DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 21358/S-008

SUPPLEMENT APPROVAL

Bracco Diagnostics, Inc.
Attention: Melanie Benson, M.S.,R.A.C.
Director, US Regulatory Affairs
107 College Road East
Princeton, NJ 08540

Dear Ms. Benson:

Please refer to your Supplemental New Drug Application (sNDA) dated January 4, 2011, received January 5, 2011, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for MultiHance® Multipack™ Injection.

We acknowledge receipt of your amendments dated October 8, December 6 and 9, 2010.

We also refer to our letter dated September 8, 2010, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for MultiHance® Multipack™ Injection. This new safety information pertains to the risk of Nephrogenic Systemic Fibrosis (NSF) associated with the use of gadolinium-based contrast agents.

We also refer to our letter dated December 20, 2010, ordering you, under Section 505(o)(4)(E) of the FDCA, to make the safety labeling changes specified in our September 8, 2010, letter, as modified in accordance with our e-mail dated November 17, 2010 and teleconference dated November 18, 2010.

This supplemental new drug application provides for revisions to the labeling for MultiHance® Multipack™ Injection consistent with our September 8, 2010 letter, our e-mail dated November 17, 2010, our teleconference on November 18, 2010 and our December 20, 2011 letter.

The ordered safety labeling changes are as follows (additions are noted by underline and deletions are noted by ~~strikethrough:~~

1. Revise the BOXED WARNING as follows:

WARNING: NEPHROGENIC SYSTEMIC FIBROSIS (NSF)

~~Gadolinium-based contrast agents increase the risk for nephrogenic systemic fibrosis (NSF) in patients with:~~

~~acute or chronic severe renal insufficiency (glomerular filtration rate <30 mL/min/1.73m^2), or~~

~~acute renal insufficiency of any severity due to the hepato-renal syndrome or in the perioperative liver transplantation period.~~

~~In these patients, avoid use of gadolinium-based contrast agents unless the diagnostic information is essential and not available with non-contrast enhanced magnetic resonance imaging (MRI). NSF may result in fatal or debilitating systemic fibrosis affecting the skin, muscle and internal organs. Screen all patients for renal dysfunction by obtaining a history and/or laboratory tests. When administering a gadolinium-based contrast agent, do not exceed the recommended dose and allow a sufficient period of time for elimination of the agent from the body prior to any readministration (See WARNINGS)..~~

Gadolinium-based contrast agents (GBCAs) increase the risk for NSF among patients with impaired elimination of the drugs. Avoid use of GBCAs in these patients unless the diagnostic information is essential and not available with non-contrasted MRI or other modalities. NSF may result in fatal or debilitating fibrosis affecting the skin, muscle and internal organs.

- **The risk for NSF appears highest among patients with:**
  - **chronic, severe kidney disease (GFR < 30 mL/min/1.73m^2), or**
  - **acute kidney injury.**
- **Screen patients for acute kidney injury and other conditions that may reduce renal function. For patients at risk for chronically reduced renal function (e.g. age > 60 years, hypertension or diabetes), estimate the glomerular filtration rate (GFR) through laboratory testing.**
- **For patients at highest risk for NSF, do not exceed the recommended MultiHance dose and allow a sufficient period of time for elimination of the drug from the body prior to re-administration (See WARNINGS) .**

2. Revise the text of the "Nephrogenic Systemic Fibrosis" subsection of the WARNINGS section.

Nephrogenic Systemic Fibrosis (NSF)

~~Gadolinium-based contrast agents increase the risk for nephrogenic systemic fibrosis (NSF) in patients with acute or chronic severe renal insufficiency (glomerular filtration rate <30 mL/min/1.73 m^2) and in patients with acute renal insufficiency of any severity~~

~~due to the hepato-renal syndrome or in the perioperative liver transplantation period. In these patients, avoid use of gadolinium-based contrast agents unless the diagnostic information is essential and not available with non-contrast MRI. For patients receiving hemodialysis, physicians may consider the prompt initiation of hemodialysis following the administration of a gadolinium-based contrast agent in order to enhance the contrast agent's elimination. The usefulness of hemodialysis in the prevention of NSF is unknown.~~

~~Among the factors that may increase the risk for NSF are repeated or higher than recommended doses of a gadolinium-based contrast agent and the degree of renal function impairment at the time of exposure.~~

~~Post-marketing reports have identified the development of NSF following single and multiple administrations of gadolinium-based contrast agents. These reports have not always identified a specific agent. Where a specific agent was identified, the most commonly reported agent was gadodiamide (Omniscan™), followed by gadopentetate dimeglumine (Magnevist®) and gadoversetamide (OptiMARK®). NSF has also developed following sequential administrations of gadodiamide with gadobenate dimeglumine (MultiHance®) or gadoteridol (ProHance®). The number of post-marketing reports is subject to change over time and may not reflect the true proportion of cases associated with any specific gadolinium-based contrast agent.~~

~~The extent of risk for NSF following exposure to any specific gadolinium-based contrast agent is unknown and may vary among the agents. Published reports are limited and predominantly estimate NSF risks with gadodiamide. In one retrospective study of 370 patients with severe renal insufficiency who received gadodiamide, the estimated risk for development of NSF was 4% (J Am Soc Nephrol 2006; 17:2359). The risk, if any, for the development of NSF among patients with mild to moderate renal insufficiency or normal renal function is unknown.~~

~~Screen all patients for renal dysfunction by obtaining a history and/or laboratory tests. When administering a gadolinium-based contrast agent, do not exceed the recommended dose and allow a sufficient period of time for elimination of the agent prior to any readministration (See CLINICAL PHARMACOLOGY and DOSAGE AND ADMINISTRATION)..~~

Gadolinium-based contrast agents (GBCAs) increase the risk for nephrogenic systemic fibrosis (NSF) among patients with impaired elimination of the drugs. Avoid use of GBCAs among these patients unless the diagnostic information is essential and not available with non-contrast enhanced MRI or other modalities. The GBCA-associated NSF risk appears highest for patients with chronic, severe kidney disease (GFR < 30 mL/min/1.73m^2) as well as patients with acute kidney injury. The risk appears lower for patients with chronic, moderate kidney disease (GFR 30 - 59 mL/min/1.73m^2) and little, if any, for patients with chronic, mild kidney disease (GFR 60 - 89 mL/min/1.73m^2). NSF may result in fatal or debilitating fibrosis affecting the skin, muscle and internal

organs. Report any diagnosis of NSF following MultiHance administration to Bracco Diagnostics (1-800-257-8151) or FDA (1-800-FDA-1088 or www.fda.gov/medwatch).

Screen patients for acute kidney injury and other conditions that may reduce renal function. Features of acute kidney injury consist of rapid (over hours to days) and usually reversible decrease in kidney function, commonly in the setting of surgery, severe infection, injury or drug-induced kidney toxicity. Serum creatinine levels and estimated GFR may not reliably assess renal function in the setting of acute kidney injury. For patients at risk for chronically reduced renal function (e.g., age > 60 years, diabetes mellitus or chronic hypertension), estimate the GFR through laboratory testing.

Among the factors that may increase the risk for NSF are repeated or higher than recommended doses of a GBCA and the degree of renal impairment at the time of exposure. Record the specific GBCA and the dose administered to a patient. For patients at highest risk for NSF, do not exceed the recommended MultiHance dose and allow a sufficient period of time for elimination of the drug prior to re-administration. For patients receiving hemodialysis, physicians may consider the prompt initiation of hemodialysis following the administration of a GBCA in order to enhance the contrast agent's elimination. The usefulness of hemodialysis in the prevention of NSF is unknown (See CLINICAL PHARMACOLOGY and DOSAGE AND ADMINISTRATION).

3. Revise the Information for Patients section as follows:

Patients scheduled to receive MULTIHANCE should be instructed to inform their physician if the patient:

1. is pregnant or breast feeding.
2. has anemia or diseases that affect the red blood cells.
3. has a history of renal and/or hepatic disease, heart disease, seizure, hemoglobinopathies, or asthma or allergic respiratory diseases.
4. is taking any medications.
5. has any allergies to any of the ingredients of MULTIHANCE.
6. has recently received a GBCA.

GBCAs increase the risk for NSF among patients with impaired elimination of the drugs. To counsel patients at risk for NSF:

- Describe the clinical manifestations of NSF
- Describe procedures to screen for the detection of renal impairment

Instruct the patients to contact their physician if they develop signs or symptoms of NSF following MultiHance administration, such as burning, itching, swelling, scaling, hardening and tightening of the skin; red or dark patches on the skin; stiffness in joints with trouble moving, bending or straightening the arms, hands, legs or feet; pain in the hip bones or ribs; or muscle weakness.

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 text.

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 package insert, 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 from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications 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).

We request that the labeling approved today be available on your website within 10 days of receipt of this letter.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at http://www.fda.gov/opacom/morechoices/fdaforms/cder.html; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

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 package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above or by fax to 301-847-8444.

LETTERS TO HEALTH CARE PROFESSIONALS

If you decide to issue a letter communicating important safety-related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit, at least 24 hours prior to issuing the letter, an electronic copy of the letter to this NDA to the following address:

MedWatch Program
Office of Special Health Issues
Food and Drug Administration
10903 New Hampshire Ave
Building 32, Mail Stop 5353
Silver Spring, MD 20993

REPORTING REQUIREMENTS

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

ADDITIONAL REQUEST

As we noted previously, this newly approved MultiHance® Multipack™ Injection labeling is not in the physicians labeling rule (PLR) format; however, the approved MultiHance® Injection labeling is in PLR format. As we requested in our Safety Labeling Change letter dated December 20, 2010, submit a separate prior approval labeling supplement for MultiHance® Multipack™ Injection that provides text in the PLR format, aligns the text of its label with that of MultiHance® Injection, and incorporates the ordered NSF safety changes.

If you have any questions, call James Moore, Regulatory Project Manager, at (301) 796-2050.

Sincerely,

{See appended electronic signature page}

Rafel Rieves, M.D.
Director
Division of Medical Imaging Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research

ENCLOSURE:
Content of Labeling

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

/s/

RAFEL D RIEVES
02/16/2011