

Record of Telephone Conversation, September 10, 2013 - Eloctate

DEPARTMENT OF HEALTH & HUMAN SERVICES
Public Health Service
Food and Drug Administration
1401 Rockville Pike
Rockville, MD 20852-1448

Application: BL STN 125487/0, Original BLA
Product: Antihemophilic Factor (Recombinant), Fc Fusion Protein
Proposed Indication: For the control and prevention of bleeding episodes, routine prophylaxis and perioperative management (surgical prophylaxis) in individuals with hemophilia A
Applicant: Biogen Idec, Inc.
Chair: Nancy Kirschbaum, PhD, Chemist, DH/LH
RPM: Leigh Pracht, DBA/RPMB
Meeting: Tuesday, September 10, 2013, 1:00 p.m. – 2 p.m.

Attendees:

FDA Attendees:

Nancy Kirschbaum, PhD, CBER/OBRR/DH/LH
Leigh Pracht, CBER/OBRR/DBA/RPMB
Christopher Joneckis, PhD, CBER/OD/RMS
Christopher Sese, Independent Assessor, Eastern Research Group

Biogen Idec Attendees:

Aoife Brennan, Senior Director, Medical Research
Paula Cobb, VP, Program Management
Lynda Cristiano, Director, Drug Safety and Risk Management
Alison Innes, Director, Biostatistics
Srividya Neelakantan, Pharmacometrician, Clinical Pharmacology
Ivan Nesterov, Senior Director, Clinical Pharmacology
Glenn Pierce, Senior VP, Global Medical Affairs
Heidi Reichert, Director, CMC
Mark Rogge, Senior Director, Clinical Pharmacology
Debra Segal, Director, Regulatory Affairs
Daniel Soroko, Associate Director, Regulatory Affairs
Suzanne Stella, Director, CMC Regulatory Affairs
Elijah Tan, Associate Director, CMC Regulatory Affairs

Discussion Summary

1. Any significant issues identified by the review committee members to date:

Process validation submitted to BL STN 125487/0 was inadequate in that designated process validation lots for 500 IU, 750 IU, 1000 IU, 1500 IU and 2000 IU were analyzed under a retrospective validation protocol. Retrospective validation is only applicable to legacy products with a long history of commercial manufacture. Please manufacture the following lots under a prospective validation protocol:

- 500 IU dosage, small -b(4)-- vial) lot size
- 1,000 IU dosage
- 2,000 IU dosage, large -b(4)-- vial) lot size

Please ensure that drug product conformance lots are manufactured from drug substance lots manufactured under a prospective validation protocol. Please ensure that all drug substance conformance batches and drug product conformance lots are monitored according to the approved, commercial stability program.

2. Pharmacovigilance and Post-marketing Studies:

Your current Pharmacovigilance Plan (PVP) is insufficient to evaluate the long-term safety and efficacy of rAHFFc, and the safety and efficacy in previously untreated patients (PUPS). Please classify the following ongoing studies as Post-marketing Commitment Studies (PMCs) and submit appropriate timelines for completion of study and submission of a final study report:

- a. "An Open-Label, Multicenter Evaluation of the Long-Term Safety and Efficacy of Recombinant Human Coagulation Factor VIII Fusion Protein (rFVIII Fc) in the Prevention and Treatment of Bleeding Episodes in Previously Treated Subjects With Hemophilia, an extension to the Phase 3 study 997HA301."
- b. "An Open-Label, Multicenter Evaluation of Safety, Pharmacokinetics, and Efficacy of Recombinant Coagulation Factor VIII Fc Fusion Protein, BII B031, in the Prevention and Treatment of Bleeding Episodes in Pediatric Subjects With Hemophilia A"

3. Any information requests sent and not received:

There are no outstanding information requests.

4. Any new information requests to be communicated:

A multi-discipline information request will be conveyed to Biogen by 13 September 2013. FDA requests response from Biogen by 01 December 2013.

5. Proposed date for the Late-cycle meeting:

The late cycle meeting is tentatively scheduled to occur on Thursday, November 14, 2013 from 1:00 – 2:30 p.m.

6. Updates regarding plans for an Advisory Committee:

BL STN 125487/0 will not be presented to an advisory committee.

7. Other projected milestones:

Milestone

Date

Second PNR review and action letter

7-December-2013

Complete Label Review

6-February-2014

Post-marketing commitments (PMC) and post-marketing
requirements (PMR) finalized

6-February-2014

Action due date and press release

8-March-2014