DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

SUPPLEMENT APPROVAL

Our STN: BL **103821/5344**

Emergent BioDefense Operations Lansing LLC
Attention: Brenda Wolling
3500 N. Martin Luther King Jr. Blvd.
Lansing, MI 48906

Dear Ms. Wolling:

We have approved your request to supplement your biologics license application for Anthrax Vaccine Adsorbed to include post-exposure prophylaxis (PEP) of disease resulting from suspected or confirmed *Bacillus anthracis* exposure, when combined with the recommended course of antimicrobial therapy in persons 18 through 65 years of age.

The review of this product was associated with the following National Clinical Trial (NCT) numbers: 01491607 and 01753115.

Under 21 CFR 201.57(c)(18), patient labeling must be reprinted at the end of the package insert. We request that the text of information distributed to patients be printed in a minimum of 10-point font.

Please provide your final content of labeling in Structured Product Labeling (SPL) format and include the carton and container labels. In addition, please submit three original paper copies for carton and container final printed labeling. All final labeling should be submitted as Product Correspondence to this BLA at the time of use (prior to marketing) and include implementation information on FDA Form 356h [OPTION: and FDA Form 2567 as appropriate].

In addition, please submit the final content of labeling (21 CFR 601.14) in SPL format via the FDA automated drug registration and listing system, (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Information on submitting SPL files using eLIST may be found in the guidance for industry titled, "SPL Standard for Content of Labeling Technical Qs and As at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

You may submit two draft copies of the proposed introductory advertising and promotional labeling with an FDA Form 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 advertisement 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)).

Please submit an amendment to all pending supplemental applications for this BLA that include revised labeling incorporating a revised content of labeling that includes this change.

SUBPART H APPROVAL REQUIREMENTS
Approvals under 21 CFR Part 601, Subpart H (Approval of Biological Product When Human Efficacy Studies Are Not Ethical or Feasible) are subject to three requirements:

1. *Approval with restrictions to ensure safe use*

   This subsection permits the Agency to require postmarketing restrictions as are needed to ensure safe use of the biological product, commensurate with the specific safety concerns presented by the biological product. We have concluded that Anthrax Vaccine Adsorbed can be safely used without restrictions on distribution or use.

2. *Information to be provided to patient recipients*

   This subsection requires applicants to prepare labeling to be provided to patient recipients for biological products approved under this subpart. We have concluded that the FDA-approved Patient Labeling for BioThrax meets the requirements of this subsection. We remind you that the Patient Labeling must be available with the product to be provided, when possible, prior to administration or dispensing of the biological product for the use approved under this subpart.

3. *Postmarketing Studies*

   This subsection requires applicants to conduct postmarketing studies, such as field studies, to verify and describe the biological product's clinical benefit and to assess its safety when used as indicated when such studies are feasible and ethical. Such postmarketing studies would not be feasible until an exigency arises. We note that a postmarket study is required to assess the clinical benefit and safety of BioThrax in a post-exposure setting should an anthrax event occur in the United States.

We remind you of your postmarketing requirement specified in your submission dated October 30, 2014. This requirement, along with agreed upon completion dates, is listed below.

POSTMARKETING REQUIREMENTS

1. To conduct a field study to evaluate the efficacy and safety of BioThrax for the post-exposure prophylaxis indication when administered concurrently with a licensed regimen of antimicrobials following a suspected and/or confirmed exposure to *Bacillus anthracis*.

Final Protocol Submission:	November 30, 2016
Study/Trial Completion:	To be determined should an event occur.
Final Report Submission:	To be determined should an event occur.

Please submit the protocols to your IND 13068, with a cross-reference to this BLA. Submit final reports to this BLA as a supplemental application. For administrative purposes, all submissions related to this required Subpart H postmarketing study must be clearly designated as:

- **Required Postmarketing Protocol - Subpart H Postmarketing Requirements**
- **Required Postmarketing Correspondence - Subpart H Postmarketing Requirements**
- **Required Postmarketing Final Report - Subpart H Postmarketing Requirements**

Your Subpart H study, under 601.91(b)(1), is a required postmarketing study. The status of this postmarketing study must be reported according to 21 CFR 601.70. Label your annual report an "**Annual Status Report of Postmarketing Study 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 Federal, Food, Drug, and Cosmetic Act 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 Web site at http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Post-marketingPhaseIVCommitments/default.htm.

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.

Because the biological product for this indication has an orphan drug designation, you are exempt from this requirement.

We will include information contained in the above-referenced supplement in your biologics license application file.

Sincerely yours,

Wellington Sun, M.D.
Director
Division of Vaccines and
Related Products Applications
Office of Vaccines
Research and Review
Center for Biologics
Evaluation and Research

Attachment: Approved Final Draft Labeling