



BLA 125514/S-174

**SUPPLEMENT APPROVAL/
FULFILLMENT OF POSTMARKETING COMMITMENT**

Merck Sharp & Dohme LLC, a subsidiary of Merck & Co., Inc.
Attention: David G. Evans, MBA
Senior Director, Global Regulatory Affairs
351 North Sumneytown Pike, PO Box 1000, UG2C-50
North Wales, PA 19454

Dear David Evans:

Please refer to your supplemental biologics license application (sBLA) received August 13, 2024, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab) solution for infusion.

This Prior Approval supplemental biologics license application provides for updates to the Clinical Studies section (14) of the US Prescribing Information to include additional overall survival efficacy results from the KEYNOTE-522 trial, entitled, "Phase 3, Randomized, Double-blind Study to Evaluate Pembrolizumab plus Chemotherapy vs Placebo plus Chemotherapy as Neoadjuvant Therapy and Pembrolizumab vs Placebo as Adjuvant Therapy for Triple-Negative Breast Cancer (TNBC)".

APPROVAL & LABELING

We have completed our review of this application. 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, 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 the labeling changes proposed in any pending "Changes Being Effected" (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

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

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>.

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 have received your submission dated August 13, 2024, containing the final report for the following postmarketing commitment listed in the July 26, 2021, approval letter for BLA 125514/S-089.

- 4118-1 Submit the final overall survival (OS) analysis and datasets with the final report from the ongoing clinical trial, KEYNOTE-522, titled “A Phase III, Randomized, Double-blind Study to Evaluate Pembrolizumab Plus Chemotherapy vs. Placebo Plus Chemotherapy as Neoadjuvant Therapy and Pembrolizumab vs. Placebo as Adjuvant Therapy for Triple Negative Breast Cancer (TNBC).”

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 July 26, 2021, letter. You are not required to report on the status of closed (released or fulfilled) PMRs/PMC 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

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

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.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

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

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}

Christy Osgood, MD
Supervisory Associate Director
Division of Oncology 1
Office of Oncologic Diseases
Center for Drug Evaluation and Research

ENCLOSURE(S):

- Content of Labeling
 - Prescribing Information

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/

CHRISTY L OSGOOD
04/21/2025 02:42:02 PM