NDA 021201/S-005

APPROVAL LETTER

Chemische Fabrik Kreussler & Corporation GmbH
c/o Methapharm, Inc.
Attention: Bernice Tao
Director of Scientific Affairs
11772 West Sample Road, Suite 101
Coral Springs, FL 33065

Dear Bernice Tao:

Please refer to your Supplemental New Drug Application (sNDA) dated and received July 17, 2024, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Asclera (polidocanol) Injection, 10mg/2mL and 20mg/2mL.

This "Changes Being Effected" supplemental new drug application provides for the following:

1. Revise the package insert (Section 11 DESCRIPTION) for the 0.5% and 1% strengths to:
    a. Include the quantity of disodium phosphate dihydrate (2.4 mg,) and potassium dihydrogen phosphate (0.86 mg) to reflect the current product formulation (e.g. your latest CMC supplement S-3 dated 05/30/2018 unless there has been changes after S-3).
    b. To remove the wording (b) (4) after the quantitative description of disodium phosphate dihydrate (2.4 mg) potassium dihydrogen phosphate (0.86 mg).

2. Ethanol content needs to be declared in terms of (v/v%) (b) (4) (b) (4) in the labeling in accordance with the 502(e) of the Act and 21 CFR 201.10(d)(2).

3. Revise the carton labeling in accordance with 21 CFR §201.100(b)(5)(iii) and 21 CFR §201.57(c)(12)(i)(C) accordingly based on the revised package insert (Section 11 DESCRIPTION), refer to comments (1) and (2) above.

4. Per the Guidance for Industry, "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 Guidance for Industry" the term "single use" is being retired by the Agency as it may cause confusion. Revise the labeling components (prescribing information, container labels, and carton labeling), from "single use" to "single-dose". If the product is appropriate and designed for "single-patient-use", then a revision from "single use" to "single patient- use" would require a "Prior Approval

Supplement". Refer to https://www.gmp-compliance.org/guidemgr/files/UCM468228.pdf for details.

APPROVAL & LABELING

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

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 http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the prescribing information) 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 titled *SPL Standard for Content of Labeling Technical Qs and As* at http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via 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 MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes, and annotate each change. To facilitate review of your submission, 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).

CARTON AND CONTAINER LABELS

Submit final printed carton and container labels that are identical to enclosed carton and container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission "**Product Correspondence – Final Printed Carton and Container Labels for approved NDA**

021201/S-005." Approval of this submission by FDA is not required before the labeling is used.

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

If you have any questions, call Esther Jones, Regulatory Business Process Manager, at (240) 402 - 0874.

Sincerely,

{See appended electronic signature page}

Gurpreet Gill-Sangha, Ph.D.
Supervisor
Division of Product Quality Assessment II
Office of Product Quality Assessment I
Office of Pharmaceutical Quality
Center for Drug Evaluation and Research

Enclosure(s):
Content of Labeling
Carton and Container Labeling

Gurpreet
Gill Sangha

Digitally signed by Gurpreet Gill Sangha
Date: 1/30/2025 09:15:32AM
GUID: 5135f2ad000117842392c50c36c7f28a