



NDA 214697/S-001

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING
REQUIREMENT**

ARS Pharmaceuticals Operations, Inc.
c/o Pacific-Link Consulting
Attention: Richard Lowenthal, MSc, MBA (MSEL)
President, Pacific-Link Consulting
11682 El Camino Real, Suite 120
San Diego, CA 92130

Dear Richard Lowenthal:

Please refer to your supplemental new drug application (sNDA) dated and received September 6, 2024, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for neffy (epinephrine nasal spray).

This Prior Approval supplemental new drug application provides for a new dose of 1 mg for patients 4 years of age and older, who weigh 15 kg to less than 30 kg, for emergency treatment of type I allergic reactions, including anaphylaxis.

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.

Neffy (epinephrine nasal spray) is also approved at a dose of 2 mg for use in adults and pediatric patients who weigh 30 kg or greater for the emergency treatment of type I allergic reactions, including anaphylaxis. This supplement provides for pediatric labeling text pursuant to the Pediatric Research Equity Act (PREA). This approval is in response to a PREA postmarketing requirement (PMR).

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 (text for the Prescribing Information, Patient Package Insert, and Instructions for Use), with the

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

addition of any labeling changes in pending “Changes Being Effected” (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).

CARTON AND CONTAINER LABELING

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 214697/S-001.**” Approval of this submission by FDA is not required before the labeling is used.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We note that you have fulfilled the pediatric study requirement for patients 4 years of age and older and between 15 kg to less than 30 kg for this application.

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>.

FULFILLMENT OF POSTMARKETING REQUIREMENT(S)/COMMITMENT(S)

Supplemental new drug application (sNDA) 214697/S-001 dated September 6, 2024, also contained the final report for the following postmarketing requirement listed in the August 9, 2024, approval letter.

- 4671-1 Conduct a single-dose, pharmacokinetic and pharmacodynamics study of neffy (ARS-1) in pediatric patients ≥ 4 years of age and between 15 to < 30 kg with Type I allergies that require prescription of an epinephrine product.

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

We remind you that there is a postmarketing commitment listed in the August 9, 2024, approval letter that is still open.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs*.³

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

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

³ For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

⁴ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

⁵ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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 Elaine Sit, Regulatory Project Manager, at (301) 796-5073 or elaine.sit@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Kelly Stone, MD, PhD
Associate Director for Therapeutic Review
Division of Pulmonology, Allergy, and Critical Care
Office of Immunology and Inflammation
Office of New Drugs
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Patient Package Insert
 - Instructions for Use
- Carton and Container 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/

KELLY D STONE
03/05/2025 01:35:03 PM