DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

NDA 20-458/SLR-002

TEVA Pharmaceuticals USA
Attention: Tu Dinh Tu, PharmD.
Manager, Regulatory Affairs
1090 Horsham Road
North Wales, PA 19454-1090

Dear Dr. Tu:

Please refer to your supplemental new drug application dated May 3, 2001, received May 4, 2001, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Galzin™ (zinc acetate) Capsules.

We acknowledge receipt of your submissions dated June 27, 2001, February 8, and February 28, 2002.

This supplemental new drug application provides for revisions to the CLINICAL TRIALS section of the package insert to include the results from a study on the use of Galzin for the maintenance of Wilson's disease during pregnancy.

We have completed the review of this supplemental application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as in the agreed upon labeling text. Accordingly, the supplemental application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the attached agreed upon labeling text for the package insert.

Please submit the copies of final printed labeling (FPL) electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA* (January 1999). Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved supplement NDA 20-458/SLR-002." Approval of this submission by FDA is not required before the labeling is used.

If a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter) is issued to physicians and others responsible for patient care, we request that you

submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HF-2
FDA
5600 Fishers Lane
Rockville, MD 20857

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, call Alice Kacuba, R.N., MSN, RAC, Regulatory Health Project Manager, at (301) 827-1602.

Sincerely,

{See appended electronic signature page}

Victor F. C. Raczkowski, M.D., M.Sc.
Acting Director
Division of Gastrointestinal and Coagulation Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosure

"CLINICAL TRIALS

Pregnant Patients
Included in a continuing single center United States trial are 19 symptomatic and presymptomatic women who became pregnant and continued Galzin therapy. These women delivered 26 live birth babies. At the time of delivery, the duration of zinc acetate therapy had ranged from 0.7 to 13.7 years. At the time of delivery all patients were using zinc acetate. The zinc acetate dosage at the start of pregnancy ranged from 25 to 50 mg two to three times a day. Two patients were being treated with penicillamine at the start of pregnancy and were switched to zinc acetate during the second month of pregnancy.

Urinary copper excretion was measured to monitor the copper status. Twenty-four hour urine excretion of copper indicated adequate control of copper levels in most patients before and during pregnancies. The results also indicated that during pregnancy, the mothers' health was protected by zinc acetate therapy, and no adverse effects on liver or neurological functions were reported. Limited pregnancy outcome data indicates an incidence of miscarriages consistent with those in the general population. From this limited experience, the rate of birth defects is 7.7%, while that in the general population is 4%. (See PRECAUTIONS, Pregnancy).

In addition, last sentence of the last paragraph of the PRECAUTIONS section, "Pregnancy" subection has the following phrase added:

"(See CLINICAL TRIALS)"

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Joyce Korvick
3/14/02 09:20:49 AM
for Dr. Victor Raczkowski