

BLA 761325

## BLA APPROVAL

Sanofi-Aventis U.S. LLC  
Attention: Selina Feng, MBS, RAC  
Regulatory Strategist, Global Regulatory Affairs  
55 Corporate Drive  
Mail Stop: 55C-300  
Bridgewater, NJ 08807-5925

Dear Selina Feng:

Please refer to your biologics license application (BLA) dated and received September 8, 2022, and your amendments, submitted under section 351(k) of the Public Health Service Act for Merilog (insulin aspart-szjj) injection, 10 mL (100 units/mL) and Merilog SoloStar (insulin aspart-szjj) injection, 3 mL (100 units/mL) for subcutaneous injection.

We acknowledge receipt of your resubmission dated August 16, 2024, which constituted a complete response to our September 8, 2023, action letter.

### **LICENSING**

We have approved your BLA for Merilog (insulin aspart-szjj) and Merilog SoloStar (insulin aspart-szjj) effective this date. You are hereby authorized to introduce or deliver for introduction into interstate commerce, Merilog (insulin aspart-szjj) and Merilog SoloStar (insulin aspart-szjj) under your existing Department of Health and Human Services U.S. License No. 1752. Merilog (insulin aspart-szjj) and Merilog SoloStar (insulin aspart-szjj) are indicated to improve glycemic control in adults and pediatric patients with diabetes mellitus.

### **MANUFACTURING LOCATIONS**

Under this license, you are approved to manufacture insulin aspart-szjj drug substance at Sanofi-Aventis Deutschland GmbH in Frankfurt am Main, Germany. The final drug product will be manufactured, filled, labeled, and packaged at Sanofi-Aventis Deutschland GmbH in Frankfurt am Main, Germany. You may label your products with the proprietary names, Merilog and Merilog SoloStar, and market them in 10 mL multiple-dose vial (100 units/mL) and 3 mL single-patient-use prefilled pen (100 units/mL), respectively, for subcutaneous injection.

### **DATING PERIOD**

The dating period for Merilog and Merilog SoloStar shall be 30 months from the date of manufacture when stored at 5°C ± 3°C, protected from light. The date of manufacture shall be defined as the date of final sterile filtration of the formulated drug product. The dating period for your drug substance shall be (b) (4) months from the date of manufacture when stored at (b) (4).

We have approved the stability protocol in your license application for the purpose of extending the expiration dating period of your drug product under 21 CFR 601.12.

### **FDA LOT RELEASE**

You are not currently required to submit samples of future lots of Merilog and Merilog SoloStar to the Center for Drug Evaluation and Research (CDER) for release by the Director, CDER, under 21 CFR 610.2. We will continue to monitor compliance with 21 CFR 610.1, requiring completion of tests for conformity with standards applicable to each product prior to release of each lot.

Any changes in the manufacturing, testing, packaging, or labeling of Merilog and Merilog SoloStar, or in the manufacturing facilities, will require the submission of information to your BLA for our review and written approval, consistent with 21 CFR 601.12.

### **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 ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

### **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.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information, Patient Package Insert, and Instructions for Use). Information on submitting SPL files using

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<sup>1</sup> See <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>  
U.S. Food and Drug Administration  
Silver Spring, MD 20993  
[www.fda.gov](http://www.fda.gov)

eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As (October 2009)*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

### **CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling and/or carton and container labeling submitted on February 12, 2025, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *SPL Standard for Content of Labeling Technical Qs & As*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved BLA 761325.**” Approval of this submission by FDA is not required before the labeling is used.

### **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.

We have determined that, at this time, no pediatric studies will be required under PREA for your BLA.

### **POSTMARKETING COMMITMENTS NOT SUBJECT TO THE REPORTING REQUIREMENTS UNDER SECTION 506B**

We remind you of your postmarketing commitments:

- 4488-1 To reassess the in-process endotoxin limit of insulin aspart (b) (4) using results of 20 batches and to submit the results to the Agency once the information is available.

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<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database at <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

The timetable you submitted on October 7, 2024, states that you will conduct this study according to the following schedule:

Final Report Submission: February 28, 2026

Submit clinical protocols to your IND 136342 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this BLA. In addition, under 21 CFR 601.70 you should include a status summary of each commitment in your annual progress report of postmarketing studies to this BLA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients/subjects entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled "**Postmarketing Commitment Protocol**," "**Postmarketing Commitment Final Report**," or "**Postmarketing Commitment Correspondence**."

### **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*.<sup>3</sup>

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 601.12(f)(4)]. Form FDA 2253 is available at FDA.gov.<sup>4</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>5</sup>

### **REPORTING REQUIREMENTS**

You must submit adverse experience reports under the adverse experience reporting requirements at 21 CFR 600.80.

Prominently identify all adverse experience reports as described in 21 CFR 600.80.

You must submit distribution reports under the distribution reporting requirements at 21 CFR 600.81.

You must submit reports of biological product deviations under 21 CFR 600.14. You should promptly identify and investigate all manufacturing deviations, including those

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

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

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

associated with processing, testing, packing, labeling, storage, holding and distribution. If the deviation involves a distributed product, may affect the safety, purity, or potency of the product, and meets the other criteria in the regulation, you must submit a report on Form FDA 3486 to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Compliance Risk Management and Surveillance  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

Biological product deviations, sent by courier or overnight mail, should be addressed to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Compliance Risk Management and Surveillance  
10903 New Hampshire Avenue, Bldg. 51, Room 4207  
Silver Spring, MD 20903

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at [FDA.gov](http://FDA.gov).

If you have any questions, call Michael Oyewole, Regulatory Project Manager, at (301) 796-3897.

Sincerely,

*{See appended electronic signature page}*

John Sharretts, M.D.  
Director  
Division of Diabetes, Lipid Disorders, and Obesity  
Office of Cardiology, Hematology, Endocrinology,  
and Nephrology  
Office of New Drugs  
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
  - Instructions for Use (Merilog)
  - Instructions for Use (Merilog Solostar)
- Carton and Container Labeling

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**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.**  
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/s/  
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JOHN M SHARRETTS  
02/14/2025 12:45:30 PM