



BLA 761055/S-051

## CORRECTED SUPPLEMENT APPROVAL

Regeneron Pharmaceuticals, Inc.  
Attention: Amanda Cook  
Director, Regulatory Affairs  
777 Old Saw Mill River Road  
Tarrytown, NY 10591

Dear Amanda Cook:

Please refer to your supplemental biologics license application (sBLA) received October 18, 2024, and your amendments, submitted under section 351(a) of the Public Health Service Act for Dupixent (dupilumab) injection.

We also refer to our approval letter dated April 17, 2025, which contained the following errors: Incomplete information regarding the required pediatric postmarketing study in the Required Pediatric Assessments section and the Part 3 combination product in the Reporting Requirements section of the Supplement Approval letter.

This corrected action letter incorporates the corrections of the errors. The effective action date will remain April 17, 2025, the date of the original letter.

We acknowledge receipt of your amendment dated October 18, 2024, which constituted a complete response to our October 19, 2023, action letter.

This Prior Approval supplemental biologics license application provides for use of Dupixent for the treatment of adult and pediatric patients aged 12 years and older with chronic spontaneous urticaria (CSU) who remain symptomatic despite H1 antihistamine treatment.

### **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, 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,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information, and Patient Package Insert, Instructions for Use) 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*.<sup>2</sup>

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).

### **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 study requirement for ages less than 2 years because the product does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients in this age group **and** is not likely to be used in a substantial number of pediatric patients in this group. The request for waiver is justified in children less than 2 years of age based on the difficulty of definitive diagnosis of CSU in this age group, and the preferred use of other treatment options (e.g. antihistamines) in this age group prior to use of dupilumab.

We are deferring submission of your pediatric study for ages 2 to < 12 years for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act is a required postmarketing study. The status of this postmarketing

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

<sup>2</sup> 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>.

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study must be reported annually according to 21 CFR 601.28 and section 505B(a)(4)(B) of the Federal Food, Drug, and Cosmetic Act. This required study is listed below.

4843-1 Conduct a pharmacokinetics (PK) and safety study in children with chronic spontaneous urticaria (CSU) aged 2 to < 12 years of age.

Final Protocol Submission: 04/2022 (submitted)  
Study Completion Date: 02/2025 (completed)  
Final Report Submission Date: 07/2025

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.<sup>3</sup>

Submit the protocol to your IND 105379, with a cross-reference letter to this BLA. Reports of this required pediatric postmarketing study must be submitted as a BLA or as a supplement to your approved BLA with the proposed labeling changes you believe are warranted based on the data derived from this study. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

### **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*.<sup>4</sup>

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<sup>3</sup> See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019)*.

<https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

<sup>4</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

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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](http://FDA.gov).<sup>5</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>6</sup>

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).

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at [FDA.gov](http://FDA.gov).

If you have any questions, call Thomas Yung, Regulatory Project Manager, at 301-796-7147 or [Thomas.Yung@fda.hhs.gov](mailto:Thomas.Yung@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Kelly Stone, MD, PhD  
Associate Director for Therapeutic Review  
Division of Pulmonology, Allergy, and Critical Care  
Office of Immunology and Inflammation  
Office of New Drugs  
Center for Drug Evaluation and Research

### ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
  - Instructions for Use

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<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>6</sup> <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.**  
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/s/  
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