

MEMORANDUM

DATE: September 2, 2015

TO: File BLA 125555/0, NUWIQ Antihemophilic Factor (Recombinant)

Cc: Victor Baum, MD, Clinical Reviewer and Mitch Frost, MD, Team Leader, HPRB, DHCR

FROM: Howard Chazin, MD, Deputy Division Director, Division of Hematology Clinical Review

RE: Voluntary postmarketing commitments included in BLA 125555/0 are reportable PMCs under Section 506B.

In September, 2014, Octapharma submitted BLA 125555/0 for NUWIQ, Antihemophilic Factor (Recombinant). Included with the application were voluntary postmarketing studies and other pharmacovigilance plans as follows.

- GENA-05 (Q1 2013-Q4 2018): Immunogenicity, efficacy and safety in previously untreated patients.
- GENA-13 (Q4 2011-Q3 2015): Long-term immunogenicity, tolerability and efficacy in previously treated children.
- GENA-15 (Q1 2014-Q1 2016): Extension for subjects who completed GENA-05.
- GENA-99 (Q2 2015-Q2 2019): Post-authorization trial to document long-term immunogenicity, safety and efficacy in patients treated in normal clinical practice.
- European Haemophilia Safety Surveillance Study: Will evaluate inhibitor development, hypersensitivity reactions, thromboembolic events, and medication errors in a home setting.

These postmarketing studies were discussed at the CBER Safety Working Group (SWG) meeting on August 27, 2015. During the discussion, it was noted that as reportable PMCs, CBER would receive annual updates and a final study report for each study. As voluntary studies, CBER would only receive data as part of an additional efficacy claim or labeling change. Since the first four studies above were in line with reportable PMCs that have been previously requested for other similar products, they were considered by the SWG as reportable PMCs. These studies would be consistent with CBER's requests for postmarketing studies on recombinant products for which there are concerns for long term immunogenicity, efficacy, and safety after licensure. The European Haemophilia Safety Surveillance Study noted above was excluded as a reportable PMC as it was considered routine pharmacovigilance.

Letter Ready Comment to Sponsor

Four of your voluntary postmarketing studies included in your BLA 125555/0; namely, GENA-05, GENA-13, GENA-15 and GENA-99 are considered by FDA as Postmarketing Commitments subject to reporting requirements under Section 506B. Please provide dates for the study completion date and final study report submission date for each of these four postmarketing commitments. Please also note some slight changes in the study titles for each of these studies below.

1. GENA-05: Evaluation of immunogenicity, efficacy and safety of Antihemophilic Factor (Recombinant) in previously untreated patients.
2. GENA-13: Evaluation of long-term immunogenicity, tolerability, and efficacy of Antihemophilic Factor (Recombinant) in previously treated children.
3. GENA-15: Extension for subjects who completed GENA-05.
4. GENA-99: Post-licensure trial to document long-term immunogenicity, safety, and efficacy of Antihemophilic Factor (Recombinant) in patients treated in normal clinical practice.