



NDA 209819/S-010

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING
REQUIREMENTS**

Indivior Inc.
10710 Midlothian Turnpike
Suite 125
North Chesterfield, VA 23235

Attention: Alexis Williams, PharmD
Global Regulatory Strategy & CMC Manager

Dear Dr. Williams:

Please refer to your supplemental new drug application (sNDA) dated and received July 6, 2019, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Sublocade (buprenorphine extended-release) injection.

This Prior Approval sNDA provides for updates to the Prescribing Information, specifically the **USE IN SPECIFIC POPULATIONS** and **NONCLINICAL TOXICOLOGY** sections, based on the results from studies conducted under Postmarketing Requirements (PMRs) 3308-1 through 5, for Sublocade.

APPROVAL & LABELING

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.

WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS

Please note that we have 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 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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling, with the addition of any labeling changes in pending “Changes Being Effectuated” (CBE) supplements, as well as annual reportable changes not included in 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*.²

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

FULFILLMENT OF POSTMARKETING REQUIREMENTS

Your submissions dated June 28, 2018; February 1, 2019; and May 10, 2019, contained the final reports for the following postmarketing requirements listed in the November 30, 2017, approval letter.

- | | |
|--------|--|
| 3308-1 | Conduct a fertility and early embryonic development study testing N-methyl-pyrrolidone in the rat model. |
| 3308-2 | Conduct an embryofetal development study testing N-methyl-pyrrolidone in the rat model. |
| 3308-3 | Conduct an embryofetal development study testing N-methyl-pyrrolidone in the rabbit model. |

¹ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

- 3308-4 Conduct a pre- and post-natal development study testing N-methyl-pyrrolidone in the rat model.
- 3308-5 Conduct a mode of action (MOA) assessment for N-methyl-pyrrolidone (NMP)- induced mouse hepatocellular adenomas and carcinomas to inform the human risk assessment for NMP.

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

We remind you that there are postmarketing requirements listed in the November 30, 2017, approval letter that are still open.

PATENT LISTING REQUIREMENTS

Pursuant to 21 CFR 314.53(d)(2) and 314.70(f), certain changes to an approved NDA submitted in a supplement require you to submit patent information for listing in the Orange Book upon approval of the supplement. You must submit the patent information required by 21 CFR 314.53(d)(2)(i)(A) through (C) and 314.53(d)(2)(ii)(A) and (C), as applicable, to FDA on Form FDA 3542 within 30 days after the date of approval of the supplement for the patent information to be timely filed (see 21 CFR 314.53(c)(2)(ii)). You also must ensure that any changes to your approved NDA that require the submission of a request to remove patent information from the Orange Book are submitted to FDA at the time of approval of the supplement pursuant to 21 CFR 314.53(d)(2)(ii)(B) and 314.53(f)(2)(iv).

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, contact Jungwon Chin, Pharm.D., Regulatory Health Project Manager, at 301-348-1772.

Sincerely,

{See appended electronic signature page}

Rigoberto Roca, MD
Director
Division of Anesthesiology, Addiction Medicine,
and Pain Medicine
Office of Neuroscience
Center for Drug Evaluation and Research

ENCLOSURE:

- Content of Labeling

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

RIGOBERTO A ROCA
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