

From: Thompson, Edward
Sent: Tuesday, November 04, 2014 11:52 AM
To: 'Steve McGregor (smcgregor@ebsi.com)'
Subject: Information Request for BL 125426/0

Contacts: Steve McGregor

Dear Mr. McGregor:

We are reviewing your biologics license application (BLA) dated April 5, 2012 for Coagulation Factor IX (Recombinant). We determined that the following information is necessary to continue our review:

1. You propose to maintain the end of shelf life specification of the (b) (4) without an adequate rationale. Please amend this value to adhere to the release specifications or provide a rationale for not adjusting this value.
2. The acceptance limit for the potency ranges in section 3.2.P.5.1 *Specifications* were changed for the lower dosage but not for the two other dosages and are not within (b) (4) of the upper limit. Please re-evaluate and amend the acceptance criteria for DP potency release and stability specifications.
3. It is not clear if Figures 14 and 16 coincidentally carry the exact same graph although they are labeled to describe the (b) (4) results look identical in the two figures in section 3.2.P.5.6 *Justification of Specifications*, Figure 14. *Control Chart for* (b) (4) *Results* and Figure 16. *Control Chart for* (b) (4). Please amend the figures so that they represent (b) (4).
4. The amended upper limits for DP release specification for the (b) (4) are not reflected in the specification (section 3.2.P.5.1). This section should contain the updated information. Please amend this section in the CTD component of the application accordingly.
5. You have provided results from clearance studies for the following process related impurities: (b) (4), CHO HCP, (b) (4). However, you have not provided the spiking test results for the process-related impurities (including Chinese Hamster Ovary Host Cell Protein (CHO HCP)) at the laboratory-scale. Please provide the required data.
6. A time limit of (b) (4) has been established for the (b) (4), based on review and assessment of (b) (4) historical manufacturing-scale data including two IB1001 process validation conformance campaigns. Please amend the CTD component of the application accordingly.

7. (b) (4) s report # 20101026-2 compares two instruments that are used to determine the rFIX potency. Table 1 illustrates the potency as (b) (4) and does not provide the potency units as in the specifications. Please amend the data to adhere to the same units as in the release specifications of the (b) (4) Drug Product.



12/16/14 JRC

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 November 18, 2014 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 April 29, 2015.

If you have any questions, please contact me at (240) 402-8443.

Sincerely,

Edward Thompson
Regulatory Project Manager
FDA/CBER/OBRR/RPMS

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