Date: May 16, 2025

To: File STN BL 125817/0

From: CAPT Edward Wolfgang, PhD, Chair, OVRR/DRMMR/RRB3

Through: David C. Kaslow, MD, Director, OVRR

Melissa Mendoza, JD, Director, OCBQ

Applicant: Novavax, Inc., US License No. 2349

Product: COVID-19 Vaccine, Adjuvanted (NUVAXOVID)

Subject: Addendum to the Summary Basis for Regulatory Action (SBRA) dated April 1, 2025, following CBER Office of the Center Director (OCD)/FDA Special Assistant to the Commissioner (SAC) revisions, to include changes to the indication and product labeling, as well as the addition of postmarketing commitment (PMC) #10, based on the CBER Director Decisional Memo dated May 16, 2025.

Executive Summary

Novavax, Inc.'s Biologics License Application (STN 125817/0) for their COVID-19 Vaccine, Adjuvanted (NUVAXOVID) had a PDUFA Action Goal Date of April 1, 2025. On April 1, 2025, the Interim Acting CBER Director and FDA SAC reviewed the Summary Basis of Regulatory Action (SBRA) and the Prescribing Information (USPI) and requested the approval of BLA 125817/0 be paused. This memorandum summarizes the regulatory activity that occurred after April 1, 2025. As requested by CBER OCD and FDA SAC, the Applicant submitted product labeling with a revised indication, and a new PMC to evaluate the clinical efficacy and safety and update the benefit-risk assessment of the intended marketed formulation of NUVAXOVID within the current epidemiological environment in a lower risk population aged 50 through 64 years. Additionally, the Applicant formally revised their application to update their Proposed Indication for Use. The justification for the requested changes can be found in the CBER Director Decisional Memo dated May 16, 2025.

Summary of Regulatory Activity

<u>New 506B PMC</u>

In response to the information requests from CBER OCD dated April 17, 2025, and May 9, 2025, the Applicant submitted the following 506B PMC agreement under amendment 110, received May 13, 2025, which was incorporated into the Approval Letter as 506B PMC #10:

A study entitled “A Phase 4, Randomized, Double-Blind, Placebo-Controlled, Post-Marketing Study to Evaluate the Efficacy and Safety of a Subvariant SARS-CoV-2 rS Vaccine Adjuvanted with Matrix-M in Adults 50 to < 65 years of Age Without High-Risk Conditions for Severe COVID-19” to evaluate the clinical efficacy and safety and update the benefit-risk assessment of the intended marketed formulation of NUVAXOVID within the current epidemiological environment in a lower risk population aged 50 through 64 years.

Study Initiation: November 30, 2025
Interim Results: May 31, 2026
Study Completion: July 31, 2026
Final Report Submission: January 31, 2027
Benefit-Risk Assessment Submission: May 31, 2027

The Applicant’s 506B PMC is consistent with CBER OCD’s request as detailed in the CBER Director Decisional Memo dated May 16, 2025.

Revised Indications and Usage, and Associated Labeling

In response to the May 7, 2025, teleconference between the Applicant and CBER Center Director and the information requests from CBER OCD dated May 9, 2025, and May 15, 2025, the Applicant submitted the following in amendment 111, received May 15, 2025:

- Revised USPI, to include a change in indications and usage from:

  “NUVAXOVID is a vaccine indicated for active immunization to prevent coronavirus disease 2019 (COVID-19) caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) in individuals 12 years of age and older.”

  to:

  “NUVAXOVID is a vaccine indicated for active immunization to prevent coronavirus disease 2019 (COVID-19) caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) in adults 65 years and older.

  NUVAXOVID is indicated for individuals 12 through 64 years who have at least one underlying condition that puts them at high risk for severe outcomes from COVID-19.”

- Revised carton label, to include changes in the age for use from:

  “For 12 years of age and older”

  to:

  “For 65 years of age and older
  For people 12 through 64 years at high risk for severe COVID-19”

The Applicant's revised labeling is consistent with CBER OCD's request as detailed in the CBER Director Decisional Memo dated May 16, 2025. The Applicant formally revised their application to update their Proposed Indication for Use in Form FDA 356h in amendment 112, dated May 16, 2025.

Communications and Submissions Received After April 1, 2025

Tables 1 and 2 include a listing of the communications and the amendments received during the BLA review period after April 1, 2025.

Table 1: Communications

Date	Format	Summary
04/04/2025	Teleconference	FDA discussed concerns regarding Novavax's COVID-19 Vaccine, Adjuvanted (NUVAXOVID) and the need for additional information.
04/17/2025	Information Request/Advice	CBER request for additional 506B PMC study to evaluate clinical efficacy of the intended marketed formulation of NUVAXOVID.
05/07/2025	Teleconference	CBER Center Director and the Applicant discussed change to NUVAXOVID proposed indication.
05/09/2025	Information Request/Advice	CBER request for revised 506B PMC, and a revised USPI to include a new indication and usage.
05/15/2025	Information Request/Advice	CBER request for a revised USPI and request for carton labels.
05/16/2025	Information Request	CBER request to formally revise their application to update their Proposed Indication for Use.

Table 2: Submissions Received

Date Received	Submission	Summary
04/24/2025	STN 125817/0.109	Response to IR dated 04/17/2025
05/13/2025	STN 125817/0.110	Response to IR dated 05/09/2025
05/15/2025	STN 125817/0.111	Response to IR dated 05/15/2025
05/16/2025	STN 125817/0.112	Response to IR dated 05/16/2025