

From: [Dehdashti, Seameen \(Jean\)](#)
To: "BDV (Barbara Davies)"
Cc: [Dehdashti, Seameen \(Jean\)](#)
Subject: FDA Information Request (IR): BLA 125671/0
Date: Wednesday, June 13, 2018 11:44:26 AM
Attachments: [image002.png](#)
Importance: High

Dear Barbara,

Reference is made to Novo Nordisk, Inc., original BLA 125671 submission, dated February 27, 2018. We are reviewing your BLA submission for Antihemophilic factor, GlycoPEGylated (STN125671) and have the following information request (IR), outlined in **bold text** below. Please provide your response by Wednesday, June 27, 2018.

FDA Information Request:

- 1. Your analytical procedure (b) (4) by (b) (4) cannot be considered a compendial procedure for Antihemophilic Factor (Recombinant), GlycoPEGylated because a monograph for Antihemophilic Factor (Recombinant), GlycoPEGylated is not present in (b) (4). To consider a test as compendial, there must be a monograph in (b) (4) and the assay procedure must be described or cited in the monograph. Please conduct complete validation of this method and provide us the report.**
- 2. For validation report for the analytical procedure, (b) (4) by (b) (4)**
 - a. In the validation report, you used only (b) (4) to demonstrate (b) (4) specificity of the method with (b) (4) value in section 5.1.1. Please provide data for at least (b) (4), preferably using products manufactured at the same manufacturing site, to evaluate the specificity of the method.**
 - b. In appendix D of the validation report, Table 13 showed the model characteristics. Please provide the rationale for using (b) (4) and describe the specific (b) (4) method that was applied.**
 - c. Table 13 also showed that there were (b) (4) samples left out for the model. Please provide justification for such action and modify the total number of (b) (4) used for the model establishing accordingly.**
 - d. Please provide experimental data to demonstrate that the variation of concentrations of excipients within the proposed specifications (for example, sucrose (b) (4) and polysorbate 80 (b) (4)) does not affect (b) (4) result of your DP sample.**
- 3. For validation report for the analytical procedure, "Protein Content and (b) (4)**
 - a. A (b) (4) is clearly displayed in the figures 2 and 4 of the validation report. Please provide identification of these (b) (4) with necessary supporting data to demonstrate that they are part of active pharmaceutical ingredients of your product.**
 - b. We do not agree that the quantitation limit (QL) for (b) (4) value of (b) (4) (section 6.6) because QL cannot be estimated by (b) (4). In addition, (b) (4) percent of a (b) (4) is affected by relative (b) (4) and their resolution. You may use data in Table 5 to estimate QL by plotting the (b) (4) (reportable result)**

against (b) (4) (response) or using an appropriate method of your choice and submit your results for review.

Please confirm receipt of my e-mail, and do not hesitate to contact me, should you have any questions and/or concerns.

Warm regards,

Jean Dehdashti, MSc, RAC
Regulatory Project Manager

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