



NDA 206321/S-002

SUPPLEMENT APPROVAL

Novo Nordisk, Inc.
Attention: Michelle Thompson
Senior Director, Regulatory Affairs
P.O. Box 846
800 Scudders Mill Road
Plainsboro, NJ 08536

Dear Ms. Thompson:

Please refer to your supplemental New Drug Application (sNDA) dated and received December 3, 2015, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Saxenda (liraglutide [rDNA origin] injection), 3 mg.

This “Changes Being Effected” supplemental new drug application proposed modifications to the approved Saxenda REMS.

We have completed our review of this supplemental application, as amended. It is approved, as further described in this communication, effective on the date of this letter.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

The REMS for Saxenda was originally approved on December 23, 2014. The REMS consists of a communication plan and a timetable for submission of assessments of the REMS. Your proposed modification to the REMS consisted of (b) (4); however, we refer to our communication dated January 28, 2016, in which we informed you that FDA does not agree with your December 3, 2015, proposal (b) (4)

The initial REMS document approved on December 23, 2014 included www.saxenda.com as the website that would contain the link to the Saxenda REMS webpage, www.saxenda.com/REMS. On January 14, 2016, FDA evaluated the landing page and links on the consumer/product website for Saxenda (www.saxenda.com). The www.saxenda.com website currently has a link to the REMS website and a link to www.saxendapro.com. This approach (containing a link to the REMS website on both www.saxenda.com and www.saxendapro.com) is acceptable to the FDA, and therefore this website should remain as it currently presents. We also acknowledge your January 29, 2016, submission in which you propose an additional consumer/product website, www.saxendacare.com. The addition of this website, which also contains a link to the REMS website, is acceptable. However, modifications to the REMS document were necessary for consistency with the presentation of the current consumer/product websites.

Your proposed modified REMS, submitted on January 29, 2016, and appended to this letter, is approved. Specifically, FDA approves your approach to include a link to the Saxenda REMS website on www.saxenda.com, www.saxendacare.com, and www.saxendapro.com.

The timetable for submission of assessments of the REMS remains the same as that approved on December 23, 2014.

There are no changes to the REMS assessment plan described in our December 23, 2014, letter.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of the FDCA. This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks:* A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* A statement about whether the REMS was meeting its goals at the time of that last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including:* Provision of the reason(s) why the proposed REMS modification is necessary; the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications, provide a rationale for why the REMS does not need to be modified.*

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the

assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**NDA 206321 REMS CORRESPONDENCE
(insert concise description of content in bold capital letters, e.g.,
UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT
METHODOLOGY**

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.

Prominently identify any submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

NDA 206321 REMS ASSESSMENT

**NEW SUPPLEMENT FOR NDA 206321/S-000
CHANGES BEING EFFECTED IN 30 DAYS
PROPOSED MINOR REMS MODIFICATION**

or

**NEW SUPPLEMENT FOR NDA 206321/S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED MAJOR REMS MODIFICATION**

or

**NEW SUPPLEMENT FOR NDA 206321/S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES
SUBMITTED IN SUPPLEMENT XXX**

or

**NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 206321/S-000
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

REMS REVISIONS FOR NDA 206321

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, are only in PDF format, they may be submitted as such, but the preference is to include as many as possible in Word format.

If you do not submit electronically, please send 5 copies of REMS-related submissions.

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 Patricia Madara, Regulatory Project Manager, at (301) 796-1249.

Sincerely,

{See appended electronic signature page}

Jennifer Rodriguez Pippins, M.D., M.P.H.
Deputy Director for Safety
Division of Metabolism and Endocrinology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE:
REMS

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

/s/

JENNIFER R PIPPINS
02/01/2016