



Our STN: BL 125034/5284

**SUPPLEMENT APPROVAL**

June 23, 2021

California Department of Public Health  
Attention: Lynda Sutton, BS  
Cato Research SMS  
2000 Centregreen Way, Suite 300  
Cary, NC 27513

Dear Ms. Sutton:

We have approved your request submitted and received December 22, 2020, to supplement your Biologics License Application (BLA) under section 351(a) of the Public Health Service Act for Botulism Immune Globulin Intravenous (Human), to revise the prescribing information to update the interval between product and vaccine administration, removed use of luer-lock, clarified that 2 mL of sterile water for reconstitution is not supplied with BabyBIG, addition of alternative text to be 508-compliant, and additional minor changes including change in zip code and reordering of references within the label.

## **LABELING**

We hereby approve the draft content of labeling Package Insert submitted under amendment 4, dated June 7, 2021.

## **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, please submit the final content of labeling (21 CFR 601.14) in Structured Product Labeling (SPL) format via the FDA automated drug registration and listing system, (eLIST) as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the Package Insert submitted on June 7, 2021. Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As* at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

All final labeling should be submitted as Product Correspondence to this BLA, STN BL 125034 at the time of use and include implementation information on Form FDA 356h.

## **ADVERTISING AND PROMOTIONAL LABELING**

You may submit two draft copies of the proposed introductory advertising and promotional labeling with Form FDA 2253 to the Advertising and Promotional Labeling Branch at the following address:

Food and Drug Administration  
Center for Biologics Evaluation and Research  
Document Control Center  
10903 New Hampshire Ave.  
WO71–G112  
Silver Spring, MD 20993-0002

You must submit copies of your final advertising and promotional labeling at the time of initial dissemination or publication, accompanied by Form FDA 2253 (21 CFR 601.12(f)(4)).

All promotional claims must be consistent with and not contrary to approved labeling. You should not make a comparative promotional claim or claim of superiority over other products unless you have substantial evidence or substantial clinical experience to support such claims (21 CFR 202.1(e)(6)).

Please submit an amendment to all pending supplemental applications for this BLA that includes revised labeling incorporating a revised content of labeling that includes these changes.

We will include information contained in the above-referenced supplement in your BLA file.

Sincerely,

Tejashri Purohit-Sheth, MD  
Director  
Division of Clinical Evaluation  
and Pharmacology/Toxicology  
Office of Tissues and Advanced Therapies  
Center for Biologics Evaluation and Research