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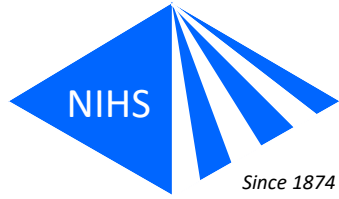
# Recent Regulatory Developments in Japan for Ensuring the Quality and Safety of Cell-Based Therapeutic Products

**Yoji SATO, PhD**

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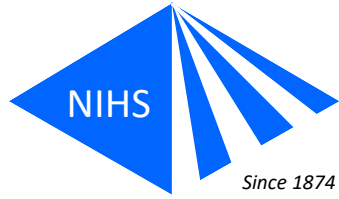
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# AGENDA

1. MCP: the Minimum Consensus Package for Ensuring the Quality and Safety of Cell Therapy Products
2. A Points-to-Consider Document Regarding Tumorigenicity Assessment of Cell Therapy Products
3. Drafting a Guidance Document on Comparability Evaluation Before & After Changes in Manufacturing Process of Cell Therapy Products



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# Q/S Guidelines for Cell-Based Therapeutic Products



## Good Tissue Practice (GTP) Guidelines

### General Principles for the Handling and Use of Cell/Tissue-Based Products

PFSB/MHLW Notification No.1314 (2000) Appendix 1;  
No 0330030 (Revision, 2007)

### Standards for Biological Raw Materials (also translated as “Standards for Biological Ingredients”)

MHLW Ministerial Notice No. 210. (2003);  
No. 37. (Revision, 2018)

## Good Cell, gene and Tissue-Based Prod. Mfg. Practice (GCTP)

### Ministerial Ordinance on Good Practices in Manufacturing Control and Quality Control of Regenerative Medical Products

MHLW Ministerial Ordinance No. 93 (2014)

## Standards for Manufacturing Facility

### Regulations for Buildings and Equipment of Pharmacies

MHLW Ministerial Ordinance No.2(1961);  
No.87 (Revision, 2014)

## Technical Guidelines Separately Written for Each Type of Starting Cell Materials

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Allogeneic Human Cell/Tissue**

PFSB/MHLW Notifications No. 0912006 (2008)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Autologous Human Cell/Tissue**

PFSB/MHLW Notifications No.0208003 (2008)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Allogeneic Human Somatic Stem Cells**

PFSB/MHLW Notifications No.0907-3 (2012)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Autologous Human Somatic Stem Cells**

PFSB/MHLW Notifications No.0907-2 (2012)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Allogeneic Human iPS(-like) Cells**

PFSB/MHLW Notifications No.0907-5 (2012)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Autologous Human iPS(-like) Cells**

PFSB/MHLW Notifications No.0907-4 (2012)

### Guidelines on Ensuring the Quality and Safety of Pharmaceuticals and Medical Devices Derived from the Processing of

#### **Allogeneic Human ES Cells**

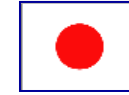
PFSB/MHLW Notifications No.0907-6 (2012)

(...and some monographs for specific products are also available.)

## Guidelines on Ensuring Quality and Safety of Products Derived by Processing of Human Cells/Tissues

- Describe the basic technical elements to ensure the quality and safety of therapeutic products derived from processing of autologous and allogeneic human (stem) cells
- Clarify differences with respect to data requirements and evaluation between MA application and application of a clinical trial for an investigational new product. For the latter, points to consider are mentioned to make sure if there are any quality and safety concerns that might pose an obstacle to initiate a clinical trial.





# “Minimum Consensus Package (MCP) for Ensuring the Quality and Safety of Cell Therapy Products”



**Guidance for Users of the Seven GL Documents**  
**Written by the Original Drafting Group of the GLs**

# The MCP Drafting Group

## Co-chairs

Takao Hayakawa (Osaka Univ./ NIHS)  
Yoji Sato (NIHS)

## Members

Takashi Aoi (Kobe Univ.)  
Akihiro Umezawa (NCCHD)  
Kiyoshi Okada (Osaka Univ.)  
Keiya Ozawa (Jichi Medical Univ.)  
Kazuhiro Takekita (Osaka Univ./ Hyperion Drug Discovery)  
Akifumi Matsuyama (Osaka Habikino Medical Center)  
Satoshi Yasuda (NIHS)  
Masayuki Yamato (Tokyo Women's Medical Univ.)

## Observers

Division of Regenerative Medicine Research, AMED  
Research and Policy Division, MHLW  
Medical Device Evaluation Division, MHLW  
Office of Cellular and Tissue-based Products, PMDA



# Necessary and Sufficient Items to Ensure Quality & Safety

- In R&D and review process of an individual cellular or gene therapy product, in order to accurately and rationally ensure the quality and safety, appropriate tests and data interpretations should be conducted, based on the risk of the product, which is assessed according to the type, characteristics and clinical application of the product. Excessive tests and data should not be required.
- However, to ensure the quality, safety, etc., of individual products, it is not easy for the developers themselves to select necessary and efficient matters and to evaluate the data among comprehensive matters indicated in the current guidelines. This issue has become a bottleneck for development.

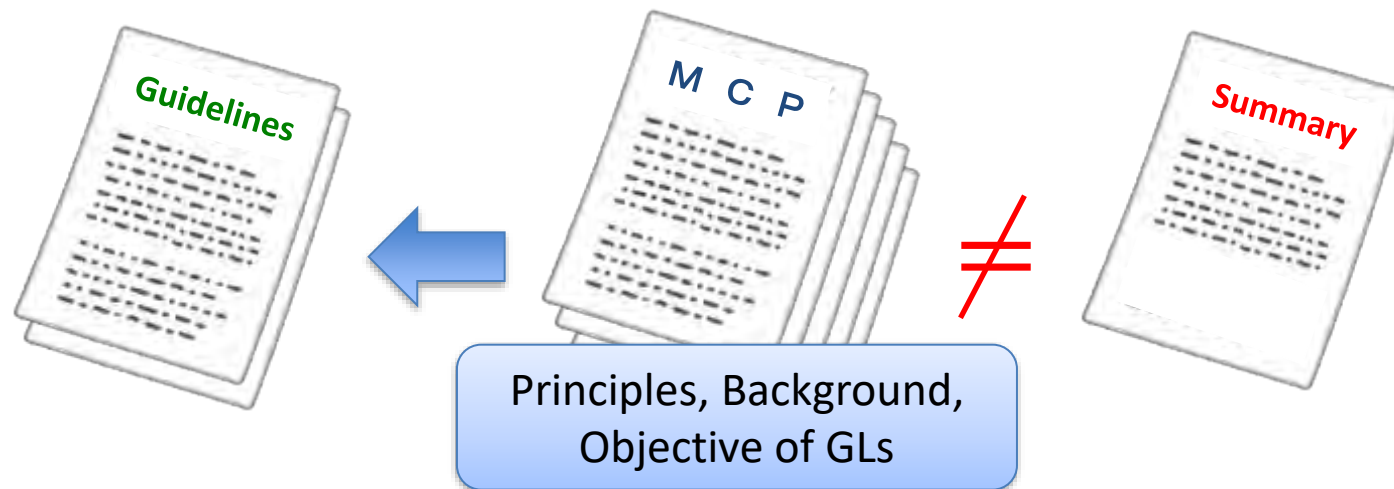
For more reasonable, efficient, and effective product development, it is useful to share technical elements and basic concepts (minimum consensus package [MCP]), which will be common bases for anticipated most human cell-based products, among the stakeholders.



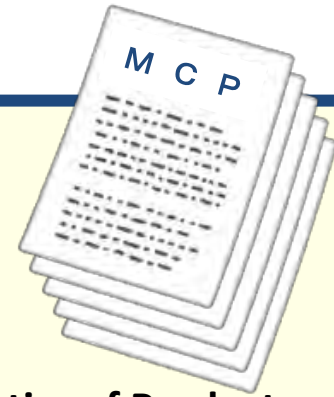
# Minimum Consensus Package (MCP) for Ensuring the Quality and Safety of CTPs

- Basic technical requirements, concepts and principles that are common to most of cell therapy products

... Aiming to prevent a divergence of GLs' interpretation and operation (unreasonable / excessive requirements), by sharing the minimum necessary recognition (principle, background, objective, etc.)



# Minimum Consensus Package (MCP) for Ensuring the Quality and Safety of CTPs



## CONTENTS

**Introduction**

**General Points of Attention**

**Chapter 1 General Principles**

**Chapter 2 Manufacturing, Evaluation, and Control of the Quality Characteristics of Products**

**Chapter 3 Stability of Human Cell-Based Products**

**Chapter 4 Nonclinical Safety Testing of Human Cell-Based Products**

**Chapter 5 Studies Supporting the Potency or Efficacy of Human Cell-Based Products**

**Chapter 6 Biodistribution of Human Cell-Based Products**

**Chapter 7 Points to Consider for Clinical Studies**

**Addendum 1 Safety Against Infectious Agents like Viruses**

**Addendum 2 Concept of Biological Raw Materials Used for Human Cell-Based Products**

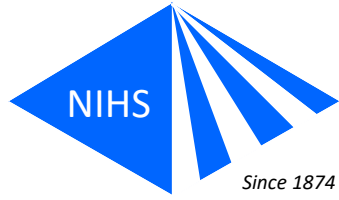
**Addendum 3 Concept of Cell Banks**

**Addendum 4 Characterization of Cells**

**Addendum 5 GTP (Good Cell/Tissue Practice)**

**Addendum 6 Nonclinical Safety Testing of Human Cell Based Products**

**39 Pages!**



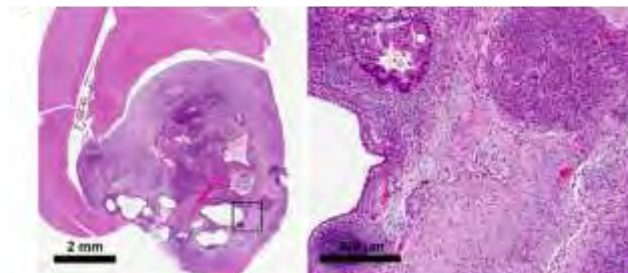
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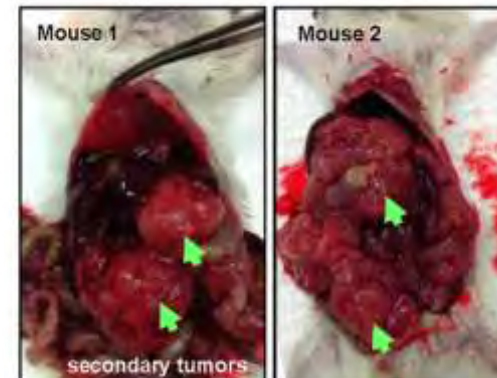
# Tumorigenicity

... is one of the major concerns for PSC-derived therapeutic products

- Human pluripotent stem cells (PSC) have the potential to revolutionize regenerative medicine and cell therapy.
- Some clinical trials on pluripotent stem cell-derived products are currently on going, and more trials are expected to start soon in many countries
- However, cells transformed during the manufacturing process and residual undifferentiated PSCs may form tumors in patients.









Ibon Garitaonandi et al. Scientific Reports | 6:34478



MOUSTAFA M et al. STEM CELLS TRANSLATIONALMEDICINE 2016;5:694-702

# Documents suggesting the need for tumorigenicity assessment of CTPs

-  U.S. Food and Drug Administration, Cellular & Gene Therapy Guidances
-  European Medicines Agency, Guidelines for advanced therapy medicinal products
-  Japanese guideline documents for ensuring the quality and safety of regenerative medical products derived from the processing of human pluripotent stem cells
-  U.S. Food and Drug Administration, Guidance for Industry: Clinical Studies for Products Derived from Human Pluripotent Stem Cells
-  EMA/CAT/571134/2005, Committee for Advanced Therapies (CAT), Reflection paper on stem cell-based medicinal products
-  Japan Ministry of Health, Labour and Welfare/Notification 0613-3/2016, Points for certified special committees for regenerative medicine to consider when evaluating tumorigenicity assessment in provision plans of regenerative medicine using human pluripotent stem cells

**... do not describe detailed characteristics and protocols of test methods**

# Purposes of test methods for the assessment of tumorigenicity of CTPs

## 1. Detection or quantitation of tumorigenic cells

= Quality control of intermediate/finished products during manufacturing processes

Safety-Related  
Quality Testing

- The amount of tumorigenic cellular impurities is one of critical quality attributes.

- a. Malignant transformed cells
- b. Residual ES/iPS cells



- They could be evaluated by *in vitro* methods, e.g. soft-agar colony formation assay, qRT-PCR for pluripotency markers ( or *in vivo* tumorigenicity testing with immunodeficient animals )



Non-clinical  
Safety Testing

## 2. Non-clinical safety assessment of finished products

- For estimation of tumorigenicity of CTP at the site of engraftment
- cannot be evaluated by any other methods than *in vivo* tumorigenicity testing with immunodeficient animals



# Methods for Detection of Transformed/Immortalized Cells



Assay	<i>In vivo</i> tumorigenicity testing using NOG mice and Matrigel	Soft agar colony formation assay	Digital soft agar colony formation assay	Cell Growth Analysis
Purpose	Detection of tumorigenic cellular impurities	Detection of anchorage-independent growth (malignant transformed cells)	Detection of anchorage-independent growth (malignant transformed cells)	Detection of immortalized cells (transformed cells)
Time	>= 16 weeks	3-4 weeks	3-4 weeks	4 weeks or more
Advantage	<ul style="list-style-type: none"> <li>◆Direct</li> <li>◆Analyzes tumor formation in a specific microenvironment</li> <li>→non-clinical safety assessment</li> </ul>	<ul style="list-style-type: none"> <li>◆Inexpensive</li> <li>◆More rapid compared with in vivo testing</li> <li>◆Isolates and characterizes malignant transformed cells</li> </ul>	<ul style="list-style-type: none"> <li>◆More rapid compared with in vivo testing</li> <li>◆Isolates and characterizes malignant transformed cells</li> </ul>	<ul style="list-style-type: none"> <li>◆Simple</li> <li>◆Inexpensive</li> <li>◆Detects both benign and malignant transformed cells</li> </ul>
Disadvantage	<ul style="list-style-type: none"> <li>◆Costly &amp; Time-consuming</li> <li>◆Needs a clean animal facility</li> <li>◆Unable to detect benign transformed cells</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Not applicable to floating cells (blood cells)</li> <li>◆Unable to detect benign transformed cells and human ES/iPS cells</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Not applicable to floating cells (blood cells)</li> <li>◆Unable to detect benign transformed cells and human ES/iPS cells</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Takes time to detect trace amount of immortalized cellular impurities</li> </ul>
Limit of detection	HeLa cells mixed in hMSCs at a ratio of $1/1E+6$ (0.0001%) at a probability of 17%	HeLa cells mixed in hMSCs at a ratio of $1/1E+3$ (0.1%) (calculated LOD: 0.02%)	HeLa cells mixed in hMSCs at a ratio of $1/1E+7$ (0.0001%)	HeLa cells mixed in hMSCs at a ratio of $1/1E+6$ (0.0001%), Immortalized hMSCs in hMSCs at a ratio of $1/E+5$ (0.001%)
Reference	Kusakawa <i>et al.</i> , <i>Regen Ther.</i> 2015	Kusakawa <i>et al.</i> , <i>Regen Ther.</i> 2015	Kusakawa <i>et al.</i> , <i>Sci Rep.</i> 2015	Kono <i>et al.</i> , <i>Biologicals.</i> 2015 Hasebe-Takada <i>et al.</i> , <i>Regen Ther.</i> 2016

# Methods for Detection of Residual hPSCs



Assay	<i>In vivo</i> tumorigenicity test using NOG mice	Flow cytometry	GlycoStem-HP Method
Purpose	Detection of tumorigenic cells	Detection of undifferentiated/pluripotent cells	Detection of undifferentiated/pluripotent cells
Time	17-30weeks	1 day	=< 3 hours
Advantage	<ul style="list-style-type: none"> <li>◆Direct</li> <li>◆Analyzes tumor formation in a specific microenvironment</li> </ul>	<ul style="list-style-type: none"> <li>◆Rapid</li> <li>◆Analyzes individual cells</li> </ul>	<ul style="list-style-type: none"> <li>◆Nondestructive</li> <li>◆Simple</li> <li>◆High throughput</li> </ul>
Dis-advantage	<ul style="list-style-type: none"> <li>◆Costly &amp; Time-consuming</li> <li>◆Specific Animal Facility</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Detects only the cells that express the known marker proteins</li> <li>◆Gating techniques strongly influence the results</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Unable to detect the expression level of the marker in individual cells</li> <li>◆Culture media influence the results</li> </ul>
Limit of detection	1000 iPSCs in 2.5E+5 hRPEs (0.4%)	0.1% of hiPSCs in hRPEs (TRA-1-60)	0.05% of hiPSCs in HEK293T cells (H3+ podocalyxin)
Reference	Kanemura <i>et al.</i> , <i>Sci Rep.</i> 2013 Kawamata <i>et al.</i> , <i>J Clin Med.</i> 2015	Kuroda <i>et al.</i> , <i>PLoS ONE.</i> 2012	Tateno <i>et al.</i> , <i>Sci Rep.</i> 2014

Assay	qRT-PCR	Droplet Digital PCR	Highly Efficient Culture of PSCs using Essential-8/LN521
Purpose	Detection of undifferentiated/pluripotent cells	Detection of undifferentiated/pluripotent cells	Detection of hPSCs
Time	Approx. 6 hours	Approx. 6 hours	About a week
Advantage	<ul style="list-style-type: none"> <li>◆Rapid</li> <li>◆Simple</li> <li>◆Quantitative</li> <li>◆Highly sensitive</li> </ul>	<ul style="list-style-type: none"> <li>◆Rapid</li> <li>◆Simple</li> <li>◆Quantitative</li> <li>◆Highly sensitive</li> </ul>	<ul style="list-style-type: none"> <li>◆Direct</li> <li>◆Easy</li> <li>◆Analyzes residual hPSCs</li> </ul>
Dis-advantage	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Detects only the cells that express the known marker genes</li> </ul>	<ul style="list-style-type: none"> <li>◆Indirect</li> <li>◆Detects only the cells that express the known marker genes</li> </ul>	<ul style="list-style-type: none"> <li>◆Time-consuming</li> </ul>
Limit of detection	Approx. 0.002% of hiPSCs in hRPEs (LIN28)	0.001% of hiPSCs in human cardiomyocytes (LIN28)	0.01-0.001% of hiPSCs in hMSCs
Reference	Kuroda <i>et al.</i> , <i>PLoS ONE.</i> 2012	Kuroda <i>et al.</i> , <i>Regen Ther.</i> 2015	Tano <i>et al.</i> , <i>PLoS ONE.</i> 2014



# Points to consider for *in vivo* test methods



- Selection of test animals
- Control cell selection, detection capability of the test system
- Number of test animals
- Administration site of the test sample
- Number of cells in the sample, and the form of the sample
- Duration of observation
- Observation of the administration site
- Histological evaluation of the administration site, identification of human cells administered and the confirmation of engraftment, histological evaluation of the degree of differentiation
- Interpretation of results

# “Points to Consider Regarding Tests to Detect Undifferentiated Pluripotent Stem Cells/Transformed Cells in Human Cell-based Products, Tumorigenicity Studies and Genomic Stability Evaluation” (MDED/PSEHB/MHLW Notification 0627-1, June 27, 2019)



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### 1. Introduction

### 2. Role of This Document

### 3. Definition of Terms

### 4. General Points to Consider

### 5. Tumorigenicity-related Tests for Human ES/iPS Cell-based Products

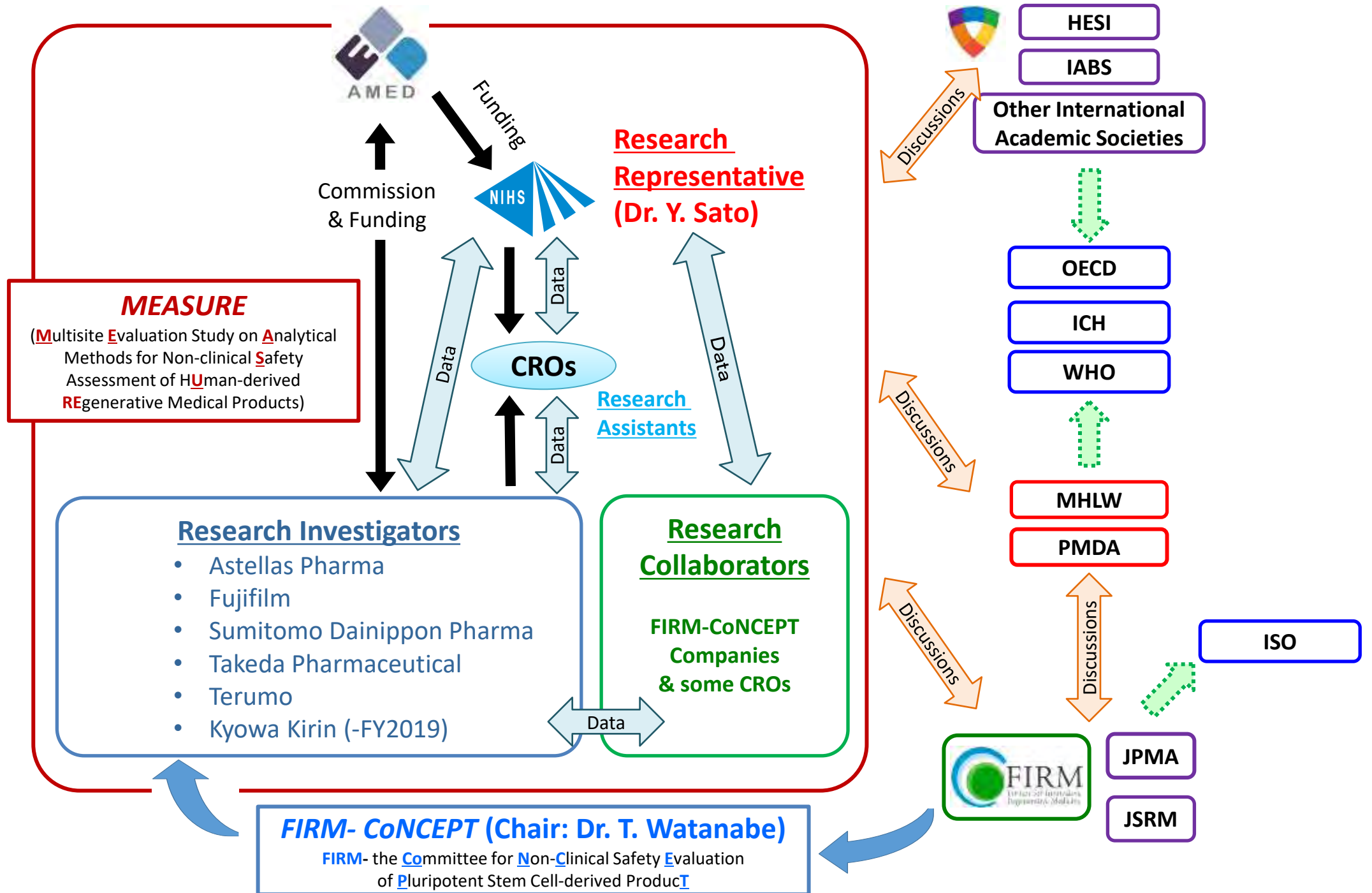
- 5.1. Tumorigenicity studies of ingredients/raw materials for quality characterization/control
- 5.2. Tests to evaluate tumorigenic cells intermingled with the intermediate or the final product
  - 5.2.1. Tests to detect undifferentiated pluripotent stem cells in the intermediate/final product
  - 5.2.2. Tests to detect transformed cells in the intermediate/final product
- 5.3. Tests for estimating the tumorigenic potential of the final product cells in humans at the site of engraftment

### 6. Tumorigenicity-related Studies for Human Somatic Cell-/Somatic Stem Cell-based Products

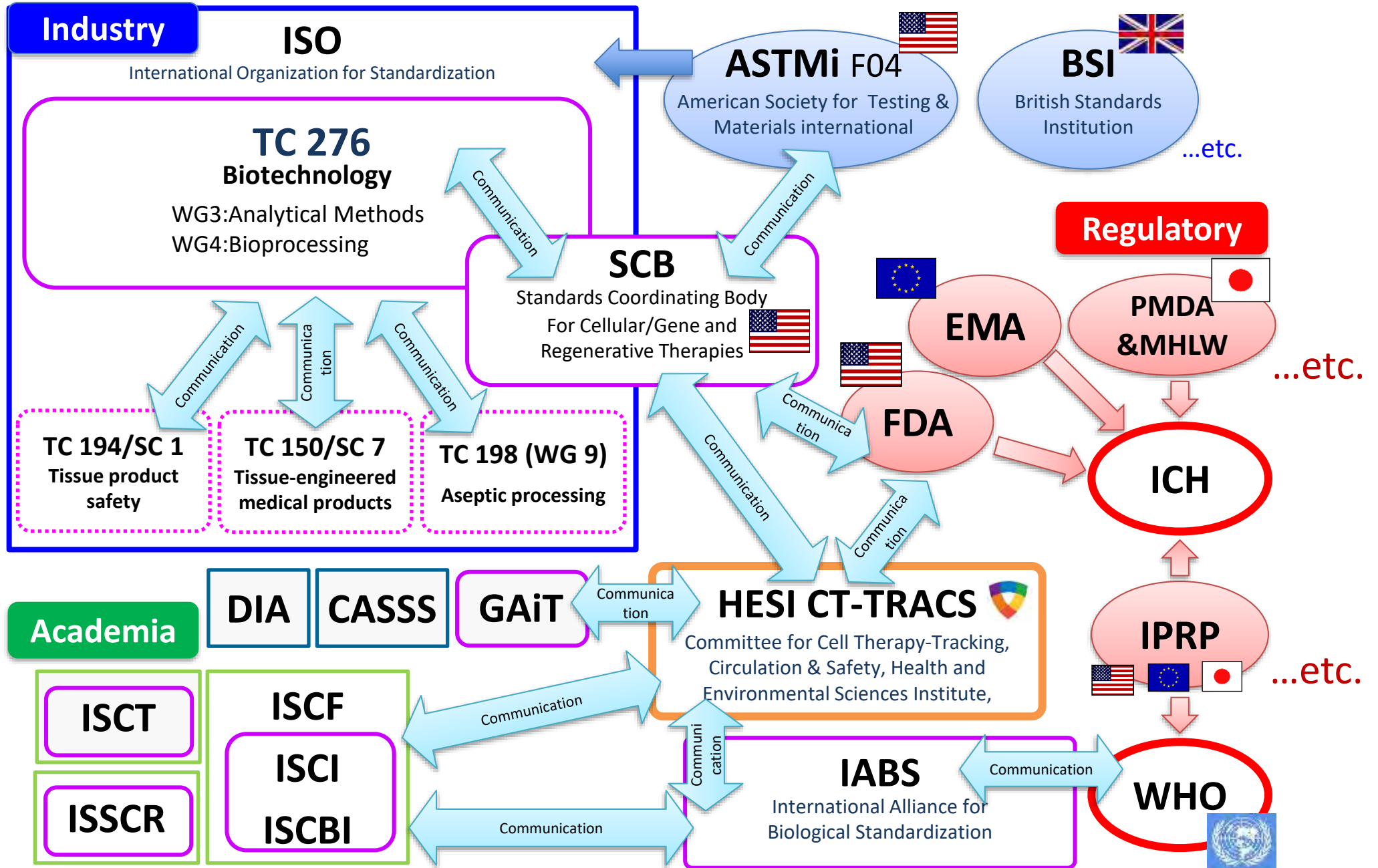
- 6.1. Tumorigenicity studies of ingredients/raw materials for quality characterization/control
- 6.2. Points to consider regarding tumorigenicity studies for the final product

### 7. General Points to Consider Regarding Genomic Stability

Out of references and points to consider regarding nonclinical evaluation of the quality/safety of human cell-based products, this document provides representative examples of tests that can be used to detect undifferentiated pluripotent stem cells and transformed cells mixed in human cell-based products as well as points to consider in selecting tests from these options to evaluate the quality/safety of specific human cell-based products.



# International Platforms for Scientific Discussions on Regulatory Harmonization and Standardization of Cell Therapy Products



# Recent Publication by HESI Committee of Cell Therapy-TRACKing, Circulation & Safety (CT-TRACS)

*Cytotherapy*. 2019;21:1095-1111



REVIEW

International Society  
ISCT  
Cell & Gene Therapy

Open Access

## Tumorigenicity assessment of cell therapy products: The need for global consensus and points to consider

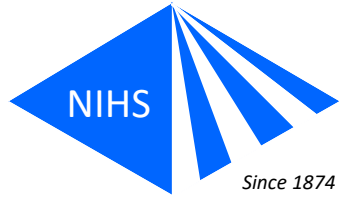
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### Abstract

Pluripotent stem cells offer the potential for an unlimited source for cell therapy products. However, there is concern regarding the tumorigenicity of these products in humans, mainly due to the possible unintended contamination of undifferentiated cells or transformed cells. Because of the complex nature of these new therapies and the lack of a globally accepted consensus on the strategy for tumorigenicity evaluation, a case-by-case approach is recommended for the risk assessment of each cell therapy product. In general, therapeutic products need to be qualified using available technologies, which ideally should be fully validated. In such circumstances, the developers of cell therapy products may have conducted various tumorigenicity tests and consulted with regulators in respective countries. Here, we critically review currently available *in vivo* and *in vitro* testing methods for tumorigenicity evaluation against expectations in international regulatory guidelines. We discuss the value of those approaches, in particular the limitations of *in vivo* methods, and comment on challenges and future directions. In addition, we note the need for an internationally harmonized procedure for tumorigenicity assessment of cell therapy products from both regulatory and technological perspectives.



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## Basic Approach for Evaluation of Comparability Before and After Manufacturing Process Changes (= ICH Q5E)

1. Attempt to assess and assure the comparability, based on the analysis results of quality attributes of the product before and after the process change.
2. When the quality attributes of the product before and after the manufacturing process change appear to be changed, and the comparability cannot be fully explained, due to reasons such as the relationship between the quality attributes and safety/efficacy not being fully understood, consider the comparability assessment with the results of non-clinical or clinical trials.



# Comparability of Cell & Gene Therapy Products

*Regen. Med.* (2016) 11(5), 483–492

White Paper

 **Regenerative  
Medicine**

*EUROPEAN COMMISSION - EUROPEAN PARLIAMANT - EUROPEAN CENTRAL BANK - EUROPEAN COURT OF JUSTICE*

## Comparability: manufacturing, characterization and controls, report of a UK Regenerative Medicine Platform Pluripotent Stem Cell Platform Workshop, Trinity Hall, Cambridge, 14–15 September 2015

This paper summarizes the proceedings of a workshop held at Trinity Hall, Cambridge to discuss comparability and includes additional information and references to related information added subsequently to the workshop. Comparability is the need to demonstrate equivalence of product after a process change, a recent publication states that this may be difficult for cell-based medicinal products. Therefore a well-managed change process is required which needs access to good science and regulatory advice and developers are encouraged to seek help early. The workshop shared current thinking and best practice and allowed the definition of key research questions. The intent of this report is to summarize the key issues and the consensus reached on each of these by the expert delegates.

First draft submitted: 10 May 2016; Accepted for publication: 17 May 2016; Published online: 12 July 2016

**Keywords:** advice • comparability • human pluripotent stem cell derived • manufacturing • quality • regulatory

A stakeholder workshop was held at Trinity Hall, Cambridge University, on the 14–15 September 2015 to discuss comparability in cell therapy manufacturing. The focus of the workshop was on human pluripotent stem cell derived therapies.

Comparability is the regulatory requirement to demonstrate product equivalence (highly similar) after a process change. Such process changes include a media component change, a characterization method change, a manufacturing platform change and the introduction of a new manufac-

turer to the community with the intent to commercialise these internationally under the same regulatory framework. Such changes should be addressed proactively and in a way that developers can best address these issues.

It was attended by more than 50 cell therapy development professionals from around the world with a wide range of backgrounds and reflecting a wide perspective. It was held under the auspices of the UK Regenerative Medicine Platform (UKRMP) and its cell biology, differentiation and manufacturing hub, The Pluripotent Stem Cell Platform

David J Williams<sup>1</sup>, Richard Archer, Peter Archibald, Ioannis Bantounas, Riccardo Baptista, Roger Barker, Jacqueline Barry, Florence Bietrix, Nicholas Blair, Julian Braybrook, Jonathan Campbell, Maurice Canham, Amit Chandra, Gabr Foldes, Rudy Gilmanshin, Mathilde Girard, Erwin Gorjup, Zoe Hewitt, Paul Houd, Johan Hylbert, Helen Jesson, Jaemin Kee, Julie Kerby, Nina Kotsoukouba, Stanley Kowalski, Chris Leider, Damian Marshall, Louis Masi, Mark McCall, Conor McCann, Nicholas Medcalf, Harry Moore, Hiroki Ozawa, David Pan, Malin Parmer, Anne S. Plant, Yvonne Reeswald, Sujith Sebastian, Glyn Stacey, Robert Thomas, Daye Thomas, Jamie Thomason, Newell, Marc Turner, Lorana Vistica, Ivan Wall, Wilton Wilson, Jacqueline Wolfman, Ying Yang & Heiko Zimmermann

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6 December 2019  
EMA/CAT/499821/2019  
Committee for Advanced Therapies (CAT)

## Questions and answers

### Comparability considerations for Advanced Therapy Medicinal Products (ATMP)

#### Introduction


CHMP scientific advice questions are often related to the suitability of comparability proposals following changes to ATMP manufacturing processes or due to introduction of additional manufacturing sites. Manufacturing process changes may encompass improvements/change in equipment, raw materials and critical starting materials such as the cells or the vector or their suppliers, manufacturing process scale or product stability. Such changes are frequent, especially in the early stages of development of ATMPs.

Every change in manufacture should be done in accordance with GMP. The criticality of the changes and the estimation of their impact on the characteristics of the product should determine the amount of comparability data needed. Where applicable, the Variation Regulation<sup>1</sup> (for authorised ATMPs) or the clinical trial framework (for investigational ATMPs) should be followed.

A suitable comparability program is required to support the introduction of changes during the development stages of an ATMP. The acceptable level of flexibility is progressively reduced from the non-clinical stage to the pivotal clinical use. Comparability is also an important tool to support changes after marketing authorisation where the process and the product are expected to be well defined and appropriately controlled by quality specifications and characterisation tools.



# Comparability of Cell & Gene Therapy Products





**ARM-USP Workshop**  
**“Comparability in**  
**Cell & Gene Therapies”**

**Final Report & Summary**

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ARM CMC Workshop Series  
May 31 2019  
Rockville Maryland, USA



## **Morning Session 1 – Industry & Regulatory Perspectives:**

*Presenters (slides available at end of report):*

**Dr. Zenobia Taraporewala** (CMC Reviewer and Acting GT Team Lead, CBER, FDA)

**Dr. Margarida Menezes-Ferreira** (Sr. Assessor Infarmed, Member of CAT, EMA)

**Fouad Atouf** (VP Global Biologics, USP)

**Michael Lehmicke** (Dir. Science & Industry Affairs, ARM)



## **Morning Session 2 – Group Thought Exercises:**

*Session Leaders:*

**Keith Wannacott, Pfizer**

**Mike Lehmicke, ARM**

**Natalie Ward, C&GT Catapult**

**Adam Roose, ARM**

**Jim Richardson, USP**



## **Afternoon Session 1 – Breakout Discussions:**

*Session Leaders:*

**Nimi Chhina, BioMarin**

**Dan Leblanc, Flexion Therapeutics**

**Kanti Thirumoothry, Kite Pharma**

**Steve Rabin, Iovance Biotherapeutics**

**Dawn Henke, Standards Coordinating Body**

**Rebecca Potts, USP**

# Comparability of Cell Therapy Products



**Study on Comparability of the Quality of Cell Therapy Products Subject to Changes in Their Manufacturing Process (FY2019-2021)**

## **[Goal]**

**Development of a draft guideline document** intended to advise what data and information should be collected to demonstrate that manufacturing process changes do not have a detrimental effect on the quality, safety and efficacy of cell therapy products

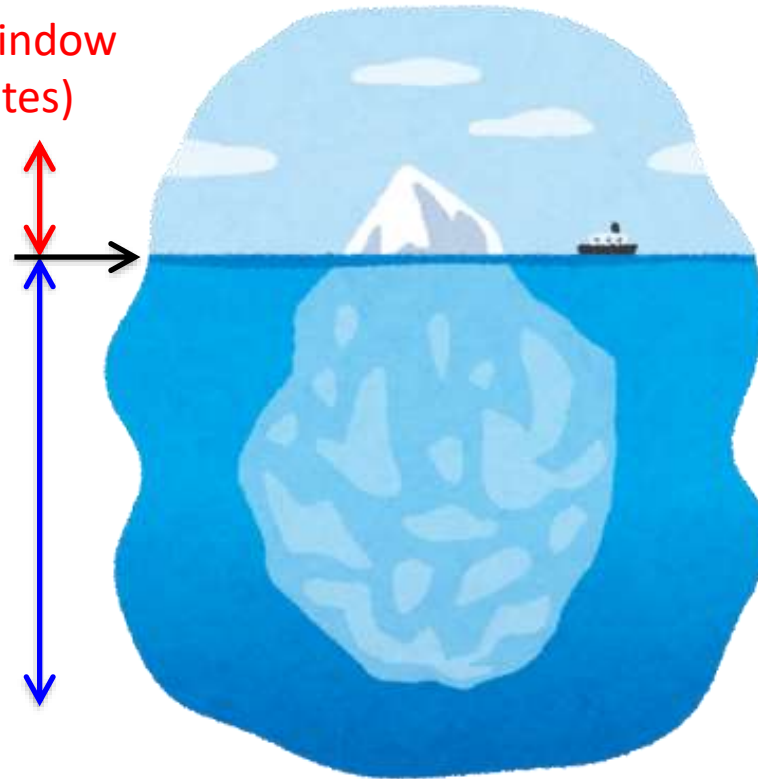
**[Chair]** Dr. Yoji SATO (NIHS)

# Cell Therapy Products are Complex

Limited Characterization Window  
(Observable Quality Attributes)

Limit of Knowledge

Unobservable  
(but Potentially Critical)  
Quality Attributes



Efficacy



Safety

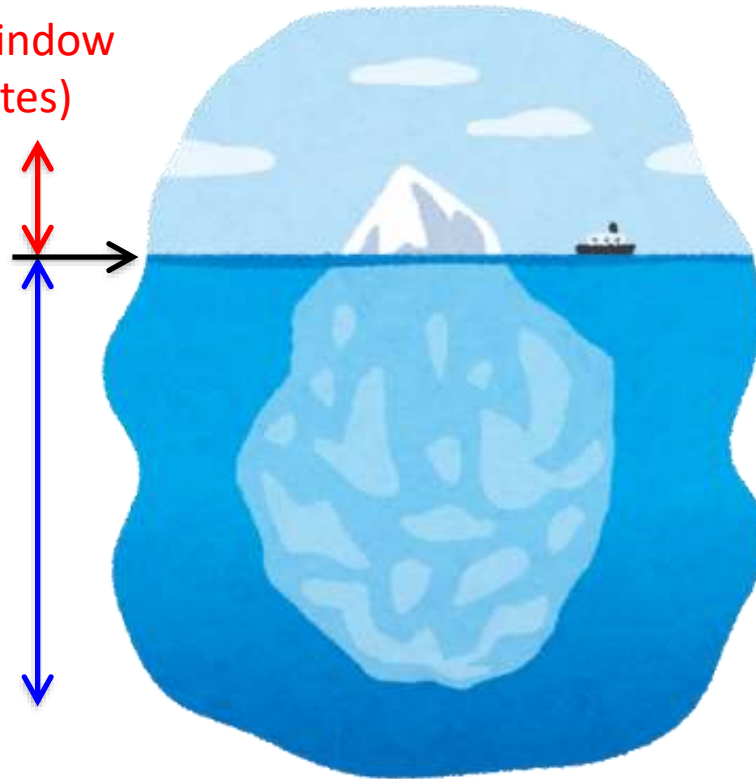
...which brings UNCERTAINTY in the comparability assessment

# Cell Therapy Products are Complex

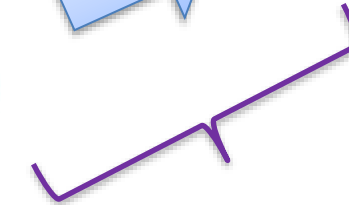
Limited Characterization Window  
(Observable Quality Attributes)

Limit of Knowledge

Unobservable  
(but Potentially Critical)  
Quality Attributes



Efficacy



The mode of action  
(MOA) is unclear in many  
cases.



**Understanding MOA**

would lead to

**CQAs related to the efficacy & *in vitro* potency assays.**

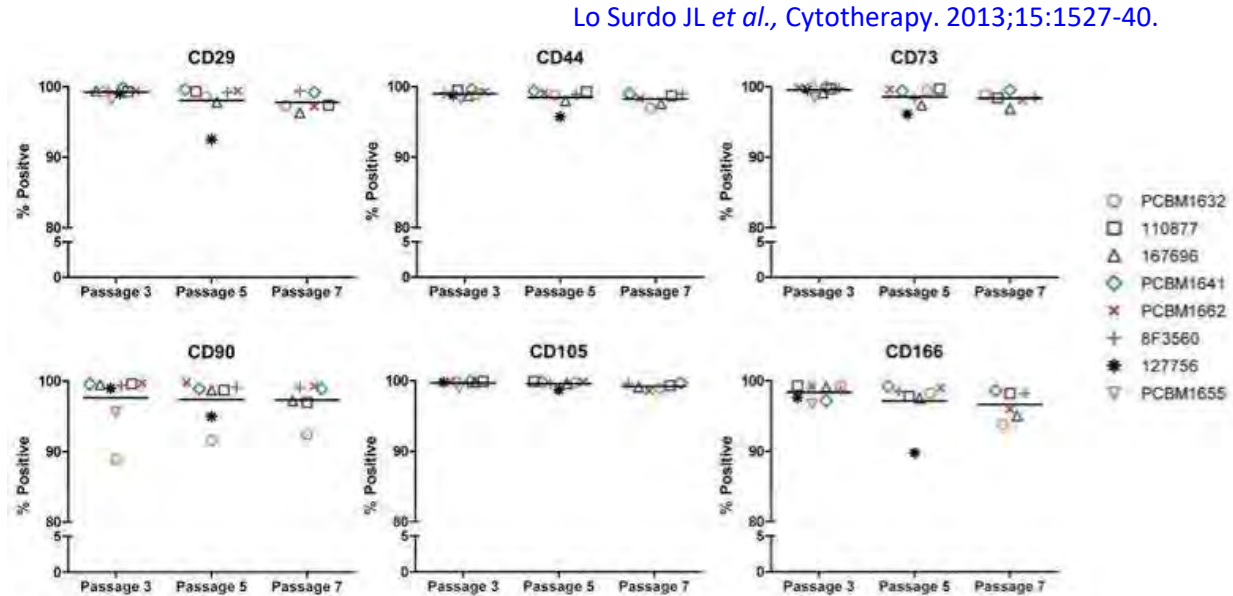
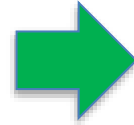


Useful Tools for Comparability Exercise

# Provide Qualified Assays that Measure CQAs Predictive of Efficacy or Safety

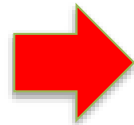
## EXAMPLE

MSCs maintain expression of cell surface markers through passages

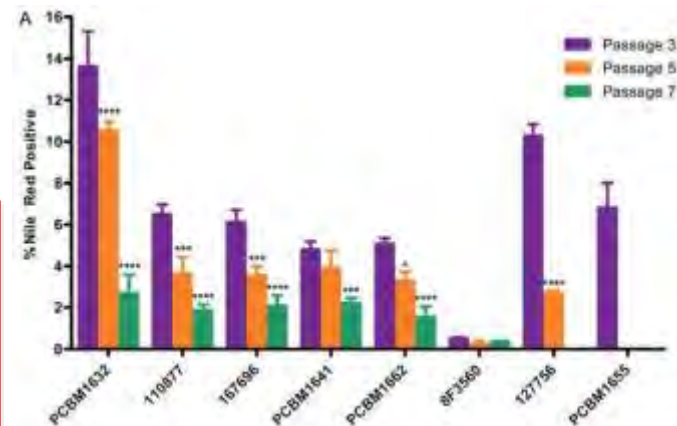


But,

They show both donor variability and decreased adipogenic potential with increasing passage.

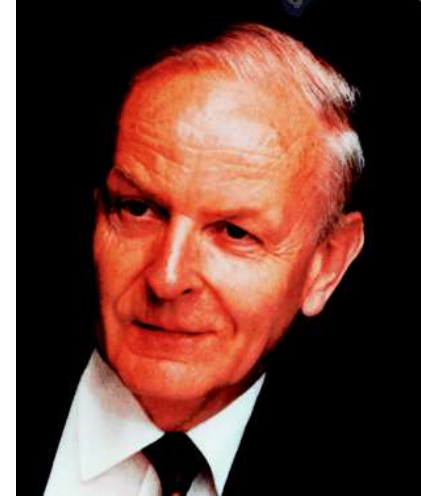


The “conventional” markers cannot be used for the comparability exercise, IF the product is expected to show this function.



# Dr. Gerhard Zbinden

arguably the father of modern toxicology



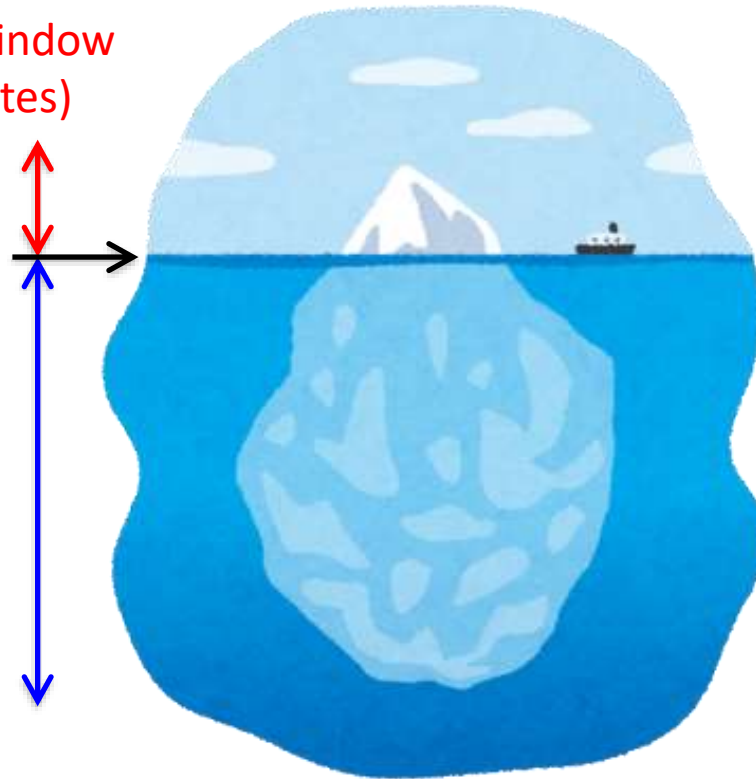
- ◆ Do not do something just because you can.
- ◆ Do not do something just because it has always been done.
- ◆ Do not do something just because others do it.

# Cell Therapy Products are Complex

Limited Characterization Window  
(Observable Quality Attributes)

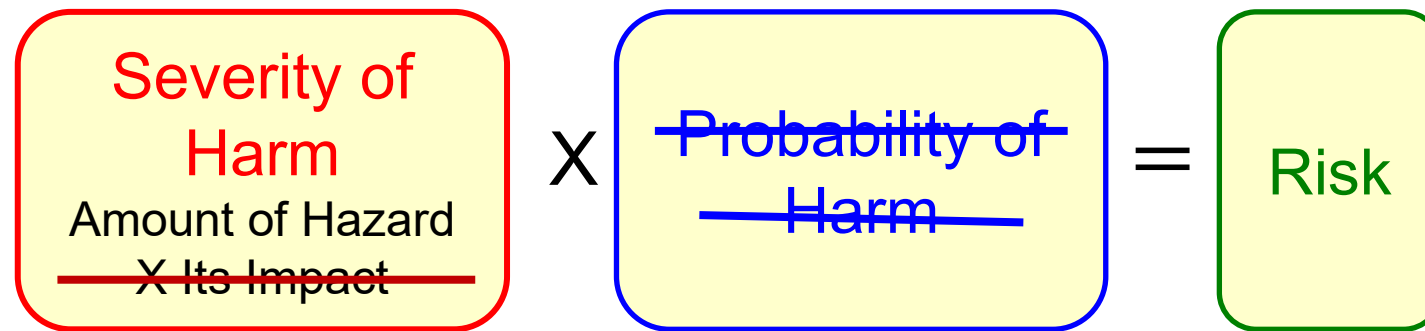
Limit of Knowledge

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Quality Attributes

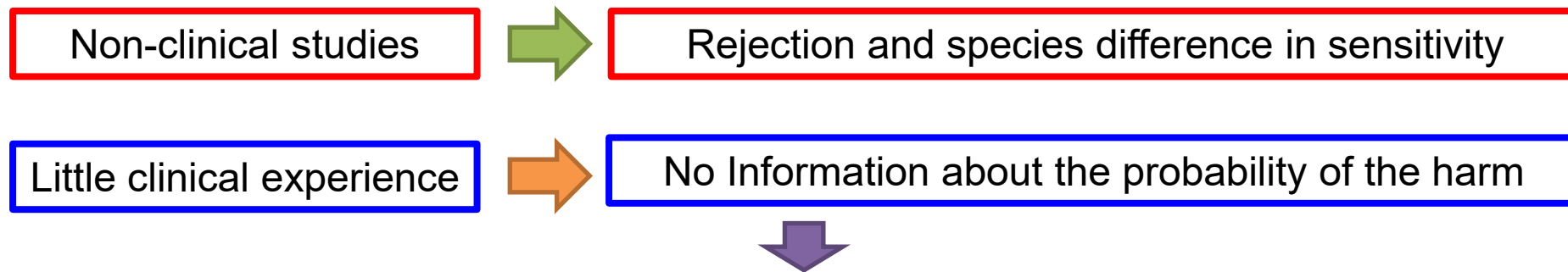


**The risk mitigation** should be comparable (or more) after the change.

# What can we do for the risk mitigation of CTPs at an early development phase?



## In Case of Human-Derived CTPs



The basic strategy for the risk mitigation of human-derived CTPs is...

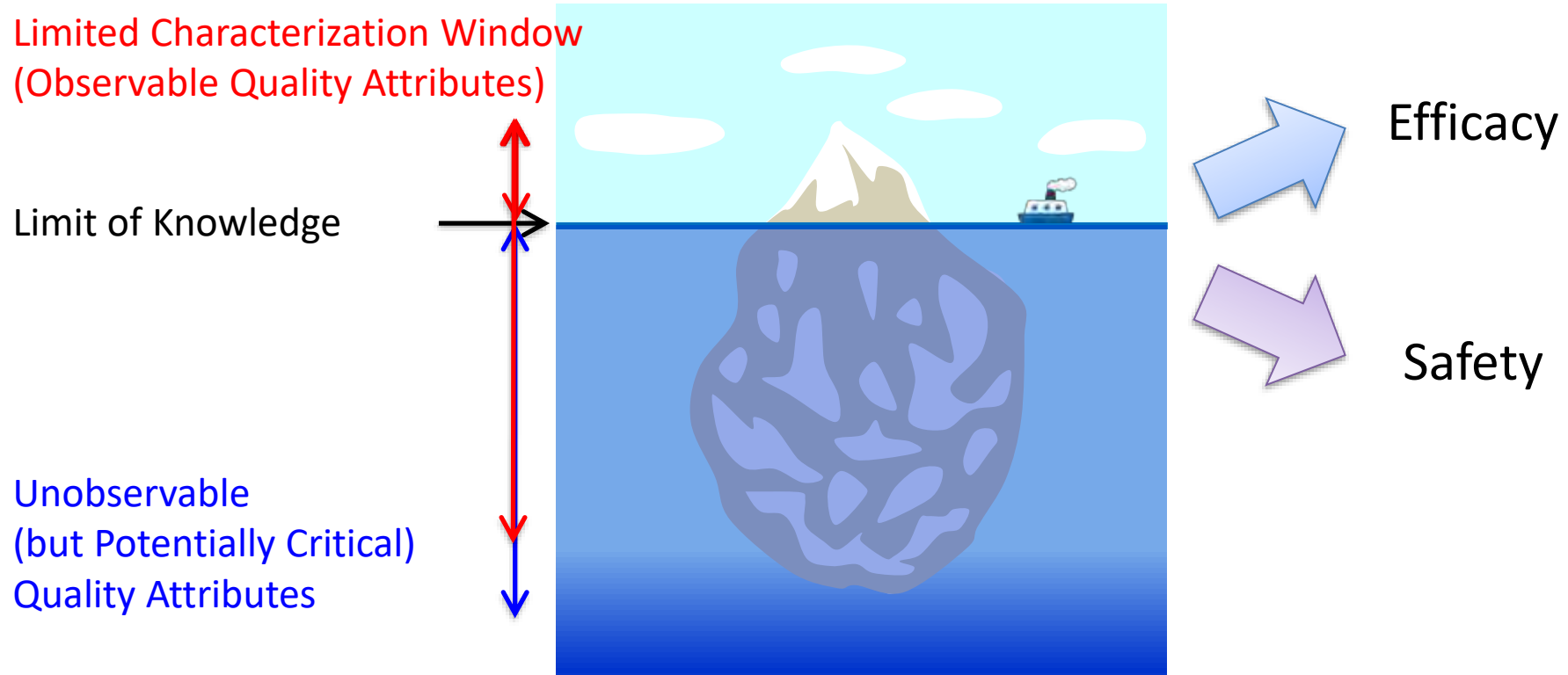
**Identification, Quantitation and Reduction of Hazards**



## Comparability Assessment of the Quality of CTPs

- ▶ Discussions and development of guideline documents are underway in Japan regarding the comparability assessment of the quality of CTPs before and after the manufacturing process change.
- ▶ The concept of ICH Q5E can be applied to CTPs. However, CTPs are complex, and there is a limit to grasping quality attributes, so it is considered more difficult to evaluate the comparability, compared to conventional biopharmaceuticals.
- ▶ Understanding the mode(s) of action of a CTP and developing *in vitro* potency assays would be useful for assessing the quality associated with its efficacy.
- ▶ Understanding and controlling the heterogeneity of cells in products are big challenges in quality control and comparability assessment of CTPs.
- ▶ It is important to validate and qualify the test methods for the quality related to the product efficacy or safety.

# Cell Therapy Products are Complex



**For good comparability exercise of CTPs, it is necessary to develop more tools for “CQA Mining”**

**“Though the difficulties will be enormous when challenging these issues, our endeavors should not be lessened in order to better serve the public interest and health.”**



**Dr. Takao Hayakawa**

Former Deputy Director General  
National Institute of Health Sciences  
(Chair, the MHLW drafting groups of the seven  
guideline documents on Q/S of CTPs and the MCP)

