

02 June 2021

Joseph G. Toerner, MD, MPH, Director Division of Hepatology and Nutrition (DHN) Office of Immunology and Inflammation Center for Drug Evaluation and Research Food and Drug Administration 5901-B Ammendale Road Beltsville MD 20705-1266

#### Fresenius Kabi USA, LLC

Three Corporate Drive Lake Zurich, Illinois 60047 T 847-550-2300 T 888-391-6300 www.fresenius-kabi.us

RE: NDA 207648 SMOFLIPID 20%, LIPID INJECTABLE EMULSION (SEQ 0087)

IND 102137

RESPONSE TO PREA NON-COMPLIANCE LETTER

Dear Dr. Toerner:

Reference is made to the 505(b)(1) New Drug Application (NDA) 207648 for Smoflipid 20%, Lipid Injectable Emulsion held by Fresenius Kabi USA, LLC.

Further reference is made to **NOTIFICATION OF NON-COMPLIANCE WITH PREA** letter received on 24 May 2021 to Postmarketing Requirement (PMR) # 3002-1 related to the following post-marketing required study.

3002-1: A prospective, randomized, controlled, double-blind, parallel-group study to compare the safety and efficacy of Smoflipid to standard- of- care soybean oil-based lipid emulsion in hospitalized neonates including low birth weight and very low birth weight neonates.

In response to the non-compliance letter, Fresenius Kabi is providing below the details on communications that have been ongoing with the Division prior to the issuance of this non-compliance letter. The communications summarized below relate to the referenced PREA PMR 3002-1

These include agreement received from the Division on submitting the Final Clinical Study Report (FSR) for pediatric assessment 3002-1 by the April 2021 deadline,

## Summary of Discussions with the FDA between August 2019 and April 2021

### A. Deferral Extensions for PMR 3002-1

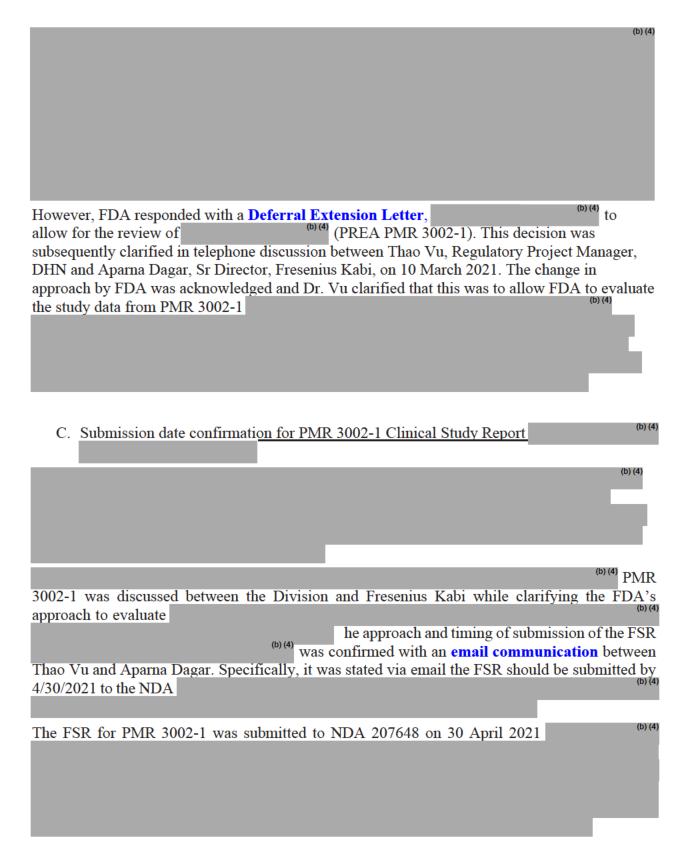
Unanticipated delays were experienced in the timely completion of this clinical study in neonates per the original committed timelines related mainly to:

- slow recruitment rates in the required neonate patients at 15 enrolled sites over the course
  of the study, and subsequently,
- need for additional time to prepare the study report due to unexpected delays caused by the COVID-19 pandemic restricting site access for completion of source data verification.

These issues had been previously communicated to the FDA and 2 Deferral Extensions (DE) were granted in August 2019 and October 2020. The second **Deferral Extension Granted** letter provided agreement to extend the Final Report Submission date for PMR 3002-1 to April 2021.

Fresenius Kabi has continued to work diligently on completing the final data collection and verification for this study to target submission of the final pediatric study report by April 2021.









Fresenius Kabi has been working closely over the past several years with the Division (DGIEP) to develop this study design and has now completed this challenging neonate study with the submission of the FSR by the due date. We are currently working diligently towards fulfilling the postmarketing requirement PMR 3002-1 for NDA 207648.

# **DEFERRAL EXTENSION REQUESTED:**

Fresenius Kabi is hereby requesting a deferral extension of 2 months for the from the FSR to PMR 3002-1 (submitted 30 April 2021). This additional time is in order to

As the final study report for the PREA PMR clinical study had been submitted within the milestone deadline

we respectfully request that the non-compliance

letter and the response not be posted at this time by FDA.

This electronic submission contains a file size of approximately 3 MB and is submitted through Electronic Submission Gateway (ESG).

Should you have any questions or require any further information please contact the undersigned. Sincerely,

Aparna Dagar Digitally signed by Aparna Dagar Disc C=US, st=Illinois, l=Llake Zurich, o=Fresenius Netzare, ou=II, n=Aparna Dagar, email=aparna.dagar@fresenius-kabi.com Reason: I am approving this docume Date: 2021.06.02 09:00:05 -05'00'

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