submitted in this review cycle. However, a new amendment was submitted to DMF (b) (4) and a review of this amendment was completed and the DMF remains adequate. Additionally, labeling was reviewed.

See original CMC IQA dated 29 Dec 2023 in DARRTS and Panorama. This NDA was originally submitted 14 March 2023. A complete response was issued 12 Jan 2024 based on non-clinical deficiencies. This resubmission was received 5 Dec 2024.

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

Recommendation by Subdiscipline:

Drug Substance - Adequate
Drug Product - Adequate
Quality Labeling - Adequate
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
Comments:

Comparability Protocols (PACMP): No
Comments:

Additional Lifecycle Comments:

Submission(s) Assessed	Document Date	Discipline(s) Affected
Supporting document 26 (eCTD 0023)	5 Dec 2024	Drug substance, labeling



Valerie
Amspacher

Digitally signed by Valerie Amspacher

Date: 4/22/2025 05:30:41PM

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Title:	NDA IQA Template CHAPTER IV-LABELING		
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Template Revision: 03

CHAPTER IV: LABELING

NDA Number	218395
Assessment Cycle Number	2
Drug Product Name	Meloxicam Injection, 30 mg/mL

Assessment Recommendation: Choose an item.

Item	Assessment Conclusion	SDN # where labeling is adequate ("N/A" otherwise)
Prescribing Information Labeling	Choose an item.	
Patient Information	Choose an item.	
Instruction for Use (IFU)	Choose an item.	
Container Labels	Choose an item.	
Carton Labeling	Choose an item.	

Brief Description of Outstanding Issues:

Submissions being reviewed:

Document Reviewed (eCTD #, SDN #)	Date Received	Information Provided
Supporting document 26 (eCTD 0023)	5 Dec 2025	PI, vial label and carton label

1.0 PRESCRIBING INFORMATION¹

Assessment of Product Quality Related Aspects of the Prescribing Information:

¹ [Labeling Review Tool \(LRT\) \(March 2022\)](#), including use of consistent terminology for dosage form and unit of measure for strength in the product title and DOSAGE FORMS AND STRENGTHS heading in Highlights, in the DOSAGE AND ADMINISTRATION, DOSAGE FORMS AND STRENGTHS, DESCRIPTION, and HOW SUPPLIED/STORAGE AND HANDLING sections (see page 2 of LRT)

1.1 HIGHLIGHTS OF PRESCRIBING INFORMATION



Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Product Title in Highlights² [21 CFR 201.57(a)(2)]		
Established name(s) ³	Adequate	"Xifyrm (meloxicam injection)"
Route(s) of administration	Adequate	"For intravenous use"
Controlled drug substance symbol (if applicable)	N/A	N/A
Initial U.S. Approval [§201.57(a)(3)]	Adequate	2000
Dosage Forms and Strengths Heading in Highlights [§ 201.57(a)(8)]		
Dosage form(s) ⁴ and strength(s) in metric system ⁵	Adequate	"XIFYRM (meloxicam injection), single- dose vial containing 30 mg/mL per vial"
If the drug product contains an active ingredient that is a salt, clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active ingredient (e.g., Tablets: 10 mg of drug-x hydrochloride). ⁶	N/A	N/A

² Draft guidance: [Product Title and Initial U.S. Approval in the Highlights of Prescribing Information for Human Prescription Drug and Biological Products — Content and Format](#) (January 2018)

³ Established name = [Drug] [Route of Administration] [Dosage Form]. Do use not "USP" descriptor in the product title or within the Highlights (see page 3 of LRT).

⁴ Draft guidance: [Product Title and Initial U.S. Approval in the Highlights of Prescribing Information for Human Prescription Drug and Biological Products — Content and Format](#) (January 2018); USP <1151>; USP Nomenclature Guideline

⁵ Labeling Review Tool (March 2022, page 13), include limited packaging information; USP <7>

⁶ Guidance: [Naming of Drug Products Containing Salt Drug Substances](#) (June 2015); MAPP 5021.1

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored." ⁷	N/A	N/A
For injectable drug products for parenteral administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package. ⁸	Adequate	Single-dose vial is the appropriate package type term according to FDA Guidance "Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use"

Assessment: *Adequate*

A recommendation was made to the labeling review team that the non-proprietary name in the Product Title should be listed as "(meloxicam injection)" according to the "Product Title" guidance.

⁷ Guidance: [Tablet Scoring: Nomenclature, Labeling, and Data for Evaluation \(March 2013\)](#)

⁸ Guidance: [Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use \(October 2018\)](#); USP <659>

1.2 FULL PRESCRIBING INFORMATION

1.2.1 Section 2 (DOSAGE AND ADMINISTRATION)⁹



Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE AND ADMINISTRATION section		
Special instructions for product preparation (e.g., reconstitution and resulting concentration, dilution, compatible diluents and/or soft food ¹⁰ , storage conditions needed to maintain the stability of the reconstituted or diluted product).	N/A	N/A
Important administration instructions supported by product quality information (e.g., do not crush or chew extended-release tablets, instructions for mixing with food).	N/A	N/A

⁹ See § 201.57(c)(3); draft guidance: [Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products — Content and Format](#) (January 2023); Labeling Review Tool (March 2022, page 25)

¹⁰ Draft Guidance: [Use of Liquids and/or Soft Foods as Vehicles for Drug Administration: General Considerations for Selection and In Vitro Methods for Product Quality Assessments](#)

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
For parenteral products: include statement: <i>"Parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit."</i> ¹¹	Adequate	"Visually inspect parenteral drug products for particulate matter and discoloration prior to administration. Should the contents appear discolored or contain particulate matter, discard the vial [see Dosage Forms and Strengths (3)]"
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. ¹² Note the labeling requirement may be applicable to another section of the PI (e.g., Section 11).	N/A	No USP monograph for meloxicam injection. Monographs exist for meloxicam tablets and oral suspension only.
For radioactive products, include radiation dosimetry for the patient and healthcare practitioner(s) who administer the drug	N/A	N/A
For hazardous products, include the statement <i>"DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures."</i> ^x with x numerical citation to "OSHA Hazardous Drugs."	N/A	N/A

Assessment: Adequate

1.2.2 Section 3 (DOSAGE FORMS AND STRENGTHS)¹³

(b) (4)

¹¹ §201.57(c)(3)(iv)

¹² USP General Notices 2.30 Legal Recognition

¹³ See § 201.57(c)(4); [Labeling Review Tool \(March 2022, page 29\)](#)

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE FORMS AND STRENGTHS section		
Available dosage form(s)	Adequate	"XIFYRM (meloxicam injection) is a sterile, clear, pale yellow to yellow color solution intended for intravenous use available as a clear, single-dose vial containing 30 mg/mL per vial."
Strength(s) in metric system	Adequate	30 mg/mL per vial
If the active ingredient is a salt, apply the USP Salt Policy per FDA Guidance . Clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active ingredient (e.g., Tablets: 10 mg of drug-x hydrochloride). No equivalency statement.	N/A	N/A
A description of the identifying characteristics of the dosage forms, including shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable.	Adequate	"XIFYRM (meloxicam injection) is a sterile, clear, pale yellow to yellow color solution intended for intravenous use available as a clear, single-dose vial containing 30 mg/mL per vial."
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored."	N/A	N/A
For injectable drug products for parenteral administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package type terms include pharmacy bulk package and imaging bulk package (see USP <659>).	Adequate	Single-dose vial is the appropriate package type term according to FDA Guidance "Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use"

Assessment: *Adequate*

1.2.3 Section 11 (DESCRIPTION)¹⁴



Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DESCRIPTION section		
Proprietary and established name(s) ¹⁵ [§ 201.57(c)(12)(i)(A)].	Adequate	
Dosage form(s) and route(s) of administration [§ 201.57(c)(12)(i)(B)].	Adequate	"XIFYRM (meloxicam injection) is a nonsteroidal anti-inflammatory drug (NSAID). It is a sterile clear, pale-yellow to yellow color solution, containing the active pharmaceutical ingredient meloxicam for intravenous administration."

¹⁴ See § 201.57(c)(12); [Labeling Review Tool \(March 2022, page 56\)](#)

¹⁵ Use of "USP" descriptor is not required to be included next to the established name throughout Prescribing Information (PI) labeling. If an applicant wants to use the "USP" descriptor next to the established name in the PI, recommend limiting its use to the product quality sections of the Full Prescribing Information (FPI) (i.e., DOSAGE FORMS AND STRENGTHS, DESCRIPTION, HOW SUPPLIED/STORAGE AND HANDLING) (see page 3 of LRT).

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
If the active ingredient is a salt, apply the USP Salt Policy and include the equivalency statement per Salt Guidance and MAPP . For example: "TRADENAME contains 100 mg of drug-x (equivalent to 123.7 mg of drug-x hydrochloride)" [§ 201.57(c)(12)(i)(C)].	N/A	N/A
List inactive ingredients (not required for oral use, except for colorant) by the USP/NF names in alphabetical order. ¹⁶ Avoid brand names. [§ 201.57(c)(12)(i)(C)].	Adequate	"Each mL of aqueous solution contains 30 mg of meloxicam, 150 mg of Hydroxypropyl Betadex, 20 mg of Meglumine, 60 mg of Povidone (b) (4) and water for injection."
For parenteral injectable dosage forms, include the name and quantities of all inactive ingredients. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect. [§ 201.100(b)(5)(iii)].	N/A	N/A
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol at 60 °F. (15.56 °C) [§ 201.10(d)(2)].	N/A	N/A
Sterility statement (if applicable) [§ 201.57(c)(12)(i)(D)].	Adequate	
Pharmacological/Therapeutic class ¹⁷ [§ 201.57(c)(12)(i)(E)].	Adequate	

¹⁶ Per § 201.100(b)(5)(i) and (ii), flavoring and colorants may be designated as such without naming their components except for FD&C Yellow No 5 and FD&C Yellow No 6, which must be listed per § 201.20. Per § 201.100(b)(5)(iii), trace amounts of harmless substances added solely for individual product identification need not be named. If an applicant wants to use the National Formulary (NF) descriptor next to excipients, recommend limiting its use to the product quality sections of the FPI (see page 3 of LRT). Do not list brand names, e.g., Opadry, Eudragit, Polistirex, etc.

¹⁷ Listed before "indicated for" in INDICATIONS AND USAGE of Highlights section [§ 201.57(a)(6)]; can also search the term "FDA EPC Text Phrases" in [FDA's Labeling Resources for Human Prescription Drugs](#) for the most recent EPC list.

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Chemical name ¹⁸ , structural formula, molecular weight [§ 201.57(c)(12)(i)(F)].	Adequate	
If radioactive, statement of important nuclear characteristics [§ 201.57(c)(12)(i)(G)].	N/A	
Other important chemical or physical properties (such as pKa or pH) [201.57(c)(12)(ii)].	Adequate	The pH of the meloxicam injection is 8.0 to 9.5.
For oral prescription drug products, include gluten statement ¹⁹ (if applicable).	N/A	N/A
Remove statements that may be misleading or promotional (e.g., "synthesized and developed by Drug Company X," "structurally unique molecular entity").	N/A	N/A
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. Note the labeling requirement may be applicable to another section of the PI (e.g., Section 2).	N/A	No USP monograph for meloxicam injection. Monographs exist for meloxicam tablets and oral suspension only.

Assessment: *Adequate*

¹⁸ Chemical names do not need to be capitalized unless it appears at the beginning of a sentence (see *Preferred IUPAC Names Provisional Recommendation*, September 2004; Chapter 1, par. 16 Name writing, p.80-90).

¹⁹ Draft guidance: [Gluten in Drug Products and Associated Labeling Recommendations \(December 2017\)](#)

1.2.4 Section 16 (HOW SUPPLIED/STORAGE AND HANDLING)²⁰



Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
HOW SUPPLIED/STORAGE AND HANDLING section		
Available dosage form(s) [§ 201.57(c)(17)].	Adequate	"1 mL Single-Dose Vial"
Strength(s) in metric system. [§ 201.57(c)(17)(i)] If the active ingredient is a salt, apply the USP Salt Policy per FDA Guidance . Clearly state whether the strength is based on the active moiety. No equivalency statement.	Adequate	"1 mL fill (30 mg/mL)"
Available units (e.g., bottles of 100 tablets) [§ 201.57(c)(17)(ii)].	Adequate	"1 mL Single-Dose Vial"
Identification of dosage forms (e.g., shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable); Include NDC(s) [§ 201.57(c)(17)(iii)].	Adequate	"clear, pale-yellow to yellow color solution" 24338-153-02 - 10 x 1 mL Single-Dose Vials 24338-153-01 - 1 mL Single-Dose Vial
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored."	N/A	N/A

²⁰ See § 201.57(c)(17); [Labeling Review Tool \(March 2022, page 70\)](#). Consider including proprietary name and established name.

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
For injectable drug products for parenteral administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package (see USP <659>).	Adequate	Single-dose vial is the appropriate package type term according to FDA Guidance "Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use"
Special handling about the supplied product (e.g., protect from light, refrigerate). If there is a statement to "Dispense in original container," provide reason why (e.g., to protect from light or moisture, to maintain stability, etc.). For hazardous drugs, state "DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures. ^x " with x numerical citation to "OSHA Hazardous Drugs." [§ 201.57(c)(17)(iv)]	Adequate	"Keep vial in carton to protect from light."
Storage conditions. Where applicable, use USP storage range rather than storage at a single temperature. (see USP <659>).	Adequate	"Store at 20°C to 25°C (68°F to 77°F); excursions permitted to 15°C to 30°C (59°F to 86°F) [see USP Controlled Room Temperature]."
Latex: If product does not contain latex and manufacturing of product and container did not include use of natural rubber latex or synthetic derivatives of natural rubber latex, state: "Not made with natural rubber latex. Avoid statements such as "latex-free." ²¹	N/A	N/A

²¹ Guidance: [Recommendations for Labeling Medical Products to Inform Users that the Product or Product Container is not Made with Natural Rubber Latex](#) (December 2014)

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Include information about child-resistant packaging ²² (if chosen by manufacturer).	N/A	N/A

Assessment: *Adequate*

1.2.5 Other Sections of Labeling

There may be other sections of labeling that contain product-quality related information. For example, there are specific required/recommended warnings for certain inactive ingredients [e.g., aspartame, aluminum in large and small volume parenterals, sulfites, FD&C Yellow Number 5 (tartrazine), and benzyl alcohol]. Please notify the prescription drug review division if the product contains any of these inactive ingredients.

Please include your comments about other sections of labeling if they contain product quality information.



1.2.6 Manufacturing Information After Section 17 (for drug products)²³

Item	Item in Proposed Labeling (choose "Adequate" or "Inadequate")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Manufacturing Information After Section 17		
Name and location of business (street address, city, state, and zip code) of the manufacturer, distributor, and/or packer.	Adequate	Azurity Pharmaceuticals, Inc.; Woburn, MA 01801

Assessment: *Adequate*

²² Guidance: [Child-Resistant Packaging Statements in Drug Product Labeling](#) (August 2019)

²³ § 201.1(h)(5) and 201.1(i); [Labeling Review Tool](#) (March 2022, page 74)

2.0 PATIENT LABELING

Assessment of Product Quality Related Aspects of Patient Labeling (e.g., Medication Guides, Instructions for Use, Patient Information):

Item	Item in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Established name ²⁴	Choose an item.	N/A
Special preparation instructions (if applicable).	N/A	N/A
Storage and handling information (if applicable).	Choose an item.	N/A
If the product contains a desiccant, ensure the desiccant has a warning (e.g., "Do not eat.") and the size and shape of the desiccant differ from the dosage form.	N/A	N/A
Active ingredient(s) (if applicable).	Choose an item.	N/A
Alphabetical listing of inactive ingredients (if applicable).	Choose an item.	N/A
Name and location of business (street address, city, state, and zip code) of manufacturer, distributor, and/or packer.	Choose an item.	N/A

Assessment: Adequate

No Medication Guides, Instructions for Use or Patient Information provided.

3.0 CONTAINER AND CARTON LABELING²⁵

²⁴ Established name = [Drug] [Route of Administration] [Dosage Form]

²⁵ [Carton and Container Labeling Resources](#)

Item	Item in Proposed Carton Labeling (choose "Adequate", "Inadequate", or "N/A")	Is item in Container Labels same as that of Carton Labeling?	Assessor's Comments about Container Labels and Carton Labeling (If an item is Inadequate or different, provide more details, as appropriate)
Proprietary name and established name ²⁷ , (font size and prominence) [§ 201.10(g)(2)].	Adequate	Yes	Send IR to change parenthesis so that product title reads, "Xifyrm (meloxicam injection)"
Strength(s) in metric system [§ 201.100(b)(4) & 201.100(d)]. ²⁸	Adequate	Yes	30 mg/mL
Route(s) of administration, not required for oral use [§ 201.100(b)(3)].	Adequate	Yes	"For Intravenous Use Only"
If the active ingredient is a salt, include the equivalency statement per Salt Guidance and MAPP [§ 201.10(d)(1) & 201.100(b)(4), USP <1121>].	N/A	Yes	N/A
Net contents (e.g., tablet count, volume of liquid) [§ 201.51(a)]. ²⁹	Adequate	Yes	"1 mL Single-Dose Vial"
"Rx only" displayed on the principal display [§ 201.100(b)(1)].	Adequate	Yes	
NDC (requested, but not required for all labels or labeling) [§ 201.2 & 207.35].	Adequate	Yes	Carton – NDC 24338-153-02 Vial – NDC 24338-153-01
Lot number and expiration date [§ 201.18 & 201.17].	Adequate	Yes	
Storage conditions. If applicable, include a space on the carton labeling for the user to write the beyond-use-date (BUD).	Adequate	Yes	Store at 20°C to 25°C (68°F to 77°F); excursions permitted to 15°C to 30°C (59°F to 86°F). [See USP controlled room temperature].

²⁷ Established name = [Drug] [Route of Administration] [Dosage Form]

²⁸ Express as "XX mg per tablet" or "XX mg per capsule" for strength of professional samples of solid oral dosage form with small net quantities per container (e.g., 5 or less) or blister pack/carton. See [Guidance: Safety Considerations for Container Labels and Carton Labeling Design to Minimize Medication Errors \(May 2022\)](#)

²⁹ § 201.51(h): A drug shall be exempt from compliance with the net quantity declaration required by this section if it is an ointment labeled "sample", "physician's sample", or a substantially similar statement and the contents of the package do not exceed 8 grams.

Item	Item in Proposed Carton Labeling (choose "Adequate", "Inadequate", or "N/A")	Is item in Container Labels same as that of Carton Labeling?	Assessor's Comments about Container Labels and Carton Labeling (If an item is Inadequate or different, provide more details, as appropriate)
For injectable drug products for parenteral administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package, and these products require a "Not for direct infusion" statement. (See USP <659>).	Adequate	Yes	Single-dose vial is the appropriate package type term according to FDA Guidance "Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use"
Name of all inactive ingredients, in alphabetical order [§ 201.10(a)] [except for oral drug per § 201.100(b)(5) or limited space per § 201.10(i)(2)].	Adequate	No	Due to the small size of the vial inactive ingredients are not on the vial label. This is acceptable because they appear on the carton label and in the PI.
For parenteral injectable dosage forms, include quantities of all inactive ingredients. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect. [§ 201.100(b)(5)(iii)].	Adequate	No	Due to the small size of the vial inactive ingredients are not on the vial label. This is acceptable because they appear on the carton label and in the PI.
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol at 60 °F. (15.56 °C) [§ 201.10(d)(2)].	N/A	Yes	N/A
Linear Bar code [§ 201.25(c)(2)]. ³⁰	Adequate	Yes	
Adequate directions for use: "Recommended Dosage: See	Adequate	Yes	"Recommended Dosage: See Prescribing Information"

³⁰ See § 201.25(b)(1)(i) for a list where bar code is not required, e.g., prescription drug samples, medical gases, radiopharmaceuticals, etc.

Item	Item in Proposed Carton Labeling (choose "Adequate", "Inadequate", or "N/A")	Is item in Container Labels same as that of Carton Labeling?	Assessor's Comments about Container Labels and Carton Labeling (If an item is Inadequate or different, provide more details, as appropriate)
Prescribing Information" [§ 201.5 & 201.55].			
Name of manufacturer/distributor /packer [§ 201.1(a), 201.1(h)(5)].	Adequate	No	The address of the "manufactured for" on the vial label is not included, but is included on the carton label.
"Keep out of reach of children" statement, optional for Rx, required for OTC [§ 201.66(c)(5)(x)].	N/A	Yes	N/A
If there is a Medication Guide, must include a statement about dispensing a Medication Guide to each patient.	N/A	Yes	N/A
No text on Ferrule and Cap overseal of a vial of injectable products unless a cautionary statement is required. (USP <7>).	Adequate	Yes	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled.	N/A	Yes	No USP monograph for meloxicam injection. Monographs exist for meloxicam tablets and oral suspension only.
When a drug product differs from the relevant USP standard of strength, quality, or purity, as determined by the application of the tests, procedures, and acceptance criteria set forth in the relevant compendium, its difference shall be plainly stated on its label. ³¹	N/A	Yes	N/A

³¹ USP General Notices 3.20 Indicating Conformance

Item	Item in Proposed Carton Labeling (choose "Adequate", "Inadequate", or "N/A")	Is item in Container Labels same as that of Carton Labeling?	Assessor's Comments about Container Labels and Carton Labeling (If an item is Inadequate or different, provide more details, as appropriate)
And others if space is available.	N/A	Yes	N/A

Assessment of Carton Labels and Container Labeling: *Adequate*

4. OUTSTANDING ISSUES AND RECOMMENDATIONS

No other meloxicam injection drug products on the market so no inconsistencies with other labels.



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Julia
Pinto

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Date: 3/24/2025 10:53:26AM
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Valerie
Amspacher

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/s/

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Title:	NDA Executive Summary		
Document ID:	OPQ-ALL-TEM-0013		
Effective Date:	31 Mar 2023	Revision:	00
Total Pages:	3		



NDA Executive Summary

1. Application/Product Information

NDA Number.	218395		
Applicant Name	Slayback Pharma LLC		
Drug Product Name	Meloxicam Injection		
Dosage Form.	Injection		
Proposed Strength(s)	30 mg/mL		
Route of Administration	Intravenous		
Maximum Daily Dose	30 mg		
Rx/OTC Dispensed	Rx		
Proposed Indication	for use in adults for the management of moderate-to-severe pain, alone or in combination with non-NSAID analgesics.		
Drug Product Description	clear pale-yellow to yellow color solution in a glass vial stoppered with a grey (b) (4) rubber stopper		
Co-packaged product information	N/A		
Device information:	N/A		
Storage Temperature/ Conditions	20°C to 25°C		
Review Team	Discipline	Primary	Secondary
	Drug Substance	Jeff Medwid	Donna Christner
	Drug Product/ Labeling	Eric Bow	Valerie Amspacher
	Manufacturing	Yan Xu	Tianhong (Tim) Zhou
	Biopharmaceutics	N/A	N/A



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	<i>Microbiology</i>	Renee Marcsisin-Rogers	Shannon Heine
	<i>Other (specify):</i>	N/A	N/A
	<i>RBPM</i>	Teicher Agosto	
	<i>ATL</i>	Valerie Amspacher	
Consults	N/A		

2. Final Overall Recommendation - Approval

3. Action Letter Information

a. Expiration Dating: The proposed 24-months expiration dating period is acceptable when stored at 20°C to 25°C (68°F to 77°F).

b. Additional Comments for Action

4. Basis for Recommendation:

a. Summary of Rationale for Recommendation:

CMC recommends approval for this NDA based on reviews by drug substance, drug product, process and facilities and microbiology.

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

Recommendation by Subdiscipline:

Drug Substance	-	Adequate
Drug Product	-	Adequate
Quality Labeling	-	Adequate
Manufacturing	-	Adequate
Biopharmaceutics	-	N/A
Microbiology	-	Adequate

Environmental Assessment: Categorical Exclusion - Adequate



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QPA for EA(s): No

5. Life-Cycle Considerations

Established Conditions per ICH Q12: Yes

Comments:

Comparability Protocols (PACMP): Yes

Comments:

Additional Lifecycle Comments:

Submission(s) Assessed	Document Date	Discipline(s) Affected
Supporting document 1; eCTD 0001	14 Mar 2023	All, original submission
Supporting document 7; eCTD 0007	3 Jul 2023	Process/facilities
Supporting document 10; eCTD 0010	20 Jul 2023	Microbiology
Supporting document 14; eCTD 0014	16 Nov 2023	Drug product (an IR was sent by non-clinical but the response was an update to the specification)
Supporting document 16; eCTD 0016	22 Nov 23	Drug product
Supporting document 18; eCTD 0018	30 Nov 2023	Drug product
Supporting document 19; eCTD 0019	1 Dec 2023	Drug product
Supporting document 20; eCTD 0020	18 Dec 2023	Drug product



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CHAPTER IV: LABELING

For more details about the items in this template, please see [Chapter IV \(Labeling\) of the NDA IQA Guide](#)

1.0 PRESCRIBING INFORMATION

Assessment of Product Quality Related Aspects of the Prescribing Information:

1.1 HIGHLIGHTS OF PRESCRIBING INFORMATION

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Product Title in Highlights		
Established name(s) ¹	Adequate	
Route(s) of administration	Adequate	
Dosage Forms and Strengths Heading in Highlights		
Summary of the dosage form(s) and strength(s) in metric system	Adequate	
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored".	N/A	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk	Adequate	Single dose

¹ Established name = [Drug] [Route of Administration] [Dosage Form]

package and imaging bulk package.		
If the drug product contains an active ingredient that is a salt, clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active ingredient (e.g., Tablets: 10 mg of drug-x hydrochloride).	N/A	

1.2 FULL PRESCRIBING INFORMATION

1.2.1 Section 2 (DOSAGE AND ADMINISTRATION)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE AND ADMINISTRATION section		
Special instructions for product preparation (e.g., reconstitution and resulting concentration, dilution, compatible diluents, storage conditions needed to maintain the stability of the reconstituted or diluted product)	N/A	
Important administration instructions supported by product quality information (e.g., do not crush or chew extended-release tablets,	N/A	

instructions for mixing with food)		
For parenteral products: include statement: <i>“Parenteral drug products must be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit”</i>	Adequate	Visually inspect parenteral drug products for particulate matter and discoloration prior to administration. Should the contents appear discolored or contain particulate matter, discard the vial [see Dosage Forms and Strengths (3)].
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. Note the labeling requirement may be applicable to another section of the PI (e.g., Section 11).	N/A	
For radioactive products, include radiation dosimetry for the patient and healthcare practitioner(s) who administer the drug	N/A	
For hazardous products, include the statement <i>“DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures.”</i> ^x with x numerical citation to “OSHA Hazardous Drugs”.	N/A	

1.2.2 Section 3 (DOSAGE FORMS AND STRENGTHS)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DOSAGE FORMS AND STRENGTHS section		
Available dosage form(s)	Adequate	
Strength(s) in metric system	Adequate	
If the active ingredient is a salt, apply the USP Salt Policy per FDA Guidance. Clearly state whether the strength is based on the active moiety (e.g., Tablets: 10 mg of drug-x) or active ingredient (Tablets: 10 mg of drug-x hydrochloride).	N/A	
A description of the identifying characteristics of the dosage forms, including shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable	Adequate	Clear, pale yellow to yellow color solution
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored"	N/A	
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package type terms include pharmacy bulk package and imaging bulk package.	Adequate	Single dose

Section 11 (DESCRIPTION)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
DESCRIPTION section		
Proprietary and established name(s)	Adequate	
Dosage form(s) and route(s) of administration	Adequate	Meloxicam is a nonsteroidal anti-inflammatory drug (NSAID). It is a sterile clear, pale-yellow to yellow solution in a single-dose vial, "For intravenous administration"
If the active ingredient is a salt, apply the USP Salt Policy and include the equivalency statement per Salt Guidance and MAPP . For example: "TRADENAME contains 100 mg of drug-x (equivalent to 123.7 mg of drug-x hydrochloride)"	N/A	
List names of all inactive ingredients. Use USP/NF names in alphabetical order. Avoid brand names.	Adequate	<i>See below</i>

For parenteral injectable dosage forms, include the name and quantities of all inactive ingredients. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect.	Adequate	Each mL of aqueous solution contains 30 mg of meloxicam, 150 mg of Hydroxypropyl Betadex, 20 mg of Meglumine, 60 mg of Povidone (b) (4) and water for injection.
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol	N/A	
Sterility statement (if applicable)	Adequate	"It is a sterile clear, pale-yellow to yellow solution"
Pharmacological/Therapeutic class	Adequate	Meloxicam is a nonsteroidal anti-inflammatory drug (NSAID).
Chemical name, structural formula, molecular weight	Adequate	Meloxicam is designated chemically as 4-hydroxy-2-methyl-N-(5-methyl-2-thiazolyl)-2H-1,2- benzothiazine-3-carboxamide-1,1-dioxide. The molecular weight is 351.4. Its molecular formula is C ₁₄ H ₁₃ N ₃ O ₄ S ₂ and the structural formula of meloxicam is (image of the structure)
If radioactive, statement of important nuclear characteristics.	N/A	
Other important chemical or physical properties (such as pKa or pH)	Adequate	Added, pH 8.0 to 9.5

Section 11 (DESCRIPTION) Continued

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
For oral prescription drug products, include gluten statement (if applicable)	N/A	
Remove statements that may be misleading or promotional (e.g., "synthesized and developed by Drug Company X," "structurally unique molecular entity")	N/A	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled. Note the labeling requirement may be applicable to another section of the PI (e.g., Section 2).	N/A	

1.2.4 Section 16 (HOW SUPPLIED/STORAGE AND HANDLING)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
HOW SUPPLIED/STORAGE AND HANDLING section		
Available dosage form(s)	Adequate	
Strength(s) in metric system	Adequate	
Available units (e.g., bottles of 100 tablets)	Adequate	
Identification of dosage forms (e.g., shape, color, coating, scoring, imprinting, and color and clarity of the solution, when applicable); Include NDC(s)	Adequate	
Assess if the tablet is scored. If product meets guidelines and criteria for a scored tablet, state "functionally scored"	N/A	

For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package.	Adequate	Single dose
Special handling about the supplied product (e.g., protect from light, refrigerate). If there is a statement to "Dispense in original container," provide reason why (e.g., to protect from light or moisture, to maintain stability, etc.). For hazardous drugs, state "DRUG X is a hazardous drug. Follow applicable special handling and disposal procedures. ^x " with x numerical citation to "OSHA Hazardous Drugs."	Adequate	Keep vial in carton to protect from light.

Section 16 (HOW SUPPLIED/STORAGE AND HANDLING) (Continued)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Storage conditions. Where applicable, use USP storage range rather than storage at a single temperature.	Adequate	Store at 20°C to 25°C (68°F to 77°F); excursions permitted to 15°C to 30°C (59°F to 86°F). [See USP controlled room temperature]. Keep vial in

		carton to protect from light.
Latex: If product does not contain latex and manufacturing of product and container did not include use of natural rubber latex or synthetic derivatives of natural rubber latex, state: <i>"Not made with natural rubber latex. Avoid statements such as "latex-free."</i>	N/A	
Include information about child-resistant packaging	N/A	

1.2.5 Other Sections of Labeling

There may be other sections of labeling that contain product-quality related information. For example, there are specific required/recommended warnings for certain inactive ingredients [e.g., aspartame, aluminum in large and small volume parenterals, sulfites, FD&C Yellow Number 5 (tartrazine), and benzyl alcohol]. Please notify the prescription drug review division if the product contains any of these inactive ingredients.

Please include your comments about other sections of labeling if they contain product quality information.

1.2.6 Manufacturing Information After Section 17 (for drug products)

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments (If an item is Inadequate, provide more details on the issues, as appropriate)
Manufacturing Information After Section 17		
Name and location of business (street address, city, state, and zip code) of the manufacturer, distributor, and/or packer	Adequate	

2.0 PATIENT LABELING

Assessment of Product Quality Related Aspects of Patient Labeling (e.g., Medication Guides, Instructions for Use, Patient Information):

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Established name ²	N/A	
Special preparation instructions (if applicable)	N/A	
Storage and handling information (if applicable)	N/A	
If the product contains a desiccant, ensure the desiccant has a warning (e.g., "Do not eat.") and the size and shape of the desiccant differs from the dosage form.	N/A	
Active ingredient(s) (if applicable)	N/A	
Alphabetical listing of inactive ingredients (if applicable)	N/A	
Name and location of business (street address, city, state, and zip code) of manufacturer, distributor, and/or packer	N/A	

Any deficiencies should be listed at the end in the "ITEMS FOR ADDITIONAL ASSESSMENT."

3.0 CONTAINER AND CARTON LABELING

² Established name = [Drug] [Route of Administration] [Dosage Form]

Item	Items in Proposed Labeling (choose “Adequate”, “Inadequate”, or “N/A”)	Assessor’s Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Established name ³ , (font size and prominence)	Adequate	
Strength(s) in metric system	Adequate	30 mg/mL
Route(s) of administration	Adequate	For intravenous use only
If the active ingredient is a salt, include the equivalency statement per Salt Guidance and MAPP .	N/A	
Net contents (e.g., tablet count, volume of liquid)	Adequate	10 x 1 mL on carton, and 1 mL on vial
“Rx only” displayed on the principal display	Adequate	
NDC	Adequate	
Lot number and expiration date	Adequate	
Storage conditions. If applicable, include a space on the carton labeling for the user to write the new beyond-use-date (BUD).	Adequate	Store at 20°C to 25°C (68°F to 77°F); excursions permitted to 15°C to 30°C (59°F to 86°F). [See USP controlled room temperature]. Keep vial in carton to protect from light.
For injectable drug products for parental administration, use appropriate package type term (e.g., single-dose, multiple-dose, single-patient-use). Other package terms include pharmacy bulk package and imaging bulk package, and these products require a “Not for direct infusion” statement.	Adequate	Single-dose

³ Established name = [Drug] [Route of Administration] [Dosage Form]

For parenteral injectable dosage forms, include the name and quantities of all active and inactive ingredients in alphabetical order. For ingredients added to adjust the pH or make isotonic, include the name and statement of effect.	Adequate	Each 1 mL contains 30 mg of meloxicam. Also contains 150 mg hydroxypropyl betadex, 20 mg meglumine, 60 mg povidone and water for injection.
If alcohol is present, must provide the amount of alcohol in terms of percent volume of absolute alcohol	N/A	
Linear Bar code	Adequate	

Item	Items in Proposed Labeling (choose "Adequate", "Inadequate", or "N/A")	Assessor's Comments about Carton Labeling (If an item is Inadequate, provide more details on the issues, as appropriate)
Name of manufacturer/distributor /packer	Adequate	
If there is a Medication Guide, must include a statement about dispensing a Medication Guide to each patient.	Adequate	
No text on Ferrule and Cap over seal, unless a cautionary statement is required.	Adequate	
If there is a USP monograph for the drug product and it contains a labeling requirement, ensure the labeling requirement is fulfilled.	N/A	
When a drug product differs from the relevant USP standard of strength, quality, or purity, as determined by the application of the tests, procedures, and acceptance criteria set forth in the relevant compendium, its difference shall be plainly stated on its label.	N/A	
And others, if space is available.	N/A	

Assessment of Carton and Container Labeling: Adequate

Any deficiencies should be listed at the end in the "ITEMS FOR ADDITIONAL ASSESSMENT."

ITEMS FOR ADDITIONAL ASSESSMENT

Assess consistency of product-quality information in prescription drug labeling (PI, c/c labeling, and FDA-approved patient labeling). See [Carton/Container Labeling Specific Resources](#) for a presentation about inappropriate inconsistencies of product quality information between labeling.

If there are inappropriate inconsistencies between the labeling (e.g., established name, strength(s), package type term, discard statement, identifying characteristics, storage, reconstitution/dilution instructions), please list these as deficiencies in this section.

Overall Assessment and Recommendation:

Adequate

Primary Labeling Assessor Name and Date: Eric Bow PhD

Secondary Assessor Name and Date (and Secondary Summary, as needed): Julia Pinto PhD



Eric
Bow

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Julia
Pinto

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CHAPTER VII: MICROBIOLOGY

For more details about the items in this template, please see [Chapter VII \(Microbiology\) of the NDA IQA Guide](#)

Product Information	Indicated for use in adults for the management of moderate-to-severe pain, alone or in combination with non-NSAID analgesics
NDA Number	218395
Assessment Cycle Number	MR01
Drug Product Name/ Strength	Meloxicam Injection 30 mg/ml
Route of Administration	Intravenous
Applicant Name	Slayback Pharma LLC
Therapeutic Classification/ OND Division	CDER/OND/ON/DAAP
Manufacturing Site	Caplin Steriles Limited, Survey No. 895 & 897, Guruvarakandigai, Sirupuzhalpettai (Post), Thiruvallur (District), Gummidipoondi, Tamil Nadu 601201, India
Method of Sterilization	(b) (4)

Assessment Recommendation: Adequate

Assessment Summary: The drug product is sterile

(b) (4)

(b) (4)

List Submissions Being Assessed (table):

Document(s) Assessed	Date Received
eCTD sequence #0001	03/14/2023
eCTD sequence #0010	07/20/2023

Highlight Key Issues from Last Cycle and Their Resolution: N/A

Remarks:

- eCTD sequence #0002 provided the applicant's response to the proprietary name request and eCTD sequence #s 0003 and 0004 provided the applicant's response to a clinical information request; therefore, no microbiology review was necessary.
- An Information Request was sent to the applicant on 07/18/2023 and a response was received on 07/20/2023. The original deficiencies are italicized below.

Concise Description of Outstanding Issues (list bullet points with key information and update as needed): None

Supporting Documents:

- DMF (b) (4) from (b) (4) for the (b) (4) stoppers (b) (4)
- DMF (b) (4) microbiology reviews (b) (4).docx dated (b) (4) (adequate), (b) (4).docx dated (b) (4) (adequate), and (b) (4).docx dated (b) (4) (adequate)
- Microbiology review (b) (4).docx, dated (b) (4) (adequate), for building and facilities, environmental monitoring, contact equipment sterilization (b) (4), media fills on (b) (4), and actions concerning product when media fills fail

S DRUG SUBSTANCE

The drug substance is non-sterile.

Assessment: N/A

P.1 DESCRIPTION OF THE COMPOSITION OF THE DRUG PRODUCT

- **Description of drug product:** A clear pale-yellow to yellow color, sterile solution free from visible particles, pH 8.0-9.5 at release, containing 30.0 mg/ml of API, supplied as a 1 ml fill volume in a 2 ml vial, and administered as an intravenous bolus injection.
- **Drug product composition:**

Ingredients	Reference standards	Function	Quantity (mg/ml)
Meloxicam	USP	API	30
HPβCD	USP-NF	(b) (4)	150
Meglumine	USP-NF		20
Povidone K12 (PVP K12)	USP-NF		60
Water for injection	USP	Vehicle	q.s. to 1 ml
(b) (4)			

- **Description of container closure system:**

Primary packing material	Description	Item/material code	Manufacturer/supplier
Container	2 ml/ 13mm (b) (4) clear, USP (b) (4) glass vial		(b) (4)
Closure	13 mm gray (b) (4) rubber stopper, (b) (4) (b) (4)		
Seal	13 mm flip off seal blue (b) (4) (b) (4)		

Assessment: Adequate

P.2 PHARMACEUTICAL DEVELOPMENT

(b) (4)

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