

BLA 125554/S-129

**SUPPLEMENT APPROVAL/  
FULFILLMENT OF POSTMARKETING  
REQUIREMENT**

Bristol-Myers Squibb Company  
Attention: Andrew Leung, Pharm.D.  
Senior Manager, US Regulatory Lead  
P.O. Box 5326  
Princeton, NJ 08543

Dear Dr. Leung:

Please refer to your supplemental biologics license application (sBLA) received June 21, 2024, 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 an update to the Opdivo (nivolumab) prescribing information (PI) and Medication Guide with results from Study CA2099DW supporting the following:

- Provides for a new indication for adult patients with unresectable or metastatic hepatocellular carcinoma (HCC) as a first-line treatment in combination with ipilimumab.
- Fulfillment of postmarketing requirement (PMR) 3822-1 and the conversion from accelerated approval to regular approval of Opdivo (nivolumab) in combination with ipilimumab in adult patients with unresectable or metastatic HCC who have been previously treated with sorafenib.

**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,<sup>1</sup> 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 Effectuated” (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 Effectuated” (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).

## **SUBPART E FULFILLED**

We approved this BLA under the regulations at 21 CFR 601 Subpart E for Accelerated Approval of Biological Products for Serious or Life-Threatening Illnesses. Approval of this supplement fulfills your commitments made under 21 CFR 601.41.

## **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.

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

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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>.

## **FULFILLMENT OF POSTMARKETING REQUIREMENT**

We have received your submission dated June 21, 2024, containing the final report for the following postmarketing requirement listed in the March 10, 2020, approval letter.

- 3822-1 Submit the final report demonstrating an improvement in overall survival from a multicenter, randomized trial to confirm the clinical benefit of nivolumab in combination with ipilimumab over standard therapy in patients with advanced hepatocellular carcinoma, that may inform product labeling. Submit the datasets with the final report.

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

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our March 10, 2020, 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*.<sup>3</sup>

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

## **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).

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<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at

<https://www.fda.gov/media/128163/download>.

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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](mailto: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

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Medication Guide

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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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