DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 207932

NDA APPROVAL

Endo Pharmaceuticals, Inc.
1400 Atwater Drive
Malvern, PA 19355

Attention: Paula Clark
Senior Director, Regulatory Affairs

Dear Ms. Clark:

Please refer to your New Drug Application (NDA) dated and received December 23, 2014, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA), for BELBUCA (buprenorphine) buccal film, 75, 150, 300, 450, 600, 750, and 900 mcg.

We also refer to your amendments dated January 13 and 27, February 12 and 13, March 5, 20, and 26, April 21, May 4, and 19, June 24, July 1, 17, 20 and 27, August 11, 25, and 31, September 3, 10, and 14, and October 21, 22, and 23, 2015.

This new drug application provides for the use of BELBUCA for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate.

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.

WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

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 and Medication Guide). 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.

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

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels submitted on October 21, 2015, 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 207932**." 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.

We are waiving the pediatric study requirement for ages 0 to less than 7 years because necessary studies are impossible or highly impracticable. This is because the number of pediatric subjects meeting the indication in the age group are too small in number to make the studies feasible.

We are deferring submission of your pediatric study for ages 7 through 16 years for this application because this product is ready for approval for use in adults and the pediatric study have not been completed.

Your deferred pediatric study required by section 505B(a) of the 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 FDCA. This required study is listed below.

2982-1 Conduct an open-label study to evaluate the pharmacokinetics and safety of BELBUCA in patients 7 through 16 years with pain severe enough to require daily, around-the-clock, long-term opioid treatment, and for which alternative treatment options are inadequate.

Final Protocol Submission:	06/2016
Study/Trial Completion:	06/2022
Final Report Submission:	12/2022

Submit the protocol(s) to your IND 072428, with a cross-reference letter to this NDA.

Reports of this required pediatric postmarketing study 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 this study. 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.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the FDCA authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to:

- Assess the known serious risks of misuse, abuse, addiction, overdose, and death associated with the long-term use of ER/LA opioid analgesics, of which BELBUCA (buprenorphine) is a member

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

2065-1 Conduct one or more studies to provide quantitative estimates of the serious risks of misuse, abuse, addiction, overdose, and death associated with long-term use of opioid analgesics for management of chronic pain, among patients prescribed ER/LA opioid products. Include an assessment of risk relative to efficacy.

These studies should address at a minimum the following specific aims:

a. Estimate the incidence of misuse, abuse, addiction, overdose, and death associated with long-term use of opioids for chronic pain. Stratify misuse and overdose by intentionality wherever possible. Examine the effect of product/formulation, dose and duration of opioid use, prescriber specialty, indication, and other clinical factors (e.g., concomitant psychotropic medications, personal or family history of

substance abuse, history of psychiatric illness) on the risk of misuse, abuse, addiction, overdose, and death.

b. Evaluate and quantify other risk factors for misuse, abuse, addiction, overdose, and death associated with long-term use of opioids for chronic pain, including but not limited to the following: demographic factors, psychosocial/behavioral factors, medical factors, and genetic factors. Identify confounders and effect modifiers of individual risk factor/outcome relationships. Stratify misuse and overdose by intentionality wherever possible.

The following timetable proposes the schedule by which you will conduct these studies:

Final Protocol Submission:	08/2014
Study Completion:	01/2018
Final Report Submission:	06/2018

2065-2 Develop and validate measures of the following opioid-related adverse events: misuse, abuse, addiction, overdose and death (based on DHHS definition, or any agreed-upon definition), which will be used to inform the design and analysis for PMR # 2065-1 and any future post-marketing safety studies and clinical trials to assess these risks. This can be achieved by conducting an instrument development study or a validation study of an algorithm based on secondary data sources.

The following timetable proposes the schedule by which you will conduct this study:

Final Protocol Submission:	08/2014
Study Completion:	08/2015
Final Report Submission:	11/2015

2065-3 Conduct a study to validate coded medical terminologies (e.g., ICD9, ICD10, SNOMED) used to identify the following opioid-related adverse events: misuse, abuse, addiction, overdose, and death in any existing post-marketing databases to be employed in the studies. Stratify misuse and overdose by intentionality wherever possible. These validated codes will be used to inform the design and analysis for PMR # 2065-1.

The following timetable proposes the schedule by which you will conduct this study:

Final Protocol Submission:	08/2014
Study Completion:	08/2015
Final Report Submission:	11/2015

2065-4 Conduct a study to define and validate “doctor/pharmacy shopping” as outcomes suggestive of misuse, abuse and/or addiction. These validated codes will be used to inform the design and analysis for PMR # 2065-1.

The following timetable proposes the schedule by which you will conduct this study:

Final Protocol Submission:	08/2014
Study Completion:	08/2015
Final Report Submission:	11/2015

Please note the following considerations regarding the postmarketing requirements detailed above. Given that misuse, abuse, addiction, overdose, and death are serious risks associated with the use of opioids as a class, FDA recommends that sponsors capture all opioid use among studied patient populations, rather than limit their efforts to specific products. However, specific product information should also be captured so as to better understand the role of specific product characteristics as risk factors for misuse, abuse, addiction, overdose, and death, as appropriate. Because many of the risk factors for misuse, abuse, addiction, overdose, and death cannot be captured using administrative databases alone, FDA is unlikely to find adequate protocols or strategies that evaluate administrative databases only as meeting the objectives outlined above.

We encourage you to work together with the holders of other approved NDA applications for ER/LA opioid analgesics on these studies to provide the best information possible. The milestones noted above reflect those that were specified at the time the study requirements were issued for the class of ER/LA opioid analgesics.

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to:

- Assess the known serious risk of hyperalgesia associated with the class of ER/LA opioid analgesics, of which BELBUCA is a member;
- Assess a signal of a serious risk of QT prolongation with BELBUCA treatment

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

2065-5 Conduct a clinical trial to estimate the serious risk for the development of hyperalgesia following use of ER/LA opioid analgesics for at least one year to treat chronic pain. We strongly encourage you to use the same trial to assess the development of tolerance following use of ER/LA opioid analgesics. Include an assessment of risk relative to efficacy.

The following timetable proposes the schedule by which you will conduct this trial:

Final Protocol Submission:	08/2014
Trial Completion:	08/2016
Final Report Submission:	02/2017

We encourage you to work together with the holders of other approved NDA applications for ER/LA opioid analgesics on this clinical trial to provide the best information possible. The milestone noted above reflects the one specified at the time the trial requirement was issued for the class of ER/LA opioid analgesics.

Additionally, FDA has determined that you are also required to conduct the following individual postmarketing trials of BELBUCA buccal film:

2982-2 Conduct a multiple ascending dose clinical trial in adults to determine the maximum tolerated dose of BELBUCA without co-administration of naltrexone to inform the dosing for a thorough QT (tQT) trial of BELBUCA.

The timetable you submitted on October 22, 2015, states that you will conduct this trial according to the following schedule:

Final Protocol Submission:	04/2016
Study Completion:	04/2017
Final Report Submission:	10/2017

2982-3 Conduct a thorough QT trial in adults without naltrexone co-administration to assess the risk of QT prolongation with BELBUCA. This trial will provide information on the conduction effects of BELBUCA on the heart, specifically cardiac repolarization, at therapeutic and supratherapeutic dose regimens. The tQT trial may be conducted as part of the required multiple ascending dose trial (PMR 2982-2).

The timetable you submitted on October 22, 2015, states that you will conduct this trial according to the following schedule:

Final Protocol Submission:	07/2017
Study Completion:	07/2018
Final Report Submission:	01/2019

Submit the protocols to your IND 072428, with a cross-reference letter to this NDA. Submit all final reports to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: **"Required Postmarketing Protocol Under 505(o)", "Required Postmarketing Final Report Under 505(o)", "Required Postmarketing Correspondence Under 505(o)"**.

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind

you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Section 505-1 of the FDCA authorizes FDA to require the submission of a risk evaluation and mitigation strategy (REMS), if FDA determines that such a strategy is necessary to ensure that the benefits of the drug outweigh the risks [section 505-1(a)].

In accordance with section 505-1 of FDCA, we have determined that a REMS is necessary for BELBUCA to ensure the benefits of the drug outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse.

In accordance with section 505-1 of FDCA, as one element of a REMS, FDA may require the development of a Medication Guide as provided for under 21 CFR 208. Pursuant to 21 CFR 208, FDA has determined that BELBUCA poses a serious and significant public health concern requiring the distribution of a Medication Guide. The Medication Guide is necessary for patients' safe and effective use of BELBUCA. FDA has determined that BELBUCA is a product for which patient labeling could help prevent serious adverse effects and that has serious risks (relative to benefits) of which patients should be made aware because information concerning the risks could affect patients' decisions to use, or continue to use BELBUCA. Under 21 CFR 208, you are responsible for ensuring that the Medication Guide is available for distribution to patients who are dispensed BELBUCA.

Pursuant to 505-1(f)(1), we have also determined that BELBUCA can be approved only if elements necessary to assure safe use are required as part of a REMS to mitigate the risk of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse that are listed in the labeling. The elements to assure safe use will inform and train healthcare providers about the potential risks and the safe use of BELBUCA.

Your proposed REMS, submitted on October 23, 2015, and appended to this letter, is approved. The REMS consists of a Medication Guide, elements to assure safe use, and a timetable for submission of assessments of the REMS.

Your REMS must be fully operational before you introduce BELBUCA into interstate commerce.

Because BELBUCA will be a member of the extended-release/long-acting (ER/LA) opioid analgesics REMS, the assessment plan will be the same assessment plan required for the other products covered by this single shared system. Because the assessments required to be submitted 6-months, 12-months, 24-months, and 36-months after the approval of the ER/LA opioid analgesics REMS have been submitted, the assessment plan for BELBUCA will align with the fifth and subsequent assessments of the ER/LA opioid analgesics REMS. Therefore, your REMS assessment plan should include, but is not limited to, the following:

Scheduled REMS Assessments

The fifth and subsequent REMS assessments, due July 9, 2016, and annually thereafter, should include the following information:

1) Documentation of the dissemination of Prescriber Letter 3:

   a) number of prescriber letters electronically sent, received, undeliverable, and opened, and

   b) number of prescriber letters mailed and undeliverable.

2) Prescriber Training: Documentation of the number of prescribers of ER/LA opioid analgesics who have completed REMS-compliant training. Performance goals, based on the 2011 estimate that 320,000 prescribers are active prescribers of ER/LA opioids (prescribers who have prescribed an ER/LA opioid within the last 12 months), are as follows:

   a) Within two years from the time the first REMS-compliant training becomes available, 80,000 prescribers (based on 25% of active prescribers) are to have been trained;

   b) Within three years from the time the first REMS-compliant training becomes available, 160,000 prescribers (based on 50% of active prescribers) are to have been trained;

   c) Within four years from the time the first REMS-compliant training becomes available, 192,000 prescribers (based on 60% of active prescribers) are to have been trained.

3) Independent Audit: The results of an independent audit of the quality of the content of the educational materials used by the CE providers to provide the REMS-compliant training. Audits must be conducted on a random sample of at least 10% of the training funded under the ER/LA Opioid REMS, and a random sample of REMS-compliant training not funded under the ER/LA Opioid REMS that will be counted as REMS-compliant training for purposes of meeting the milestones in item 2 above and must evaluate:

   a) whether the content of the training covers all elements of the FDA "blueprint" approved as part of the REMS;

   b) whether the post-course knowledge assessment measures knowledge of all sections of the FDA "blueprint"; and

   c) whether the training was conducted in accordance with the Accreditation Council for Continuing Medication Education (ACCME) standards for CE or appropriate standards for accreditation bodies.

4) Evaluation of Prescriber Understanding:

a) The results of an evaluation of ER/LA opioid prescribers' awareness and understanding of the serious risks associated with these products and their awareness of appropriate prescribing practices for ER/LA opioids, comparing the awareness and understanding of prescribers who have taken the REMS-compliant training with those who have not taken such training. This evaluation may include, for example, surveys of healthcare providers.

b) The results of any long-term evaluation of prescribers of ER/LA opioids who have taken ER/LA Opioid REMS-funded training to determine these prescribers' knowledge retention and practice changes 6 months to 1 year after they completed the REMS-compliant training.

5) Evaluation of Patient Understanding: The results of an evaluation of patients' understanding of the serious risks of these products and their understanding of how to use these products safely. This evaluation may include, for example, surveys of patients.

6) Surveillance Results: Results of surveillance and monitoring for misuse, abuse, overdose, addiction, and death. Surveillance needs to include information on changes in abuse, misuse, overdose, addiction, and death for different risk groups (e.g., teens, chronic abusers) and different settings (e.g., emergency departments, addiction treatment centers, poison control call centers). The information should be drug-specific whenever possible.

7) Drug Utilization Patterns: An evaluation of drug utilization patterns, including: an evaluation of prescribing behaviors of the prescribers of ER/LA opioid analgesics, e.g., prescriptions to non-opioid tolerant patients, excessive prescriptions for early refills.

8) Patient Access: An evaluation of changes in patient access to ER/LA opioid analgesics.

9) Methodologies: A description of the data sources and the methodologies used to conduct all of the above described analyses.

10) Goals: The requirements for assessments of an approved REMS under section 505-1(g)(3) of the FDCA include with respect to each goal included in the strategy, an assessment of the extent to which the approved strategy, including each element of the strategy, is meeting the goal or whether one or more such goals or such elements should be modified.

Definitions: For purposes of these REMS assessments, the following definitions apply:

REMS-compliant training: Training will be considered "REMS-compliant training" if 1) it, for training provided by CE providers, is offered by an accredited provider to licensed prescribers, 2) it includes all elements of the FDA "blueprint", 3) it includes a post-course knowledge assessment of all of the sections of the "FDA blueprint", and 4) it is subject to independent audit to confirm that conditions of the REMS training have been met.

FDA Blueprint: A document entitled, "Blueprint for Prescriber Continuing Education Programs Extended-Release and Long-Acting Opioids," approved as part of this REMS that contains core messages to be conveyed to prescribers in the training about the risks and appropriate prescribing practices for the safe use of ER/LA opioids.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any of goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of the FDCA. This assessment should include:

a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
c) *If the new indication for use introduces unexpected risks*: A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for us*e: A statement about whether the REMS was meeting its goals at the time of that the last assessment and if any modifications of the REMS have been proposed since that assessment.
e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use*: Provision of as many of the currently listed assessment plan items as is feasible.
f) I*f you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including*: Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications,* provide a rationale for why the REMS does not need to be modified.

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous

REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

NDA 207932 REMS CORRESPONDENCE
(insert concise description of content in bold capital letters, e.g.)
UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT METHODOLOGY

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application from using any element to assure safe use to block or delay approval of an application under section 505(b)(2) or (j) or to prevent application of such element under 505-1(i)(1)(B) to a drug that is subject of an ANDA. A violation of this provision in 505-1(f) could result in enforcement action.

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

NDA 207932 REMS ASSESSMENT

NEW SUPPLEMENT FOR NDA 207932/S-XXX/
CHANGES BEING EFFECTED IN 30 DAYS
PROPOSED MINOR REMS MODIFICATION

or

NEW SUPPLEMENT FOR NDA 207932/S-XXX
PRIOR APPROVAL SUPPLEMENT
PROPOSED MAJOR REMS MODIFICATION

or

NEW SUPPLEMENT FOR NDA 207932/S-XXX
PRIOR APPROVAL SUPPLEMENT
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES SUBMITTED IN SUPPLEMENT XXX

or

NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 207932/S-XXX
REMS ASSESSMENT

PROPOSED REMS MODIFICATION (if included)

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

REMS REVISIONS FOR NDA 207932

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, are only in PDF format, they may be submitted as such, but the preference is to include as many as possible in Word format.

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

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, Medication Guide, and patient PI (as applicable) 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 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. 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.

EXPIRY DATING PERIOD

A 24-month expiry dating period is granted for BELBUCA, all dosage strengths in individual child-resistant foil packages, when stored at 25°C (77°F) with excursions permitted from 15° to 30°C (59° to 86°F).

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 Spiros Nicols, Regulatory Project Manager, at (240) 402-5988.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, M.D.
Director
Division of Anesthesia, Analgesia, and
Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosures:
Content of Labeling
Carton and Container Labeling
REMS

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

/s/

SHARON H HERTZ
10/23/2015