

MEMORANDUM



Department of Health and Human Services
Public Health Service
United States Food and Drug Administration
Center for Biologics Evaluation and Research



To: Basil Golding, M.D., Division Director, DH/OBRR/CBER

From: Natalya Ananyeva, Ph.D., Laboratory of Hemostasis (LH), Division of Hematology (DH)/OBRR and Kimberly Lindsey, M.D., Clinical Review Branch (CRB)/DH/OBRR

Through: Timothy Lee, Ph.D., Acting Chief, LH/DH/OBRR and Nisha Jain, M.D., Branch Chief, CRB/DH/OBRR

Subject: Request to waive Ethicon's BLA for Fibrin Sealant Patch [EVARREST], STN 125392/0, from referral to Blood Products Advisory Committee

BACKGROUND

STN 125392 is an original biologics license application (BLA) submitted by Ethicon, Inc. for Fibrin Sealant Patch with the proposed proprietary name EVARREST. EVARREST is a sterile bio-absorbable hemostatic agent. It is a combination product made of Human Fibrinogen and Human Thrombin plasma-derived proteins (Biological Components) coated onto a flexible composite Backing layer (Device Component). The Backing layer consists of a knitted oxidized regenerated cellulose backing layer under a layer of polyglactin 910 non-woven fibers. EVARREST is supplied in the form of a white to yellowish sterile dry patch approximately 4 x 4 in. (10.2 x 10.2 cm) in size and approximately 2 mm thick.

Fibrin Sealant Patch is intended for use as an adjunct to hemostasis for soft tissue bleeding during open retroperitoneal, intra-abdominal, pelvic, and (non-cardiac) thoracic surgery when control of bleeding by standard surgical methods of hemostasis is ineffective or impractical.

REASONS FOR WAIVING REFERRAL TO BPAC

The Division of Hematology in the Office of Blood Research and Review reviewed information in this application and determined that referral to the Blood Products

Advisory Committee (BPAC) prior to approval was not needed for the following reasons (FDAAA [HR 3580-138 SEC. 918: REFERRAL TO ADVISORY COMMITTEE]):

1. New molecular entity provision (NME) does not apply to EVARREST as it does not represent a historically novel product class. Fibrin sealants have been on the market and have been used as an adjunct to hemostasis for extended time – since the late 1970’s in Europe and since 1998 in the United States (TISSEEL manufactured by Baxter was approved by FDA in May 1998).
2. The mechanism of action of fibrin sealants (fibrinogen/thrombin products) and their function in blood coagulation and control of local hemorrhage is well studied and understood. Upon contact with the bleeding wound surface, the fibrinogen-thrombin reaction initiates the last step of the coagulation cascade – formation of a fibrin clot.
3. The Biological Components of EVARREST are ----b(4)-----

4. A similar combination fibrin sealant product TachoSil (Takeda Pharmaceuticals / Nycomed) has been used in European Union since 2004 and was approved by FDA in 2010 (STN 125351) as an adjunct to hemostasis in cardiovascular surgery where standard techniques are insufficient.
5. The overall clinical program to evaluate efficacy and safety of EVARREST was adequate and did not raise any major concerns.
6. Review of information submitted in the BLA for EVARREST did not raise any controversial issues or pose unanswered scientific questions which would have benefited from advisory committee discussion and recommendation.