DIVISION SIGNATORY REVIEW

Application Type	505(b)(2)
Application Number	NDA 219840
PDUFA Goal Date	9/21/2025
Division/Office	Division of Imaging and Radiation Medicine/Office of Specialty Medicine
Signatory Name	A. Alex Hofling
Review Completion Date	7/31/2025
Established/Proper Name	Barium sulfate
Trade Name	E-Z-DISK
Pharmacologic Class	Radiographic contrast agent
Applicant	Bracco Diagnostics Inc.
Dosage Form	Tablet
Recommended Indications	For the evaluation of esophageal patency in adults and pediatric patients aged 12 years and older
Recommended Dosing Regimen	The recommended dose of E-Z-DISK in adults and pediatric patients aged 12 years and older is one 700 mg tablet orally during imaging.
Recommended Regulatory Action	Approval

In this New Drug Application (NDA), Bracco Diagnostics Inc. seeks marketing approval of E-Z-DISK barium sulfate tablets for oral use in radiographic evaluation of the esophagus through a 505(b)(2) pathway that relies on literature, guidelines, and post-marketing experience of various barium sulfate products as previously reviewed in Bracco's "flagship" NDA 208036. The Applicant and FDA previously agreed that this flagship NDA could contain the clinical and nonclinical data for a variety of barium sulfate products, and the clinical review of this flagship NDA dated November 17, 2015, would be relied upon for subsequent original and supplemental barium sulfate NDAs, including the current E-Z-DISK NDA. As with other barium sulfate products in the flagship and related NDAs, E-Z-DISK NDA 219840 addresses historical marketing of an unapproved barium sulfate product.

The clinical review team appropriately concluded that proposed reliance on flagship NDA 208036 data is adequate to support both effectiveness and safety of E-Z-DISK, particularly given the extensive clinical experience with barium sulfate tablets. The clinical review team also concluded that a published study not included in the flagship NDA further supports the clinical utility of barium sulfate tablets. However, the available data (b) (4) , an indication for evaluation of esophageal patency is (b) (4) appropriate and aligns with the structure delineation claims of other barium sulfate products.

In addition to adults, E-Z-DISK is expected to have utility in certain children, and it is reasonable to base safety and effectiveness in the pediatric population on studies, guidelines, and post-marketing experience of other barium sulfate products as reviewed in flagship NDA 208036. Per recommendations of the clinical team and discussion with the FDA Pediatric Review Committee, indicating E-Z-DISK in patients aged 12 years and older is appropriate given literature-based assessment of native esophageal diameter in children. Potential additional assessment of smaller barium sulfate tablets in children below 12 years of age is not a regulatory requirement given the low number of patients in this age range in whom such a tablet would be expected to provide meaningful benefit over liquid contrast.

The pharmacology/toxicology review team notes the limited available nonclinical data for barium sulfate and defers to clinical review for safety evaluation. Given the extensive clinical experience with barium sulfate, including unapproved marketed E-Z-DISK itself, and the lack of novel excipients in E-Z-DISK, additional nonclinical data are not required to support safety.

The Integrated Quality Assessment notes no deficiencies in product quality information or facilities. In vitro tablet disintegration testing is performed (b) (4) as a risk reduction strategy for tablet retention, a potential event discussed further below.

Recommendations of the Associate Director for Labeling incorporate advice from the Division of Medication Error Prevention and Analysis and include contraindications, warnings and precautions, and adverse reactions that are consistent with those in the prescribing information of other barium sulfate products. Additionally, Section 2 of the prescribing information contains the statement, “E-Z-DISK is formulated to disintegrate within the gastrointestinal (GI) tract. In the event of prolonged retention, consider implementing appropriate interventions.” This statement addresses potential tablet retention, which is expected to rarely occur and will be evident in the esophagus during the imaging procedure.

Per the findings of the multidisciplinary review team, E-Z-DISK has a favorable benefit-risk profile for the evaluation of esophageal patency in adults and pediatric patients aged 12 years and older and approval of this NDA is recommended.

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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