CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 020772

APPROVABLE LETTER

NDA 20-772

Orphan Medical, Inc.
Attention: Dayton Reardan, Ph.D.
13911 Ridgedale Drive
Minnetonka, MN 55305

NOV 6 1997

Dear Dr. Reardan:

Please refer to your new drug application dated May 6, 1997, received May 7, 1997, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Sucraid® (sacrosidase) Oral Solution.

We acknowledge receipt of your submissions dated June 4, 6, 11, 16, 17 and 20, July 1, 7, 11, 18, and 25, August 13, 20, and 21, September 3, 8, 11, 12, 18, 23, and 25, and October 28, 1997. The User Fee goal date for this application is November 7, 1997.

We have completed the review of this application as submitted with draft labeling, and it is approvable. Before this application may be approved, however, it will be necessary for you to:

1. Provide an adequate response to our letters dated July 31 and September 22, 1997, requesting additional microbiology and chemistry, manufacturing, and controls information, respectively. For your convenience, the content of the July 31, 1997 letter is reiterated below:

b. In addition, our September 22, 1997 letter requested information about chemistry, manufacturing, and controls items under the following headings:

1). Regarding Drug Substance: Description and Characterization, Synthesis/Method of Manufacture/Process Controls, Reference Standard, Regulatory Specifications/Analytical Methods, Container Closure, and Stability

2). Regarding Drug Product: Methods of Manufacturing and Packing, Regulatory Specifications and Methods, Container Closure, and Stability

For complete details, please refer to the letter dated September 22, 1997.

2. In addition, please provide for individual patients, based on the efficacy data from pivotal study S-2, as requested in our October 23, 1997 telephone conversation.

Finally, it will be necessary for you to submit final printed labeling (FPL) [package insert, patient package insert, cartons, and container labels] identical in content to the enclosed marked-up draft labeling. Please submit 20 copies of the final printed labeling, ten of which are individually mounted on heavy-weight paper or similar material.

If additional information relating to the safety or effectiveness of this drug becomes available, revision of the labeling may be required.

Under 21 CFR 314.50(d)(5)(vi)(*b*), we request that you update your NDA by submitting all safety information you now have regarding your new drug. Please provide updated information as listed below:

1. Retabulate all safety data including results of trials that were still ongoing at the time of NDA submission. The tabulation can take the same form as in your initial submission. Tables comparing adverse reactions at the time the NDA was submitted vs now will certainly facilitate review.

2. Retabulate drop-outs with new drop-outs identified. Discuss, if appropriate.

3. Provide details of any significant changes or findings, if any.

4. Summarize worldwide experience on the safety of this drug.

5. Submit case report forms for each patient who died during a clinical study or who did not complete a study because of an adverse event.

Please also update the new drug application with respect to reports of relevant safety information, including all deaths and any adverse events that led to discontinuation of the drug and any information suggesting a substantial difference in the rate of occurrence of common but less serious adverse events. The update should cover all studies and uses of the drug including: (1) those involving indications not being sought in the present submission, (2) other dosage forms, and (3) other dose levels, etc.

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional material and the package insert directly to:

Food and Drug Administration
Division of Drug Marketing, Advertising and Communications,
HFD-40
5600 Fishers Lane
Rockville, Maryland 20857

Within 10 days after the date of this letter, you are required to amend the application, notify us of your intent to file an amendment, or follow one of your other options under 21 CFR 314.110. In the absence of such action FDA may take action to withdraw the application.

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

If you have any questions, please contact Melodi McNeil, Regulatory Health Project Manager, at (301) 443-0483.

Sincerely yours,

/S/ 11/4/97

/S/

11/5/97

Paula Botstein, M.D.
Acting Director
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosure: Draft Labeling

cc:

Original NDA 20-772
HFD-180/Div. Files
HFD-002/ORM
HFD-92/DDM-DIAB
HFD-180/M.McNeil
HFD-180/Talarico /S/ 11-5-1997
HFD-180/Prizont
HFD-180/Gallo-Torres
HFD-180/Duffy /S/ 11/5/97
HFD-180/Shaw
HFD-180/Choudary
HFD-820/Gibbs /S/ 11/5/97
HFD-870/Chen
HFD-870/Kaus
HFD-720/Huque
HFD-720/Sankoh
HFD-160/Hughes
HFD-160/Cooney
HFD-103/Office Director
HFD-101/L.Carter
DISTRICT OFFICE
HFD-40/DDMAC (with draft labeling)

Drafted by: MM/October 2, 1997/c:\wpfiles\cso\n\20772710.ae
Initialed by: LTalarico 10/7/97, 10/31/97
EDuffy 10/31/97
PBotstein 11/4/97
Final: November 5, 1997

APPROVABLE (AE)