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APPLICATION NUMBER:

761444Orig2s000

OTHER ACTION LETTERS



BLA 761444/Original 2

PROVISIONAL DETERMINATION

Shanghai Henlius Biotech, Inc.
c/o Paraxel International
2520 Meridian Parkway, Suite 200
Durham, NC 27713

ATTENTION: Avani Patel, B.S. Pharmacy, Pharm.D.
Senior Regulatory Affairs Consultant

Dear Dr. Avani Patel:

Please refer to your biologics license application (BLA) dated and received August 30, 2024, and your amendments, submitted under section 351(k) of the Public Health Service (PHS) Act for Bildyos (denosumab-nxxp) injection and Bilprevda (denosumab-nxxp) injection.

BLA 761444 seeks licensure of:

- Bildyos (denosumab-nxxp) injection 60 mg/mL in a single-dose vial and in a single-dose prefilled syringe for subcutaneous use as interchangeable biosimilars with US-Prolia (denosumab) injection 60 mg/mL in a single-dose prefilled syringe for subcutaneous use, and
- Bilprevda (denosumab-nxxp) injection 120 mg/1.7 mL (70mg/mL) in a single-dose vial for subcutaneous use as an interchangeable biosimilar with US-Xgeva (denosumab) injection 120 mg/1.7 mL (70mg/mL) in a single-dose vial for subcutaneous use.

This BLA proposes the use of Bildyos (denosumab-nxxp) injection for:

- Treatment of postmenopausal women with osteoporosis at high risk for fracture, defined as a history of osteoporotic fracture, or multiple risk factors for fracture; or patients who have failed or are intolerant to other available osteoporosis therapy. In postmenopausal women with osteoporosis, denosumab reduces the incidence of vertebral, nonvertebral, and hip fractures.
- Treatment to increase bone mass in men with osteoporosis at high risk for fracture, defined as a history of osteoporotic fracture, or multiple risk factors for fracture; or patients who have failed or are intolerant to other available osteoporosis therapy.
- Treatment of glucocorticoid-induced osteoporosis in men and women at high risk of fracture who are either initiating or continuing systemic glucocorticoids in a daily

dosage equivalent to 7.5 mg or greater of prednisone and expected to remain on glucocorticoids for at least 6 months. High risk of fracture is defined as a history of osteoporotic fracture, multiple risk factors for fracture, or patients who have failed or are intolerant to other available osteoporosis therapy.

- Treatment to increase bone mass in men at high risk for fracture receiving androgen deprivation therapy for nonmetastatic prostate cancer. In these patients denosumab also reduced the incidence of vertebral fractures.
- Treatment to increase bone mass in women at high risk for fracture receiving adjuvant aromatase inhibitor therapy for breast cancer.

This BLA proposes the use of Bilprevda (denosumab-nxxp) injection for:

- Prevention of skeletal-related events in patients with multiple myeloma and in patients with bone metastases from solid tumors.
- Treatment of adults and skeletally mature adolescents with giant cell tumor of bone that is unresectable or where surgical resection is likely to result in severe morbidity.
- Treatment of hypercalcemia of malignancy refractory to bisphosphonate therapy.

For administrative purposes, we have split BLA 761444 as follows:

- BLA 761444/Original 1 – biosimilarity
- BLA 761444/Original 2 – interchangeability

The subject of this correspondence is BLA 761444/Original 2. A separate correspondence was issued for BLA 761444/Original 1.

All future submissions to these BLAs should specify the BLA number and the Original number to which each submission pertains.

We have completed a provisional review of this application, as amended. A final determination under sections 351(i) and 351(k) of the PHS Act that:

- Bildyos (denosumab-nxxp) injection 60 mg/mL in a single-dose vial and in a single-dose prefilled syringe for subcutaneous use would be interchangeable with US-Prolia (denosumab) injection 60 mg/mL in a single-dose prefilled syringe for subcutaneous use, and
- Bilprevda (denosumab-nxxp) injection 120 mg/1.7 mL (70mg/mL) in a single-dose vial for subcutaneous use would be interchangeable with US-Xgeva

(denosumab) injection 120 mg/1.7 mL (70mg/mL) in a single-dose vial for subcutaneous use

is currently subject to unexpired exclusivity for the first interchangeable biosimilar biological products, and thus may not be made before the exclusivity has expired. See section 351(k)(6) of the PHS Act. We have not identified any deficiencies that would justify a complete response action at this time; however, we also cannot approve your application because of the unexpired first interchangeable exclusivity. We have therefore provisionally determined that your 351(k) application meets the interchangeability criteria under section 351(k) of the PHS Act.

This provisional determination is based upon information available to the Agency at this time (i.e., information in your application and that the manufacturing of the biological product complies with the standards established in the BLA as well as the requirements in applicable regulations). This determination is subject to change on the basis of any new information that may come to our attention.

BLA 761444/Original 2 is not approved and Bıldıyos (denosumab-nxxp) and Bilprevda (denosumab-nxxp) cannot be legally marketed as interchangeable biosimilar products unless and until you have been notified in writing that BLA 761444/Original 2 is approved after any necessary additional review. To obtain approval of this application, submit an amendment no more than six months prior to the date you believe that your application will be eligible for approval. In your cover letter, clearly identify your amendment as **“REQUEST FOR APPROVAL”**. You must demonstrate that this application meets all applicable standards for licensure at the time of submission of such an amendment. This amendment should provide the legal/regulatory basis for your request for approval and should include a copy of any relevant supporting documentation, as appropriate. In addition to a safety update, the amendment should also identify changes, if any, in the application, i.e., updated labeling; chemistry, manufacturing, and controls data; and risk evaluation and mitigation strategy (REMS). If there are no changes, clearly state so in your cover letter. Any changes require our review before approval, and the goal date for our review will be set accordingly.

Enclosed are the currently agreed upon labeling (text for the Prescribing Information, Medication Guide, Carton and Container labeling). If you believe that there are grounds for issuing the approval letter before the expiration of the exclusivity period, you should amend your application accordingly.

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.

Refer to the “Required Pediatric Assessments” section of the correspondence for BLA 761444/Original 1.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Section 505-1 of the Food Drug Cosmetic Act (FDCA) authorizes FDA to require the submission of a risk evaluation and mitigation strategy (REMS), if FDA determines that such a strategy is necessary to ensure that the benefits of the drug outweigh the risks.

Refer to the “Risk Evaluation and Mitigation Strategy Requirements” section of the correspondence for BLA 761444/Original 1.

If you have any questions, contact Alice Lee, Senior Regulatory Health Project Manager, at 301-796-8881.

Sincerely,

{See appended electronic signature page}

Theresa Kehoe, MD
Director
Division of General Endocrinology
Office of Cardiology, Hematology, Endocrinology,
and Nephrology
Office of New Drugs
Center for Drug Evaluation and Research

and

{See appended electronic signature page}

Christy Osgood, MD
Supervisory Associate Director
Division of Oncology 1
Office of Oncologic Diseases
Office of New Drugs
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
 - Prescribing Information

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov

- Medication Guide (Bildyos)
- Carton and Container Labeling
 - Bildyos
 - Bilprevda

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/

THERESA E KEHOE
08/29/2025 10:44:59 AM

CHRISTY L OSGOOD
08/29/2025 01:20:21 PM