DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

BLA 125274/S-105

SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING REQUIREMENT
FULFILLMENT OF POSTMARKETING COMMITMENTS

Ipsen Biopharmaceuticals, Inc.
Attention: Leslie Harris, PhD
Director, Global Regulatory Affairs, Neurology
106 Allen Road, 3rd floor
Basking Ridge, NJ 07920

Dear Dr. Harris:

Please refer to your Supplemental Biologics License Application (sBLA), dated September 30, 2015, received September 30, 2015, and your amendments, submitted under section 351(a) of the Public Health Service Act for Dysport (abobotulinumtoxinA).

This Prior Approval supplemental biologics application proposes the addition of the following indication: treatment of lower limb spasticity in pediatric patients 2 years of age and older.

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 text.

WAIVER OF HIGHLIGHTS SECTION

Please note that we previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to the enclosed labeling (text for the package insert and Medication Guide) and include the labeling changes proposed in any pending "Changes Being Effected" (CBE) supplements.

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/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes labeling changes for this BLA, including pending "Changes Being Effected" (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in MS Word format that includes the changes approved in this supplemental application.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for children less than 2 years of age because necessary studies are impossible or highly impracticable. This is because cerebral palsy, the most frequent cause of spasticity in children, is not reliably diagnosed until children are 2 years of age or older.

We note that you have fulfilled the pediatric study requirement for ages 2 to 17 years for this application.

FULFILLMENT OF POSTMARKETING REQUIREMENT

Your September 30, 2015, submission contains the final report for the following postmarketing requirement (PMR) listed in the April 29, 2009, approval letter for BLA 125274 and BLA 125274/S-001 and the July 15, 2015, approval letter for BLA 125274/S-102.

2564-1 (identified as PMR #1 in the letter of April 29, 2009, and PMR 2933-1 in the letter of July 15, 2015)
A juvenile rat toxicology study is required to identify the unexpected serious risk of adverse effects on postnatal growth and development. The study should utilize animals of an age range and stage(s) of development that are comparable to the intended pediatric population; the duration of dosing should cover the intended length of treatment in the pediatric population. In addition to the usual toxicological parameters, this study should evaluate effects of Dysport (abobotulinumtoxinA) on growth, reproductive development, and neurological and neurobehavioral development.

We reviewed your submission and conclude that the above requirement was fulfilled.

FULFILLMENT OF POSTMARKETING COMMITMENTS

Your September 30, 2015, submission contains the final report for the following postmarketing commitment (PMC) listed in the April 29, 2009, approval letter for BLA 125274 and BLA 125274/S-001.

2564-6 (identified as PMC #5 in the letter of April 29, 2009)
A randomized, double-blind, adequately controlled, multiple fixed doses, parallel group clinical study of Dysport (abobotulinumtoxinA) in botulinum toxin-naïve children ages 2-17 years with lower extremity spasticity. The minimum duration of the study is 12 weeks. The study should be submitted to the FDA for special protocol assessment.

In addition, we received your submission dated September 4, 2015, containing the final report for the following PMC listed in the April 29, 2009, approval letter for BLA 125274 and BLA 125274/S-001.

2564-8 (identified as PMC #7 in the letter of April 29, 2009)
A randomized, double-blind, adequately controlled, multiple fixed doses, parallel group clinical study of Dysport (abobotulinumtoxinA) in botulinum toxin-naïve adults with lower extremity spasticity. The minimum duration of the study is 12 weeks. The study should be submitted to the FDA for special protocol assessment.

We reviewed your submissions and conclude that the above commitments were fulfilled.

We remind you that there are postmarketing requirements and commitments listed in the April 29, 2009, approval letter and the July 15, 2015, supplement approval letter that are still open.

PROMOTIONAL MATERIALS

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

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft

Guidance for Industry (available at: http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf).

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, contact Taura Holmes, PharmD, MS, Regulatory Project Manager, at Taura.Holmes@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Eric Bastings, MD
Deputy Director
Division of Neurology Products
Office of Drug Evaluation I
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/

ERIC P BASTINGS
07/29/2016