Dear Dr. Klein:

Please refer to your Biologics License Application (BLA) received September 30, 2022, submitted under section 351(a) of the Public Health Service Act (PHS Act) for Respiratory Syncytial Virus Vaccine.

**LICENSING**

We have approved your BLA for Respiratory Syncytial Virus Vaccine effective this date. You are hereby authorized to introduce or deliver for introduction into interstate commerce, Respiratory Syncytial Virus Vaccine under your existing Department of Health and Human Services U.S. License No. 2001. Respiratory Syncytial Virus Vaccine is indicated for active immunization for the prevention of lower respiratory tract disease (LRTD) caused by respiratory syncytial virus (RSV) in individuals 60 years of age and older.

The review of this product was associated with the following National Clinical Trial (NCT) numbers: NCT03529773, NCT03572062, NCT04071158, NCT05096208, and NCT05035212.

**MANUFACTURING LOCATIONS**

Under this license, you are approved to manufacture Respiratory Syncytial Virus Vaccine. You may label your product with the proprietary name ABRYSVO. The Respiratory Syncytial Virus (RSV) A and B stabilized prefusion F protein (RSVpreF) drug substances will be manufactured at (b) (4) The Lyophilized RSVpreF antigen component of the vaccine will be manufactured, filled, and lyophilized at (b) (4) The Sterile Water Diluent Component will be manufactured at (b) (4) The Lyophilized Antigen Component and the Sterile Water Diluent Component to form the final product ABRYSVO will be labeled and packaged with the vial adapter at (b) (4) and at (b) (4)
The vaccine will be supplied in cartons of 1, 5, and 10 kits, with each kit containing a vial of Lyophilized Antigen Component, a pre-filled syringe containing Sterile Water Diluent Component and a vial adapter.

**DATING PERIOD**

The dating period for the Lyophilized Antigen Component of Respiratory Syncytial Virus Vaccine shall be 18 months from the date of manufacture when stored at 2 – 8 °C. The dating period for the Sterile Water Diluent Component of Respiratory Syncytial Virus Vaccine shall be 24 months from the date of manufacture when stored at 2 – 8 °C. The dates of manufacture shall be defined as the dates of filling into final containers. Following the final sterile filtration, no reprocessing/reworking is allowed without prior approval from the Agency. The dating period for your drug substance shall be [b] (4) when stored at [b] (4). The expiration date for the packaged product, Lyophilized Antigen Component with Sterile Water Diluent Component, shall be dependent on the earliest expiration date of either component. Future dating period updates will be submitted as an annual report.

**COMPARABILITY PROTOCOL**

This approval includes comparability protocols as identified below:

For manufacture of Drug Substance (DS):

[b] (4)

For manufacture of Drug Product (DP):

- Comparability Protocol for Introduction of Alternate Filters at [b] (4)

Under 21 CFR 601.12(e), approval of a comparability protocol may justify a reduced reporting category for a particular change. In your annual report (21 CFR 601.12(d)), you should report information confirming that the change(s) meet(s) the requirements specified in your approved comparability protocol. Include the information described in 21 CFR 601.12(d)(3).

**FDA LOT RELEASE**

Please submit final container samples of the product and each kit component in final containers together with protocols showing results of all applicable tests. Please submit protocols showing results of all applicable tests. You may not distribute any lots of product until you receive a notification of release from the Director, Center for Biologics Evaluation and Research (CBER).

**BIOLOGICAL PRODUCT DEVIATIONS**
You must submit reports of biological product deviations under 21 CFR 600.14. You should identify and investigate all manufacturing deviations promptly, including those associated with processing, testing, packaging, labeling, storage, holding and distribution. If the deviation involves a distributed product, may affect the safety, purity, or potency of the product, and meets the other criteria in the regulation, you must submit a report on Form FDA 3486 to the Director, Office of Compliance and Biologics Quality, electronically through the eBPDR web application or at the address below. Links for the instructions on completing the electronic form (eBPDR) may be found on CBER's web site at https://www.fda.gov/vaccines-blood-biologics/report-problem-center-biologics-evaluation-research/biological-product-deviations:

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

MANUFACTURING CHANGES

You must submit information to your BLA for our review and written approval under 21 CFR 601.12 for any changes in, including but not limited to, the manufacturing, testing, packaging, or labeling of Respiratory Syncytial Virus Vaccine, or in the manufacturing facilities.

LABELING

We hereby approve the draft content of labeling including: Package Insert submitted under amendment 73, dated May 31, 2023, and the draft carton and container labels submitted under amendments 66 and 71, dated May 24, 2023, and May 30, 2023.

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 May 31, 2023. 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.
CARTON AND CONTAINER LABELS


All final labeling should be submitted as Product Correspondence to this BLA, STN BL 125769 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)).

ADVERSE EVENT REPORTING

You must submit adverse experience reports in accordance with the adverse experience reporting requirements for licensed biological products (21 CFR 600.80). In addition to the reporting requirements in 21 CFR 600.80, you must submit adverse experience reports for Guillain-Barré Syndrome (GBS) and other immune-mediated demyelinating conditions, and supraventricular arrhythmias as 15-day expedited reports to the Vaccine Adverse Event Reporting System (VAERS) at https://vaers.hhs.gov/. GBS and immune-mediated demyelinating conditions, and supraventricular arrhythmia reports must be submitted as 15-day expedited reports for 3 years following the date of product licensure. You must submit distribution reports as described in 21 CFR 600.81. For information on adverse experience reporting, please refer to the guidance for industry Providing Submissions in Electronic Format — Postmarketing Safety Reports.

For information on the postmarketing safety reporting requirements for combination products as described in 21 CFR 4, Subpart B, and the dates by which combination product applicants must comply with these requirements, please refer to the Postmarketing Safety Reporting for Combination Products webpage available at https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products.

PEDIATRIC REQUIREMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are deferring submission of your pediatric studies for children 0 to <2 years of age for this application because the pediatric studies should be delayed until additional safety or effectiveness data have been collected.

We are deferring submission of your pediatric studies for children 2 to <18 years of age for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required under section 505B(a) of the Federal Food, Drug, and Cosmetic Act (FDCA) are required postmarketing studies. The status of these postmarketing studies must be reported according to 21 CFR 601.28 and section 505B(a)(4)(C) of the FDCA. In addition, section 506B of the FDCA and 21 CFR 601.70 require you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

Label your annual report as an Annual Status Report of Postmarketing Requirements/Commitments and submit it to the FDA each year within 60 calendar days of the anniversary date of this letter until all Requirements and Commitments subject to the reporting requirements under section 506B of the FDCA are released or fulfilled. These required studies are listed below:

1. Deferred pediatric study under PREA (Study C3671016), to evaluate safety and effectiveness in children and adolescents 2 to <18 years of age

   Final Protocol Submission: September 30, 2023
2. Deferred pediatric study under PREA (Study C3671017), to evaluate safety and effectiveness in high-risk immunocompromised children 2 to <18 years of age

   Final Protocol Submission: September 30, 2024
   Study Completion Date: December 31, 2025
   Final Report Submission: June 30, 2026

3. Deferred pediatric study under PREA (Study C3671018), to evaluate safety and effectiveness in seropositive, then seronegative infants <2 years of age

   Final Protocol Submission September 30, 2024
   Study Completion Date: December 31, 2027
   Final Report Submission: June 30, 2028

4. Deferred nonclinical program under PREA to evaluate vaccine-associated enhanced respiratory disease

   Final Protocol Submission: June 30, 2023
   Study Completion Date: August 31, 2024
   Final Report Submission: September 30, 2024

Submit the protocols to your IND 17931, with a cross-reference letter to this BLA, STN BL 125769 explaining that these protocols were submitted to the IND.

Submit final study reports to this BLA STN BL 125769. For your PREA PMRs to be considered fulfilled, you must submit and receive approval of either an efficacy or a labeling supplement. For administrative purposes, all submissions related to these required pediatric postmarketing studies must be clearly designated as:

- **Required Pediatric Assessment(s)**

**POSTMARKETING REQUIREMENTS UNDER SECTION 505(o)**

Section 505(o) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute (section 505(o)(3)(A), 21 U.S.C. 355(o)(3)(A)).
We have determined that an analysis of spontaneous postmarketing adverse events reported under section 505(k)(1) of the FDCA will not be sufficient to assess a signal of a serious risk of Guillain-Barré syndrome (GBS).

Furthermore, the pharmacovigilance system that FDA is required to maintain under section 505(k)(3) of the FDCA is not sufficient to assess this serious risk. Therefore, based on appropriate scientific data, we have determined that you are required to conduct the following study:

5. A postmarketing retrospective cohort study utilizing Centers for Medicare and Medicaid Services (CMS) claims data, to evaluate the serious risk of Guillain-Barré syndrome (GBS) among approximately 1.5 million older adults vaccinated with ABRYSVO in the United States (Study C3671031).

We acknowledge the timetable you submitted on April 14, 2023, which states that you will conduct this study according to the following schedule:

- Final Protocol Submission: November 30, 2023
- Study Completion Date: May 31, 2029
- Final Report Submission: May 31, 2030

Please submit the protocol to your IND 17931, with a cross-reference letter to this BLA, STN BL 125769 explaining that this protocol was submitted to the IND. Please refer to the sequential number for each study and the submission number as shown in this letter.

Please submit the final study report to the BLA. If the information in the final study report supports a change in the label, the final study report must be submitted as a supplement to this BLA, STN BL 125769. For administrative purposes, all submissions related to this postmarketing study required under section 505(o) must be submitted to this BLA and be clearly designated as:

- Required Postmarketing Correspondence under Section 505(o)
- Required Postmarketing Final Report under Section 505(o)
- Supplement contains Required Postmarketing Final Report under Section 505(o)

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. In addition, section 506B of the FDCA and 21 CFR 601.70 require you to report annually on the status of any postmarketing commitments or required studies or clinical trials.
You must describe the status in an annual report on postmarketing studies for this product. Label your annual report as an **Annual Status Report of Postmarketing Requirements/Commitments** and submit it to the FDA each year within 60 calendar days of the anniversary date of this letter until all Requirements and Commitments subject to the reporting requirements of section 506B of the FDCA are fulfilled or released. The status report for each study should include:

- the sequential number for each study as shown in this letter;
- information to identify and describe the postmarketing requirement;
- the original milestone schedule for the requirement;
- the revised milestone schedule for the requirement, if appropriate;
- the current status of the requirement (i.e., pending, ongoing, delayed, terminated, or submitted); and,
- an explanation of the status for the study or clinical trial. The explanation should include how the study is progressing in reference to the original projected schedule, including the patient accrual rate (i.e., number enrolled to date and the total planned enrollment).

As described in 21 CFR 601.70(e), we may publicly disclose information regarding these postmarketing studies on our website at [http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Post-marketingPhaseIVCommitments/default.htm](http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Post-marketingPhaseIVCommitments/default.htm).

We will consider the submission of your annual report under section 506B of the FDCA and 21 CFR 601.70 to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in section 505(o) and 21 CFR 601.70. We remind you that to comply with section 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to periodically report on the status of studies or clinical trials required under section 505(o) may be a violation of FDCA section 505(o)(3)(E)(ii) and could result in regulatory action.

**POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B**

We acknowledge your written commitments as described in your letters of April 14, 2023, and May 12, 2023, as outlined below:

6. A Post-Marketing Active Surveillance Safety Study of Atrial Fibrillation Following ABRYSVO Among Older Adults in The Veterans Affairs Health System (Study C3671037).

   Final Protocol Submission: November 30, 2023

   Study Completion Date: February 28, 2027

   Final Report Submission: February 29, 2028
7. Complete the ongoing Phase 3 study to Evaluate the Efficacy, Immunogenicity, and Safety of ABRYSVO in Adults (Study C3671013) and to evaluate the safety and effectiveness of revaccination.

Final protocol submission: Submitted

Study Completion Date: March 31, 2025

Final Report Submission: September 30, 2025

Please submit clinical protocols to your IND 17931, and a cross-reference letter to this BLA, STN BL 125769, explaining that these protocols were submitted to the IND.

If the information in the final study report supports a change in the label, the final study report must be submitted as a supplement. Please use the following designators to prominently label all submissions, including supplements, relating to these postmarketing study commitments as appropriate:

- Postmarketing Commitment – Correspondence
- Postmarketing Commitment – Final Study Report
- Supplement contains Postmarketing Commitment – Final Study Report

For each postmarketing study subject to the reporting requirements of 21 CFR 601.70, you must describe the status in an annual report on postmarketing studies for this product. Label your annual report as an Annual Status Report of Postmarketing Requirements/Commitments and submit it to the FDA each year within 60 calendar days of the anniversary date of this letter until all Requirements and Commitments subject to the reporting requirements of section 506B of the FDCA are fulfilled or released. The status report for each study should include:

- the sequential number for each study as shown in this letter;
- information to identify and describe the postmarketing commitment;
- the original schedule for the commitment;
- the status of the commitment (i.e., pending, ongoing, delayed, terminated, or submitted); and,
- an explanation of the status including, for clinical studies, the patient accrual rate (i.e., number enrolled to date and the total planned enrollment).

As described in 21 CFR 601.70(e), we may publicly disclose information regarding these postmarketing studies on our website at http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Post-marketingPhaseIVCommitments/default.htm.

POST APPROVAL FEEDBACK MEETING

New biological products qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication
process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, please contact the Regulatory Project Managers for this application.

Sincerely,

David C. Kaslow, MD
Director
Office of Vaccines Research and Review
Center for Biologics Evaluation and Research