



BLA 125514/120

**SUPPLEMENT APPROVAL/
FULFILLMENT OF POSTMARKETING COMMITMENT**

Merck Sharp & Dohme Corp., a subsidiary of Merck & Co., Inc.
Attention: Geet Mankad
Director, Global Regulatory Affairs
126 East Lincoln Avenue, RY34-B1139N
Rahway, NJ 07065-0900

Dear Ms. Mankad:

Please refer to your supplemental biologics license application (sBLA), dated July 29, 2021, and your amendments, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab), injection, 100 mg.

This Prior Approval supplemental biologics license application provides for updates to Section 14, CLINICAL STUDIES, Microsatellite Instability-High or Mismatch Repair Deficient Colorectal Cancer, subsection of the Keytruda Prescribing Information (PI) with data obtained from the KEYNOTE-177 Trial described in postmarketing commitment (PMC) 3892-1.

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 (text for PI) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements.

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 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 Effected" (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).

FULFILLMENT OF POSTMARKETING COMMITMENT

We received your submission dated July 29, 2021, containing the final report for the following postmarketing commitment listed in the June 29, 2020, approval letter for BLA 125514/S-84.

3892-1 Submit the final overall survival analyses and datasets for the ongoing clinical trial KEYNOTE-177, titled, "A Phase III Study of Pembrolizumab (MK-3475) vs. Chemotherapy in Microsatellite Instability-High (MSI-H) or Mismatch Repair Deficient (dMMR) Stage IV Colorectal Carcinoma (KEYNOTE-177)" to further characterize the clinical benefit of pembrolizumab for patients with microsatellite instability high or mismatch repair deficiency metastatic colorectal cancers that may inform product labeling.

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

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our June 29, 2020, approval letter.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the

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>.

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

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, call Gina Davis, Senior Regulatory Health Project Manager, at (301) 266-0928.

Sincerely,

{See appended electronic signature page}

Steven Lemery, MD, MHS
Director
Division of Oncology 3
Office of Oncologic Diseases
Center for Drug Evaluation and Research

ENCLOSURE:

- Content of Labeling
 - Prescribing Information

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>

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/

STEVEN J LEMERY
12/17/2021 09:54:24 AM