CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

125319

OTHER REVIEW(S)

Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research

Office of Biotechnology Products
Federal Research Center
Silver Spring, MD
Tel. 301-796-4242

Memorandum

PROJECT MANAGER'S REVIEW

Application Number: STN 125319/0

Name of Drug: Ilaris®

Sponsor: Norvartis Pharmaceutical Corporation

Material Reviewed: Ilaris® (canakinumab) Carton and Container Labels

OBP Receipt Date: April 8, 2009

Amendment Reviewed:

Background:

STN 125319/0 for canakinumab is an original Biologic License Application (BLA) indicated for the treatment of Cryopyrin-Associated Periodic Syndromes (CAPS), in adults and children aged 4 years and older. The product is a sterile, white lyophilized powder, for subcutaneous injection after reconstitution with the 1.0 ml of preservative-free Sterile Water for Injection. The resulting solution provides a clear to slightly opalescent and is a colorless 150mg/ml solution.

Labels Reviewed:

Ilaris® (canakinumab) Container Label
Vial label
Ilaris® (canakinumab) Carton Label
Carton label

Review

The carton and container labels for Ilaris® (canakinumab) were reviewed and found to be adequate under most of the following regulations: 21 CFR 610.60 through 21 CFR

1 Page(s) Withheld

_____ Trade Secret / Confidential (b4)

_X_ Draft Labeling (b4)

_____ Draft Labeling (b5)

_____ Deliberative Process (b5)

Conclusions

The following deficiencies were noted in the initial review of the canakinumab container and carton labels:

- Please add the statement "No U.S. standard of potency" to the carton label to comply with 21 CFR 610.61(r).
- Please bold and capitalize the statement "Do Not Freeze per 21 CFR 201.15 on all labeling.
- Please indicate how the label is affixed to the vial and where the visual area of inspection is located as per 21 CFR 610.60 (e).
- Please remove the statement, ——— and add the appropriate divided manufacturer information to comply with 21 CFR 610.63 on all labeling. b(4)
- Please revise the dosage statement, "See package insert for DOSAGE and ADMINISTRATION and PREPARATION for ADMINISTRATION." on the carton to read, "Please see package insert for dosage, dilution, and administration." for clarification and improved readability.
- Please revise the strength presentation of 150 mg/mL to 150 mg to accurately describe the product and comply with 21 CFR 610.61(g) and 21 CFR 201.51on all carton and container labels. In addition, please revise the package insert, section 3. "DOSAGE FORMS AND STRENGTHS."
- Please revise and move the statement, "Injection for Subcutaneous Use" to "For Injection" to comply with Per United States Pharmacopeia, 5/1/09-8/1/09, USP 32/NF27, General Chapter, Injection <1>above the strength designation. Additionally, please add the statement "For Subcutaneous Use" under the strength designation. These changes will improve readability.

  Ilaris
  (canakinumab)
  For Injection
  150 mg
  For Subcutaneous Use

- If a medication guide is required, please add the Statement "Dispense the enclosed Medication Guide to each patient." to comply with 21 CFR 208.24 and 21 CFR 610.60.
- Please provide font size configurations for all carton and container labels.

- Please revise the statement, "Carton of 1 vial" to read "Single vial carton" in Section 16, "HOW SUPPLIED/STORAGE AND HANDLING", for readability.

5/20/09

Kimberly Rains, Pharm.D
Regulatory Project Manager
CDER/OPS/OBS

Comment/Concurrence: I agree with the deficiencies listed above. In addition, please see the following comment:

- In the carton label, please change the statement: [redacted] b(4)

  To: **If not used within 60 minutes after reconstitution, the vial should be kept at 2-8 °C (36-46 °F) up to 4 hours, and should be protected from light.**

Ruth Cordoba-Rodriguez, Ph.D.
Product Reviewer
Division of Monoclonal Antibodies
CDER/OPS/OBP

Patrick Swann, Ph.D.
Deputy Director
Division of Monoclonal Antibodies
CDER/OPS/OBP

REGULATORY PROJECT MANAGER LABELING REVIEW (PHYSICIAN LABELING RULE)

Division of Anesthesia, Analgesia, and Rheumatology Products

Application Number: BLA 125319

Name of Drug: Ilaris (canakinumab)

Applicant: Novartis Pharmaceuticals.

Material Reviewed:

Submission Date: December 15, 2008

Receipt Date: December 17, 2008

Submission Date of Structure Product Labeling (SPL): December 15, 2008

Type of Labeling Reviewed: WORD

Background and Summary

This review provides a list of revisions for the proposed labeling that should be conveyed to the applicant. These comments are based on Title 21 of the Code of Federal Regulations (201.56 and 201.57), the preamble to the Final Rule, Guidance(s), and FDA recommendations to provide for labeling quality and consistency across review divisions. When a reference is not cited, consider these comments as recommendations only.

Review

The following issues/deficiencies have been identified in the proposed labeling.

1. Include "Revised: Month/Year" at the end of the **HIGHLIGHTS**. The revision date will be month/year the application is approved.

2. Add the sentence "* Sections or subsections omitted from the full prescribing information are not listed" at the end of the **FULL PRESCRIBING INFORMATION: CONTENTS* section**.

Recommendations

The labeling deficiencies, were communicated to the Sponsor during labeling negotiations and the label was revised with the recommended changes.

Ramani Sista
Regulatory Project Manager

Supervisory Comment/Concurrence:

Parinda Jani 6.17.09
Parinda Jani
Chief, Project Management Staff

Drafted: RS/061709
Revised/Initialed:STR 061709
Finalized:
Filename: CSO Labeling Review Template (updated 1-16-07).doc
CSO LABELING REVIEW OF PLR FORMAT

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications

****PRE-DECISIONAL AGENCY MEMO****

DATE: MAY 8, 2009

To: Ramani Sista - Regulatory Project Manager
Carolyn Yancey – Medical Officer
Division of Anesthesia, Analgesia, and Rheumatology Products (DAARP)

From: Mathilda Fienkeng – Regulatory Review Officer
Kendra Jones – Regulatory Review Officer
Division of Drug Marketing, Advertising, and Communications (DDMAC)

Through: Andrew Haffer – Regulatory Review Officer
Sam Skariah – Regulatory Review Officer
Division of Drug Marketing, Advertising, and Communications (DDMAC)

Subject: **DDMAC draft labeling comments**
BLA 125319/0 Ilaris® (canakinumab) Injection for subcutaneous use

DDMAC has reviewed the proposed product labeling (PI), and Medication Guide and carton/container labels for Ilaris (canakinumab) Injection for Subcutaneous use (Ilaris), submitted for consult on January 8, 2009.

The following comments are provided using the updated proposed PI sent via email by Ramani Sista, on April 21, 2009. DDMAC has provided comments on the tradename to DMEPA.

DDMAC has reviewed the carton/container label in the EDR, submitted by the sponsor on 4/6/2009 and has no comments.

If you have any questions about DDMAC's comments, please do not hesitate to contact us.

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__X__ Trade Secret / Confidential

_____ Draft Labeling

_____ Deliberative Process