



Our Reference: BLA 125668/o

Octapharma Pharmazeutika Produktionsges.m.b.H.

Attention: Mr. Stanley Ammons

November 9, 2018

Sent by email

Dear Mr. Ammons:

We are reviewing your December 28, 2017, biologics license application (BLA), for Immune Globulin Subcutaneous (Human). We determined that the following information is necessary to continue our review:

1. For the filter usage at Step (b) (4) ,
 - a. According to page 10/25, Method of Preparation (eCTD section 3.2.S.2.2), Step (b) (4) involves "... (b) (4) .” Whereas, in page 53, Master Batch Record English translation 056HBE714-00, “(b) (4) ” are used for Step (b) (4) . Please clarify the (b) (4) discrepancy.
 - b. The document 056SOP115 does not contain any instruction on when the (b) (4) can be used at Step (b) (4) . To ensure the product manufacturing consistency, please commit to include in the standard operating procedure (SOP) 056SOP115 detailed descriptions regarding the condition when the (b) (4) can be applied at Step (b) (4) . The SOP should be written and approved before the manufacturing of the next Process Performance Qualification lots scheduled for the (b) (4) and will be included in the next Annual Report.
 - c. Table 3 of eCTD section 3.2.S.2.2 Description of Process and Process Controls – add info, using maximum of (b) (4) is indicated under the column “Amount of (b) (4) used in routine”. To avoid confusion, please change “yes” to “no” for Step (b) (4) under the column “Are they changed out during the batch?”
2. The English translation of batch record 056HBE714/02 could not be found in eCTD sequence 0032 as indicated in Question 2, Amendment 35. Please clarify. Please provide the changes history since 056HBE714/00.
3. For the (b) (4) usage at Step (b) (4) , we disagree that the (b) (4) used in Step (b) (4) for Octagam 5% and Octagam 10% is (b) (4) at Step (b) (4) for Cutaquig.

- a. Please commit
 - i. To place the first CUTAQUIG lot manufactured with the (b) (4) at Step (b) (4) into the stability program. The stability data will be submitted annually as a Postmarketing Commitment Submission - Status Update. Within three months after the completion of the study, a final stability report will be submitted as a Postmarketing Commitment Submission - Final Study Report. All stability failures will be reported within 45 days of the occurrence as a Postmarketing Commitment Submission - Status Update.
 - ii. To provide a standard operating procedure (SOP) for the (b) (4) at Step (b) (4) which includes detailed descriptions regarding the condition when the (b) (4) can be applied. The SOP should be written and approved before the manufacturing of the next Process Performance Qualification lots scheduled for the (b) (4) and will be included in the next Annual Report.
- b. To avoid confusion, please change “yes” to “(b) (4) allowed” for Step (b) (4) under the column “Are they changed out during the batch?” in Table 3 of eCTD section 3.2.S.2.2 Description of Process and Process Controls – add info.

The review of this submission is on-going, and issues may be added, expanded upon, or modified.

Please submit your response to this information request as an amendment to this file by November 15, 2018, 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 December 29, 2018.

Please send an email message acknowledging receipt of this request.

If you have any questions, please contact me.

Sincerely,
Edward Thompson
Regulatory Project Manager
FDA/CBER/OTAT/DRPM

THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW

If you are not the addressee, or a person authorized to deliver the document to the addressee, you are hereby notified that any review, disclosure, dissemination, copying, or other action based on the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us at the above address by mail.

Thank you