



Our STN: ANDA BA 125750

**ANDA APPROVAL**  
**April 25, 2022**

CSL Plasma, Inc.  
Attention: Michelle Kelley  
155 Medical Sciences Drive  
Union, SC 29379

Dear Michelle Kelley:

This letter is in reference to your abbreviated new drug application (ANDA) received for review on June 21, 2021, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for Anticoagulant Sodium Citrate 4% w/v Solution USP.

Reference is also made to any amendments submitted prior to the issuance of this letter.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the ANDA is **approved**, effective on the date of this letter. We have determined your Anticoagulant Sodium Citrate 4% w/v Solution USP to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Anticoagulant Sodium Citrate 4% w/v Solution, of Haemonetics Corporation.

Under section 506A of the FD&C Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

Please note that if FDA requires a Risk Evaluation and Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the FD&C Act.

### **WAVIER REQUEST**

FDA has reviewed your request to waive the requirement to comply with 21 CFR 314.80(c)(2)(ii)(B) for adverse experience reporting of minor citrate reactions submitted. While FDA may waive the requirement for adverse experience reporting of certain categories of adverse events, such waivers are granted post-approval.

Following receipt of this approval, please submit your waiver request and see below additional comments:

- For additional information, please refer to the FDA Draft Guidance for Industry *Postmarketing Safety Reporting for Human Drug and Biological Products Including Vaccines* (March 2001), available at <https://www.fda.gov/media/73593/download>.
- In your waiver request, replace “minor citrate reactions” with “nonserious, expected adverse experiences”, i.e., the waiver would encompass all “non-serious, expected” events in accordance with the regulatory definition for nonserious, expected adverse events (AEs) rather than limiting to “minor citrate reactions.”
- The waiver from the requirement to submit reports for certain AEs does not represent a waiver from the separate requirement to maintain records. Applicants who obtain such waivers are still required to maintain records of these nonserious, expected adverse experiences and to submit information on these adverse experiences to the FDA in the summary tabulations section of postmarketing periodic reports.

## **REPORTING REQUIREMENTS**

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98 and at section 506I of the FD&C Act. The Agency should be advised of any change in the marketing status of this drug or if this drug will not be available for sale after approval. In particular, under section 506I(b) of the FD&C Act, you are required to notify the Agency in writing within 180 days from the date of this letter if this drug will not be available for sale within 180 days from the date of approval. As part of such written notification, you must include (1) the identity of the drug by established name and proprietary name (if any); (2) the ANDA number; (3) the strength of the drug; (4) the date on which the drug will be available for sale, if known; and (5) the reason for not marketing the drug after approval.

## **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling materials prior to publication or dissemination. Please note that these submissions are voluntary. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert (PI), Medication Guide, and patient PI (as applicable) to the Advertising and Promotional Labeling Branch at the following address:

Food and Drug Administration  
Center for Biologics Evaluation and Research  
Document Control Center  
10903 New Hampshire Avenue  
WO71-G112  
Silver Spring, MD 20993-0002

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf>).

You must also submit final promotional materials and package insert(s), 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 <https://www.fda.gov/media/73013/download>. Information and Instructions for completing the form can be found at <https://www.fda.gov/media/132152/download>.

## **ANNUAL FACILITY FEES**

The Generic Drug User Fee Amendments of 2012 (GDUFA) (Public Law 112-144, Title III) established certain provisions<sup>1</sup> with respect to self-identification of facilities and payment of annual facility fees. Your ANDA identifies at least one facility that is subject to the self-identification requirement and payment of an annual facility fee. Self-identification must occur by June 1<sup>st</sup> of each year for the next fiscal year. Facility fees must be paid each year by the date specified in the *Federal Register* notice announcing facility fee amounts.

All finished dosage forms (FDFs) or active pharmaceutical ingredients (APIs) manufactured in a facility that has not met its obligations to self-identify or to pay fees when they are due will be deemed misbranded. This means that it will be a violation of federal law to ship these products in interstate commerce or to import them into the United States. Such violations can result in prosecution of those responsible, injunctions, or seizures of misbranded products. Products misbranded because of failure to self-identify or pay facility fees are subject to being denied entry into the United States.

## **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling

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<sup>1</sup> Some of these provisions were amended by the Generic Drug User Fee Amendments of 2017 (GDUFA II) (Public Law 115-52, Title III).

[21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>. The SPL will be accessible via publicly available labeling repositories.

Sincerely,

Orieji Illoh, MD  
Director  
Division of Blood Components and Devices  
Office of Blood Research and Review  
Center for Biologics Evaluation and Research