



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

Our Reference: BL 125582/0

CSL Behring Recombinant Facility AG
Attention: Mr. Kevin D White
December 29, 2015
Sent by email

Dear Mr. White:

We are reviewing your December 5, 2014 biologics license application (BLA) for Coagulation Factor IX (Recombinant), Albumin Fusion Protein. We are providing the following comments and request for labeling revision to continue our review:

1. You reported a (b) (4) discrepancy between the primary Reference Standard (PRS1) potency assignment against the WHO International Standard (IS) for plasma-derived Factor IX concentrate at (b) (4) (test code QAR152; potency value (b) (4) International Units [IU]/mL) and Marburg (test code Q-10-081; potency value (b) (4) International Units [IU]/mL). IDELVION potency is currently assigned at Marburg using the (b) (4) PRS1 potency value. To ensure the continuity between the activity unit of IDELVION and the unit of the WHO IS, stability of the PRS1 and Working Potency Standards should be maintained by the (b) (4) method QAR152 and the WHO IS for Factor IX concentrate. Therefore please update the BLA with the following information:
 - a. An SOP for establishment of replacement Primary and Working Standards for IDELVION potency which should include periodic activity unit verification against the current WHO IS for Factor IX concentrate using method QAR152;
 - b. A stability protocol for reference standards describing the use of QAR152 method;
 - c. The QAR152 method validation report;
 - d. An update of the Prescribing Information with the description of the composition of the aPTT reagents (source of contact activator and phospholipids) which are used for the PRS1 IU-assignment and IDELVION potency labeling.

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by January 12, 2016 referencing the date of this request. Please include both a red-line strike out and clean copy of the revised package insert in WORD format. If you anticipate you will not be able to respond by this date, please contact the Agency immediately so a new response date can be identified.

If we determine that your response to this information request constitutes a major amendment, we will notify you in writing.

The action due date for this file is March 5, 2016.

Please send an acknowledgement for receipt of this request.

If you have any questions, please contact me at (240) 402-8443.

Sincerely,
Edward Thompson
Regulatory Project Manager
FDA/CBER/OBRR/RPMS