



BLA 761097/S-030

SUPPLEMENT APPROVAL

Regeneron Pharmaceuticals, Inc.
Attention: Karen Kuphal, Ph.D., MBA, PMP
Director, Regulatory Affairs
777 Old Saw Mill River Road
Tarrytown, NY 10591

Dear Dr. Kuphal:

Please refer to your supplemental biologics license application (sBLA) received April 11, 2025, and your amendments, submitted under section 351(a) of the Public Health Service Act for Libtayo (cemiplimab-rwlc) injection.

This Prior Approval supplemental biologics license application provides an update to the Libtayo (cemiplimab-rwlc) prescribing information (PI) and medication guide (MG) with a new indication for the adjuvant treatment of patients with cutaneous squamous cell carcinoma (CSCC) at high risk of recurrence after surgery and radiation.

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](http://www.fda.gov),¹ that is identical to the enclosed labeling (text for the Prescribing Information and Medication Guide) 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).

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 due to CSCC in pediatric patients being extremely rare.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitment:

- 4899-1 Complete the ongoing clinical trial R2810-ONC-1788 and provide subsequent analyses of disease free survival (DFS) and overall survival (OS) to further characterize the clinical benefit of cemiplimab in patients with cutaneous squamous cell carcinoma at high risk of recurrence following treatment with surgery and radiation.

The timetable you submitted on September 2, 2025, states that you will conduct this study according to the following schedule:

Trial Completion: 10/2026
Final Report Submission: 04/2027

Submit the DFS and OS datasets with the final report 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*.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 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 Craig Long, Senior Regulatory Health Project Manager, at 301-837-7646 or email at Craig.Long@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Steven Lemery, M.D., M.H.S.
Director
Division of Oncology 3
Office of Oncologic Diseases
Center for Drug Evaluation and Research

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>

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Medication Guide

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
10/08/2025 12:41:48 PM