

From: Hooban, Christopher  
Sent: Tuesday, October 13, 2015 10:44 AM  
To: Krammer, Marlene  
Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Thanks!

From: Krammer, Marlene [mailto:marlene.krammer@octapharma.com]  
Sent: Tuesday, October 13, 2015 10:18 AM  
To: Hooban, Christopher  
Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Chris,

Thank you for your Email. We will provide the complete response by October 19, 2015.  
Kind regards, Marlene

Marlene Krammer  
Manager  
International Regulatory Affairs Department

Octapharma Pharmazeutika Prod.ges.m.b.H. | Oberlaaer Strasse 235 | A-1100 Vienna Austria |  
Office: +43 (0) 1 610 32 1707 | Fax: +43 (0) 1 610 32 9122 | marlene.krammer@octapharma.com  
| www.octapharma.com

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From: Hooban, Christopher [mailto:Christopher.Hooban@fda.hhs.gov]  
Sent: Tuesday, October 13, 2015 4:07 PM  
To: Krammer, Marlene  
Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Marlene,

Good morning. We would prefer to have this information provided back to us prior to the external midcycle meeting (OCT 20, 2015). Would OCT 19, 2015 be acceptable? If not, would you be able to send any completed items by OCT 19, 2015 and any remaining items by OCT 21, 2015? Thanks for your time.

Chris

From: Krammer, Marlene [mailto:marlene.krammer@octapharma.com]  
Sent: Monday, October 12, 2015 8:36 AM  
To: Hooban, Christopher

Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Chris,  
Good morning. Thanks for your response. We will submit the conformance lots even if expired. In addition, we kindly ask FDA to extend the deadline for submitting the responses to October 21, 2015. Could you please let us know if the proposed new deadline is acceptable for FDA?  
Kind regards, Marlene

Marlene Krammer  
Manager  
International Regulatory Affairs Department

Octapharma Pharmazeutika Prod.ges.m.b.H. | Oberlaaer Strasse 235 | A-1100 Vienna Austria |  
Office: +43 (0) 1 610 32 1707 | Fax: +43 (0) 1 610 32 9122 | marlene.krammer@octapharma.com  
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From: Hooban, Christopher [mailto:Christopher.Hooban@fda.hhs.gov]  
Sent: Friday, October 09, 2015 7:25 PM  
To: Krammer, Marlene  
Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Marlene,

Good afternoon. The following responses were provided for the questions posed in your email from earlier this morning:

1. Please submit the conformance lots even if expired.
2. Some of the information was found in the cited document; however, for simplicity purposes, please provide the following in a summary table and cite the SOP number for each:
  - a. Donor screening (individual donation)
  - b. Donor screening (minipool format)
  - c. In-process screening (manufacturing pool)
  - d. In-process screening (minipool)

Thanks for your time. Again if you have any questions or concerns related to this information request please contact me.

Chris Hooban, MS, MPH  
Regulatory Project Manager  
OBRR/CBER/FDA  
U.S. Food & Drug Administration  
White Oak Building 71, Room 4257  
Office: (240)402-8376

Mobile: (240)762-2266  
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From: Krammer, Marlene [mailto:marlene.krammer@octapharma.com]  
Sent: Friday, October 09, 2015 5:36 AM  
To: Hooban, Christopher  
Cc: Ammons, Stanley; Rangetiner, Barbara; Cagungun, Nannette  
Subject: RE: Information Request (October 7, 2015) - BLA 125587/0

Dear Mr. Hooban:

I refer to your Email dated October 7, 2015 in regards to STN 125587/0. Could you kindly help regarding the following questions?

1. In point no. 12 FDA is asking to submit 4 consecutive conformance and 4 consecutive consistency lots, 2 vials each. We will submit 2 vials each of 4 consecutive consistency lots (manufactured in 2014) as requested. Please note that the conformance lots were manufactured in 2013 and that they are expired already. Therefore we kindly ask you to let us know if we shall submit them to FDA even if expired.
2. In point no. 8 FDA is asking for testing SOPs of the plasma pool and minipool. Tests done on the plasma pool are specified in the method of preparation (section 3.2.S.2.2). Respective SOPs and method validation reports for the plasma pool tests are included in section 32S43 of the initial BLA. Could you please let us know if this fulfills FDA's request regarding plasma pool testing SOPs?

Many thanks in advance for your response.  
Kind regards, Marlene Krammer

Marlene Krammer  
Manager  
International Regulatory Affairs Department

Octapharma Pharmazeutika Prod.ges.m.b.H. | Oberlaaer Strasse 235 | A-1100 Vienna Austria |  
Office: +43 (0) 1 610 32 1707 | Fax: +43 (0) 1 610 32 9122 | marlene.krammer@octapharma.com  
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From: Hooban, Christopher [mailto:Christopher.Hooban@fda.hhs.gov]  
Sent: Wednesday, October 07, 2015 2:20 PM  
To: Ammons, Stanley  
Cc: Cagungun, Nannette  
Subject: Information Request (October 7, 2015) - BLA 125587/0

Our Reference: BL 125587/0  
Original BLA

Octapharma Pharmazeutika Produktionsges.m.b.H.

Dear Mr. Ammons:

We are reviewing your April 15, 2015 biologics license application (BLA) for Immune Globulin Intravenous, Human 10%. We are providing the following comments and request for additional information to continue our review:

1. Please provide the mixing study report for setting the mixing speed range at (b) (4) for manufacturing step (b) (4).

2. Please provide data to support your claim that the (b) (4)

Please also provide assessment of the impact that this variation may have on the quality and purity of the final product.

3. In deviation 21457, it is described that the (b) (4)

Please confirm the recounting of the life cycle for the (b) (4) and its impact on the ongoing life cycle study.

4. Please provide the following documents for review:

\* 080VRE10314.103/00: Validation Report IVIG 10% (NewGam) – Manufacture of Clinical Batches

5. Please clarify that under what circumstances STEP (b) (4) and STEP (b) (4) will be included in the manufacturing process of Newgam. Please provide the Batch Records for the (b) (4) steps or direct us to the BLA section containing this information.

6. Deviations 36254, 36261 and 36596, which affected multiple batches during the manufacturing of the consistency lots, were attributed to the use of US plasma. However, according to your IR response (Question 5 of FDA August 27, 2015 Information Request), such deviations did not occur during the manufacturing of the conformance lots which were also derived from US plasma. Please explain.

7. Please submit (b) (4) data for all available lots. Please include: graphs, input/output parameters (including, but not limited to (b) (4)

(b) (4) ), instrument used, and software version. Please also submit your SOP for (b) (4) testing.

8. Please provide the plasma pool and minipool testing SOPs.
9. Please submit your plasma inventory hold, lookback, and traceability procedure(s).
10. Please submit the SOP(s) on testing, rejection, and release of Raw Materials.
11. Please submit documentation of agreements with Raw Material suppliers, which specify that Octapharma will be notified of any changes to the material.
12. Please submit four (4) consecutive conformance and four (4) consecutive consistency lots, 2 vials each, for research purposes, to the following address:

FDA/CBER/OBRR

Attn: M. Norton /Nancy Eller/Dr. Dorothy Scott

Building 52/Room 4122

10903 New Hampshire Avenue

Silver Spring, MD 20993-0002

Telephone: (240) 402-8210

Please notify Dr. Dorothy Scott ([dorothy.scott@fda.hhs.gov](mailto:dorothy.scott@fda.hhs.gov)), Ms. Nancy Eller

([nancy.eller@fda.hhs.gov](mailto:nancy.eller@fda.hhs.gov)), and Ms. Malgorzata Norton

([malgorzata.norton@fda.hhs.gov](mailto:malgorzata.norton@fda.hhs.gov)) when the samples are being shipped, and please include the tracking number in the email.

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 October 14, 2015 referencing the date of this request. 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.

The action due date for this file is April 14, 2016.

If you have any questions, please contact me at (240) 402-8376 or [christopher.hooban@fda.hhs.gov](mailto:christopher.hooban@fda.hhs.gov).

Chris Hooban, MS, MPH

Regulatory Project Manager

OBRR/CBER/FDA

U.S. Food & Drug Administration

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