

Our STN: BL 101833/5160 SUPPLEMENT APPROVAL

Greer Laboratories, Inc. Attention: Kimberly Davis 639 Nuway Circle NE P.O. Box 800 Lenoir NC, 28645

February 24, 2023

## Dear Kimberly Davis:

We have approved your request received January 25, 2023, to supplement your Biologics License Application (BLA) submitted under section 351(a) of the Public Health Service Act for Non-Standardized Allergenic Extracts to update the "Warnings and Precautions" section of the package insert to include new safety information on the risk of anaphylaxis following false negative food allergen skin test results.

The review of this supplement was associated with our January 12, 2023, SAFETY LABELING CHANGE NOTIFICATION LETTER, notifying you, under Section 505(o)(4) of the Federal Food, Drug, and Cosmetic Act (FDCA), of new safety information that we believe should be included in the labeling for Non-Standardized Allergenic Extracts. This information pertains to the risk of anaphylaxis following false negative food allergen skin test results.

## **LABELING**

We hereby approve the draft content of labeling Package Insert submitted January 25, 2023.

## **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, please submit the final content of labeling (21 CFR 601.14) in Structured Product Labeling (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>. Content of labeling must be identical to the [choose all that apply: Package Insert, Patient Package Insert, Instructions for Use, and Medication Guide] submitted on [DATE]. 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>.

The SPL will be accessible via publicly available labeling repositories.

All final labeling should be submitted as Product Correspondence to this BLA, STN BL 101833 at the time of use and include implementation information on Form FDA 356h.

## ADVERTISING AND PROMOTIONAL LABELING

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.

We will include information contained in the above-referenced supplement in your BLA file.

Sincerely,

Joseph G. Toerner, MD, MPH
Acting Deputy Director - Clinical
Division of Vaccines and
Related Products Applications
Office of Vaccines
Research and Review
Center for Biologics
Evaluation and Research