



NDA 204286

NDA APPROVAL

Merz Pharmaceuticals, LLC
Attention: Misty M. D'Ottavio, RN
Senior Regulatory Affairs Manager
4215 Tudor Lane
Greensboro, NC 27410

Dear Ms. D'Ottavio:

Please refer to your New Drug Application (NDA) dated August 30, 2012, received August 31, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Naftin (naftifine hydrochloride) Gel, 2%.

We acknowledge receipt of your amendments dated September 19, October 5, 17 and 22, November 14, December 19, 2012; January 18, February 8 and 20, April 9 and 12, May 24, and June 5, 7, 11, 12, 16 and 26, 2013.

This new drug application provides for the use of Naftin (naftifine hydrochloride) Gel, 2% for the treatment of interdigital tinea pedis.

We have completed our review of this 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). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE-CONTAINER LABELS

Submit final printed carton and immediate-container labels that are identical to the enclosed carton and immediate-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 – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 204286.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

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.

WAIVED

We are waiving the pediatric study requirement for ages 0 to 11 years because the product does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients in this age group **and** is not likely to be used in a substantial number of pediatric patients in this group. Tinea pedis is not prevalent in population younger than 12 years of age. The Division concludes that studies are highly impracticable.

DEFERRED

We are deferring submission of your pediatric study for ages 12 to 17 years for this application because this product is ready for approval for use in adults and the pediatric study have not been completed.

PREA POSTMARKETING REQUIREMENTS

Your deferred pediatric study required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act/FDCA are required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act/FDCA. This required study is listed below.

2050 – 1 Pharmacokinetic/Safety/Tolerability trial under maximal use conditions in adolescent subjects ages 12 years to 17 years 11 months with a minimum of at least 18 evaluable subjects with tinea pedis interdigital type.

Final Protocol Submission: 07/12
Study/Trial Completion: 07/13
Final Report Submission: 12/13

Submit the protocol to your IND 105603, with a cross-reference letter to this NDA.

Reports of this/these required pediatric postmarketing study(ies) must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

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 to:

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

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. 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 NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Strother D. Dixon, Regulatory Project Manager, at (301) 796-1015.

Sincerely,

{See appended electronic signature page}

Susan J. Walker, M.D., F.A.A.D.
Director
Division of Dermatology and Dental Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

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

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

/s/

SUSAN J WALKER
06/27/2013