



NDA 209637

NDA APPROVAL

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

Dear Ms. DeChiaro:

Please refer to your New Drug Application (NDA) dated and received December 5, 2016, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Ozempic (semaglutide) injection.

This new drug application provides for the use of Ozempic (semaglutide) injection as an adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus.

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 text.

WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

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, Medication Guide, and instructions for use). 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*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>

Reference ID: 4190425

Novo Nordisk Exhibit 2106
Mylan Pharms. Inc. v. Novo Nordisk A/S

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (May 2015, Revision 3)*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 209637.**” Approval of this submission by FDA is not required before the labeling is used.

EXPIRATION DATING PERIOD

The shelf life of the drug product is 36 months at 5°C, and the in-use shelf life is 56 days at 5°C to 30°C after initial use.

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.

We are waiving the pediatric study requirement for ages 0 through 9 years (inclusive) because necessary studies are impossible or highly impracticable. This is because there are too few children in this age range with type 2 diabetes mellitus to study.

We are deferring submission of your pediatric study for ages 10 to 17 years (inclusive) for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required under section 505B(a) of the FDCA is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(C) of the FDCA. This required study is listed below.

- 3294-1 Conduct a 26-week, randomized, double-blind, placebo-controlled parallel group study of the safety and efficacy of Ozempic (semaglutide) for the treatment of type 2 diabetes mellitus in pediatric patients ages 10 to 17 years (inclusive), followed by a 26-week open-label, controlled extension. Background therapy will consist of either metformin, insulin, or metformin plus insulin.

Draft Protocol Submission: March 2018
Final Protocol Submission: January 2019
Study Completion: December 2026
Final Report Submission: October 2027

Submit the protocol to your IND 079754, with a cross-reference letter to this NDA.

Reports of this required pediatric postmarketing study must be submitted as a new drug application (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 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 assess a signal of a serious risk of medullary thyroid carcinoma associated with Ozempic (semaglutide).

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following study:

- 3294-2 Conduct a medullary thyroid carcinoma registry-based case series of at least 15 years duration to systematically monitor the annual incidence of medullary thyroid carcinoma in the United States and to identify any increase related to the introduction of Ozempic (semaglutide) into the marketplace. This study will also establish a registry of incident cases of medullary thyroid carcinoma and characterize their medical histories related to diabetes and use of Ozempic (semaglutide).

The timetable you submitted on November 7, 2017, states that you will conduct this study according to the following schedule:

Draft Protocol Submission:	August 2018
Final Protocol Submission:	February 2019
Interim Report Submissions:	March 2020, March 2021, March 2022, March 2023, March 2024, March 2025, March 2026, March 2027, March 2028, March 2029, March 2030, March 2031, March 2032, March 2033
Study Completion:	May 2034
Final Report Submission:	May 2035

Submit clinical protocols to your IND 079754, with a cross-reference letter to this NDA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final reports 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 protocols 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 or FDA's regulations under 21 CFR parts 50 (Protection of Human Subjects) and 56 (Institutional Review Boards).

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.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitments:

- 3294-3 Develop and validate a sensitive assay to assess the neutralizing activity of anti-semaglutide antibodies and its cross-neutralizing effect on native GLP-1.

The timetable you submitted on November 7, 2017, states that you will conduct this study according to the following schedule:

Final Report Submission: November 2018

- 3294-4 Conduct a study to assess the incidence of neutralizing antibodies to semaglutide and GLP-1 in subjects treated with semaglutide using the assays developed under PMC 3294-3. The samples may be derived from pre-existing clinical studies. Sample selection criteria will be submitted to and reviewed by the Agency prior to initiation of sample analysis.

The timetable you submitted on November 7, 2017, states that you will conduct this study according to the following schedule:

Final Protocol Submission: November 2018
Final Report Submission: May 2019

Submit clinical protocols to your IND 079754, for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii) you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “**Postmarketing Commitment Protocol,**” “**Postmarketing Commitment Final Report,**” or “**Postmarketing Commitment Correspondence.**”

RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS

We acknowledge receipt of your submission dated December 5, 2016, of a proposed risk evaluation and mitigation strategy (REMS). We have determined that, at this time, a REMS is not necessary for Ozempic (semaglutide) injection to ensure that its benefits outweigh its risks.

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