



Our STN: BL 125822/0

**MID-CYCLE COMMUNICATION  
SUMMARY**

April 04, 2025

Kedrion SpA  
Attention: Erin Stokes, PhD  
Parker Plaza  
400 Kelby Street, 11<sup>th</sup> Floor  
Fort Lee, NJ 07024

Dear Dr. Stokes:

Attached is a copy of the summary of your March 24, 2025 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 125822/0 in your future submissions related to Immune Globulin Intravenous (Human), 10% Solution (QIVIGY).

If you have any questions, please contact Julia Wright by email at [Julia.Wright@fda.hhs.gov](mailto:Julia.Wright@fda.hhs.gov).

Sincerely,

Beatrice Kallungal, MS  
Director  
Division of Review Management and Regulatory Review 1  
Office of Review Management and Regulatory Review  
Office of Therapeutic Products  
Center for Biologics Evaluation and Research

## Mid-Cycle Communication Teleconference Summary

**Application Type and Number:** BLA 125822/0

**Product Name:** Immune Globulin Intravenous (Human), 10% Solution (b) (4)

**Proposed Indication for Use:** Primary Immune Deficiency (PID)

**Applicant:** Kedrion SpA

**Meeting Date & Time:** March 24, 2025, from 12:00-12:30 PM EST

**Committee Chair:** Jennifer Reed, PhD

**RPM:** Julia Wright, MHA, RN

### FDA Attendees:

Yambasu Brewah, MS, CBER/OTP/OPPT/DPD

Lu Deng, PhD, CBER/OTP/OPPT/DPD

Nancy Eller, MS, CBER/OTP/OPPT/DPD

Adriane Fisher, MBA, MPH, CBER/OTP/ORMRR

Christine Harman, CBER/OCBQ/DMPQ

Michael Kennedy, PhD, CBER/OTP/OPPT/DPD

Jianping Li, PhD, CBER/OTP/OPPT/DPD

Rommel Maglalang, CBER/OTP/ORMRR

Zainab Mansaray-Storms, CBER/OCBQ/DMPQ

Ewa Marszal, PhD, CBER/OTP/OPPT/DPD

Tyree Newman, MDiv, CBER/OTP/ORMRR

Malgorzata (Margaret) Norton, MS, CBER/OTP/OPPT/DPD

Lisa Pham, CBER/OCBQ/DMPQ

Jennifer Reed, PhD, CBER/OTP/OPPT/DPD

Kam Sang Kwok, PhD, CBER/OTP/OPPT/DPD

Dorothy Scott, MD, CBER/OTP/OPPT/DPD

Debra Vause, CBER/OCBQ/DMPQ

Nicole Verdun, MD, CBER/OTP

Maria Virata, PhD, CBER/OTP/OPPT/DPD

Julia Wright, NHA, RN, CBER/OTP/ORMRR

Hailing Yan, MS, CBER/OTP/OPPT/DPD

Pei Zhang, PhD, CBER/OTP/OPPT/DPD

Lilin Zhong, MS, CBER/OTP/OPPT/DPD

### Applicant Attendees:

Erin Stokes, PhD Senior Manager, US Regulatory Affairs (myself)

Alberto Dessy, PhD Regulatory Affairs Development & US Director

Paloma De Miguel, PhD Chief Medical and Regulatory Affairs Officer

Tommaso Paoli, PhD Global Quality Senior Vice President

Barbara Giulianetti, PhD Quality Senior Director Bolognana (b) (4) sites

Sara Del Carlo, PhD Bolognana (b) (4) Quality Control Senior Manager

Nunzio Di Paolo Validation Manager

Michele Sotgiu, PhD Global Senior Pharmaceutical Development Director

Francesco Pierantoni, Global Senior Manager Analytical Development

Alessandro Crudeli, Process Development and Industrialization Manager

Elisa Moretti, Pathogen Safety Director  
David Gambelli, Site Leader Bolognana Plant  
Fabrizio Garetto, Klg10 Project Leader  
Carla Scali, PhD Preclinical Pharmacology and Toxicology Manager, Research & Innovation  
Alessandro Bizzarri, Global Pharmacovigilance Director and Kedrion SpA EU QPPV  
Nisha Jain, MD VP, Global Clinical Development and Strategy

### Discussion Summary:

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

### Chemistry, Manufacturing, and Controls

- Manufacturing process validation is incomplete.
  - The cumulative process and hold time study did not include the following conditions:
    - (b) (4) as the starting material.
    - drug substance (b) (4) stored for (b) (4)
  - Lack of evidence supporting the proposed (b) (4) for Ultrafiltration/Diafiltration (UF/DF) (b) (4) to ensure the manufacturing process is under control.
  - Sources of leachable (b) (4) in (b) (4) DP, and whether these are similar in clinical versus PPQ/commercial batches, are not clear.

### Meeting Discussion for Agenda item 1:

The Applicant intends to submit additional data supporting (b) (4) extended hold times as a BLA amendment. The Applicant will submit additional information regarding leachable impurities. The Applicant agreed to (a) evaluating the range of (b) (4) present in commercial-scale batches of drug product (n=(b) (4)), and (b) investigating means to reduce (b) (4) contaminants in drug product, as post-marketing commitments.

The Applicant intends to withdraw the proposed (b) (4) for the UF/DF (b) (4) and will remove all mentions of (b) (4) UF/DF (b) (4) in the eCTD dossier. The Applicant will continue the concurrent validation study for the UF/DF (b) (4) and agrees to amending the study protocol by (b) (4)

(b) (4) based on protocol and data review, and submitting the interim reports to the Agency.

2. Information regarding major safety concerns.

- No major safety concerns have been identified at this time.

**Meeting Discussion for Agenda item 2:**

There was no discussion of this question during the meeting.

3. Preliminary Review Committee thinking regarding a) risk management, b) the potential need for any post-marketing requirement(s) (PMRs), and/or safety-related PMCs, and c) the ability of adverse event reporting and CBER's Sentinel Program to provide sufficient information about product risk.

- PREA PMR for the deferred pediatric study needed.
- Potential CMC PMCs will be discussed with the firm.
- No REMS is needed at this time.

**Meeting Discussion for Agenda item 3:**

There was no discussion of this question during the meeting.

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

- 2 CMC IRs sent March 25<sup>th</sup> & 31<sup>st</sup>: Due: April 7<sup>th</sup> & 9<sup>th</sup> 2025
- 1 OBPV IR sent March 31<sup>st</sup>. Due: April 8<sup>th</sup>.2025

**Meeting Discussion for Agenda item 4:**

There was no discussion of this question during the meeting.

5. Any new information requests to be communicated.

- None at this time.

**Meeting Discussion for Agenda item 5:**

There was no discussion of this question during the meeting.

6. Proposed dates for the Late-Cycle meeting (LCM).

- The Late-Cycle meeting is scheduled on June 11, 2025, from 11:00 AM -12:00 PM EST.
- We intend to send the Late-Cycle meeting materials to you approximately 10 days in advance of the meeting, on May 30, 2025.
- If these timelines change, we will communicate updates during the course of the review.

**Meeting Discussion for Agenda item 6:**

There was no discussion of this question during the meeting.

7. Updates regarding plans for the AC meeting.

- There are no plans for an AC meeting at this time.

**Meeting Discussion for Agenda item 7:**

There was no discussion of this question during the meeting.

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

- Labeling Target Date: August 27, 2025
- Target Date to communicate anticipated PMR: August 01, 2025
- PMC Target Date: August 27, 2025
- PDUFA Date: September 26, 2025

**Meeting Discussion for Agenda item 8:**

There was no discussion of this question during the meeting.

9. Discuss status of inspections (GMP, BiMo, GLP) including issues identified that could prevent approval. **Note:** Ensure notification of intent to inspect manufacturing facilities has been issued.

- GMP pre-licensing inspection is scheduled for April 1-10, 2025.
- BiMo: We have no issues to report on the status of inspections.

**Meeting Discussion for Agenda item 9:**

There was no discussion of this question during the meeting.