



NDA 020607-S38

## SUPPLEMENT APPROVAL

Pfizer, Inc.  
Attention: Lisa Amatulli, MS  
Senior Manager, Pfizer Global Regulatory Affairs  
235 East 42<sup>nd</sup> Street  
New York, NY 10017-7555

Dear Ms. Amatulli:

Please refer to your supplemental new drug application (sNDA) dated and received November 11, 2020, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Arthrotec (Diclofenac Sodium and Misoprostol delayed-release tablets) 50mg diclofenac sodium and 200 mcg misoprostol; and 75 mg diclofenac sodium and 200 mcg misoprostol.

We also refer to our letter dated October 15, 2020, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for nonsteroidal anti-inflammatory drug (NSAID) products. This information pertains to the serious risks of fetal renal dysfunction, oligohydramnios, and neonatal renal impairment, and Drug Reaction with Eosinophilia and Systemic Symptoms (DRESS).

This supplemental new drug application provides for revisions to the labeling for Arthrotec, consistent with our October 15, 2020 letter.

### **APPROVAL & LABELING**

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

You are responsible for assuring that the wording in this FPL is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

## **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at FDA.gov.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (Prescribing Information, and Medication Guide), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eList may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4).

## **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

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<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

If you have any questions, call Jacqueline LeeHoffman, PharmD, Safety Regulatory Project Manager, at 240-402-8689.

Sincerely,

*{See appended electronic signature page}*

Joyce Korvick, M.D., M.P.H.  
Deputy Director for Safety  
Division of Gastroenterology (DG)  
Office of Immunology and Inflammation (OII)  
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Medication Guide

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**This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.**  
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/s/  
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JOYCE A KORVICK  
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