U.S. FOOD & DRUG ADMINISTRATION

LATE-CYCLE MEETING MEMORANDUM

Our STN: BL 125817/0

Novavax Inc.
Attention: Ms. Kathleen Callahan
700 Quince Orchard Road
Gaithersburg, MD 20878

Dear Ms. Callahan:

Attached is a copy of the memorandum summarizing your December 17, 2024, Late-Cycle Meeting teleconference with CBER. This memorandum constitutes the official record of the meeting teleconference. If your understanding of the meeting teleconference outcomes differs from those expressed in this summary, it is your responsibility to communicate with CBER in writing as soon as possible.

Please include a reference to the appropriate Submission Tracking Number (125817) in future submissions related to the subject product.

If you have any questions, please contact (b) (6) and (b) (6) by email at (b) (6) @fda.hhs.gov and (b) (6) @fda.hhs.gov, respectively.

Sincerely,

(b) (6)
(b) (6)
Office of Vaccines Research and Review
Center for Biologics Evaluation and Research

Late-Cycle Meeting Materials

Meeting Date and Time: December 17, 2024, 3:30 PM – 5:00 PM ET

Meeting Location: Teleconference

Application Number: 125817/0

Product Name: COVID-19 Vaccine, Adjuvanted

Indication: For the prevention of COVID-19 caused by SARS-CoV-2 in individuals 12 years of age and older.

Applicant Name: Novavax Inc.

Meeting Chair: (b) (6)

Meeting Recorder: (b) (6)

FDA ATTENDEES

(b) (6)			

NOVAVAX ATTENDEES

Henrietta Ukwu	Iksung Cho	Qianyi Zhang	Jared Lantzy
Ruxandra Draghia Akli	Wayne Woo	Rick Crowley	Jannine Cobb
Rober Walker	Denny Kim	Marco Cacciuttolo	Kathleen Callahan
Raburn Mallory	(b) (4)	Alex Parnell	

SANOFI ATTENDEES

(b) (4)

BACKGROUND

PDUFA BLA goal date: April 1, 2025

In preparation for this meeting, CBER issued the Late-Cycle Meeting Materials on December 6, 2024.

DISCUSSION

Following a quick introduction, a brief history of the regulatory submissions and events below were mentioned:

- On October 11, 2024, CBER sent an additional IR after reviewing Novavax's August 29, 2024, response to CBER's July 29, 2024, comments. In the IR, CBER communicated concerns that the discrepancies and deficiencies described may preclude a complete review of the datasets (IR #27).
- On December 6, 2024, a teleconference between Novavax and CBER took place during which CBER discussed concerns with the datasets submitted under amendment 33 (SN 0035). Additionally, CBER provided clarifications and responses to Novavax's technical questions.
- On December 11, 2024, CBER's discussion points and clarifications from the December 6, 2024, teleconference was emailed to Novavax.
- On December 16, 2024, Novavax emailed power point slides which outlined Novavax's submission plans to provide updated clinical datasets for study -301 and an updated USPI as part of their response to CBER's IR #27.

After CBER's opening remarks, Novavax presented the slides emailed to CBER on December 16, 2024. The slides are provided below for completeness.

Slide 1: Novavax Impact Assessment of Dataset Request

➢ In terms of efficacy, moving event terms suggestive of "COVID-like illness" from the AE dataset to the CE dataset did not result in any change to the per protocol cases that were specified to quantify the primary analysis of vaccine efficacy or important secondary efficacy analyses.

➢ For the safety analyses, the number of AEs reported will change due to moving of COVID-19 event terms from the AE dataset to the CE dataset and adding asymptomatic COVID-19 records to the AE dataset but will not result in the generation of any new safety signals for the vaccine.

➢ The changes made to the submitted data will **not result in a meaningful change to the overall benefit-risk assessment for the vaccine** and supports ongoing review of the application under the current timeline.

Slide 2: Summary of Complete Response to IR #27 Related to Clinical Datasets

To complete the response to outstanding BLA IR #27 regarding the clinical datasets, Novavax plans to submit:

- Response document for BLA IR #27 by December 23, 2024;
- Updated SDTM dataset packages for all affected studies by December 31, 2024;
- Updated ADAM dataset packages for all affected studies by January 08, 2025; and
- Updated tables and CSR addendums for all affected studies, as well as updated USPI by January 26, 2025.

Does CBER agree that receipt of deliverables as outlined above supports completion of review to achieve the April 1st PDUFA date?

Following Novavax's slide presentation, CBER reminded Novavax that the purpose of the LCM is not to discuss new submitted information, and that no regulatory decisions or responses to Novavax's question(s) would be provided during the meeting. Instead, CBER requested that Novavax submit their proposal as an amendment to BLA 125817 and that a formal response from CBER can be expected once the team's review of the proposal is complete.

1. Substantive Review Issues to be discussed during the LCM

The following substantive review issues have been identified to date:

a. Potential discrepancies and deficiencies that may preclude a complete review of the current datasets.

b. Recently proposed estimates for the assay and CCIT validation report submission timelines included in Novavax's December 9, 2024, correspondence:

   i. JN.1 (b) (4) testing results from the *in vitro* and *in vivo* assays: submission to the BLA on January 22, 2025
   ii. CCIT via (b) (4) method and validation report: submission to the BLA on January 31, 2025

Novavax's proposed submission dates are close to the action due date of the application. This may pose a risk that insufficient time will be available for proper review of the data prior to the action due date and result in designation of the submission(s) as a major amendment or the need to issue a complete response letter.

Meeting Discussion:
CBER summarized that on December 9, 2024, Novavax sent an email with new submission dates. These included the testing results for the previously manufactured JN.1 (b) (4) (Lot (b) (4)) using the (b) (4) *in vitro*

and *in vivo* (b) (4) had been pulled forward to allow submission by January 22, 2025**,** with submission of the qualification report for the *in vivo* (b) (4) test by December 16, 2024. Additionally, the CCIT information will be submitted by January 31, 2025. Novavax was informed on December 16, 2024, that the new submission dates were acceptable.

For inspections: We have no issues to report on the status of (b) (6) inspections. However, if we learn of any issues from the outstanding facility inspections, the agenda will be modified accordingly.

Meeting Discussion:
There was no further discussion of this item during the telecon. This response is now considered final.

Amendments: We acknowledge your amendments submitted/received. A review of these amendments is ongoing.

Meeting Discussion:
There was no further discussion of this item during the telecon. **This response is now considered final.**

2. Advisory Committee Meeting

An Advisory Committee meeting is not planned.

Meeting Discussion:
There was no further discussion of this item during the telecon. **This response is now considered final.**

3. Risk Management Actions (e.g., REMS, the ability of adverse event reporting and CBER's Sentinel Program to provide sufficient information about product risk)

We have not identified any issues related to risk management. We do not believe that a risk management action (e.g., REMS) is needed at this time.

Meeting Discussion:
There was no further discussion of this item during the telecon. **This response is now considered final.**

4. Information Requests (IRs):

October 11, 2024, IR regarding: 1) the second round of STDM and ADaM dataset comments for study 301 and 2) comments on CSR and datasets for study 311.

October 28, 2024, IR confirming that the updated shipping-validation report should also be submitted to the BLA.

November 13, 2024, IR regarding a Postmarketing Study for Long-Term Outcomes After Myocarditis

November 19, 2024, IR regarding Milestone Dates for Post Authorization Studies

Meeting Discussion:
There was no further discussion of this item during the telecon. This response is now considered final.

5. **Postmarketing Requirements/Postmarketing Commitments**

You will be informed by February 4, 2025, of any PMRs and by February 28, 2025, of any PMCs.

Meeting Discussion:
There was no further discussion of this item during the telecon. This response is now considered final.

6. **Major labeling issues**

The COVID-19 Vaccine, Adjuvanted package insert, outer carton and container labels are currently under review. Proposed labeling comments or requests for revisions will be communicated by February 28, 2025.

Meeting Discussion:
There was no further discussion of this item during the telecon. This response is now considered final.

7. **Review Plans**

Reviews are expected to be completed on time. However, the final review will depend on the information received in upcoming submissions.

Meeting Discussion:
There was no further discussion of this item during the telecon. This response is now considered final.

8. **Applicant Questions**

Meeting Discussion:
Novavax confirmed that they had no further questions concerning the remaining components of the LCM agenda.

9. Wrap-up and Action Items

This application has not yet been fully reviewed by the signatory authorities, Division Directors, and Review Committee Chair and therefore, this meeting did not address the final regulatory decision for the application. Novavax agreed to submit a formal request as an amendment to BLA 125817 for CBER to review their new proposed timelines that address outstanding components in CBER IR #27 issued on October 11, 2024. CBER will review the information once submitted and provide Novavax with feedback.