QUERY 1

In amendment 54 to BLA STN 125742/0 (Seq 0056, dated 08/17/2021), you agreed to perform an endotoxin test (b) (4) and explained you will establish the method and perform verification studies at your drug product release testing facilities. Please submit information and data to support this method along with a draft updated lot release protocol template, to CBER as a CBE-30 supplement in accordance with 21 CFR 601.12(c). Please acknowledge our request and keep us updated on the progress of your studies so we can anticipate the submission. If you would like to engage in further discussions, please let us know.

RESPONSE 1

The Sponsor acknowledges this request and commits to submit the new method and supporting information/data as a CBE-30 supplement to the BLA by 06Dec2021.

Literature References

None

SUPPORTING DOCUMENTATION

New or Replaced Supporting Documentation

None

Previously submitted supporting documentation

None

QUERY 2

In amendment 50 to BLA STN 125742/0 (Seq 0050, dated 08/16/2021) you stated that you would include specific parameters/instructions for (b) (4) in the CGE integrity test method (TM100010392). Please acknowledge that you will submit the revised SOP to your IND 19736. The difference in (b) (4) used in assay validation and Lot Release Protocols submitted to CBER recently (lots FD7220, FE3592 and FF2587) indicates that a requirement for a specific (b) (4) has not been established, giving the appearance that your current method allows for (b) (4) parameters that could potentially result in (b) (4). Since there is (b) (4) (b) (4) we recommend you include instructions on what actions to take when (b) (4) (b) (4) (b) (4) (b) (4) to minimize (b) (4) and ensure consistency of the method. We encourage you to perform robustness studies with varied sample preparation and instrument conditions to decide on the optimal parameters. Please contact CBER if you wish to discuss your approach.

RESPONSE 2

The Sponsor acknowledges this request and commits to submit additional information and data as a supplement to the BLA. Potential to include (b) (4) (b) (4) parameters will expand the scope beyond what was originally planned when proposing a supplement by 30 September 2021, however.

Further discussions between CBER and Pfizer scientists are essential to define the scope of the changes being requested. We propose to have these discussions by 24 Sept 2021, based on availability of CBER personnel, and to submit the additional (b) (4) instructions on an agreed upon timeline, but not later than June 2022.

Literature References

None

SUPPORTING DOCUMENTATION

New or Replaced Supporting Documentation

None

Previously submitted supporting documentation

None