F I L E N O T E

MEETING HELD AT NDAB- DUBLIN
Tuesday, October 9th, 1984

The meeting was held to discuss the question of Heat-treated Koate with Dr. Scott, Dr. McCarthy and Mary Rafter regarding MR's letter of 13th September to MT advising that only heat-treated product would be acceptable in Eire.

MT was introduced to Dr. McCarthy and Mary Rafter. Dr. Scott would be available later.

Dr. McC and MR confirmed that the Board would not consider granting marketing approval for a non-heat-treated product.

MT pointed out that she understood Professor Temperley wanted to continue using regular Koate for the time being and had some reservations about heat-treated Factor VIII preparations. Also, at present, we can only supply him with non-heat-treated product in the quantities and unitage he requires.

However, we wish to register Koate H-T and change over to supplying heat-treated product as soon as possible. Dr. McC suggested MT explain the situation to Dr. Scott.

MT explained that the Koate application, which was under assessment, had to be updated as the process was now the same for both regular and heat-treated product up to the point of heating after lyophilisation. What would they like us to do about this? MT suggested that she annotate the changes in the Koate H-T application. MR agreed that we need not now amend the existing application but she had to clear this from the file and annotating any changes just for the record would be helpful.

MR raised the point about collection of plasma from sites near San Francisco or Los Angeles, etc. They still require a written statement from a senior Cutter executive confirming that plasma is not collected from areas associated with AIDS. They pointed out that the list attached to the press statement included centres close to the high risk areas and some people were saying that plasma should not be used if it was collected from these places. MT said that the press statement confirmed that these were not in high risk areas. The Board, however, required this assurance in writing from Cutter (obviously, they needed to protect themselves

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if questions were raised). MR said other companies were saying that some of these sites were in risk areas (e.g., Berkeley, Long Beach, Lauderdale). There was concern about AIDS in Ireland as there had been 2 or 3 deaths (not in haemophiliacs). Dr. McC then left the meeting.

MT and MR went through the manufacturing process and MT pointed out the changes that had now been made. Further details would be included in the Koate H-T application, annotated as agreed as applying to both regular and heat-treated (e.g., where new specifications and procedures are used).

We then discussed the various queries raised by MR and our responses as MR had not had time to consider our last letter. Also, these will apply to Koate H-T.

MR was satisfied on most points but the following were noted:-

1. Glycine - they accept that a statement that the product "contains glycine" is acceptable on the label and no limits need to be declared. MR would like to know, however, the maximum limits we are setting in-house. The use of a sticker on the label is quite acceptable in the first instance and the Board understands that we would not wish to print labels specially for a small market - any special labelling requirements could be included in the next reprint.

2. They would like to see the distributor's name and address on the insert leaflet - MT confirmed that it would appear and a sample is to be sent to NDAB prior to marketing.

3. MR was still a little uncertain about the range of unitage in the specification. She accepted our arguments and appreciated the reason for not setting tighter limits but, since they had to issue a P.A. for each different pack, they really need a suitable specification for each.

   MR asked about control of filling. MT explained that the fill varies depending on the potency of the material and required unitage in the vial.

   MR will give this some further thought, but felt they needed a better specification for minimal potency in each vial.

   MT pointed out that the actual unitage was quoted on the label.

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4. MR was pleased to note that there was more emphasis on testing for purity and said she would like to see the CAE results.

She noted that the "clottable protein" assay was no longer used in stability testing.

The stability results quoted clottable protein in terms of w/w and not w/v as in the specification. MT will clarify this in writing. Not now important but file has to be tidied.

MR considered that the meeting had been very useful and when the application for heat-treated Koate was submitted, it should not take her long to clear it.

MT then met Dr. S and explained the situation about supply of Koate to Professor Temperley.

Dr. S said that if Professor Temperley wanted the non-heat-treated product, there would be no objection to Cutter continuing to supply it as originally agreed, as long as we keep her informed.

MT said that it may be up to a year as a batch had been set aside for him. Dr. S said that is alright, and in any case, our application for Koate H-T could take several months to go through the system. MT said that she understood that no heat-treated product was yet being used in Ireland. Dr. S seemed surprised but said a number of companies had applied for product authorisations.

GRO-C

Marie Tatt.

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E.L. Greene
B.A. Dyos
B.A. Elliott

(oct11b)