

Our STN: BL 125201/728 SUPPLEMENT APPROVAL
September 14, 2017

CSL Behring AG Attention: Mr. Kevin Darryl White 1020 First Avenue P.O. Box 61501 King of Prussia, PA 19406-0901

Dear Mr. White.

We have approved your request dated November 11, 2017, to supplement your Biologics License Application submitted under section 351(a) of the Public Health Service Act (42 U.S.C. 262) for Immune Globulin Intravenous (Human), 10% Liquid for the treatment of adults with chronic inflammatory demyelinating polyneuropathy (CIDP) to improve neuromuscular disability and impairment.

The review of this supplement was associated with the following National Clinical Trial (NCT) numbers: NCT01184846, NCT01545076

## **LABELING**

We hereby approve the draft package insert labeling submitted under amendment 20, dated September 14, 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 BLA 125201/0 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 <a href="http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm">http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm</a>. 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 <a href="http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf">http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf</a>.

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.

We are waiving the pediatric study requirement for ages zero to less than 2 years because necessary studies are impossible or highly impracticable as there are no validated appropriate neurological assessment tools available for this age group and because of the rarity of the condition in this young population.

We are deferring submission of your pediatric study for ages 2 to less than 17 years for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study is required under section 505B(a) of the Federal Food, Drug, and Cosmetic Act (FDCA) as a required postmarketing study. The status of this postmarketing study must be reported according to 21 CFR 601.28 and section 505B(a)(3)(B) of the FDCA. In addition, section 506B of the FDCA and 21 CFR 601.70

require you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

Label your annual report as an **Annual Status Report of Postmarketing Study Requirement/Commitments** and submit it to the FDA each year within 60 calendar days of the anniversary date of the approval of BLA 125201/0 until all Requirements and Commitments subject to the reporting requirements under section 506B of the FDCA are released or fulfilled. This required study is listed below:

1. Deferred pediatric study under PREA for the treatment of chronic inflammatory demyelinating polyneuropathy (CIDP) to improve neuromuscular disability and impairment and for maintenance therapy to prevent relapse in pediatric patients ages 2 to less than 17 years. The study will be a randomized study of single versus multiple Privigen dosing.

Final Protocol Submission: March 31, 2018

Study Completion Date: March 31, 2023

Final Report Submission: July 31, 2023

Since you do not have an existing IND for your product to treat CIDP, please submit a new IND for the deferred pediatric study protocol, with a cross-reference letter to BLA 125201/0 explaining that this protocol was submitted to the IND.

Submit final study reports to this BLA. For administrative purposes, all submissions related to this required pediatric postmarketing study must be clearly designated as:

## • Required Pediatric Assessment

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