Dear Ms. Hufnagel:

Please refer to your biologics license application (BLA) dated and received October 22, 2020, and your amendments, submitted under section 351(a) of the Public Health Service Act for Ngenla (somatrogon-ghla) injection.

We also refer to our approval letter dated June 27, 2023, which contained the following error: the initial US approval and revision dates in the content of labeling attachments (Prescribing Information, Patient Package Insert, and Instructions for Use) did not reflect the date of approval of the application.

This corrected action letter incorporates the correction of the error. The effective action date will remain June 27, 2023, the date of the original letter.

We acknowledge receipt of your resubmission dated November 22, 2022, which constituted a complete response to our January 21, 2022, action letter.

**LICENSING**

We have approved your BLA for Ngenla (somatrogon-ghla) effective this date. You are hereby authorized to introduce or deliver for introduction into interstate commerce, Ngenla under your existing Department of Health and Human Services U.S. License No. 2060. Ngenla is a human growth hormone analog indicated for treatment of pediatric patients aged 3 years and older who have growth failure due to inadequate secretion of endogenous growth hormone.

**MANUFACTURING LOCATIONS**

Under this license, you are approved to manufacture somatrogon-ghla drug substance at Pfizer Ireland Pharmaceuticals, in Dublin, Ireland. The final formulated drug product will be manufactured, filled, assembled, labeled, and packaged at Pfizer Manufacturing Belgium NV, in Puurs, Belgium. You may label your product with the proprietary name,
Ngenla, and market it in 24 mg and 60 mg injections in a 1.2 mL single-patient-use prefilled pen.

**DATING PERIOD**

The dating period for Ngenla shall be 36 months from the date of manufacture when stored at 2-8°C. The date of manufacture shall be defined as the date of final sterile filtration of the formulated drug product. The dating period for your drug substance shall be [b (d)] months from the date of manufacture when stored at [b (d)]

We have approved the stability protocol in your license application for the purpose of extending the expiration dating period of your drug substance under 21 CFR 601.12.

**FDA LOT RELEASE**

You are not currently required to submit samples of future lots of Ngenla to the Center for Drug Evaluation and Research (CDER) for release by the Director, CDER, under 21 CFR 610.2. We will continue to monitor compliance with 21 CFR 610.1, requiring completion of tests for conformity with standards applicable to each product prior to release of each lot.

Any changes in the manufacturing, testing, packaging, or labeling of Ngenla, or in the manufacturing facilities, will require the submission of information to your BLA for our review and written approval, consistent with 21 CFR 601.12.

**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.

**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.\(^\text{1}\) Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information, Patient Package Insert, and Instructions for Use). Information on submitting SPL files using

\(^\text{1}\) See [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm)

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[www.fda.gov](http://www.fda.gov)
eLIST may be found in the guidance for industry SPL Standard for Content of Labeling Technical Qs and As (October 2009).²

The SPL will be accessible via publicly available labeling repositories.

**CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, and were submitted on May 12, 2023, as soon as they are available, but no more than 30 days after they are printed. 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 BLA 761184.” Approval of this submission by FDA is not required before the labeling is used.

**ADVISORY COMMITTEE**

Your application for somatrogon-ghla was not referred to an FDA advisory committee because the application did not raise significant public health questions on the role of the biologic, and there were no controversial issues that would benefit from advisory committee discussion.

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

**POSTMARKETING COMMITMENTS NOT SUBJECT TO THE REPORTING REQUIREMENTS UNDER SECTION 506B**

We remind you of your postmarketing commitment:

4446-1 To perform commercial shipping studies to qualify the actual shipping conditions for the drug product (prefilled pen). The commercial shipping studies will include:

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² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database at [https://www.fda.gov/RegulatoryInformation/Guidances/default.htm](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).

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[www.fda.gov](http://www.fda.gov)
a. Product quality assessment on commercial drug product in the commercial container closure system, fully packaged (primary and secondary packaging, etc.) before and after real-time shipping to evaluate the effect of handling and shipping conditions on product quality.

b. Analytical testing to evaluate impact on critical quality attributes (CQAs) during shipping. Justification for the selected CQAs will be provided.

c. Evaluation of container closure integrity to ensure the maintenance of sterile barrier using an appropriate method (e.g., dye ingress).

d. Device functionality tests to demonstrate that the shipping conditions do not adversely impact the integrity and functionality of the device.

e. Temperature monitoring of the shipping container (external and internal temperatures) recorded continuously throughout shipping from thermal couple probes placed inside and outside of the shipping container.

The timetable you submitted on March 30, 2023, states that you will conduct this study according to the following schedule:

   Final Report Submission:  March 2024

Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this BLA. In addition, under 21 CFR 601.70 you should include a status summary of each commitment in your annual progress report of postmarketing studies to this BLA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients/subjects entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “Postmarketing Commitment Protocol,” “Postmarketing Commitment Final Report,” or “Postmarketing Commitment Correspondence.”

**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.³

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

REPORTING REQUIREMENTS

You must submit adverse experience reports under the adverse experience reporting requirements at 21 CFR 600.80.

Prominently identify all adverse experience reports as described in 21 CFR 600.80.

You must submit distribution reports under the distribution reporting requirements at 21 CFR 600.81.

You must submit reports of biological product deviations under 21 CFR 600.14. You should promptly identify and investigate all manufacturing deviations, including those associated with processing, testing, packing, labeling, storage, holding and distribution. If the deviation involves a distributed product, may affect the safety, purity, or potency of the product, and meets the other criteria in the regulation, you must submit a report on Form FDA 3486 to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Compliance Risk Management and Surveillance
5901-B Ammendale Road
Beltsville, MD 20705-1266

Biological product deviations, sent by courier or overnight mail, should be addressed to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Compliance Risk Management and Surveillance
10903 New Hampshire Avenue, Bldg. 51, Room 4207
Silver Spring, MD 20903

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

³ For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/media/128163/download.
⁴ http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf
⁵ http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf

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product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at FDA.gov.

**POST APPROVAL FEEDBACK MEETING**

New biological products 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.

If you have any questions, call Dana Smith, Regulatory Project Manager, at 240-402-9906.

Sincerely,

{See appended electronic signature page}

Lisa B. Yanoff, M.D.
Deputy Director
Office of Cardiology, Hematology, Endocrinology, and Nephrology
Office of New Drugs
Center for Drug Evaluation and Research

**ENCLOSURES:**

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
  - Instructions for Use
- 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
06/29/2023 05:09:44 PM