BLA 125554/S-114

SUPPLEMENT APPROVAL/
FULFILLMENT OF POSTMARKETING
COMMITMENT

Bristol-Myers Squibb Company
Attention: Parth Patel, PharmD
Senior Manager - Oncology
86 Morris Avenue
Summit, NJ 07901

Dear Dr. Patel:

Please refer to your supplemental biologics license application (sBLA), dated May 19, 2022, received May 19, 2022, and your amendments, submitted under section 351(a) of the Public Health Service Act for Opdivo (nivolumab) injection.

This Prior Approval supplemental biologics license application provides for updates to the Overall Survival (OS) information from CHECKMATE-9ER in section 14 (Clinical Studies) of the USPI as requested by the FDA on April 21, 2022.

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, Medication Guide) 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 the 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.

We are waiving the pediatric studies requirement for this application because necessary studies are impossible or highly impracticable to conduct in the pediatric population since the indication rarely if ever exists in children and an adequate study population does not exist.

FULFILLMENT OF POSTMARKETING COMMITMENT

We have received your submission dated October 19, 2021, containing the final report for the following postmarketing commitment listed in the January 22, 2021, approval letter.

4002-1 Submit the final overall survival report and datasets, including results for the favorable IMDC risk subgroup, based on the pre-specified final number of events for the clinical trial CHECKMATE-9ER, titled "A Phase 3, Randomized, Open-Label Study of Nivolumab Combined with Cabozantinib versus Sunitinib in Participants with Previously Untreated Advanced or Metastatic Renal Cell Carcinoma." The results from this trial may inform product labeling.

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

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our January 22, 2021, letter.

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]

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 Christal Lee, Regulatory Project Manager, at 240-402-2711.

Sincerely,

{See appended electronic signature page}

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

ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
  - Medication Guide

[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

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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.

/s/

DANIEL L SUZMAN
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