

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

761170Orig1s000

Trade Name: Phesgo for subcutaneous injection

Generic or Proper Name: pertuzumab, trastuzumab, and hyaluronidase-zzxf

Sponsor: Genentech, Inc.

Approval Date: June 29, 2020

Indication: For use in combination with chemotherapy for:

- the neoadjuvant treatment of adult patients with HER2-positive, locally advanced, inflammatory, or early stage breast cancer (either greater than 2 cm in diameter or node positive) as part of a complete treatment regimen for early breast cancer.
- the adjuvant treatment of adult patients with HER2-positive early breast cancer at high risk of recurrence.

Select patients for therapy based on an FDA-approved companion diagnostic test.

For use in combination with docetaxel for the treatment of adult patients with HER2-positive metastatic breast cancer who have not received prior anti-HER2 therapy or chemotherapy for metastatic disease.

Select patients for therapy based on an FDA-approved companion diagnostic test.

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APPROVAL LETTER

BLA 761170

BLA APPROVAL

Genentech, Inc.
Attention: Sili Liu, PhD
Regulatory Program Management
1 DNA Way
South San Francisco, CA 94080

Dear Dr. Liu:

Please refer to your biologics license application (BLA) dated December 18, 2019, received December 18, 2019, and your amendments, submitted under section 351(a) of the Public Health Service Act for Phesgo (pertuzumab, trastuzumab, and hyaluronidase-zzxf) for subcutaneous injection.

LICENSING

We have approved your BLA for Phesgo (pertuzumab, trastuzumab, and hyaluronidase-zzxf) effective this date. You are hereby authorized to introduce or deliver for introduction into interstate commerce, Phesgo, under your existing Department of Health and Human Services U.S. License No. 1048. The indications for Phesgo are listed below:

1. Early Breast Cancer

Phesgo is indicated for use in combination with chemotherapy for:

- the neoadjuvant treatment of adult patients with HER2-positive, locally advanced, inflammatory, or early stage breast cancer (either greater than 2 cm in diameter or node positive) as part of a complete treatment regimen for early breast cancer.
- the adjuvant treatment of adult patients with HER2-positive early breast cancer at high risk of recurrence.

Select patients for therapy based on an FDA-approved companion diagnostic test.

2. Metastatic Breast Cancer

Phesgo is indicated for use in combination with docetaxel for the treatment of adult patients with HER2-positive metastatic breast cancer who have not received prior anti-HER2 therapy or chemotherapy for metastatic disease.

Select patients for therapy based on an FDA-approved companion diagnostic test.

MANUFACTURING LOCATIONS

Under this license, you are approved to manufacture pertuzumab SC drug substance at Genentech, Inc. in Vacaville, CA. Trastuzumab SC drug substance will be manufactured at Roche Diagnostics GmbH in Penzberg, Germany and Roche Singapore Technical Operations Pte., Ltd in Tuas Bay Link, Singapore. Hyaluronidase drug substance will be manufactured at Avid Bioservices, Inc. in Tustin, CA. The final formulated drug product will be manufactured, filled, labeled, and packaged at F. Hoffmann-La Roche Ltd in Kaiseraugst, Switzerland. You may label your product with the proprietary name, Phesgo, and market it in 1,200 mg pertuzumab, 600 mg trastuzumab, and 30,000 units hyaluronidase per 15 mL injection in a single-dose vial and 600 mg pertuzumab, 600 mg trastuzumab, and 20,000 units hyaluronidase per 10 mL injection in a single-dose vial.

DATING PERIOD

The dating period for Phesgo shall be 18 months from the date of manufacture when stored at 2-8°C, protected from light. The date of manufacture shall be defined as the date of final sterile filtration of the formulated drug product. The dating period for your pertuzumab SC drug substance shall be (b) (4) months from the date of manufacture when stored at (b) (4)°C. The dating period for your trastuzumab SC drug substance shall be (b) (4) months from the date of manufacture when stored at (b) (4)°C. The dating period for your hyaluronidase drug substance shall be (b) (4) months from the date of manufacture when stored at (b) (4)°C.

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

FDA LOT RELEASE

You are not currently required to submit samples of future lots of Phesgo 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 Phesgo, or in the manufacturing facilities, will require the submission of information to your biologics license application for our review and written approval, consistent with 21 CFR 601.12.

APPROVAL & LABELING

We have completed our review of this application. 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, as described at FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information). 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.

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 761170.**” Approval of this submission by FDA is not required before the labeling is used.

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

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>.

ADVISORY COMMITTEE

Your application for Phesgo was not referred to an FDA advisory committee because the application did not raise significant safety or efficacy issues that were unexpected for a biologic of this class or in the intended population.

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.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitment:

3870-1 Submit the final report and datasets for invasive disease free survival (iDFS), event free survival (EFS), distant recurrence-free interval (DRFI), and overall survival (OS) from trial FeDeriCa titled: A phase III, randomized, multicenter, open-label, two-arm study to evaluate the pharmacokinetics, efficacy, and safety of subcutaneous administration of the fixed-dose combination of pertuzumab and trastuzumab in combination with chemotherapy in patients with HER2-positive early breast cancer, that may inform product labeling.

The timetable you submitted on May 29, 2020, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 10/2018 (completed)

Trial Completion: 08/2023

Final Report Submission: 02/2024

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

We remind you of your postmarketing commitment:

3870-2 Perform real-time drug product (loading and maintenance dose) commercial container closure system leachate studies using appropriate test methods to identify and quantify volatile organic compounds (VOC), semi-VOC, non-VOC, and trace metals at regular intervals through the end of shelf life. The study results will be updated annually in the BLA Annual Report. The final results of this study and the toxicology risk evaluation for the levels of leachates detected in the drug product will be provided in the final study report to the BLA.

The timetable you submitted on June 22, 2020, states that you will conduct this study according to the following schedule:

Final Report Submission: 01/2021

A final submitted protocol is one that the FDA has reviewed and commented upon, and you have revised as needed to meet the goal of the study or clinical trial.

Submit clinical protocols to your IND 131009 for this product. 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 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

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

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 for licensed biological products (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 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:

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

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

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

MEDWATCH-TO-MANUFACTURER PROGRAM

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 FDA.gov.⁶

POST APPROVAL FEEDBACK MEETING

New molecular entities and 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, contact Sherry Hou, PharmD, Regulatory Project Manager, at Sherry.Hou@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Laleh Amiri-Kordestani, MD
Supervisory Associate Director
Division of Oncology 1
Office of Oncologic Diseases
Center for Drug Evaluation and Research

ENCLOSURE(S):

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

⁶ <http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm>

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/

LALEH AMIRI KORDESTANI
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