

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**Approval Package for:**

**Application Number: 20706**  
**Trade Name: Emadine**  
**Generic Name: Emedastine difumarate**  
**Sponsor: Alcon Laboratories**  
**Approval Date: December 29, 1997**  
**Indication: Relief of signs and symptoms of  
allergic conjunctivitis**

# CENTER FOR DRUG EVALUATION AND RESEARCH

**APPLICATION: 20706**

## CONTENTS

	Included	Pending Completion	Not Prepared	Not Required
Approval Letter	X			
Tentative Approval Letter				X
Approvable Letter	X			
Final Printed Labeling		X		
Medical Review(s)	X			
Chemistry Review(s)	X			
EA/FONSI	X			
Pharmacology Review(s)	X			
Statistical Review(s)	X			
Microbiology Review(s)				X
Clinical Pharmacology Biopharmaceutics Review(s)	X			
Bioequivalence Review(s)				X
Administrative Document(s)	X			
Correspondence				

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**Application Number: 20706**

**APPROVAL LETTER**



NDA 20-706

DEC 29 1997

Alcon Laboratories, Inc.  
Attention: Susan H. Caballa  
Associate Director, Regulatory Affairs  
6201 South Freeway  
Fort Worth, Texas 76134-2099

Dear Ms. Caballa:

Please refer to your new drug application dated March 22, 1996, received March 26, 1996, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Emadine™ (emedastine difumarate ophthalmic solution), 0.05%. We also refer to the approvable letter dated February 14, 1997.

We acknowledge receipt of your submissions dated December 16, 1996, and January 3, 6, and 17, February 24, March 11, 17, and 26, October 24, 27, and 28, November 6, and December 2, 9, and 12, 1997.

This new drug application provides for Emadine for the temporary relief of the signs and symptoms of allergic conjunctivitis.

We have completed the review of this application, including the submitted draft labeling, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the draft labeling in the submission dated December 12, 1997, with the revision identified below. Accordingly, the application is approved effective on the date of this letter. As discussed by telephone on December 29, 1997, between Richard Gural of Alcon Laboratories, Inc. and Wiley Chambers and Lissante LoBianco of the Division of Anti-Inflammatory, Analgesic and Ophthalmic Drug Products, the following sentence will be added as the third sentence in the Pregnancy subsection of the Precautions section, "However, at 70,000 times the maximum recommended ocular human use level, emedastine difumarate was shown to increase the incidence of external, visceral and skeletal anomalies in rats."

This revision is a term of the NDA approval. Marketing the product before making the revision, exactly as requested, in the final printed label (FPL) may render the product misbranded and an unapproved new drug.

Please submit 20 copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FINAL

PRINTED LABELING" for approved NDA 20-706. Approval of this submission by FDA is not required before the labeling is used.

Should additional information relating to the safety and effectiveness of the drug become available, revision of the labeling may be required.

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to the Division of Anti-Inflammatory, Analgesic, and Ophthalmic Drug Products and two copies of both the promotional material and the package insert directly to:

Division of Drug Marketing, Advertising and Communications, HFD-40  
Food and Drug Administration  
5600 Fishers Lane  
Rockville, Maryland 20857

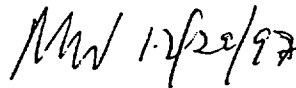
Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

Please submit one market package of the drug product when it is available.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact Lissante C. LoBianco, Regulatory Health Project Manager, at (301) 827-2090.

Sincerely,



Michael Weintraub, M.D.  
Director  
Office of Drug Evaluation V  
Center for Drug Evaluation and Research

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cc:

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HFD-550/Div. Files (with draft labeling)

HFD-002/ORM (with draft labeling)

HFD-92/DDM-DIAB

HFD-550/Deputy Dir/Chambers (with draft labeling) *WAC 12/29/97*

HFD-550/MO/Ludwig (with draft labeling)

HFD-550/Clin Rev/Holmes (with draft labeling)

HFD-550/Acting Supv Proj Mgr/Koerner

HFD-550/PM/LoBianco (with draft labeling) *RL 12/29/97*

HFD-550/Chem TL/Patel

HFD-550/Chem/Lin

HFD-830/ONDC III/Chen

HFD-550/Pharm TL/Chen

HFD-550/Pharm/Yang

HFD-725/Stat/Patricia

HFD-805/Micro TL/Cooney

HFD-805/Micro/Vincent

HFD-880/Biopharm TL/Bashaw

HFD-105/Office Director

HFD-101/L. Carter

DISTRICT OFFICE

HFD-40/DDMAC (with draft labeling)

HF-2/Medwatch (with draft labeling)

HFD-92/DDM-DIAB (with draft labeling)

HFD-613/OGD (with draft labeling)

HFD-735/DPE (with draft labeling)

HFD-20/Press Office (with draft labeling)

Drafted by: LoBianco/December 10, 1997/20706.ap

Revised by: Chambers/December 15, 1997/n20706ap.wpd

Revised by: LoBianco/December 29, 1997/n20706ap.wpd

APPROVAL (AP)

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**APPLICATION NUMBER: 20706**

**APPROVABLE LETTER**

NDA 20-706

FEB 14 1997

Alcon Laboratories, Inc.  
Attention: Susan H. Caballa  
Associate Director, Regulatory Affairs  
6201 South Freeway  
Fort Worth, Texas 76134-2099

Dear Ms. Caballa:

Please refer to your new drug application dated March 22, 1996, received March 26, 1996, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Emadine™ (emedastine difumarate ophthalmic solution), 0.05%.

We acknowledge receipt of your submissions dated May 1, 22, 29, and 31, June 14, 17, and 25, July 19, August 6, 12, 15, 21, and 23, September 24 and 27, October 31, November 20 and 22, and December 10, 1996.

We have completed the review of this application as submitted with draft labeling, and it is approvable. Before this application may be approved, however, it will be necessary for you to address the following deficiencies:



Redacted 2

pages of trade

secret and/or

confidential

commercial

information

In addition, it will be necessary for you to submit revised draft labeling identical in content to the draft labeling enclosed. If additional information relating to the safety or effectiveness of this drug becomes available, revision of the labeling may be required.

Under 21 CFR 314.50(d)(5)(vi)(b), we request that you update your NDA by submitting all safety information you now have regarding your new drug.

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional material and the package insert directly to:

Division of Drug Marketing, Advertising and Communications, HFD-40  
Food and Drug Administration  
5600 Fishers Lane  
Rockville, Maryland 20857

Within 10 days after the date of this letter, you are required to amend the application, notify us of your intent to file an amendment, or follow one of your other options under 21 CFR 314.110. In the absence of such action FDA may take action to withdraw the application.

Under 21 CFR 314.102(d) of the new drug regulations, you may request an informal or telephone conference with the Division to discuss what further steps need to be taken before the application may be approved.

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The drug may not be legally marketed until you have been notified in writing that the application is approved.

If you have any questions, please contact Joanne M. Holmes, M.B.A., Project Manager, at (301) 827-2090.

Sincerely yours,



Michael Weintraub, M.D.  
Director  
Office of Drug Evaluation V  
Center for Drug Evaluation and Research

Enclosure: Draft Labeling

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cc:

Original NDA 20-706  
HFD-550/Div. Files  
HFD-002/ORM  
HFD-92/DDM-DIAB  
HFD-550/Acting Div Dir/Chambers *VAK 12/31/96*  
HFD-550/MO/Ludwig *EML 12/31/96*  
HFD-550/Proj Mgr/Holmes  
HFD-550/Acting Supv Proj Mgr/LoBianco *APB 12/31/96*  
HFD-550/Chem TL/Patel  
HFD-820/Chem/Gilman  
HFD-550/Pharm TL/Chen  
HFD-550/Pharm/Yang  
HFD-725/Stat TL/Leung  
HFD-725/Stat/Patrician  
HFD-805/Micro TL/Cooney  
HFD-805/Micro/Vincent  
HFD-880/Biopharm TL/Bashaw *EM 12/31/96*  
HFD-105/Office Director  
HFD-101/L.Carter  
DISTRICT OFFICE  
HFD-40/DDMAC (with draft labeling)

Drafted by: jh December 13, 1996/20706.ae

APPROVABLE (AE)