



NDA 205029/S-004

SUPPLEMENT APPROVAL

Belcher Pharmaceuticals, LLC
6911 Bryan Dairy Road
Suite 210
Largo, FL 33777

Attention: Mihir Taneja
Vice President

Dear Mr. Taneja:

Please refer to your Supplemental New Drug Application (sNDA) dated March 10, 2016, received March 10, 2016, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Epinephrine Injection, USP (epinephrine, 1:1000), 1 mg/mL.

We also refer to our letter dated February 9, 2016, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for Epinephrine Injection, USP (epinephrine, 1:1000). This information pertains to reports of lacerations and embedded needles after epinephrine injection and post-marketing adverse event reports of serious infection (e.g. *Clostridium perfringens*) at the injection site following epinephrine injection for anaphylaxis.

This supplemental new drug application provides for revisions to the labeling for Epinephrine Injection consistent with our February 9, 2016, letter and the changes agreed upon in our March 24, and 31, and April 15, 2016, correspondences.

APPROVAL & LABELING

We have completed our review of this supplemental application, as amended. 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 text for the package insert, with the 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 titled “SPL Standard for Content of Labeling Technical Qs and As at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes 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 MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, 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).

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.

Because none of these criteria apply to your application, you are exempt from this requirement.

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 Carol F. Hill, Senior Regulatory Health Project Manager for Safety, at (301) 796-1226.

Sincerely,

{See appended electronic signature page}

Sally Seymour, MD
Deputy Director for Safety

NDA 205029/S-004

Page 3

Division of Pulmonary, Allergy, and Rheumatology
Products
Office of Drug Evaluation II

ENCLOSURE(S):
Content of Labeling

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

/s/

SALLY M SEYMOUR
05/18/2016