Our STN: BL 103174/6160

SUPPLEMENT APPROVAL
September 21, 2017

Grifols Therapeutics Inc.
Attention: Ms. Joan Robertson
8368 US 70 Business Highway West
Clayton, NC 27520

Dear Ms. Robertson:

This letter supersedes the letter issued on September 8, 2017, that did not include the agreed upon post marketing commitments.

We have approved your request dated November 10, 2016, to supplement your Biologics License Application submitted under section 351(a) of the Public Health Service Act (42 U.S.C. 262) for Alpha-1-Proteinase Inhibitor (Human) [Prolastin-C] to include a new alanine-stabilized liquid formulation, Prolastin®-C Liquid, as an alternate dosage form to the currently licensed lyophilized Prolastin-C, and to submit a new package insert for the alternate dosage form.

The review of this supplement was associated with the following National Clinical Trial (NCT) number: NCT02282527.

We hereby approve the draft package insert labeling submitted under amendment 14 dated September 8, 2017, and the draft carton and container labeling submitted under amendment 9, dated July 27, 2017.

Please provide your final content of labeling in Structured Product Labeling (SPL) format and include the carton and container labels. In addition, please submit three original paper copies for carton and container final printed labeling. All final labeling should be submitted as Product Correspondence to STN BL 103174/0 at the time of use (prior to marketing) and include implementation information on Form FDA 356h.

In addition, please submit the final content of labeling (21 CFR 601.14) in SPL format via the FDA automated drug registration and listing system, (eLIST) as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As* at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

You may submit two draft copies of the proposed introductory advertising and promotional labeling with Form FDA 2253 to the Advertising and Promotional Labeling Branch at the following address:

Food and Drug Administration
Center for Biologics Evaluation and Research
Document Control Center
10903 New Hampshire Ave.
WO71-G112
Silver Spring, MD 20993-0002

You must submit copies of your final advertising and promotional labeling at the time of initial dissemination or publication, accompanied by Form FDA 2253 (21 CFR 601.12(f)(4)).

All promotional claims must be consistent with and not contrary to approved labeling. You should not make a comparative promotional claim or claim of superiority over other products unless you have substantial evidence or substantial clinical experience to support such claims (21 CFR 202.1(e)(6)).

Please submit an amendment to all pending supplemental applications for this BLA that include revised labeling incorporating a revised content of labeling that includes these changes.

PEDIATRIC REQUIREMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because the biological product for this indication has an orphan drug designation, you are exempt from this requirement.

POSTMARKETING COMMITMENTS NOT SUBJECT TO THE REPORTING REQUIRMENTS UNDER SECTION 506B

We acknowledge your written commitment as described in your correspondence of May 12, 2017 and July 28, 2017, as outlined below:

PMC #1 Grifols Therapeutics Inc. commits to submit a validation bridging study evaluating plasma samples from the STAMP clinical study 11815 in the (b) (4) immunogenicity assay. No stability data are available for these samples. A final study report will be submitted by September 30, 2018.

Final Report Submission: September 30, 2018

PMC #2 Grifols commits to evaluating (b) (4) in the currently approved, reconstituted lyophilized A1PI product and comparing the (b) (4) to the alanine stabilized liquid A1PI formulation. To allow sufficient time for batch production, analytical testing of stability samples, and comparative analysis, Grifols commits to submitting a final study report by March 31, 2021.

Final Report Submission: March 31, 2021

We will include information contained in the above-referenced supplement in your Biologics License Application file.

Sincerely,

Tejashri Purohit-Sheth, MD
Director
Division of Clinical Evaluation and
Pharmacology/Toxicology
Office of Tissues and Advanced Therapies
Center for Biologics Evaluation and Research