

NDA 212819/S-008

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING
REQUIREMENT**

Merck Sharp & Dohme LLC
Attention: Brenda L. Pennypacker, MS
Director, Global Regulatory Affairs
351 North Sumneytown Pike
P.O. Box 1000, UG2D-68
North Wales, PA 19454-2505

Dear Brenda L. Pennypacker:

Please refer to your supplemental new drug application (sNDA) dated and received February 13, 2025, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Recarbrio (imipenem, cilastatin, and relebactam) for injection.

This Prior Approval sNDA provides for the addition of pediatric patients (birth to <18 years of age) weighing at least 2 kg to the approved indications for treatment of complicated urinary tract infections (cUTI), including pyelonephritis in patients who have limited or no alternative treatment options; complicated intra-abdominal infections (cIAI) in patients who have limited or no alternative treatment options; and hospital-acquired bacterial pneumonia and ventilator-associated bacterial pneumonia (HABP/VABP).

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.

This supplement provides for pediatric labeling text pursuant to the Pediatric Research Equity Act (PREA). This approval is in response to a PREA Postmarketing Requirement (PMR).

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.¹ Content of labeling must be identical to the enclosed labeling (text for the

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

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.

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 all relevant pediatric age groups for this application.

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated February 13, 2025, containing the final report for the following postmarketing requirement listed in the June 04, 2020, supplement 002 approval letter.

3865-1 Conduct a randomized, open-label, active controlled trial to evaluate the safety and tolerability of imipenem, cilastatin and relebactam in children from birth to less than 18 years of age with complicated urinary tract infections, complicated intra-abdominal infections and hospital-acquired bacterial pneumonia or ventilator-associated bacterial pneumonia.

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

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>.

fulfilled.

This completes all of your postmarketing requirements acknowledged in our July 16, 2019, and June 04, 2020, approval letters.

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, email Lori Kolejian, MS, MSAMB, Regulatory Project Manager, at Lori.kolejian@fda.hhs.gov, or call (301) 796-0881.

Sincerely,

{See appended electronic signature page}

Dmitri Iarikov, MD, PhD
Deputy Director
Division of Anti-Infectives
Office of Infectious Diseases
Office of New Drugs
Center for Drug Evaluation and Research

ENCLOSURE:

- Content of Labeling
 - Prescribing Information

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/

DMITRI IARIKOV
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