



BLA 125514/S-142

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING COMMITMENT**

Merck Sharp & Dohme Corp., a subsidiary of Merck & Co., Inc.
Attention: Dajie Li, JD
Associate Director, Global Regulatory Affairs
126 E. Lincoln Avenue PO Box 2000
Mailstop RY34-B295
Rahway, NJ 07065

Dear Dr. Li:

Please refer to your supplemental biologics license application (sBLA), dated February 10, 2023, received February 10, 2023, and your amendments, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab) injection.

This Prior Approval supplemental biologics license application provides for updates to the Prescribing Information to add final overall survival results from the CLEAR trial in fulfillment of postmarketing commitment 4123-1 from the August 10, 2021 approval letter for sBLA 125514/supplement(S)-102.

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.

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,¹ that is identical to the enclosed labeling (Prescribing Information) and include

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

the labeling changes proposed in any pending “Changes Being Effectuated” (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*.²

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 Effectuated” (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.

Because none of these criteria apply to your application, you are exempt from this requirement.

FULFILLMENT OF POSTMARKETING COMMITMENT

We have received your submission dated February 10, 2023, containing the final report for the following postmarketing commitment listed in the August 10, 2021 approval letter for BLA 125514/S-102.

² 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>.

- 4123-1 Provide the final overall survival report and datasets, including results for the favorable risk MSKCC and IMDC risk subgroups, based on the prespecified final number of events for the clinical trial CLEAR, titled “A Multicenter, Openlabel, Randomized, Phase 3 Trial to Compare the Efficacy and Safety of Lenvatinib in Combination with Everolimus or Pembrolizumab Versus Sunitinib Alone in First-Line Treatment of Subjects with Advanced Renal Cell Carcinoma.” The report and datasets should include updated overall survival results for all three study arms on the CLEAR trial. The results from this trial may inform product labeling.

We have reviewed your submission and conclude that the above commitment was fulfilled.

This completes all of your postmarketing requirements (PMRs) and postmarketing commitments (PMCs) acknowledged in our August 10, 2021 letter. You are not required to report on the status of closed (released or fulfilled) PMRs/PMCs in your annual report required under 21 CFR 601.70 of the FD&CA.

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-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.³

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in this supplement, including any new safety-related information [21 CFR 601.12(a)(4)]. The revisions to 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 601.12(a)(4).

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

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

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

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).

If you have any questions, contact Sso (Anna) Lee, Regulatory Project Manager, at (301) 796-0282 or at Sso.Lee@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Daniel Suzman, MD
Deputy Director
Division of Oncology 1
Office of Oncologic Diseases
Center for Drug Evaluation and Research

ENCLOSURE(S):

- Content of Labeling
 - Prescribing Information

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.

/s/

DANIEL L SUZMAN
10/23/2023 09:35:13 AM