



BLA 050114/S-010

**SUPPLEMENT APPROVAL  
PRIOR APPROVAL SUPPLEMENT**

AllerQuest, LLC  
10 Farmington Valley Drive, Suite 106  
Plainville, CT 06062

Attention: Richard Bauer, PhD, MBA  
Vice President, Quality and Regulatory Affairs

Dear Dr. Bauer:

Please refer to your supplemental biologics license application (sBLA) dated March 23, 2022, received March 23, 2022, submitted as under section 351(a) of the Public Health Service Act (PHS Act) for PRE-PEN (benzylpenicilloyl polylysine injection), and your amendments.

This Prior Approval supplemental biologics application provides for the omission of the potency statement in the Description section of the labeling, revisions to the description of in-use room temperature storage conditions in the How Supplied section of the labeling, and revisions to conform to labeling requirements for biological products regulated under section 351 of the PHS Act.

**APPROVAL & LABELING**

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

**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 include the labeling changes proposed in any pending “Changes Being Effectuated” (CBE) supplements.

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

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 Effected” (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 this supplemental application, 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).

### **CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved BLA 050114/S-010.**” Approval of this submission by FDA is not required before the labeling is used.

For information on FDA’s compliance policy for requirements related to BLA-specific labeling revisions, see guidance for industry, *The “Deemed to be a License” Provision of the BPCI Act: Questions and Answers*.<sup>3</sup>

### **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 application, you are exempt from this requirement.

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<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> Available at: <https://www.fda.gov/media/119274/download>. For the most recent version of a guidance, check the FDA Guidance Documents Database at <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

## **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).

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at [FDA.gov](http://FDA.gov).

If you have any questions, call Brandi Wheeler, Regulatory Project Manager, at (301)796-4495.

Sincerely,

*{See appended electronic signature page}*

Sally Seymour, MD  
Director  
Division of Pulmonology, Allergy, and Critical  
Care  
Office of Immunology and Inflammation  
Office of New Drugs  
Center for Drug Evaluation and Research

### ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
- Carton and Container Labeling

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**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.**  
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/s/  
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SALLY M SEYMOUR  
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