DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 207987

NDA APPROVAL

Belcher Pharmaceuticals, LLC
Attention: Mihir Taneja
Vice President
6911 Bryan Diary Road, Suite 210
Largo, FL 33777

Dear Mr. Taneja:

Please refer to your New Drug Application (NDA) dated and received February 12, 2015, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ABLYSINOL (dehydrated alcohol) 1 mL and 5 mL injection.

We acknowledge receipt of your amendment dated December 22, 2017, which constituted a complete response to our December 9, 2015, action letter.

This new drug application provides for the use of ABLYSINOL to induce controlled cardiac septal infarction to improve exercise capacity in adults with symptomatic hypertrophic obstructive cardiomyopathy who are not candidates for surgical myectomy.

We have completed our review of this application. 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. 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

We acknowledge your June 20, 2018, submission containing final printed carton and container labels.

REQUIRED PEDIATRIC ASSESSMENTS

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

SENTINEL/ARIA NOTIFICATION

The Food and Drug Administration Amendments Act of 2007 (FDAAA) required FDA to establish a national electronic system to monitor the safety of FDA-regulated medical products. In fulfillment of this mandate, FDA established the Sentinel System, which enables FDA to proactively monitor drug safety using electronic health data from multiple data sources that contribute to the Sentinel Distributed Database.

FDA plans to evaluate the use of dehydrated alcohol in the Sentinel System as part of the implementation of section 505(o) of the FDCA. We have determined that the new pharmacovigilance system, Sentinel's Active Risk Identification and Analysis (ARIA) System, established under section 505(k)(3) of the FDCA, is sufficient to assess the following serious risks: heart failure, ventricular fibrillation, atrioventricular block with and without permanent pacemaker insertion, subsequent septal myectomy, and death.

The ARIA safety assessment will be posted to the Sentinel website at this location: https://www.sentinelinitiative.org. Once there is sufficient product uptake to support an analysis, an analysis plan will be posted online. After the analysis is complete, FDA will also post the results on the Sentinel website. FDA will notify you prior to posting the analysis plan and prior to posting the results.

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 prescribing information, 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 prescribing information, 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 NDA (21 CFR 314.80 and 314.81).

MEDWATCH-TO-MANUFACTURER PROGRAM

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm.

If you have any questions, please call Brian Proctor, Regulatory Project Manager, at (240) 402-3596.

Sincerely,

{See appended electronic signature page}

Norman Stockbridge, M.D., Ph.D.
Director
Division of Cardiovascular and Renal Products
Office of Drug Evaluation I
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/

NORMAN L STOCKBRIDGE
06/21/2018