



BLA 103948/S-5177 and 5179

## SUPPLEMENT APPROVAL

Genzyme Corporation  
Attention: Ying Zheng, PhD  
Manager, Global Regulatory Affairs  
55 Corporate Drive  
Bridgewater, NJ 08807

Dear Dr. Zheng:

Please refer to your supplemental biologics license applications (sBLAs), dated and received March 27, 2020, and April 6, 2020, and your amendments, submitted under section 351(a) of the Public Health Service Act for Lemtrada (alemtuzumab) injection.

These Prior Approval supplemental biologics applications provide for the addition of two new contraindications (patients with known hypersensitivity or anaphylactic reactions to alemtuzumab or any of the excipients in Lemtrada; patients with active infection), revisions to the Boxed Warning related to monitoring recommendations, revisions to Section 2.5 (Dosage and Administration; Infusion Instructions), and revisions to the Highlights, Warnings and Precautions, Adverse Reactions, and Patient Counseling Information sections of the labeling and the Medication Guide pertaining to the risks for infusion reactions, thyroid disorders, acquired hemophilia A, Epstein-Barr virus, and viral hepatitis.

### **APPROVAL & LABELING**

We have completed our review of these applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

### **WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

### **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at

FDA.gov,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effectuated” (CBE) supplements.

Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effectuated” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in Microsoft Word format that includes the changes approved in these supplemental applications, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

### **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your applications, you are exempt from this requirement.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.<sup>3</sup>

---

<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at [FDA.gov](http://FDA.gov).<sup>4</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>5</sup>

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in these supplements, including any new safety information [21 CFR 601.12(a)(4)]. The revisions to your promotional materials should include prominent disclosure of the important new safety information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 601.12(a)(4).

## **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, contact CDR Candido Alicea, Regulatory Project Manager, at (240) 402-8310.

Sincerely,

*{See appended electronic signature page}*

Alice Hughes, MD  
Deputy Director for Safety  
Division of Neurology 2  
Office of Neuroscience  
Center for Drug Evaluation and Research

## ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Medication Guide

---

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

-----  
**This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.**  
-----

/s/  
-----

ALICE HUGHES  
09/25/2020 04:06:29 PM