CENTER FOR DRUG EVALUATION AND RESEARCH

BLA APPLICATION NUMBER:
125156

APPROVAL LETTER
Genentech, Inc.
Attention: Robert L. Garnick, Ph.D.
Senior Vice President, Regulatory Affairs, Quality & Compliance
1 DNA Way
South San Francisco, California 94080-4990

Dear Dr. Garnick:

We have approved your biologics’ license application for Lucentis (ranibizumab injection) effective this date. You are hereby authorized to introduce or deliver for introduction into interstate commerce, ranibizumab injection under your existing Department of Health and Human Services U.S. License No. 1048. Lucentis (ranibizumab injection) is indicated for the treatment of patients with neovascular (wet) age-related macular degeneration.

Under this license, you are approved to manufacture ranibizumab drug substance at Genentech, Inc., South San Francisco, California; fill the final formulated product at Novartis Pharma Stein AG, Stein, Switzerland; and label and package filled vials at Genentech, Inc., South San Francisco, California. You may label your product with the proprietary name Lucentis and market it in 10 mg/mL single use glass vials.

We acknowledge receipt of your submissions dated December 29, 2005, and January 31, February 10, 17, 21, and 24, March 17, 23, and 31, April 10, and 28, May 5, 10, 25 (2), 26 (2), and 31, and June 1, 5 (2), 6, 9, 13, 16, 23, 26, 27, 28 (3), and 29, 2006.

The final printed labeling (FPL) must be identical in content to the enclosed labeling text for the package insert, submitted June 28, 2006; the immediate vial container submitted March 31, 2006; and the carton labels submitted June 5, 2006. The statement “No U.S. standard of potency” should be added with the next printing of carton labels. Marketing this product with FPL that is not identical in content to the approved labeling text may render the product misbranded and an unapproved new drug.

The dating period for formulated drug product shall be 18 months from the date of manufacture when stored at 2°-8°C (36°-46°F). The date of manufacture shall be defined as the date of final of the formulated drug product. The dating period for ranibizumab drug substance shall be when stored at -20°C.

You currently are not required to submit samples of future lots of Lucentis 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.
You must submit information to your biologies license application for our review and written approval under 21 CFR 601.12 for any changes in the manufacturing, testing, packaging or labeling of Lucentis, or in the manufacturing facilities.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. We are waiving the pediatric study requirement for this application.

The following are Postmarketing Studies that are subject to reporting requirements of 21 CFR 601.70:

1. Submit the final Clinical Study Report from Study FVF3689g by June 30, 2008.

2. Provide safety and efficacy data from a 2-year adequate and well-controlled clinical trial of a mutually acceptable design exploring multiple dosing frequencies of Lucentis.

   Date of submission of protocol: November 14, 2008.

   Date of start of study: September 21, 2009.

   Date of final clinical study report: April 1, 2013.

3. To detect and characterize immune responses to ranibizumab:
   a. Develop and validate a confirmatory assay capable of detecting both IgG and IgM isotype responses.
   b. Develop and validate an assay to detect neutralizing anti-ranibizumab antibodies.


4. To characterize further the immune response to ranibizumab, serum samples collected in studies FVF2587g, FVF2598g, FVF3192g will be assayed using the validated methods described above in Postmarketing Commitment #3. The data obtained will be analyzed to discover and evaluate any association between immunoreactivity and dosing frequency as well as any potential impact of immunoreactivity on efficacy or safety outcomes.

   The need for an additional clinical study will be determined based on the results from the analysis described above.

   Date of submission of protocol and statistical analysis plan: February 28, 2007.

   Date of submission of final study report: September 30, 2008.
The following are Postmarketing Studies that are not subject to reporting requirements of 21 CFR 601.70:

5. To revise release specifications, shelf-life specifications and in-process limits for ranibizumab drug substance and drug product after ~ commercial manufacturing runs to reflect increased manufacturing experience.

These revisions to the Quality control system, the corresponding data from the ~ commercial manufacturing runs and the analysis plan used to create the revisions will be submitted as a supplement on or before June 30, 2008.

6. To perform additional Lucentis stability studies at 40°C using Ion Exchange Chromatography (IEC) to demonstrate that the corrective actions taken at ~ to address the atypical accelerated stability profile observed in the Lucentis 2005 qualification campaign have been sufficient.

Specifically, a one time stability study consisting of ~ Lucentis Drug Product launch lots are placed at 40°C and tested by IEC at ~ months. These ~ Lucentis Drug Product lots are derived from the following:

- ~ of these Lucentis Drug Product lots are manufactured from distinct lots of ~
- At least ~ of these ~ lots are aliquoted and used to manufacture ~ Lucentis drug product lots.

Data will be submitted as a supplement on or before March 31, 2007.

We request that you submit clinical protocols to your IND, with a cross-reference letter to this biologics license application. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this application. Please use the following designators to label prominently all submissions, including supplements, relating to these postmarketing study commitments as appropriate:

- Postmarketing Study Protocol
- Postmarketing Study Final Report
- Postmarketing Study Correspondence
- Annual Report on Postmarketing Studies

For each postmarketing study subject to the reporting requirements of 21 CFR 601.70, you must describe the status in an annual report on postmarketing studies for this product. The status report for each study should include:

- information to identify and describe the postmarketing commitment,
- the original schedule for the commitment,
the status of the commitment (i.e. pending, ongoing, delayed, terminated, or submitted),

- an explanation of the status including, for clinical studies, the patient accrual rate (i.e. number enrolled to date and the total planned enrollment), and

- a revised schedule if the study schedule has changed and an explanation of the basis for the revision.

As described in 21 CFR 601.70(e), we may publicly disclose information regarding these postmarketing studies on our Web site (http://www.fda.gov/cder/pmc/default.htm). Please refer to the April 2001 Draft Guidance for Industry: Reports on the Status of Postmarketing Studies – Implementation of Section 130 of the Food and Drug Administration Modernization Act of 1997 (see http://www.fda.gov/cber/gdlns/post040401.htm) for further information.

You must submit adverse experience reports under the adverse experience reporting requirements for licensed biological products (21 CFR 600.80). You should submit postmarketing adverse experience reports to the Central Document Room, Center for Drug Evaluation and Research, Food and Drug Administration, 5901-B Ammendale Road, Beltsville, MD 20705-1266. Prominently identify all adverse experience reports as described in 21 CFR 600.80.

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at www.fda.gov/medwatch/report/mmp.htm.

You must submit distribution reports under the distribution reporting requirements for licensed biological products (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 the Division of Compliance Risk Management and Surveillance (HFD-330), Center for Drug Evaluation and Research, Food and Drug Administration, 5600 Fischers Lane, Rockville, MD 20857. Biological product deviations sent by courier or overnight mail should be addressed to Food and Drug Administration, CDER, Office of Compliance, Division of Compliance Risk Management and Surveillance, HFD-330, Montrose Metro 2, 11919 Rockville Pike, Rockville, MD 20852.
Please submit all FPL at the time of use and include implementation information on FDA Form 356h. Please provide a PDF-format electronic copy as well as original paper copies (ten for circulars and five for other labels). In addition, you may wish to submit draft copies of the proposed introductory advertising and promotional labeling with a cover letter requesting advisory comments to the Food and Drug Administration, Center for Drug Evaluation and Research, Division of Drug Marketing, Advertising and Communication, 5901-B Ammendale Road, Beltsville, MD 20705-1266. Final printed advertising and promotional labeling should be submitted at the time of initial dissemination, accompanied by a FDA Form 2253.

All promotional claims must be consistent with and not contrary to approved labeling. You should not make a comparative promotional claim or claim of superiority over other products unless you have substantial evidence to support that claim.

Please refer to http://www.fda.gov/cder/biologics/default.htm for important information regarding therapeutic biological products, including the addresses for submissions.

If you have any questions, call Lori M. Gorski, Project Manager, at (301) 796-0722.

Sincerely,

Mark J. Goldberger, M.D., M.P.H.
Director
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure