DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 021097/S-014
NDA 021892/S-004

APPROVAL LETTER

Salix Pharmaceuticals, Inc.
Attention: Benjamin Burgin, RAC
Senior Manager, Regulatory Affairs
1700 Perimeter Park Drive
Morrisville, NC 27560

Dear Mr. Burgin:

Please refer to your supplemental new drug applications dated February 9, 2009, received February 10, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for NDA 21-097 for Visicol (sodium phosphate monobasic monohydrate, USP and sodium phosphate dibasic anhydrous, USP) Tablets and NDA 21-892 for OsmoPrep (sodium phosphate monobasic monohydrate, USP and sodium phosphate dibasic anhydrous, USP) Tablets.

We acknowledge receipt of your submissions dated March 6, 2009, July 30, 2009, September 24 2009, and September 30, 2009.

These supplemental new drug applications provide for a proposed Risk Evaluation and Mitigation Strategy (REMS) for Visicol and OsmoPrep as requested in our letter dated December 10, 2008.

We completed our review of these supplemental new drug applications, as amended. They are approved, effective on the date of this letter.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Section 505-1 of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require the submission of a Risk Evaluation and Mitigation Strategy (REMS) if FDA becomes aware of new safety information and makes a determination that such a strategy is necessary to ensure that the benefits of the drug outweigh the risk of acute phosphate nephropathy associated with the use of oral sodium phosphate products (section 505-1(a)).

In March 2006, information regarding the risks of acute phosphate nephropathy (a type of acute kidney injury) associated with the use of oral sodium phosphate products for bowel cleansing was added to the Warnings section of the existing labeling for Visicol and incorporated into the labeling with which OsmoPrep was approved on March 16, 2006. In May 2006, an FDA Alert and science background paper were posted for healthcare professionals detailing cases of acute phosphate nephropathy associated with the use of oral sodium phosphate products for bowel cleansing.

Since May 2006, FDA has continued to receive reports of acute kidney injury with both prescription and over-the-counter oral sodium phosphate products. Twenty unique cases of acute kidney injury

associated with the use of OsmoPrep were reported which included 3 cases of biopsy proven acute phosphate nephropathy. In addition, observational retrospective cohort studies were published which reported an increased risk of acute kidney injury in patients undergoing bowel cleansing using oral sodium phosphate products, as defined by changes in serum creatinine. We considered this information to be "new safety information" as defined in FDAAA.

Your proposed REMS, submitted on February 9, 2009 and amended on July 30, 2009, September 24, 2009, and September 30, 2009 is appended to this letter, and is approved. The REMS consists of a Medication Guide, a communication plan, and a timetable for submission of assessments of the REMS.

The REMS assessment plan should include but is not limited to the following:

a. Patients' understanding of the serious risks of Visicol and OsmoPrep
b. A report on periodic assessments of the distribution and dispensing of the Medication Guide in accordance with 21 CFR 208.24
c. A report on failures to adhere to distribution and dispensing requirements, and corrective actions taken to address noncompliance

The requirements for assessments of an approved REMS under section 505-1(g)(3) include, in section 505-1(g)(3)(B) and (C), information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)vii) and including any updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in 505-1(g) could result in enforcement action.

We remind you that in addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in Section 505-1(g)(2)(A) of FDCA.

Prominently identify the submission containing the REMS assessments or proposed modifications with the following wording in bold capital letters at the top of the first page of the submission:

NDA 021097 or NDA 021892 REMS ASSESSMENT

NEW SUPPLEMENT FOR NDA 021097 or NDA 021892
PROPOSED REMS MODIFICATION
REMS ASSESSMENT

NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 021097 or NDA 021892REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)

If you do not submit electronically, please send 5 copies of REMS-related submissions.

PROMOTIONAL MATERIALS

In addition, submit three copies of the introductory promotional materials that you propose to use for these products. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package inserts directly 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

REPORTING REQUIREMENTS

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

If you have any questions, call Matthew Scherer, Regulatory Project Manager, at (301) 796- 2307.

Sincerely,

{See appended electronic signature page}

Joyce Korvick, M.D., M.P.H.
Deputy Director for Safety
Division of Gastroenterology Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosures: REMS Documents

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
NDA-21097	SUPPL-14	SALIX PHARMACEUTICALS INC	VISICOL(SODIUM PHOSPHATE DIBASIC ANHYDRA
NDA-21892	SUPPL-4	SALIX PHARMACEUTICALS INC	OSMOPREP

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

/s/

JOYCE A KORVICK
10/13/2009