



BLA 125553/S-035

## SUPPLEMENT APPROVAL

Sandoz Inc.  
Attention: Bina Merai  
Manager, Regulatory Affairs Biosimilars  
100 College Road West  
Princeton, NJ 08540

Dear Bina Merai:

Please refer to your supplemental biologics license application (sBLA), dated and received May 23, 2023, and your amendments, submitted under section 351(k) of the Public Health Service Act for Zarxio (filgrastim-sndz) injection.

This Category A Prior Approval sBLA provides for the following changes to align the Zarxio United States Prescribing Information (USPI) with the US-licensed Neupogen USPI, approved on April 18, 2023:

- Include “extramedullary hematopoiesis” as an adverse reaction in Section 6.2 Postmarketing Experience
- Relocate Immunogenicity to Section 12.6
- Minor changes to Section 11 Description and Section 16 How Supplied/Storage and Handling.

### **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.

To align labeling, note that the labeling approved with this supplement also includes those labeling changes approved for S-032, which licensed Zarxio (filgrastim-sndz) 300 mcg/mL and 480 mcg/1.6 mL, injection, for subcutaneous (SC) and intravenous (IV) use, in a single-dose vial (vial) as biosimilar to US-Neupogen, 300 mcg/mL and 480 mcg/1.6 mL, injection, for SC and IV use, in a vial.

### **WAIVER OF HIGHLIGHTS ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information.

## **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,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information and Patient Package Insert) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements.

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*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in Microsoft Word format that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

## **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 have determined that you have fulfilled the pediatric study(ies) requirement for all relevant pediatric age groups for this application.

## **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-*

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

<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

*Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.*<sup>3</sup>

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](http://FDA.gov).<sup>4</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>5</sup>

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety-related information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety-related information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4).

### **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).

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

If you have any questions, contact Anh-Thy Ly, Regulatory Project Manager, at 240-240-1001 or [Anh-Thy.Ly@fda.hhs.gov](mailto:Anh-Thy.Ly@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Ann Farrell, MD  
Director  
Division of Nonmalignant Hematology  
Office of Cardiology, Hematology,  
Endocrinology, and Nephrology  
Office of New Drugs  
Center for Drug Evaluation and Research

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

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

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

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert

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**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.**  
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/s/  
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