

From: Thompson, Edward
Sent: Wednesday, November 06, 2013 7:50 AM
To: 'Jennifer Spinella (jspinella@raretx.com)'
Cc: Wang, Yonggang; Fisher, Robert (Robert.Fisher@fda.hhs.gov); Kennedy, Michael
Subject: Information Request for BL 125488/0

Contacts: Jennifer Spinella

Dear Ms. Spinella:

We are reviewing your March 16, 2013 biologics license application (BLA) for Crotalidae (pit viper) Immune F(ab')₂ (Equine) Injection. We determined that the following information is necessary to continue our review:

1. Please submit the Certificate of Analysis for the clinical lots of Anavip (specifically lots P-6A-06, P-7D-10, P-8E-02-A, P-8E-02-D, and P-8F-04-C) or indicate where the CoA may be found in your BLA.
2. Please submit the drug substance and drug final product batch records, and the certificate of analysis, for the lot of Anavip manufactured during the (b) (4) FDA inspection of your facilities.
3. Please submit a comparison of the following hold (or pre-use storage) times incurred during manufacture of your clinical and conformance lots: (b) (4) bulk product.
4. Please provide an update to your Drug Substance stability test for two conformance lots, i.e., Lot (b) (4)
5. There is significant difference for the (b) (4) levels in your Bulk Product stability test, between clinical lot (B-6F-16, produced in 2007) and two conformance lots (b) (4) (b) (4), produced in 2012). The (b) (4) levels for B-6F-16 was not detectable whereas the ones for the other two were much higher. Please outline any manufacturing changes that might have contributed to the increase, and provide any supporting information for this event if there is any.
6. Please provide an executed batch record summary for the clinical lots, similar to the one provided for your conformance lots in 2.3.R "exec-brps-sum". This summary should include detailed information on the plasma batches and fractionation batches used to produce the drug substance.
7. Please provide the 12th month data for the first two conformance lots and the 0, 3rd month data for the third conformance lot produced during pre-license inspection, within two weeks once they are available.

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 for items 1-6 in this information request as an amendment to this file by November 21, 2013 referencing the date of this request. Please submit your response for item 7 in this information request as an amendment to this file upon availability 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.

If we determine that your response to this information request constitutes a major amendment, we will notify you in writing.

The action due date for this file is March 18, 2014.

Please send an email message acknowledging receipt of this request.

If you have any questions, please contact me at (301) 827-9167.

Sincerely,

Edward Thompson
Regulatory Project Manager
FDA/CBER/OBRR/DBA/RPMB

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