DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

BLA 125277/37

SUPPLEMENT BLA APPROVAL
August 17, 2011

SUPPLEMENT BLA APPROVAL
REMS ASSESSMENT ACKNOWLEDGEMENT
RELEASE REMS ELEMENT

Dyax Corp.
300 Technology Square
Cambridge, MA 02139

Attention: Nicole D' Auteuil
Vice President, Regulatory Affairs & Operations

Dear Ms. D' Auteuil:

Please refer to your Supplemental Biologics License Application (sBLA), dated May 26, 2011, received May 27, 2011, submitted under section 351 of the Public Health Service Act for Kalbitor (ecallantide)

We acknowledge receipt of your risk evaluation and mitigation strategy (REMS) assessment dated May 26, 2011. After consultation between the Office of Surveillance and Epidemiology and the office of New Drugs, we found the REMS assessment to be adequate with the following comment:

> Submit your methodology and survey instrument for review at least 90 days before the next evaluation is conducted. Submit both methods and instruments together, and clearly identify changes from previous protocols.

This Prior Approval supplement to your biologics license application proposes to eliminate the requirement of the Medication Guide as an element of the approved Kalbitor (ecallantide) REMS.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

The REMS for Kalbitor (ecallantide) was originally approved on December 1, 2009, and the most recent REMS modification was approved on April 5, 2011. The REMS consists of a Medication Guide, communication plan, and a timetable for submission of assessments of the REMS.

Your proposed modification to the REMS consists of eliminating the requirement for the Medication Guide as an element of the REMS.

We have determined that maintaining the Medication Guide as part of the approved labeling is adequate to address the serious and significant public health concern and meets the standard in 21 CFR 208.1. Therefore, it is no longer necessary to include the Medication Guide as an element of the approved REMS to ensure that the benefits of Kalbitor (ecallantide) outweigh its risks.

We agree with your proposal, and a Medication Guide is no longer required as part of the REMS for Kalbitor (ecallantide).

Your proposed modified REMS, submitted on May 27, 2011, and appended to this letter, is approved.

The modified REMS consists of communication plan and a timetable for submission of assessment of the REMS.

We remind you that the Medication Guide will continue to be part of the approved labeling for Kalbitor (ecallantide) in accordance with 21 CFR 208.

The timetable for submission of assessments of the REMS will remain the same as that approved on December 1, 2009.

The revised REMS assessment plan should include, but is not limited to, the following:

1. A summary of all reported serious hypersensitivity reactions with analysis of adverse event reporting by prescriber type.
2. Specification of measures that would be taken to increase awareness if surveys of health care providers indicate that provider awareness is not adequate.
3. An evaluation of health care providers' understanding and patients' understanding of the serious risks of Kalbitor (ecallantide) injection.
4. Based on the information submitted, an assessment and conclusion of whether the REMS is meeting its goals, and whether modifications to the REMS are needed.
5. Information on the status of any postapproval study or clinical trial required under section 505(o)(3) or otherwise undertaken to investigate a safety issue. With respect to any such postapproval study, you must include the status of such study, including whether any difficulties completing the study have been encountered. With respect to any such postapproval clinical trial, you must include the status of such clinical trial, including whether enrollment has begun, the number of participants enrolled, the expected completion date, whether any difficulties completing the clinical trial have been encountered, and registration information with respect to requirements under subsections (i) and (j) of section 402 of the Public Health Service Act. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 601.70 and including any material or significant updates to the status information since the annual

report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

In addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

If you currently distribute or plan to distribute an authorized generic product under this NDA, you must submit a complete proposed REMS that relates only to the authorized generic product. Submit a proposed REMS, REMS supporting document, and any required appended documents as a prior approval supplement. Approval of the proposed REMS is required before you may market your authorized generic product.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

BLA125277 REMS ASSESSMENT

NEW SUPPLEMENT FOR BLA 125277
PROPOSED REMS MODIFICATION
REMS ASSESSMENT

NEW SUPPLEMENT (NEW INDICATION FOR USE)
FORBLA 125277
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)

If you do not submit electronically, please send 5 copies of REMS-related submissions.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Ladan Jafari, Safety Regulatory Project Manager, at (301) 796-1231.

Sincerely,

/ Sally Seymour /
Sally Seymour, M.D.
Deputy Director for Safety
Division of Pulmonary, Allergy, and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE(S):
REMS