extractable/leachable studies and stability studies. Also, for design differences in the delivery device or container closure system, performance testing, and a human factors study may be needed.

However, a prospective biosimilar applicant will not be able to obtain licensure under section 351(k) for its product when a design difference in the delivery device or container closure system results in any of the following:

- A clinically meaningful difference between the proposed product and the reference product in terms of safety, purity, and potency;
- A different route of administration or dosage form; or
- A condition of use (e.g., indication, dosing regimen) for which the reference product has not been previously approved; or otherwise does not meet the standard for biosimilarity.

Additional considerations apply for a proposed interchangeable product. For example, in reviewing an application for a proposed interchangeable product, the FDA may consider whether the differences from the reference product significantly alter critical design attributes, product performance, or operating principles, or would require additional instruction to healthcare providers or patients, for patients to be safely alternated or switched between the reference product and one or more interchangeable products without the intervention of the prescribing healthcare provider. Additional performance data about the delivery device may also be necessary.

A proposed biosimilar product in a delivery device will be considered a combination product and may, in some instances, require a separate application for the device.

Q. I.5: Can an applicant obtain licensure of a proposed biosimilar product for fewer than all routes of administration for which an injectable reference product is licensed?

A. I.5: Yes, an applicant may obtain licensure of a proposed biosimilar product for fewer than all routes of administration for which an injectable reference product is licensed. An applicant must demonstrate that there are no clinically meaningful differences between the proposed biosimilar product and the reference product in terms of safety, purity, and potency. In a limited number of circumstances, this may include providing information from one or more studies using a route of administration for which licensure is not requested (e.g., a study using subcutaneous administration may provide a more sensitive comparative assessment of immunogenicity