



NDA 216986/S-009

SUPPLEMENT APPROVAL FULFILLMENT OF POSTMARKETING REQUIREMENT

Guerbet LLC
Attention: Alpa Jain
Manager-Regulatory Affairs
214 Carnegie Center, Suite 300
Princeton, NJ 08540

Dear Alpa Jain:

Please refer to your supplemental new drug application (sNDA) dated April 22, 2025, received April 22, 2025, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Elucirem (gadopiclenol) injection.

This Prior Approval supplemental new drug application updates the U.S. Prescribing Information to include an extension of the existing Elucirem indications to pediatric patients < 2 years of age, including term neonates. In addition, this supplement provides for revisions to subsection 8.1 Pregnancy to reflect clinical experience regarding the risk of *in utero* exposure to gadolinium-based contrast agents (GBCAs) based on a review of scientific literature.

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.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at [FDA.gov](http://www.fda.gov).¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information), with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

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

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 from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We note that you have fulfilled the pediatric study requirement for patients < 2 years of age (including term neonates) for this application.

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated April 22, 2025, containing the final report for the following postmarketing requirement listed in the September 21, 2022, approval letter.

- 4341-1 Conduct a study of approximately 40 neonates and infants aged < 2 years that will receive a single dose of 0.05 mmol/kg gadopichlenol intravenously for the evaluation of the plasma pharmacokinetics profile of gadopichlenol (POP-PK analysis). Safety and imaging data will be collected as secondary endpoints.

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

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>.

We remind you that there are postmarketing requirements listed in the September 21, 2022, approval letter that are still open.

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

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 314.81(b)(3)(i)]. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

PATENT LISTING REQUIREMENTS

Pursuant to 21 CFR 314.53(d)(2) and 314.70(f), certain changes to an approved NDA submitted in a supplement require you to submit patent information for listing in the Orange Book upon approval of the supplement. You must submit the patent information required by 21 CFR 314.53(d)(2)(i)(A) through (C) and 314.53(d)(2)(ii)(A) and (C), as applicable, to FDA on Form FDA 3542 within 30 days after the date of approval of the supplement for the patent information to be timely filed (see 21 CFR 314.53(c)(2)(ii)).

You also must ensure that any changes to your approved NDA that require the submission of a request to remove patent information from the Orange Book are submitted to FDA at the time of approval of the supplement pursuant to 21 CFR 314.53(d)(2)(ii)(B) and 314.53(f)(2)(iv).

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

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>

If you have any questions, please contact Ms. Sharon Thomas, Regulatory Project Manager, at sharon.thomas@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

A. Alex Hofling, M.D., Ph.D.
Office Director
Office of Specialty Medicine
Center for Drug Evaluation and Research
Food and Drug Administration

ENCLOSURE(S):

- Content of Labeling
 - Prescribing Information
 - Medication Guide

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/

AUGUST A HOFLING
02/20/2026 10:11:00 AM