Our STN: BL 125730/0

MID-CYCLE COMMUNICATION AGENDA

OCTOBER 28, 2020

Stratatech Corporation
Attention: Mary Lokuta, PhD
510 Charmany Drive, Suite 150
Madison, WI 53719

Dear Dr. Lokuta:

Attached is a copy of the summary of your October 1, 2020 Mid-Cycle Communication Teleconference with CBER. This memorandum constitutes the official record of the Teleconference. If your understanding of the Teleconference outcomes differs from those expressed in this summary, it is your responsibility to communicate with CBER as soon as possible.

Please include a reference to STN BLA 125730 in your future submissions related to StrataGraft.

If you have any questions, please contact Candace Jarvis at (240) 402-8315.

Sincerely,

Raj Puri, PhD
Director
Division of Cell and Gene Therapy
Office of Tissues and Advanced Therapies
Center for Biologics Evaluation and Research

U.S. Food & Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

Mid-Cycle Communication Teleconference Summary

Application type and number: BLA 125730

Product name: StrataGraft-Allogeneic Keratinocyte Cell Line (NIKS), Seeded on Rat Collagen ((b) (4)) Conditioned with Human Dermal Fibroblasts ((b) (4))]

Proposed Indication: To promote durable wound closure & regenerative healing in the treatment of adult patients with (b) (4) thermal burns that contain intact dermal elements, and for which surgical intervention is clinically indicated

Applicant: Stratatech Corp

Meeting date & time: October 1, 2020, 11:00AM-12:00PM
Committee Chair: Steven Bauer, PhD
RPM/Meeting Recorder: Candace Jarvis

Attendees:

FDA Attendees:
Takele Agrawal, PhD, CBER/OTAT/DCGT
Steven Bauer, PhD, CBER/OTAT/DCGT
Hector Carrera, PhD, CBER/OCBQ/DMPQ
Haecin Chun, CBER/OCBQ/DIS/BMB
John Dennis, PhD, CBER/OTAT/DCGT
Melanie Eacho, PhD, CBER/OTAT/DCGT
Varsha Garnepudi, CBER/OCBQ/DBSQC
Jasmine Gatti, MD, CBER/OTAT/DCEPT
Candace Jarvis, CBER/OTAT/DRPM
Beatrice Kallungal, MS, CBER/OTAT/DRPM
Anthony Lorenzo, PhD, CBER/OTAT/DMPQ
Randa Melhem, PhD, CBER/OCBQ/DMPQ
Manette Niu, MD, CBER/OBE
Laura Ricles, Ph, CBER/OTAT/DCGT
Abigail Shearin, PhD, CBER/OTA/DCEPT
Rosa Sherafat-Kazemzadeh, MD, CBER/OTAT/DCEPT
Terrig Thomas, PhD, CBER/OTAT/DCGT
Kelly Wang, PhD, CBER/OTAT/DHT
Kerry Welsh, MD, CBER/OBE/DE/AEB
Lei Xu, MD, CBER/OTAT/DCEPT

Sponsor Attendees:
Stratatech
Steven Romano, MD, Executive VP and CSO
Mary Lokuta, PhD, Director, Regulatory Affairs
Sheryl Raukete, B.Pharm (Hons) Regulatory Affairs

Sharad Agarwal, Director, Regulatory Affairs, CMC
David Young, Sr. Director, Regulatory Affairs, CMC
Stephen Murray, MD, VP Research, Strategy, and Innovation
Allen Comer, PhD, Senior Director, Research, Strategy, and Innovation
Lee Shaughnessy, PhD, Quality Project Manager
Brian D Doty, VP, Pharmaceutical Sciences
Liam Keary, VP, Global Quality, Global Operations
Dan Feddersen, Director, Quality
Nilima Justice, MD, VP Pharmacovigilance
Regis Vilchez, MD PhD, VP Clinical Development
Janice Smiell, MD, Sr. Director, Clinical Development
Randi Rutan, RN BSN, Director, Clinical Development

BARDA
Narayan Iyer, Branch Chief, Burns
Sabrina Mcintyre, Contracting Officer
Franco Aveau, Sr. Program Analyst
Irene Tennant, Sr. Regulatory Affairs Analyst
Melissa Willens, Regulatory
Anna O'Rourke, Clinical SME
Anthony Tavera, Quality SME

Agenda

Discussion Summary

1. Any significant issues/major deficiencies, categorized by discipline, identified by the Review Committee to date.

Chemistry, Manufacturing, and Controls issues

a. Regarding rat tail collagen: on 9/24/2020, we issued IR#22 requesting validation reports for the specification testing performed for the rat-tail type I collagen in Table 1 of Section 3.2.S.2.3-5.

Meeting Discussion: Stratatech has requested all the relevant validation reports from vendors and is working closely with contract laboratories to gather validation information. They commit to submitting all the requested documents by October 30, 2020 as well as plan to submit the information on a rolling basis. Stratatech plans to submit full validation reports. FDA asked that Stratatech contact DMPQ by way of the RPM for the appropriate method for providing the information on the contractor they are receiving the validation summaries.

b. Regarding Stability of Cell Banks: you provide stability monitoring information for NIKS and NHDF cell banks in Section 3.2.S.2.3 Control of

Materials. Please provide clarification of acceptance criteria for stability assessments in terms of MCB and WCB (b) (4) , and other functional assessments and criteria to determine ongoing acceptability. Other than the information provided in this section, please describe any other information you may have on quality attributes that can be monitored to assess cell bank stability.

Meeting Discussion: Stratatech states the MCBs are (b) (4) after the last successful Working Cell Bank manufacture. WCBs are similarly (b) (4) .
FDA notes 3 issues: Identity testing, assessments in table 5 on end of production.
dc

c. Histology method validation

i. You state that since the histology method is a standard methodology widely used to assess tissue architecture, the method was verified for specificity but not validated. However, while not all attributes provided in ICH guideline Q2(R1) are applicable, the method should be validated for accuracy, repeatability, specificity, and intermediate precision.

ii. You state that the verification of specificity demonstrates that the histology method is capable of consistently identifying mature StrataGraft tissue from immature tissue. However, unlike the appearance and barrier function assays, histological examination did not identify immature tissue at process (b) (4). Consequently, the acceptance criteria of "(b) (4) " is not acceptable and needs to be modified to reflect the presence of an (b) (4) .

Meeting Discussion: Stratatech commits to developing and executing a validation protocol with the criteria as requested. The additional validation parameters may require the manufacture of additional tissue lots to obtain in-process tissue samples over a (b) (4) manufacturing period which should be completed by the end of November 2020.

d. Regarding Module 3.2.A.2, Viral and Adventitious Agents Safety Evaluation

i. Some of the documentation in this module lack safety information on the ingredients of animal origin such as BSA, Trypsin, (b) (4) used for production of (b) (4) . IR #15 was sent and a reply was requested by 9/28/2020. On 9/22/2020 the request

was partially addressed, and an extension was requested to address one of the questions by Oct 2, 2020.

Meeting Discussion: Stratatech will submit the remaining information of IR 15 regarding the Trypsin raw material on 10/2/20.
Update: Information submitted.

ii. No information is provided on validation of the assays and detection methods used for viral and adventitious agents safety evaluation of, (b) (4) . IR #14 was sent, and a reply was requested by 9/28/2020. On 9/28/2020, Stratatech requested an extension until Oct 9 2020 to provide the response.

Meeting Discussion: Stratatech has contracted the viral testing to (b) (4) and is compiling the validation reports. Validation summaries for the (b) (4) test methods were submitted. In addition, (b) (4) was used to evaluate sterility and (b) (4) testing labs were used to test for mycoplasma. (b) (4) has just provided the complete test method validation report which will be submitted to the BLA. (b) (4) was acquired by (b) (4) is no longer operational. Stratatech has requested that (b) (4) search the (b) (4) archives for the validation report for that test method. FDA has no concerns with this plan.

Clinical/CMC

a. Xenotransplantation exemption request: we are considering your proposal but have not yet finalized our position.

Meeting Discussion: There was no discussion of this comment.

2. Information regarding major safety concerns.

Post approval risk management plan for potential tumorgenicity -requested addition of tumorigenicity to pharmacovigilance plan with expedited reporting of dermal malignancies, IR # 17 - submitted 28 September 2020. The review team will review the revised PV plan and will follow up with questions.

Meeting Discussion: There was no discussion of this comment

3. Any information requests sent, and responses not received.

Information Request #14 due 9/28 request for extension until 9 Oct 2020
Updated: This IR was submitted on 9/30

Information Request #21 due 9/28 quantified data of (b) (4) will be submitted 11/6
Information Request #22 due 9/30
Updated: This IR was submitted on 9/30

4. Any new information requests to be communicated.

None at this time. If any additional information requests are identified, we will provide them by email.

Update: Information Request 23 was issued on October 5, 2020 and we received a response from Stratatech on October 9, 200. Information Request 24 was issued on October 8, 2020.

5. Proposed date(s) for the Late-Cycle meeting (LCM).

The LCM between you and the Review Committee is currently scheduled for November 12, 2020.

a. We intend to send the LCM meeting materials to you approximately 3 days in advanced of the LCM

6. Updates regarding plans for the AC meeting.

We do not plan to host an AC meeting.

7. Other projected milestone dates for the remainder of the review cycle, including changes to previously communicated dates.

Our target for communication of proposed labeling and any PMR/PMC requests remains January 4, 2021. However, communication may occur earlier than this date, if circumstances allow.