DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-632/S-010

Vicuron Pharmaceuticals Inc
c/o Pfizer Inc .
Attention: Ms. Anne Palestroni
Director, Worldwide Regulatory Strategy
235 East 42nd Street
New York, NY 10017

Dear Ms. Palestroni:

Please refer to your supplemental new drug application dated and received August 25, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Eraxis® (anidulafungin) for Injection.

We acknowledge receipt of your submissions dated February 5, 2009 and April 6, 2009 (2), June 2, 2009, and June 4, 2009. Your submission dated February 5, 2009, constituted a complete response to the agency December 18, 2008 Complete Response letter.

This Prior Approval supplemental new drug application provides for revisions to the package insert as well as the Carton and Container labels.

The revisions proposed in the package insert are as follows (additions are noted by underline and deletions are noted by ~~strikethrough~~).

Package Insert

1. The header of the Package Insert is revised as follows:

   [INTRAVENOUS INFUSION~~]~~, DILUTED WITH STERILE WATER FOR INJECTION] (not for IV Bolus Injection)

2. In the **DESCRIPTION** section of the package insert, the 5th paragraph is revised as follows:

   Prior to administration, ERAXIS for Injection requires reconstitution with sterile ~~the companion diluent (20% (w/w) Dehydrated Alcohol in~~ Water for Injection~~)~~ and subsequent dilution with either 5% Dextrose Injection, USP or 0.9% Sodium Chloride Injection, USP (normal saline).

3. In the **DOSAGE AND ADMINISTRATION/Preparation of ERAXIS for Administration** subsection of the package insert, the first paragraph is revised as follows:

ERAXIS for Injection must be reconstituted with sterile ~~the companion diluent (20% (w/w) Dehydrated Alcohol in~~ Water for Injection~~)~~ and subsequently diluted with only 5% Dextrose Injection, USP or 0.9% Sodium Chloride Injection, USP (normal saline) has not been established.

4. The **DOSAGE AND ADMINISTRATION/Preparation of ERAXIS for Administration/***Reconstitution 50 mg/vial* subsection is revised as follows

Aseptically reconstitute each 50 mg vial with 15 mL of sterile ~~the companion diluent (20% (w/w) Dehydrated Alcohol in~~ Water for Injection to provide a concentration of 3.33 mg/mL. The reconstituted solution ~~should be stored at 25°C (77°F);~~ can be stored for up to one hour at 2°C - 8°C (36°F - 46°F) prior to dilution into the infusion solution ~~excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature)~~. Do not ~~refrigerate or~~ freeze. ~~The reconstituted solution must be further diluted and administered within 24 hours.~~

5. The **DOSAGE AND ADMINISTRATION/Preparation of ERAXIS for Administration/***Reconstitution 100 mg/vial* subsection is revised as follows:

Aseptically reconstitute each 100 mg vial with 30 mL of sterile ~~the companion diluent (20% (w/w) Dehydrated Alcohol in~~ Water for Injection to provide a concentration of 3.33 mg/mL. The reconstituted solution ~~should be stored at 25°C (77°F);~~ can be stored for up to one hour at 2°C - 8°C (36°F - 46°F) prior to dilution into the infusion solution ~~excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature)~~. Do not ~~refrigerate or~~ freeze. ~~The reconstituted solution must be further diluted and administered within 24 hours.~~

6. The **DOSAGE AND ADMINISTRATION/***Dilution and Infusion* subsection of the package insert is revised as follows:

Aseptically transfer the contents of the reconstituted vial(s) into the appropriately sized IV bag (or bottle) containing either 5% Dextrose Injection, USP or 0.9% Sodium Chloride Injection, USP (normal saline). See Table 10 ~~provides the number of Unit Packs (ERAXIS vial and companion diluent vial, see HOW SUPPLIED), volumes and infusion solution concentration~~ for the dilution and infusion instructions for each dose.

7. In the **DOSAGE AND ADMINISTRATION/Table 10. Dilution Requirements for ERAXIS Administration** is revised as follows:

Table 10. Dilution Requirements For ERAXIS Administration

Dose	Number of ~~Unit Packs~~ Vials Required	Total Reconstituted Volume Required	Infusion Volume[a] [3]	Total Infusion Volume [b]	Rate of Infusion	~~Infusion Solution Concentration~~ Minimum Duration of Infusion
50 mg	1–50 mg	15 mL	~~100~~ 50 mL	~~115~~ 65 mL	1.4 mL/ min or 84 mL/hour	~~0.43mg/mL~~ 45 min
100 mg	2–50 mg OR 1–100 mg	30 mL	~~250~~ 100 mL	~~280~~ 130 mL	1.4 mL/ min or 84 mL/hour	~~0.36mg/mL~~ 90 min
200 mg	4–50 mg OR 2–100 mg	60 mL	~~500~~ 200 mL	~~560~~ 260 mL	1.4 mL/ Min or 84 mL/hour	~~0.36mg/mL~~ 180 min

[a] Either 5% Dextrose Injection, USP or 0.9% Sodium Chloride Injection, USP (normal saline)
[b] Infusion solution concentration is 0.77 mg/mL

8. In the **DOSAGE AND ADMINISTRATION** section, the 1st. 2nds and 3rd paragraphs after Table 10 are revised as follows:

The rate of infusion should not exceed 1.1 mg/minute (equivalent to 1.4 mL/minute when reconstituted and diluted per instructions).

If the infusion solution is not used immediately, it should be stored in at ~~25°C (77°F)~~ 2°C – 8°C (36°F – 46°F) ~~excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature)~~. Do not ~~refrigerate or~~ freeze. The infusion solution should be administered within 24 hours of preparation.

Parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit. If particulate matter or discoloration ~~are~~ is identified, discard the solution.

9. The **HOW SUPPLIED** section of the package insert, is revised as follows:

ERAXIS (anidulafungin) for Injection is supplied in a single-use vial of sterile, lyophilized, preservative-free, powder. ~~The companion single-use diluent vial contains 20% (w/w) Dehydrated Alcohol in Water for Injection.~~ ERAXIS (anidulafungin) is available in the following packaging configuration:

Single Use ~~Unit Pack (containing~~ Vial of ERAXIS 50 mg ~~vial and 15 mL Diluent vial)~~
NDC 0049-101~~0~~4-28 One - 50 mg vial ~~and 15 mL diluent vial~~

Single Use ~~Unit Pack (containing~~ Vial of ERAXIS 100 mg ~~vial and 30 mL Diluent vial)~~
NDC 0049-011~~5~~6-28 One - 100 mg vial ~~and 30 mL diluent vial~~

10. The **STORAGE** section of the package insert, the paragraph is modified as follows:

UNRECONSTITUTED VIALS
ERAXIS ~~for Injection~~ unreconstituted vials ~~and companion diluent vials~~ should be stored at ~~25°C (77°F); excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature)~~ 2°C - 8°C (36°F - 46°F). Do not freeze.

RECONSTITUTED ~~**VIALS**~~ SOLUTION
~~Reconstituted~~ ERAXIS ~~for Injection should~~ reconstituted solution can be stored at ~~25°C (77°F); excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature)~~ 2°C – 8°C (36°F – 46°F) for up to one hour. Do not ~~refrigerate or~~ freeze. ~~The reconstituted vials must be further diluted and administered with 24 hours.~~
Chemical and physical in-use stability of the reconstituted solution has been demonstrated for 1 hour at 5ºC (42º F).

~~**Diluted Product**~~
~~Diluted ERAXIS for Injection should be stored at 25°C (77°F); excursions permitted to 15-30°C (59-86°F) (see USP Controlled Room Temperature). Do not refrigerate or freeze.~~

INFUSION SOLUTION
ERAXIS infusion solution can be stored at 2°C – 8°C (36°F – 46°F), but should be administered within 24 hours. Do not freeze.

Chemical and physical in-use stability of the infusion solution has been demonstrated for 24 hours at 5ºC (41ºF).

We completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text for the package insert submitted on June 4, 2009, and the Carton and Container labels submitted on June 2, 2009.

As soon as possible, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format as described at http://www.fda.gov/oc/datacouncil/spl.html that is identical to the enclosed labeling for the package insert. Upon receipt, we will transmit this version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission as, "**SPL for approved NDA 21-632/S-010**."

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

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

If you have any questions, call Judit Milstein, Chief Project Management Staff, at (301) 796-1600.

Sincerely,

{See appended electronic signature page}

Renata Albrecht, M.D.
Director
Division of Special Pathogen and Transplant Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure: Package Insert
Carton and Container Labels

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

/s/

Renata Albrecht

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