DEPARTMENT OF HEALTH & HUMAN SERVICES
FDA/CBER/OVRR/DVRPA

Memorandum

Date: January 5, 2022

From: Daphne D. Stewart, CSO
Regulatory Management Support Branch,
DVRPA/OVRR

Through: Tim D. Nelle, Ph.D., CAPT U.S. Public Health Service,
Branch Chief, RMSB

To: BLA STN 125752/0 File

Subject Review of ModernaTX, Inc. – BLS 125752/0
COVID-19 Vaccine, mRNA Vaccine – spikevax®
Carton and Container Labeling

Background

This Biologic License Application (BLA) is for COVID-19 mRNA Vaccine (nucleoside modified) – COMIRNATY® which is indicated for active immunization to prevent COVID-19 disease caused by SARS-CoV-2 in individuals 18 years of age and older. This submission on contains the following labels that are the subject of this review:

- Multiple-Dose 5.5 mL (10 Doses) Vial Carton Label
- Multiple-Dose 5.5 mL Vial Container Label
- Multiple-Dose 7.5 mL (10 Doses) Vial Carton Label
- Multiple-Dose 7.5 mL Vial Container Label

These labels were reviewed for compliance with the regulations 21 CFR 201.25 & 21 CFR 207.35, Subpart G – Labeling Standards 21 CFR 610.60 (a)(1) through (7) and 21 CFR 610.60 (7) (b) through (e), 21 CFR 610.62 (a) through (c), 21 CFR 610.63, 21 CFR 610.64, 21 CFR 610.67, the Drug Supply Chain Security Act (DSCSA) and CBER Job Aid 900.08: National Drug Code, Bar Code and Product Identifier. To ensure completeness, the CBER checklists were used during this review; however, only the checklists for the final draft labels are attached to this review (see Appendixes). In each checklist, an "x" next to each item denotes that the label was found to be compliant with the corresponding regulation.

Multiple-Dose 5.5 mL (10 Doses) Vial Carton Label (NDC 80777-100-99):
The following issues were identified:

- There is a prominence issue with the proper name and tradename per 21 CFR 610.62 (b).
- The font size of "Suspension…" should be decreased and the font size of "For 18…." should be increased.

Multiple-Dose 5.5 mL Vial Container Label (NDC 80777-100-11):
The following issues were identified:

- There is a prominence issue with the proper name and tradename per 21 CFR 610.62 (b).
- The font size of "Suspension…" should be decreased and the font size of "For 18…." should be increased.
- The applicant will need to place the Human Readable Data onto the label sheet.

Multiple-Dose 7.5 mL (10 Doses) Vial Carton Label (NDC 80777-100-98):
The following issues were identified:

- There is a prominence issue with the proper name and tradename per 21 CFR 610.62 (b).
- The font size of "Suspension…" should be decreased and the font size of "For 18…." should be increased.

Multiple-Dose 7.5 mL Vial Container Label (NDC 80777-100-15):
The following issues were identified:

- There is a prominence issue with the proper name and tradename per 21 CFR 610.62 (b).
- The font size of "Suspension…" should be decreased and the font size of "For 18…." should be increased.
- The applicant will need to place the Human Readable Data onto the label sheet.

The above issues were conveyed to the applicant on November 15, 2021. The applicant submitted their responses to these issues on November 19, 2021, by submitting revised labels.

Review of carton and container labels submitted December 6, 2021:

The revised labels were reviewed and were found to be acceptable for approval however, there was one minor issue. The applicant will need to revise their label statement from "No Preservative" to "Contains No Preservative" on both of their container and carton labels.

The committee sent in one final IR to the applicant to revise the labeling statement from "No Preservative" to "Contains No Preservative" on both their container and carton labels on December 10, 2021. The applicant submitted their response to this issue on December 14, 2021, by submitting revised labels.

Review of carton and container labels submitted December 27, 2021:
The revised labels were reviewed and were found to be acceptable for approval. Details of these reviews are provided in Appendix 1 (Multiple-Dose 5.5 mL (10 Doses) Vial Carton Label) Carton Label (NDC 80777-100-99), Appendix 2 (*Multiple-*

Dose 5.5 mL Vial Container Label (NDC 80777-100-11), Appendix 3 (*Multiple-Dose 7.5 mL (10 Doses) Vial Carton Label* (NDC 80777-100-98) and Appendix 4 (*Multiple-Dose 7.5 mL Vial Container Label* (NDC 80777-100-15).

Recommendations

These labels are currently in compliance with 21 CFR 201.25, 21 CFR 207.35 and 21 CFR 610.60 through 21 CFR 610.67, Drug Supply Chain Security Act (DSCSA), the Guidance for Industry, "Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use", and CBER Job Aid 900.08: National Drug Code, Bar Code and Product Identifier. Therefore, these labels are recommended for approval.

Appendix 1: Review Checklist for Multiple-Dose 5.5 mL (10 Doses) Vial Carton Label: (Package) Label – (NDC 80777-100-99 submitted on December 14, 2021

21 CFR 610.61 (a) through (s)	Checked items "x" indicate compliance
a. The proper name of the product;	X
b. The name, address, and license number of manufacturer;	X
c. The lot number or other lot identification;	X
d. The expiration date;	X
e. The preservative used and its concentration, or if no preservative is used and the absence of a preservative is a safety factor, the words "no preservative";	X
f. The number of containers, if more than one;	X
g. The amount of product in the container expressed as (1) the number of doses, (2) volume, (3) units of potency, (4) weight, (5) equivalent volume (for dried product to be reconstituted), or (6) such combination of the foregoing as needed for an accurate description of the contents, whichever is applicable;	X
h. The recommended storage temperature;	X
i. The words "Shake Well", "Do not Freeze" or the equivalent, as well as other instructions, when indicated by the character of the product;	X
j. The recommended individual dose, for multiple dose containers.	10 Doses
k. The route of administration recommended, or reference to such directions in an enclosed circular	X
l. Known sensitizing substances, or reference to an enclosed circular containing appropriate information;	X
m. The type and calculated amount of antibiotics added during manufacture;	X
n. The inactive ingredients when a safety factor, or reference to an enclosed circular containing appropriate information;	X
o. The adjuvant, if present;	N/A
p. The source of the product when a factor in safe administration;	X
q. The identity of each microorganism used in manufacture, and, where applicable, the production medium and the method of inactivation, or reference to an enclosed circular containing appropriate information	X
r. Minimum potency of product expressed in terms of official standard of potency or, if potency is a factor and no U.S. standard of potency has been prescribed, the words "No U.S. standard of potency."	X
s. The statement: "'Rx only'" for prescription biologicals.	X

JA 900.08: NDC, Bar Code, & Product Identifiers/21 CFR 201.25 & 21 CFR 207.35 (3)(i)	**Checked items "x" indicate compliance**
9. Barcode & Linear or One-Dimensional (1D) (Parallel Lines) NDC a. Using the website https://www.fda.gov/industry/structured-product-labeling-resources/ndcnhric-labeler-codes (to check the sponsor's NDC) b. Click "Open" c. Click "ndc_hric_labeler_codes" d. Click "Yes" e. Locate the Firm Name and the NDC Labeler Code will be to the right	X X X X X X
10. Detachable Portion If the detachable label has a 2D Barcode, then you need to follow steps #8 & steps #9 (Barcode & NDC/2D Barcode) The actual detach label needs to include: a. Proprietary Name b. NDC # c. Lot # & Expiry Date	N/A
If the detachable label cannot contain all the above information, then it should have: a. Proprietary Name b. NDC # c. Lot # For 2D Barcodes on the carton label to meet the regulations for the Drug Supply Chain Security Act (DSCSA). Product Identifier - 2D Barcode a. Locate the symbol and the datamatrix codes will consist of: NDC (01): EXPIRY (17): BATCH/LOT (10): SERIAL (21):	N/A X X X X X

Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use Guidance for Industry	**Checked items "x" indicate compliance**
a. Multiple-Dose b. Single-Dose c. Single-Patient-Use	x

11. *If there is an age range associated with the label is should be included on the label. The placement should not be on the detachable portion.*	18 years of age and older
Comments: Multiple-Dose 5.5 mL (10 Doses) Vial Carton Label. This label is acceptable for approval.	

Appendix 2: Review Checklist for Multiple-Dose 5.5 mL Vial Container Label (NDC 80777-100-11) submitted on December 14, 2021

21 CFR 610.60(a)(1) through (7)	Checked items "x" indicate compliance
a. *Full label.* The following items shall appear on the label affixed to each container of a product capable of bearing a full label:	X
* 1. The proper name of the product;	X
* 2. The name, address, and license number of manufacturer;	X
* 3. The lot number or other lot identification;	X
* 4. The expiration date;	X
* 5. The recommended individual dose, for multiple dose containers.	5.5 mL
* 6. The statement: "'Rx only'" for prescription biologicals.	X
7. If a Medication Guide is required under part 208 of this chapter, the statement required under §208.24(d) of this chapter instructing the authorized dispenser to provide a Medication Guide to each patient to whom the drug is dispensed and stating how the Medication Guide is provided, except where the container label is too small, the required statement may be placed on the package label.	N/A

21 CFR 610.62 (7) (b) through (e)	Checked items "x" indicate compliance
b. *Package label information.* If the container is not enclosed in a package, all the items required for a package label shall appear on the container label.	N/A
c. *Partial label.* If the container is capable of bearing only a partial label, the container shall show as a minimum the name (expressed either as the proper or common name), the lot number or other lot identification and the name of the manufacturer; in addition, for multiple dose containers, the recommended individual dose. Containers bearing partial labels shall be placed in a package which bears all the items required for a package label.	X
d. *No container label.* If the container is incapable of bearing any label, the items required for a container label may be omitted, provided the container is placed in a package which bears all the items required for a package label.	N/A
e. *Visual inspection.* When the label has been affixed to the container a sufficient area of the container shall remain uncovered for its full length or circumference to permit inspection of the contents.	X

JA 900.08: NDC, Bar Code, & Product Identifiers/21 CFR 201.25 & 21 CFR 207.35 (3)(i)	
*8. Barcode Linear or One-Dimensional (1D) (Parallel Lines) NDC a. Using the website https://www.fda.gov/industry/structured-product-labeling-resources/ndcnhric-labeler-codes (to check the sponsor's NDC) b. Click "Open" c. Click "ndc_nhric_labeler_codes" d. Click "Yes" e. Locate the Firm Name and the NDC Labeler Code will be to the right	N/A N/A
*9. Product Identifier - 2D Barcode a. Locate the symbol and the datamatrix code information will consist of: NDC (01): EXPIRY (17): BATCH/LOT (10): SERIAL (21):	N/A
10. Detachable Portion If the detachable label has a 2D Barcode, then you need to follow steps #8 & steps #9 (Barcode & NDC/2D Barcode) The actual detach label needs to include: a. Proprietary Name b. NDC # c. Lot # & Expiry Date If the detachable label cannot contain all the above information, then it should have: a. Proprietary Name b. NDC # c. Lot #	N/A N/A

Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use Guidance for Industry	**Checked items "x" indicate compliance**
a. Multiple-Dose b. Single-Dose c. Single-Patient-Use	x

11. *If there is an age range associated with the label is should be included on the label. The placement should not be on the detachable portion.*	18 years of age and older
Comments: Multiple-Dose 5.5 mL Vial Container Label. This label is acceptable for approval.	

**** Minimum requirement for partial labels***

Appendix 3: Review Checklist for Multiple-Dose 7.5 mL (10 Doses) Vial Carton Label:(Package) Label – (NDC 80777-100-98) submitted on December 14, 2021

21 CFR 610.61 (a) through (s)	Checked items "x" indicate compliance
a. The proper name of the product;	X
b. The name, address, and license number of manufacturer;	X
c. The lot number or other lot identification;	X
d. The expiration date;	X
e. The preservative used and its concentration, or if no preservative is used and the absence of a preservative is a safety factor, the words "no preservative";	X
f. The number of containers, if more than one;	X
g. The amount of product in the container expressed as (1) the number of doses, (2) volume, (3) units of potency, (4) weight, (5) equivalent volume (for dried product to be reconstituted), or (6) such combination of the foregoing as needed for an accurate description of the contents, whichever is applicable;	X
h. The recommended storage temperature;	X
i. The words "Shake Well", "Do not Freeze" or the equivalent, as well as other instructions, when indicated by the character of the product;	X
j. The recommended individual dose, for multiple dose containers.	10 Doses
k. The route of administration recommended, or reference to such directions in an enclosed circular	X
l. Known sensitizing substances, or reference to an enclosed circular containing appropriate information;	X
m. The type and calculated amount of antibiotics added during manufacture;	X
n. The inactive ingredients when a safety factor, or reference to an enclosed circular containing appropriate information;	X
o. The adjuvant, if present;	N/A
p. The source of the product when a factor in safe administration;	X
q. The identity of each microorganism used in manufacture, and, where applicable, the production medium and the method of inactivation, or reference to an enclosed circular containing appropriate information	X
r. Minimum potency of product expressed in terms of official standard of potency or, if potency is a factor and no U.S. standard of potency has been prescribed, the words "No U.S. standard of potency."	X
s. The statement: "'Rx only'" for prescription biologicals.	X

JA 900.08: NDC, Bar Code, & Product Identifiers/21 CFR 201.25 & 21 CFR 207.35 (3)(i)	**Checked items "x" indicate compliance**
9. Barcode & Linear or One-Dimensional (1D) (Parallel Lines) NDC b. Using the website https://www.fda.gov/industry/structured-product-labeling-resources/ndcnhric-labeler-codes (to check the sponsor's NDC) b. Click "Open" c. Click "ndc_hric_labeler_codes" d. Click "Yes" e. Locate the Firm Name and the NDC Labeler Code will be to the right	X X X X X X
10. Detachable Portion If the detachable label has a 2D Barcode, then you need to follow steps #8 & steps #9 (Barcode & NDC/2D Barcode) The actual detach label needs to include: a. Proprietary Name b. NDC # c. Lot # & Expiry Date	N/A
If the detachable label cannot contain all the above information, then it should have: a. Proprietary Name b. NDC # c. Lot # For 2D Barcodes on the carton label to meet the regulations for the Drug Supply Chain Security Act (DSCSA). Product Identifier - 2D Barcode b. Locate the symbol and the datamatrix codes will consist of: NDC (01): EXPIRY (17): BATCH/LOT (10): SERIAL (21):	N/A X X X X X

Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use Guidance for Industry	**Checked items "x" indicate compliance**
d. Multiple-Dose e. Single-Dose f. Single-Patient-Use	x

11. *If there is an age range associated with the label is should be included on the label. The placement should not be on the detachable portion.*	18 years of age and older
Comments: Multiple-Dose 7.5 mL (10 Doses) Vial Carton Label. This label is acceptable for approval.	

Appendix 4: Review Checklist for Multiple-Dose 7.5 mL Vial Container Label (NDC 80777-100-15) submitted on December 14, 2021

21 CFR 610.60(a)(1) through (7)	Checked items "x" indicate compliance
b. *Full label.* The following items shall appear on the label affixed to each container of a product capable of bearing a full label:	X
* 1. The proper name of the product;	X
* 2. The name, address, and license number of manufacturer;	X
* 3. The lot number or other lot identification;	X
* 4. The expiration date;	X
* 5. The recommended individual dose, for multiple dose containers.	7.5 mL
* 6. The statement: "'Rx only'" for prescription biologicals.	X
7. If a Medication Guide is required under part 208 of this chapter, the statement required under §208.24(d) of this chapter instructing the authorized dispenser to provide a Medication Guide to each patient to whom the drug is dispensed and stating how the Medication Guide is provided, except where the container label is too small, the required statement may be placed on the package label.	N/A

21 CFR 610.62 (7) (b) through (e)	Checked items "x" indicate compliance
b. *Package label information.* If the container is not enclosed in a package, all the items required for a package label shall appear on the container label.	N/A
c. *Partial label.* If the container is capable of bearing only a partial label, the container shall show as a minimum the name (expressed either as the proper or common name), the lot number or other lot identification and the name of the manufacturer; in addition, for multiple dose containers, the recommended individual dose. Containers bearing partial labels shall be placed in a package which bears all the items required for a package label.	X
d. *No container label.* If the container is incapable of bearing any label, the items required for a container label may be omitted, provided the container is placed in a package which bears all the items required for a package label.	N/A
e. *Visual inspection.* When the label has been affixed to the container a sufficient area of the container shall remain uncovered for its full length or circumference to permit inspection of the contents.	X

JA 900.08: NDC, Bar Code, & Product Identifiers/21 CFR 201.25 & 21 CFR 207.35 (3)(i)	
*8. Barcode Linear or One-Dimensional (1D) (Parallel Lines) NDC b. Using the website https://www.fda.gov/industry/structured-product-labeling-resources/ndcnhric-labeler-codes (to check the sponsor's NDC) b. Click "Open" c. Click "ndc_nhric_labeler_codes" d. Click "Yes" e. Locate the Firm Name and the NDC Labeler Code will be to the right	N/A N/A
*9. Product Identifier - 2D Barcode a. Locate the symbol and the datamatrix code information will consist of: NDC (01): EXPIRY (17): BATCH/LOT (10): SERIAL (21):	N/A
10. Detachable Portion If the detachable label has a 2D Barcode, then you need to follow steps #8 & steps #9 (Barcode & NDC/2D Barcode) The actual detach label needs to include: a. Proprietary Name b. NDC # c. Lot # & Expiry Date If the detachable label cannot contain all the above information, then it should have: a. Proprietary Name b. NDC # c. Lot #	N/A N/A

Selection of the Appropriate Package Type Terms and Recommendations for Labeling Injectable Medical Products Packaged in Multiple-Dose, Single-Dose, and Single-Patient-Use Containers for Human Use Guidance for Industry	**Checked items "x" indicate compliance**
d. Multiple-Dose e. Single-Dose f. Single-Patient-Use	x

11. *If there is an age range associated with the label is should be included on the label. The placement should not be on the detachable portion.*	18 years of age and older
Comments: Multiple-Dose 7.5 mL Vial Container Label. This label is acceptable for approval.	

**** Minimum requirement for partial labels***