Dear Ally Danta:

Please refer to your new drug application (NDA) dated and received September 9, 2022, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Aphexda (motixafortide) for injection.

This NDA provides for the use of Aphexda (motixafortide) for injection in combination with filgrastim (G-CSF) to mobilize hematopoietic stem cells to the peripheral blood for collection and subsequent autologous transplantation in patients with multiple myeloma.

**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 the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information) as well as annual reportable changes not included in the enclosed labeling. 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.²

The SPL will be accessible via publicly available labeling repositories.

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² 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](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).
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 SPL Standard for Content of Labeling Technical Qs & As. For administrative purposes, designate this submission “Final Printed Carton and Container Labeling for approved NDA 217159.” Approval of this submission by FDA is not required before the labeling is used.

DATING PERIOD

Based on the stability data submitted to date, the expiry dating period for Aphexda (motixafortide) for injection shall be 24 months from the date of manufacture when stored at 2 °C to 8 °C.

ADVISORY COMMITTEE

Your application for Aphexda (motixafortide) was not referred to an FDA advisory committee because this is not the first drug for this specific indication, or first-in-pharmacological class. In addition, this application does not raise significant public health questions on the role of the drug and there are no controversial issues that require an advisory committee discussion. The risks associated with the use of the drug are expected to be mitigated through labeling.

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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

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

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess a signal.
of a serious risk of tumor cell mobilization. It is possible that motixafortide could mobilize tumor cells and that subsequent reinfusion of those tumor cell could contribute to disease relapse. As this represents a serious safety concern, the risk of disease relapse and death should be studied further by collecting additional long term safety and efficacy data.

Furthermore, the active postmarket risk identification and analysis system as available under section 505(k)(3) of the FDCA will not be sufficient to assess a signal of this serious risk.

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess a signal of a serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following trial:

4501-1 Complete Study BL-8040.SCM.301: “A Phase III, Randomized, Double-Blinded, Placebo-Controlled, Multi-Centre Study Evaluating the Safety, Tolerability and Efficacy of Combination Treatment of BL-8040 and G-CSF as Compared to Placebo and G-CSF for the Mobilization of Hematopoietic Stem Cells for Autologous Transplantation in Subjects with Multiple Myeloma – the GENESIS Study”. Provide at least 5 years of follow-up data for enrolled subjects. Long-term safety outcomes of interest include overall survival, progression free survival and rates of relapse.

The timetable you agreed to on September 1, 2023, states that you will conduct this trial according to the following schedule:

- Interim Report 1: 09/2025
- Interim Report 2: 09/2027
- Study Completion: 09/2028
- Final Report Submission: 03/2029

FDA considers the term final to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.3

Submit clinical protocol(s) to your IND 113776 with a cross-reference letter to this NDA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final report(s) to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

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3 See the guidance for Industry Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019).

U.S. Food and Drug Administration
Silver Spring, MD 20993
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Required Postmarketing Protocol Under 505(o), Required Postmarketing Final Report Under 505(o), Required Postmarketing Correspondence Under 505(o).

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B(a)(1) of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B(a)(1) and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

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.4

As required under 21 CFR 314.81(b)(3)(i), 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.5 Information and Instructions for completing the form can be found at FDA.gov.6

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

REQUESTED PHARMACOVIGILANCE

We request that you submit all serious domestic and foreign occurrences of hypersensitivity and injection site reactions for motixafortide as 15-day "alert reports" 4 For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/media/128163/download.
5 http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf
6 http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf

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(described under 21 CFR 314.80(c)(1)), from any source, including information derived from reports in the scientific literature, through the 3rd year following initial U.S. approval.

Provide a separate narrative summary and analysis of these adverse events (i.e., serious hypersensitivity reactions and injection site reactions), apart from your required analysis of 15-day “alert reports,” in each required postmarketing periodic safety report [e.g., periodic adverse drug experience report (PADER) required under 21 CFR 314.80(c)(2)], quarterly during the first 3 years following initial U.S. approval.

These narrative summaries and analyses should include an assessment of all new information obtained during the reporting interval and cumulatively since initial U.S. approval related to these adverse events (i.e., serious hypersensitivity reactions and injection site reactions) with the aim of further characterizing these risks. These analyses should describe the following: indication for use, demographics, underlying risk factors, temporal association, action taken, outcome, dechallenge/rechallenge, confounders, and assessment of causality. Your assessment should also include whether the findings from your analysis warrants any labeling changes and/or other regulatory action regarding these adverse events.

POST APPROVAL FEEDBACK MEETING

New molecular entities qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

COMPENDIAL STANDARDS

A drug with a name recognized in the official United States Pharmacopeia or official National Formulary (USP-NF) generally must comply with the compendial standards for strength, quality, and purity, unless the difference in strength, quality, or purity is plainly stated on its label (see FD&C Act § 501(b), 21 USC 351(b)). FDA typically cannot share application-specific information contained in submitted regulatory filings with third parties, which includes USP-NF. To help ensure that a drug continues to comply with compendial standards, application holders may work directly with USP-NF to revise official USP monographs. More information on the USP-NF is available on USP’s website⁷.

⁷ https://www.uspnf.com/
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If you have any questions, call May Zuwannin, Regulatory Project Manager, at 301-796-7775.

Sincerely,

{See appended electronic signature page}

Lisa Yanoff, MD
Deputy Director
Office of Cardiology, Hematology, Endocrinology, and Nephrology
Center for Drug Evaluation and Research

ENCLOSURES:
- Content of Labeling
  - Prescribing Information
- Carton and Container Labeling
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/
LISA B YANOFF
09/08/2023 05:58:05 PM