



NDA 216386

**NDA APPROVAL**

Pfizer Inc.  
Attention: Kathleen Collins  
Senior Director, Pfizer Global Regulatory Affairs  
500 Arcola Road  
c/o Lesa Jenkins Mailstop: D6403  
Collegeville, PA 19426

Dear Ms. Collins:

Please refer to your new drug application (NDA) dated and received March 9, 2022, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zavzpret (zavegepant) nasal spray.

This NDA provides for the use of Zavzpret (zavegepant) nasal spray for the acute treatment of migraine with or without aura in adults.

### **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.

### **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](http://www.fda.gov).<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information, Patient Package Insert, and Instructions for Use) 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*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

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

<sup>2</sup> 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>.

## **CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the carton labeling submitted on February 1, 2023, and container labeling submitted on December 7, 2022, 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 *SPL Standard for Content of Labeling Technical Qs & As*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 216386.**” Approval of this submission by FDA is not required before the labeling is used.

## **DATING PERIOD**

Based on the stability data submitted to date, the expiry dating period for Zavzpret (zavegepant) nasal spray shall be 24 months from the date of manufacture when stored at 20°C to 25°C (controlled room temperature).

## **ADVISORY COMMITTEE**

Your application for Zavzpret (zavegepant) was not referred to an FDA advisory committee because the clinical trial design was acceptable, the efficacy findings were clear, and the safety profile was acceptable for use in the intended population.

## **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 are waiving the pediatric studies requirement for children 0 to 5 years of age because necessary studies are impossible or highly impracticable. This waiver is being granted because very few children of this age can be definitively diagnosed with migraine.

We are deferring submission of your pediatric studies for children 6 to 17 years of age for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act are required postmarketing studies. The status of these postmarketing studies must be reported annually, according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act. These required studies are listed below:

**U.S. Food and Drug Administration**  
Silver Spring, MD 20993  
[www.fda.gov](http://www.fda.gov)

- 4408-1 A juvenile animal toxicology study in rat.  
Final Report Submission: Submitted
- 4408-2 An open-label, single-dose study to evaluate the safety, tolerability, and single-dose pharmacokinetics (PK) of zavegepant in patients with migraine ages 6 through 11 years.  
Final Protocol Submission: 10/2023  
Study Completion: 06/2027  
Final Report Submission: 11/2032
- 4408-3 A randomized, double-blind, placebo-controlled efficacy and safety study under PREA for the acute treatment of migraine with or without aura in patients ages 6 through 17 years. This study includes an initial single-blind-placebo lead-in phase to identify placebo non-responders to enroll in the efficacy portion of the trial. This efficacy study must be designed to show superiority of zavegepant over placebo.  
Final Protocol Submission: 12/2023  
Study Completion: 05/2032  
Final Report Submission: 11/2032
- 4408-4 A pediatric open-label safety study under PREA to evaluate the long-term safety of zavegepant in migraine patients ages 6 through 17 years. This study should be a minimum of one year in length. This study should include a minimum of 200 patients treating, on average, one migraine attack per month for 6 months; and 75 patients treating, on average, at least one migraine attack per month for one year.  
Final Protocol Submission: 12/2023  
Study Completion: 05/2032  
Final Report Submission: 11/2032

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.<sup>3</sup>

Submit the protocols to your IND 134120, with a cross-reference letter to this NDA.

<sup>3</sup> See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019)*.

<https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

Reports of these required pediatric postmarketing studies must be submitted as an 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.

### **POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (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 identify an unexpected serious risk of adverse maternal, fetal, and infant outcomes resulting from the use of Zavzpret (zavegepant) during pregnancy.

Furthermore, the active postmarket risk identification and analysis system as available 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 studies:

4408-5      Prospective pregnancy exposure registry cohort analyses in the United States that compare the maternal, fetal, and infant outcomes of women with migraine exposed to zavegepant during pregnancy with two unexposed control populations: one consisting of women with migraine who have not been exposed to zavegepant before or during pregnancy, and the other consisting of women without migraine. The registry will identify and record pregnancy complications, major and minor congenital malformations, spontaneous abortions, stillbirths, elective terminations, preterm births, small-for-gestational-age births, and any other adverse outcomes, including postnatal growth and development. Outcomes will be assessed throughout pregnancy. Infant outcomes, including effects on postnatal growth and development, will be assessed through at least the first year of life.

Draft Protocol Submission:	11/2023
Final Protocol Submission:	06/2024
Annual Interim Report Submissions:	06/2025
	06/2026

06/2027

06/2028

06/2029

06/2030

06/2031

06/2032

06/2033

06/2034

06/2035

06/2036

Study Completion:

06/2037

Final Report Submission:

06/2038

4408-6 A pregnancy outcomes study using a different study design than provided for in PMR 4408-5 (for example, a retrospective cohort study using claims or electronic medical record data with outcome validation or a case-control study) to assess pregnancy complications, major congenital malformations, spontaneous abortions, stillbirths, and small-for-gestational-age births in women exposed to zavegepant during pregnancy compared to an unexposed control population.

Draft Protocol Submission:

11/2023

Final Protocol Submission:

06/2024

Annual Interim Report Submissions:

06/2025

06/2026

06/2027

06/2028

06/2029

06/2030

Study Completion:

06/2031

Final Report Submission:

06/2032

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.<sup>4</sup>

Submit clinical protocol(s) to your IND 134120 with a cross-reference letter to this NDA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final

<sup>4</sup> See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019)*.

<https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

**U.S. Food and Drug Administration**

Silver Spring, MD 20993

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report(s) 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).**

Submission of the protocol(s) for required postmarketing observational studies to your IND is for purposes of administrative tracking only. These studies do not constitute clinical investigations pursuant to 21 CFR 312.3(b) and therefore are not subject to the IND requirements under 21 CFR part 312.

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.

### **REQUESTED PHARMACOVIGILANCE**

We request that you perform postmarketing surveillance for cardiovascular events, cerebrovascular events, and hepatotoxicity events after exposure to Zavzpret (zavegepant). Include comprehensive summaries and analyses of these events quarterly as part of your required postmarketing safety reports [e.g., periodic safety update reports (PSURs)]. Include analyses of the events by age and gender. In the analysis of each case, provide an assessment of causality, with documentation of risk factors and results of all assessments that support the diagnosis or the causality, along with extent of exposure to Zavzpret (zavegepant) and most recent exposure to Zavzpret (zavegepant), concomitant therapies, treatment given for the event, and outcome. Include a comparison to background rates expected in a migraine population of the same age and gender.

### **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.*<sup>5</sup>

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 FDA.gov.<sup>6</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>7</sup>

**REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

**POST APPROVAL FEEDBACK MEETING**

New molecular entities qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

If you have any questions, contact Lana Chen, Regulatory Project Manager, at (301) 796-1056.

Sincerely,

*{See appended electronic signature page}*

Teresa Buracchio, MD  
Director (Acting)  
Office of Neuroscience  
Center for Drug Evaluation and Research

**ENCLOSURES:**

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
  - Instructions for Use

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<sup>5</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

<sup>6</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>7</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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**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.**  
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