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KALAS 2024 Conference

*Symposium 12: Developing Cell-Gene Treatment (CGT) Human Cell Immunotherapy
Using Humanized Animal Models*

In Vivo and In Vitro Studies for Evaluation of Tumorigenicity of Cell Therapy Products

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National Institute of Health Sciences, Japan

DISCLAIMER

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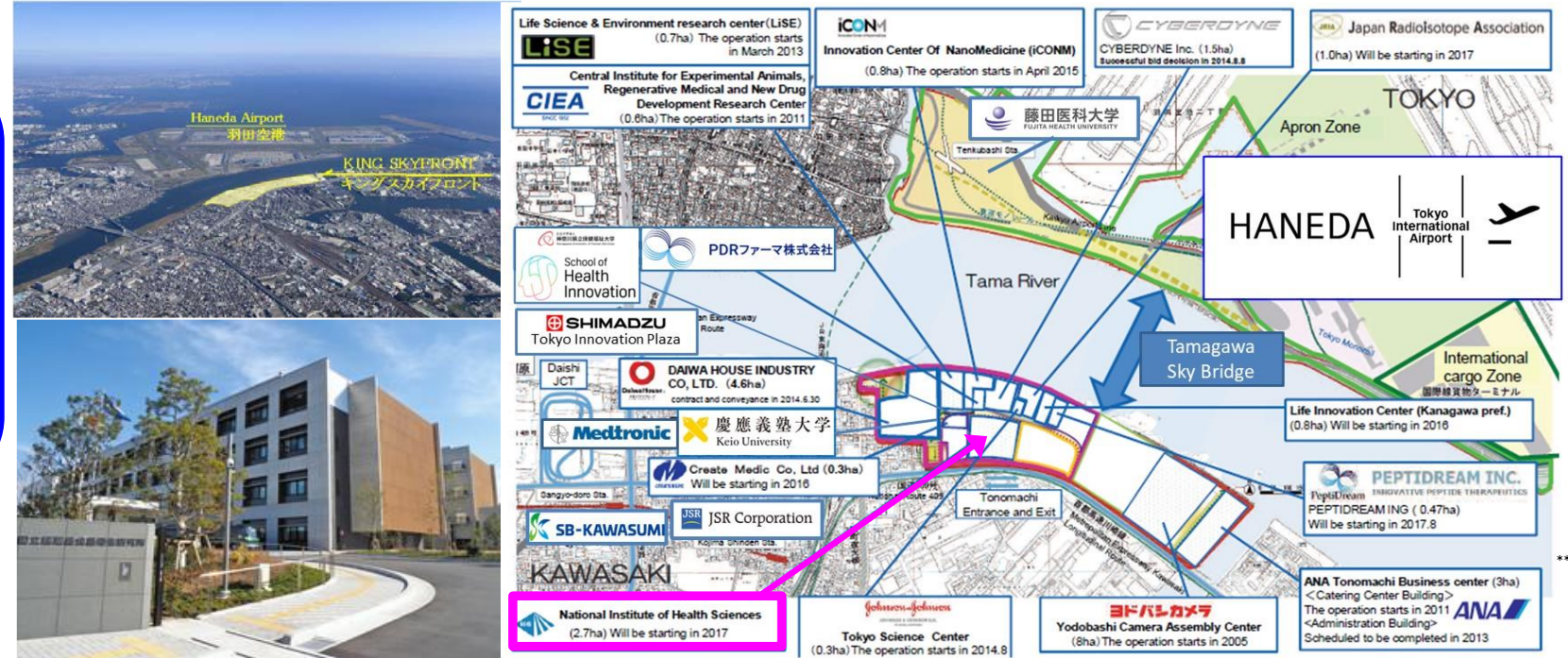
National Institute of Health Sciences



- **Established in 1874** as “Tokyo Pharmaceutical Testing Laboratory”
- Located just across the river from Haneda Airport (Tokyo International Airport)
- Serves as the Base of Research and Evaluation in the Field of **Regulatory Science**

This year marks its 150th anniversary.

Our institute sounds like US NIH, but is actually more like the research sections of US FDA or like NIFDS of Korean MFDS.



“Regulatory Science”



...is the science of developing new tools, standards, and approaches to assess the safety, efficacy, quality, and performance of all FDA-regulated products.

Why is regulatory science necessary for the development of advanced therapeutic products?

- It is because **the development of evaluation methods often do not catch up with the rapid development of new types of products (e.g., cell and gene therapy products)**, which emerge as a result of technological advances.
- It is also because even when **new types of analytical tools (e.g., next-generation sequencers)** are developed as a result of technological advances, **their capabilities and limitations when used to evaluate the quality and safety of therapeutic products are unknown.**

AGENDA

- 1. What is tumorigenicity? –The risk of tumorigenesis and its hazards–**
- 2. Development of highly sensitive test methods for the detection of transformed cells in human cell therapy products**
- 3. Development of highly sensitive test methods for the detection of residual pluripotent stem cells in human ES/iPS cell-derived products**
- 4. How much are genomic mutations predictive of abnormal tissue formation from human iPSC-derived products after engraftment?**

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Major Challenges in Regulatory Science of Cell Therapy Products

What should be evaluated?

1. Viral safety (allogeneic vs. autologous)
 2. Characteristics and eligibility of cells to be used as raw materials
 3. Eligibility of ancillary materials of human or animal origin, other than cell substrates
 4. Establishment and management of cell banks as cell substrates
 5. Manufacturing strategy and process validation to achieve reproducibility of the final product quality
 6. Characterization of cells as active ingredients of the final product
 7. Identification and specification of critical quality attributes of the final product (QC of the final product)
 8. Comparability in the quality of products subject to changes in their manufacturing process/cell banks
 9. Design and interpretation of non-clinical safety studies and non-clinical proof-of-concept studies
 10. Design and interpretation of tumorigenicity studies (especially for ESC/iPSC-derived products)
 11. Immunogenicity of the final product
 12. Biodistribution of administered cells *in vivo* and their behavior at the engraftment site
 13. Design and interpretation of clinical trials
 14. Efficacy and safety follow-up
-
- ```
graph LR; 1[1. Viral safety (allogeneic vs. autologous)] --- S[Safety & eligibility of raw materials]; 2[2. Characteristics and eligibility of cells to be used as raw materials] --- S; 3[3. Eligibility of ancillary materials of human or animal origin, other than cell substrates] --- S; 4[4. Establishment and management of cell banks as cell substrates] --- S; 5[5. Manufacturing strategy and process validation to achieve reproducibility of the final product quality] --- Q[Ensuring the quality of the final product]; 6[6. Characterization of cells as active ingredients of the final product] --- Q; 7[7. Identification and specification of critical quality attributes of the final product (QC of the final product)] --- Q; 8[8. Comparability in the quality of products subject to changes in their manufacturing process/cell banks] --- Q; 9[9. Design and interpretation of non-clinical safety studies and non-clinical proof-of-concept studies] --- P[Prediction of safety & efficacy in the non-clinical phase]; 10[10. Design and interpretation of tumorigenicity studies (especially for ESC/iPSC-derived products)] --- P; 11[11. Immunogenicity of the final product] --- P; 12[12. Biodistribution of administered cells in vivo and their behavior at the engraftment site] --- P; 13[13. Design and interpretation of clinical trials] --- C[Clinical Evaluation]; 14[14. Efficacy and safety follow-up] --- C;
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- Safety & eligibility of raw materials**
- Ensuring the quality of the final product**
- Prediction of safety & efficacy in the non-clinical phase**
- Clinical Evaluation**

# Major Challenges in Regulatory Science of Cell Therapy Products

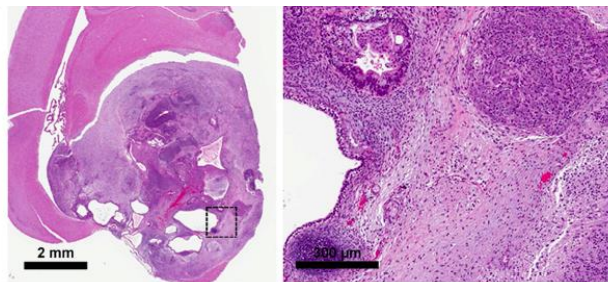
## What should be evaluated?

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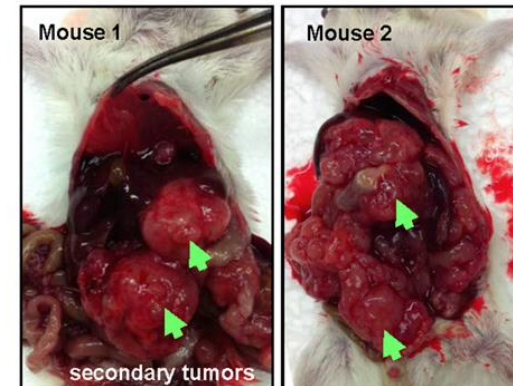
# Tumorigenicity

... is one of the major concerns for cell therapy products, especially for pluripotent stem cell-derived 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 TRANSLATIONAL MEDICINE 2016;5:694–702

# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products

1. Contamination with Tumorigenic Cellular Impurities
  - a. **Malignant Transformed Cells**
  - b. **Residual ES/iPS Cells**
2. Genomic Instability
3. Cancer-Related Genomic Mutations



# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products

## 1. Contamination with Tumorigenic Cellular Impurities

a. **Malignant Transformed Cells**

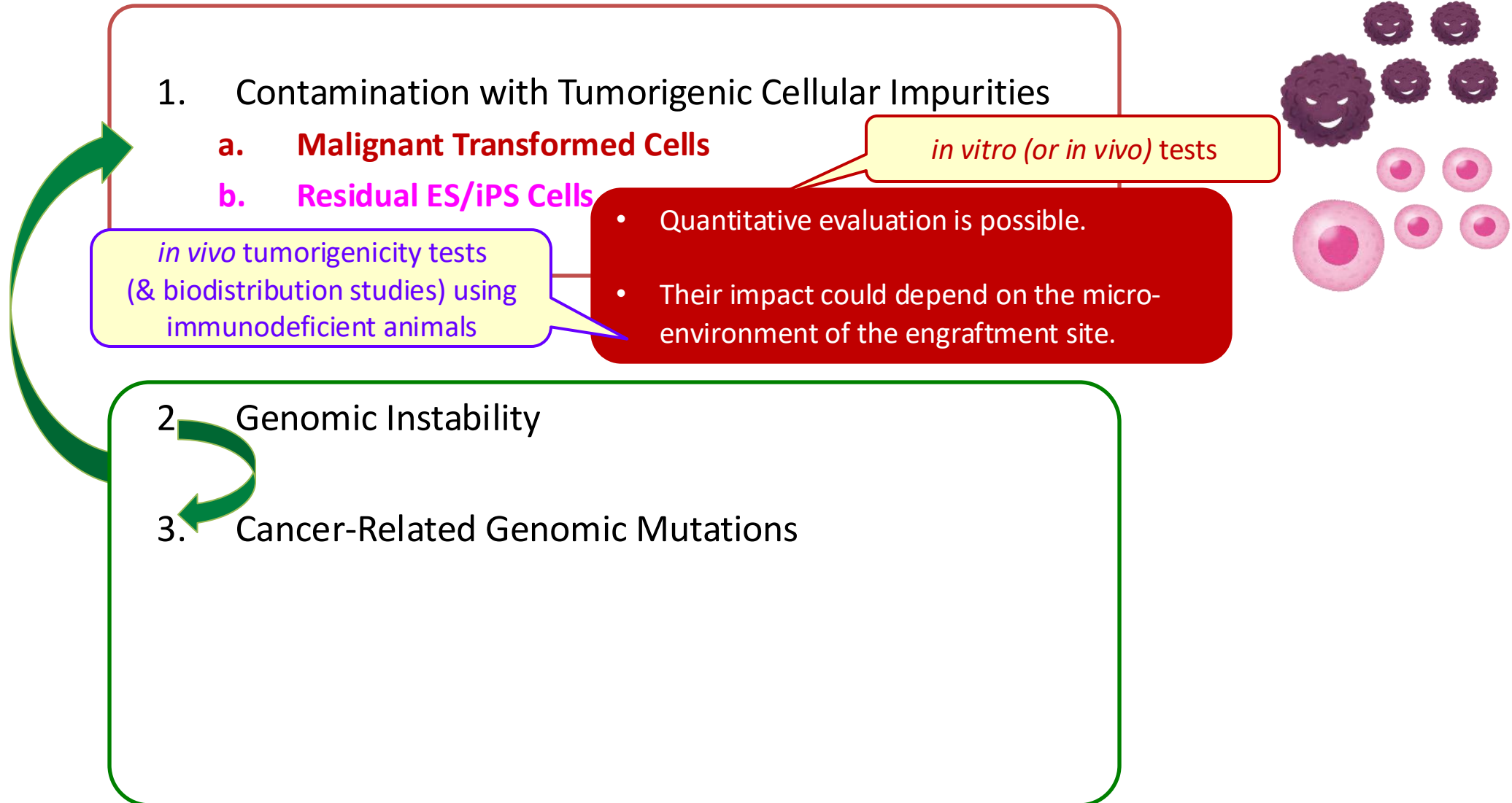
b. **Residual ES/iPS Cells**

## 2. Genomic Instability

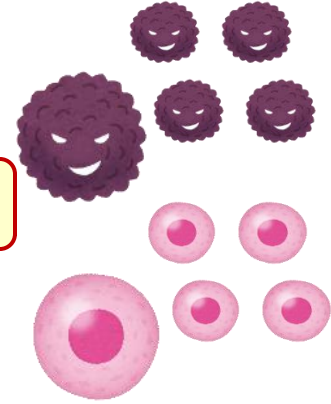
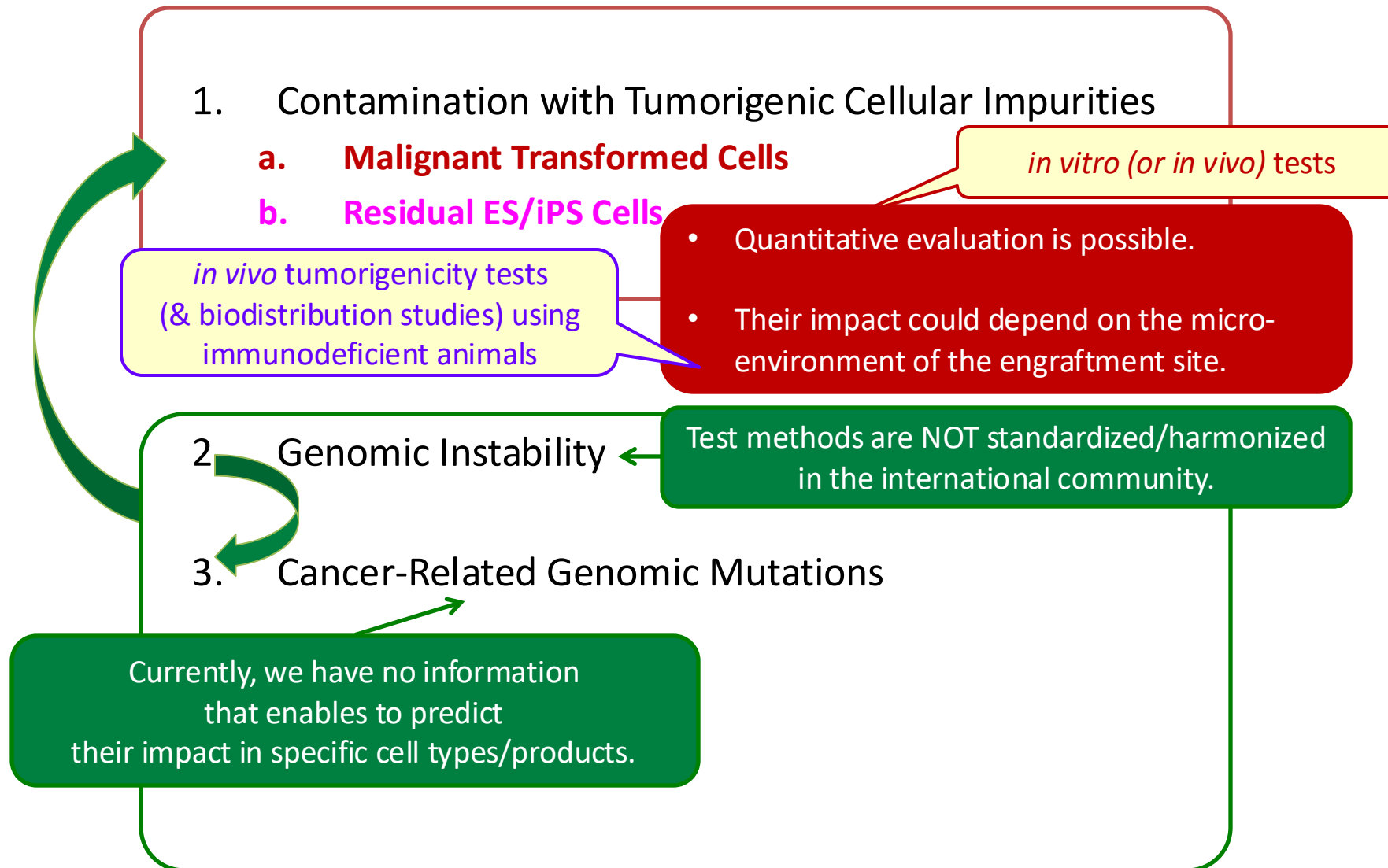
## 3. Cancer-Related Genomic Mutations



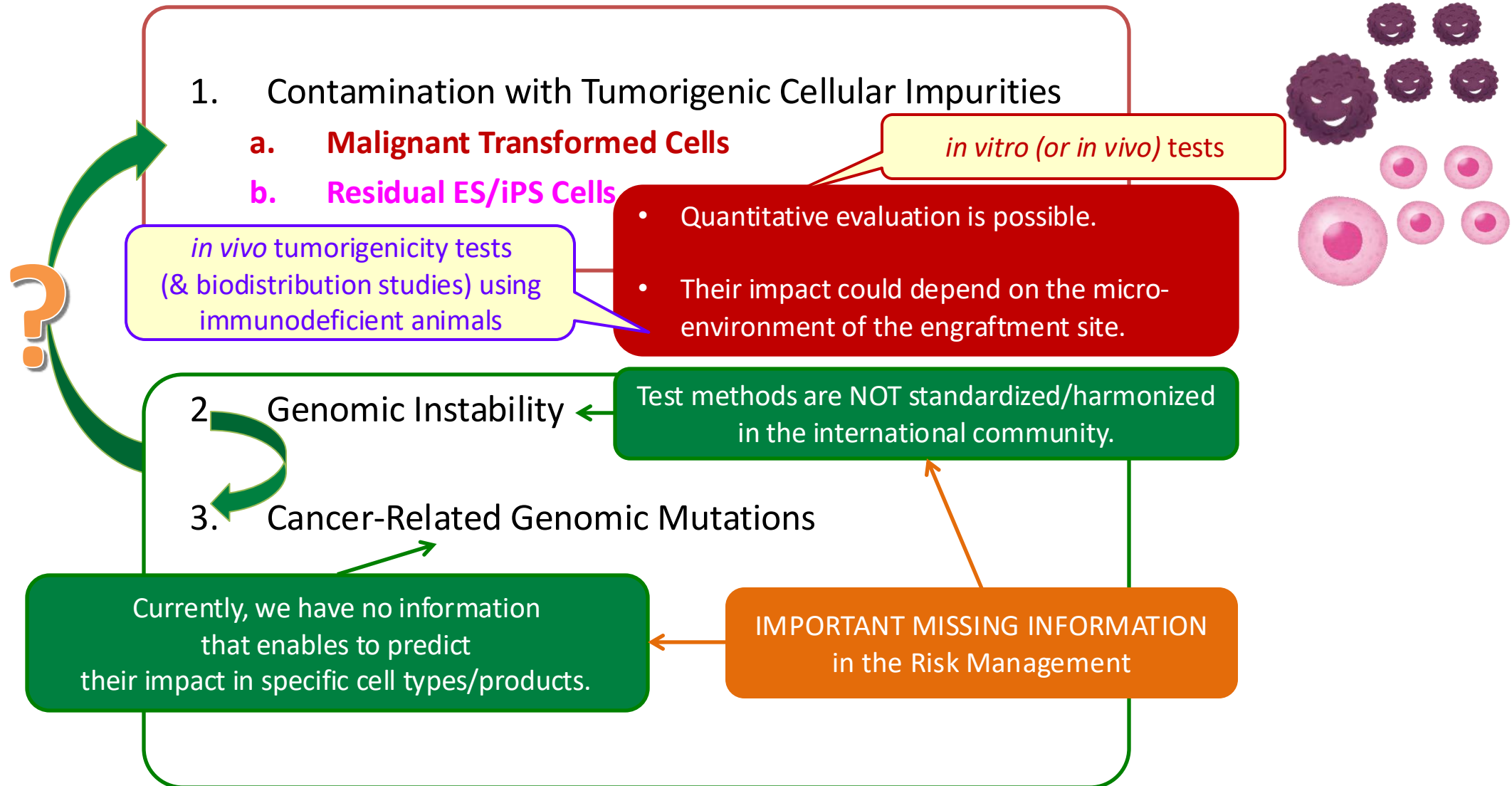
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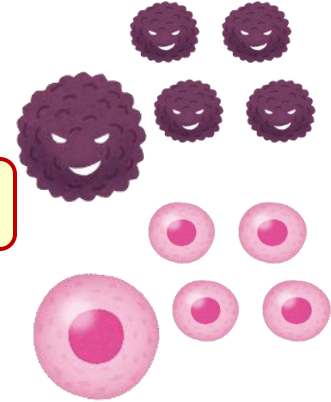
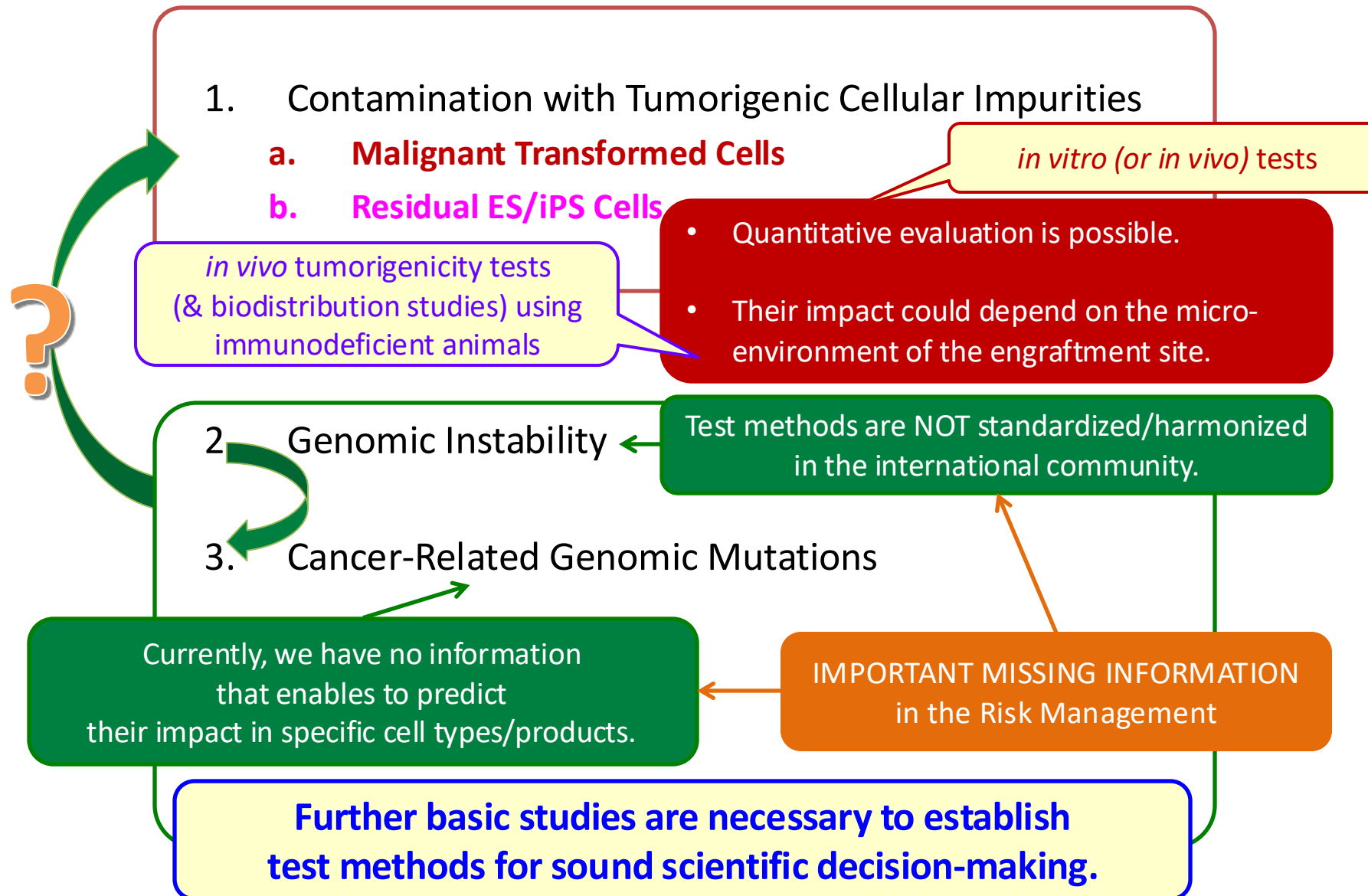
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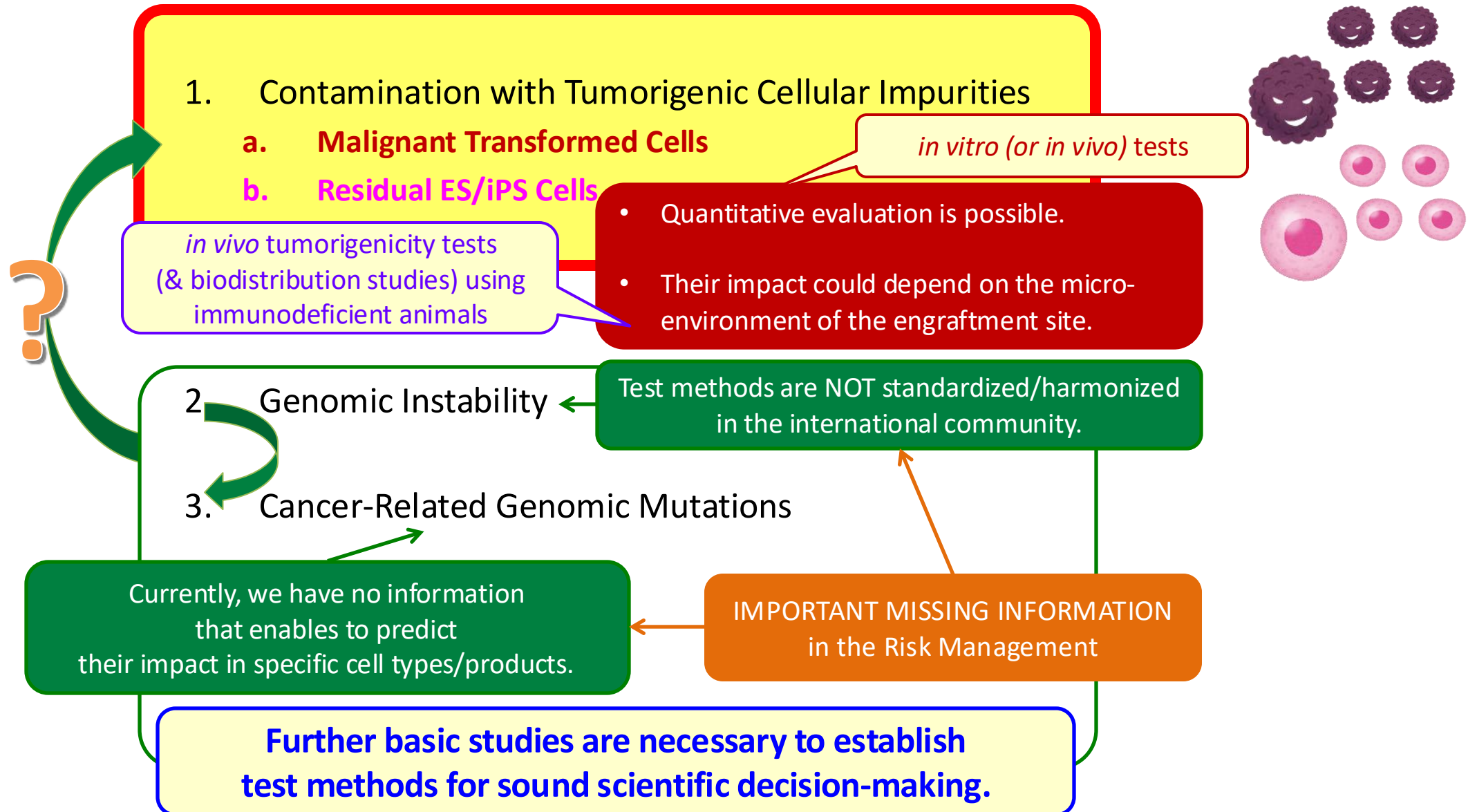
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# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products



# AGENDA

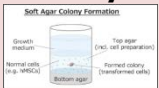


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# Development of Test Methods for Detection of Transformed Cells



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

## *In Vitro Assays*

| Assays/<br>Platform | Conventional soft<br>agar colony formation                                        | Digital soft agar<br>colony formation                                              | Cell growth analysis                                                                                                                     |
|---------------------|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  |   |                                                       |
| Positive control    | HeLa cells                                                                        | HeLa cells                                                                         | HeLa cells                                                                                                                               |
| Duration            | 3 to 4 weeks                                                                      | 3 to 4 weeks                                                                       | 4 weeks or more                                                                                                                          |
| Assay principle     | Conventional SACF assay based on anchorage-independent cell growth                | Image-based screening system for the SACF assay using a high-content cell analyzer | The analysis of cell senescence/growth after serial passaging (compare the growth rates of hMSC w/wo positive controls after 5 passages) |
| Pros                | Low cost                                                                          | High sensitivity                                                                   | High sensitivity, Low cost                                                                                                               |
| Cons                | Low sensitivity                                                                   | High cost (needs image scanner)                                                    | Time-consuming                                                                                                                           |
| Sensitivity         | 0.02%                                                                             | 0.00001%                                                                           | 0.0001%                                                                                                                                  |
| Reference           | Kusakawa et al., Regen Ther. 2015                                                 | Kusakawa et al., Sci Rep. 2015                                                     | Kono et al., Biologicals. 2015<br>Hasebe-Takada et al. Regen Ther 2016                                                                   |

## *In Vivo Assay*

| Assays/Platform  | Tumorigenicity Test                                                                                                       |
|------------------|---------------------------------------------------------------------------------------------------------------------------|
| Animals          | NOG mice                                                                                                                  |
| Route            | Subcutaneous transplantation                                                                                              |
| Positive control | HeLa cells                                                                                                                |
| Duration         | >= 16 weeks                                                                                                               |
| Pros             | Direct evaluation in micro environment (expected clinical use site)                                                       |
| Cons             | High cost, Long time, Especial facility, Low through put, Histopathological evaluation to confirm malignancy of the tumor |
| Sensitivity      | to detect 10 HeLa cells in 10 <sup>6</sup> hMSC (0.0001%) at 17% of probability                                           |
| Reference        | Kusakawa et al., Regen Ther. 2015                                                                                         |



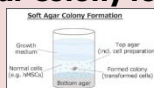


# Development of Test Methods for Detection of Transformed Cells



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

## Example 1

## In Vitro Assays

| Assays/<br>Platform | Conventional soft agar colony formation<br> | Digital soft agar colony formation<br> | Cell growth analysis<br>                              |
|---------------------|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Positive control    | HeLa cells                                                                                                                   | HeLa cells                                                                                                              | HeLa cells                                                                                                                               |
| Duration            | 3 to 4 weeks                                                                                                                 | 3 to 4 weeks                                                                                                            | 4 weeks or more                                                                                                                          |
| Assay principle     | Conventional SACF assay based on anchorage-independent cell growth                                                           | Image-based screening system for the SACF assay using a high-content cell analyzer                                      | The analysis of cell senescence/growth after serial passaging (compare the growth rates of hMSC w/wo positive controls after 5 passages) |
| Pros                | Low cost                                                                                                                     | High sensitivity                                                                                                        | High sensitivity, Low cost                                                                                                               |
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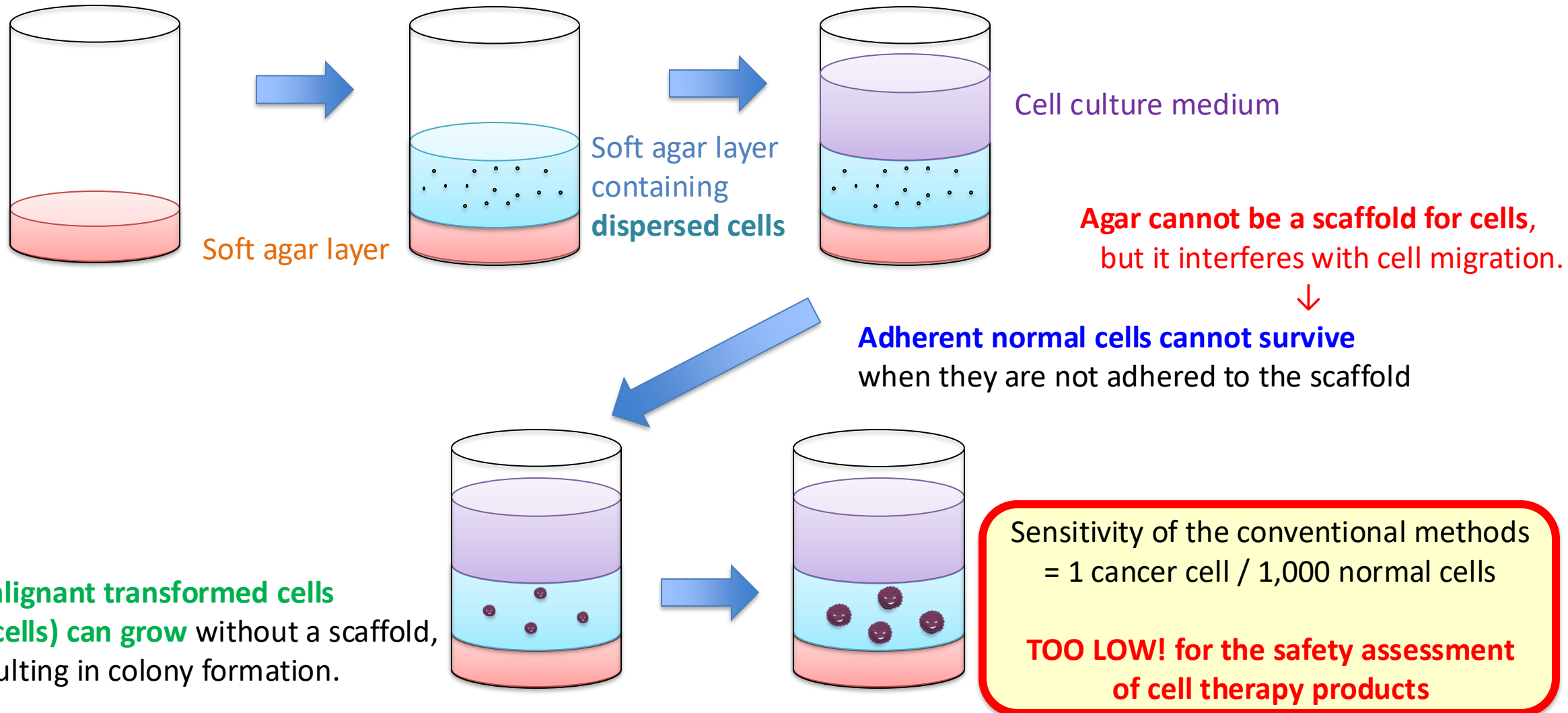
## In Vivo Assay

| Assays/Platform  | Tumorigenicity Test                                                                                                       |
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| Sensitivity      | to detect 10 HeLa cells in 10 <sup>6</sup> hMSC (0.0001%) at 17% of probability                                           |
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# Conventional Soft Agar Colony Formation Assay

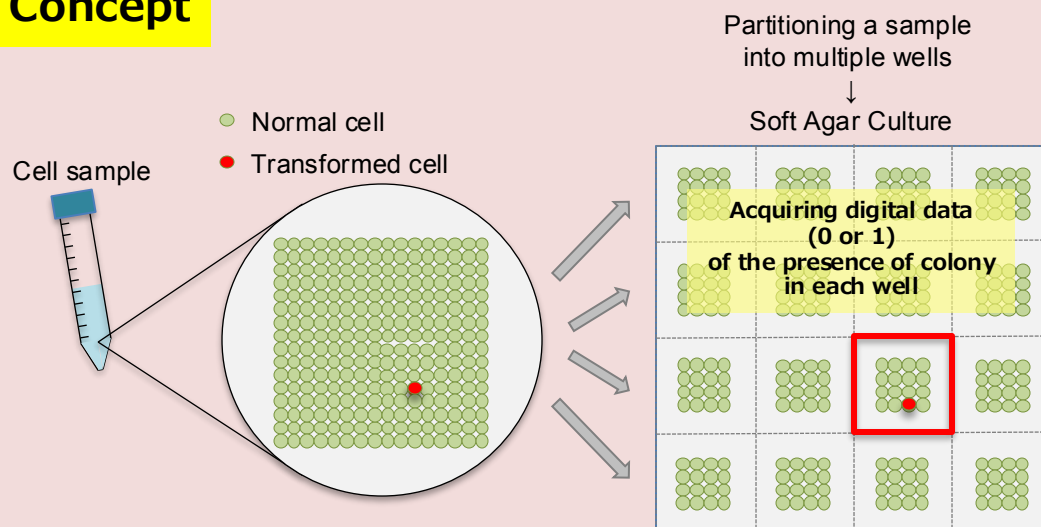
**Purpose:** Detection of scaffold-independent proliferation (= **malignant transformed cells**)





# Digital Soft-Agar Colony Formation Assay

## Concept



Partitioning a cell sample into multiple wells of culture plates enables digital readout of the presence of colony in each well and elevates the sensitivity for their detection.

Low S/N ratio

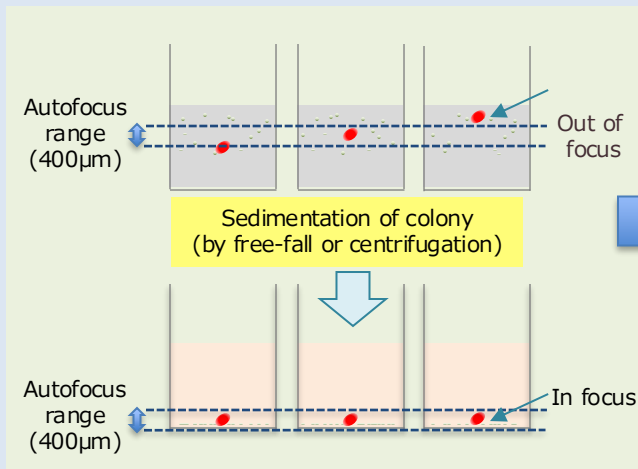
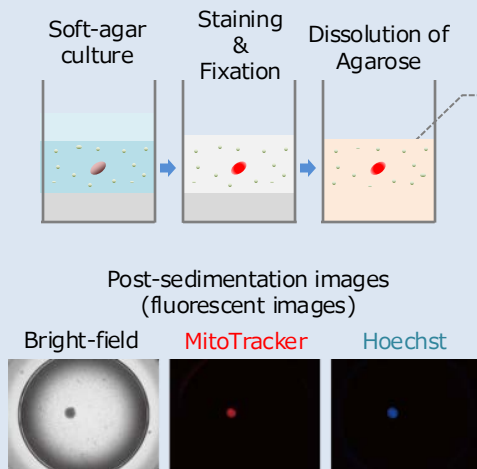


High S/N ratio

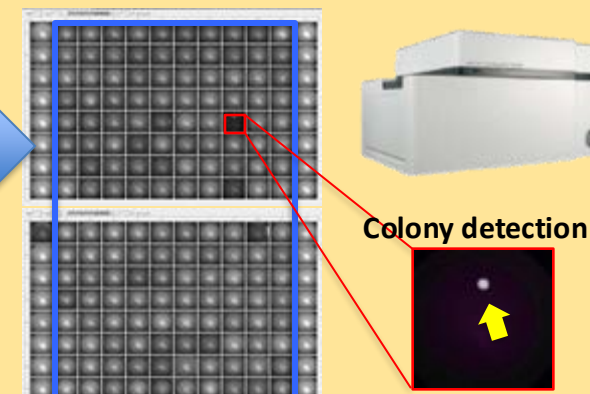


## Procedures

### Soft-agar culture & sample preparation

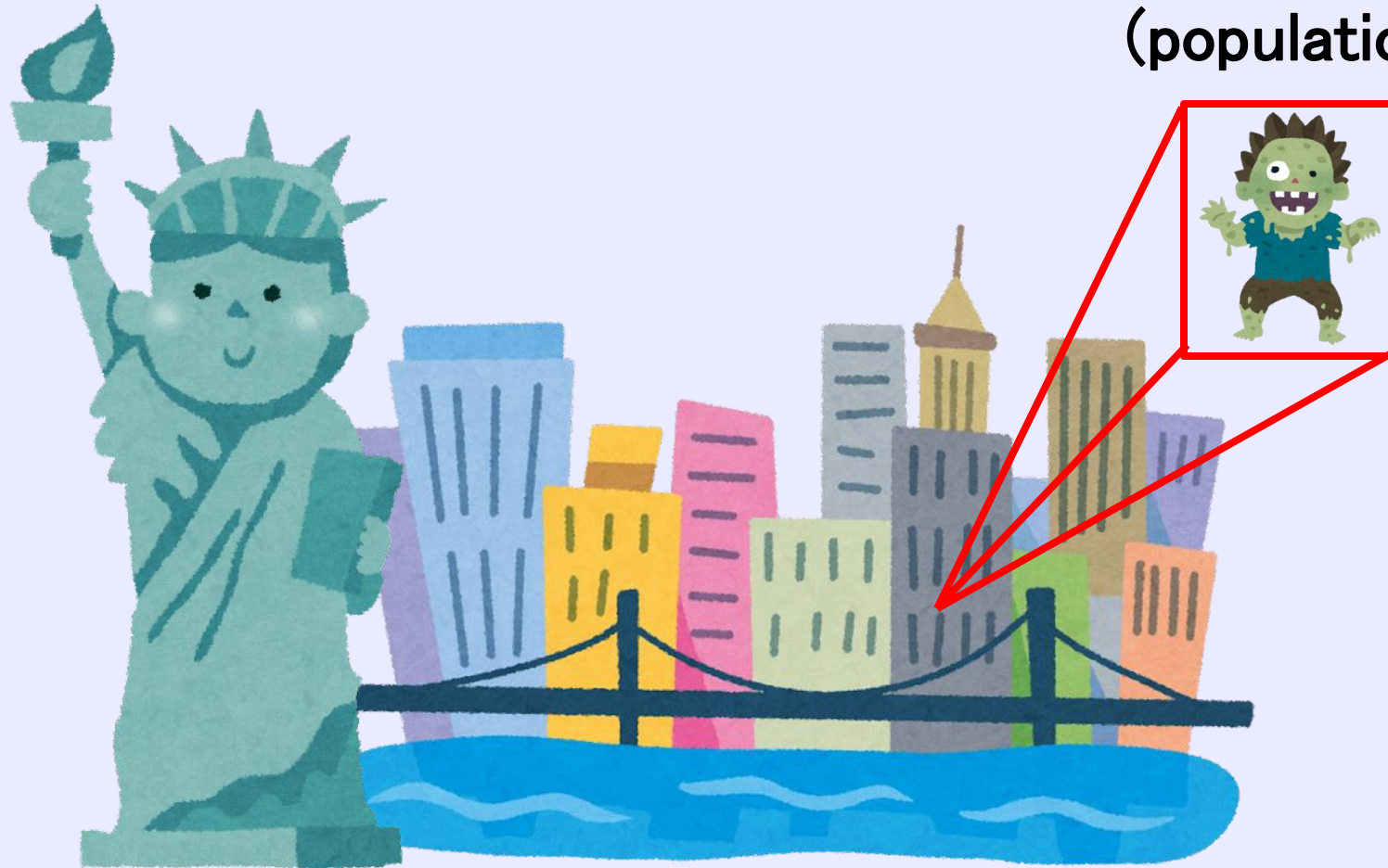


### High-throughput screening of colony formation using an imaging cytometer



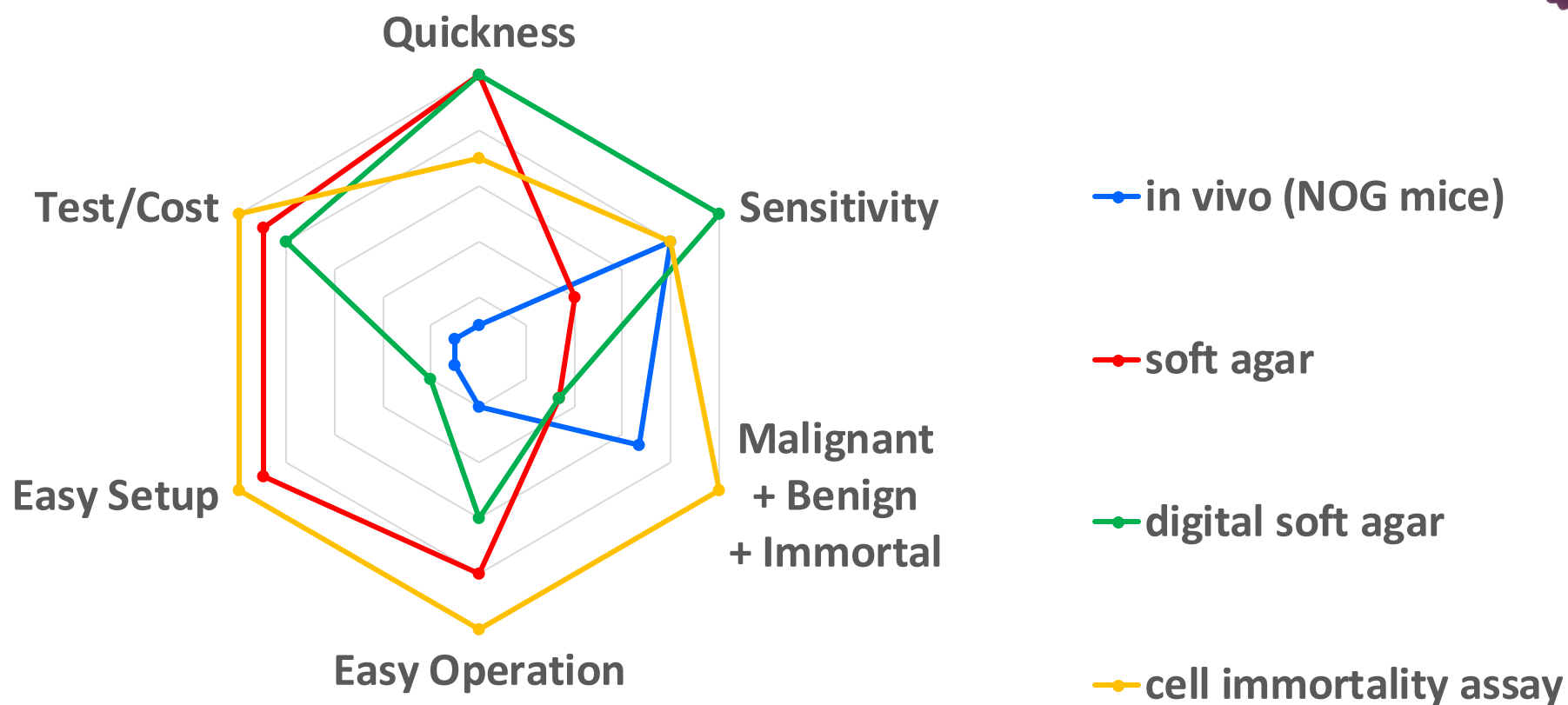
**Digital Soft-Agar Colony Formation Assay** has achieved the ability to detect cancer cells in normal cells at a ratio of **1 in 10 million**

Comparable to the ability to find one zombie in New York City  
(population: about 8 million)



# Qualitative Comparisons of Test Methods for Detection of Transformed Cells

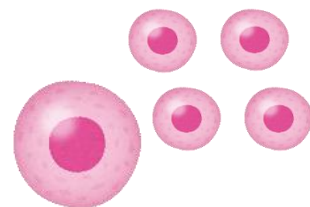
(based on our validation studies and past literature)



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# Development of Test Methods for Detection of Residual Undifferentiated PSCs



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

## In Vitro Assays

| Assays/<br>Platform | Flow cytometry<br>      | qRT-PCR<br> | Droplet Digital<br>PCR<br> | Direct detection<br>using a highly<br>efficient<br>amplification<br>method* |
|---------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Positive control    | iPS cells                                                                                                | iPS cells                                                                                    | iPS cells                                                                                                    | iPS cells                                                                   |
| Duration            | 1 day                                                                                                    | 6 hours                                                                                      | a few hours                                                                                                  | about a week                                                                |
| Marker              | TRA-1-60 etc                                                                                             | Lin28                                                                                        | Lin28                                                                                                        | -                                                                           |
| Pros                | Simple/quick                                                                                             | Simple/quick,<br>High sensitivity                                                            | Simple/quick,<br>High sensitivity                                                                            | Direct detection,<br>High sensitivity                                       |
| Cons                | Low sensitivity,<br>Indirect detection,<br>Difficulty in the<br>manual selection of<br>marker thresholds | Indirect detection,<br>Lin28 expression is<br>noted in some<br>differentiated cells          | Indirect detection,<br>Lin28 expression is<br>noted in some<br>differentiated cells                          | Time-consuming,<br>Low throughput                                           |
| Sensitivity         | 0.1%                                                                                                     | 0.002%                                                                                       | 0.001%                                                                                                       | 0.01-0.001%                                                                 |
| Reference           | Kuroda et al., PLoS ONE. 2012                                                                            | Kuroda et al., PLoS ONE. 2012                                                                | Kuroda et al., Regen Ther. 2015                                                                              | Tano et al., PLoS ONE. 2014                                                 |

## In Vivo Assay

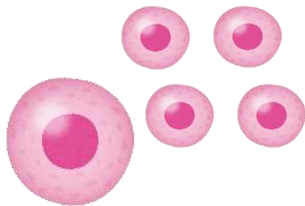
| Assays/Platform  | Tumorigenicity Test                                                                                                                                                                  |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Animals          | NOG mice                                                                                                                                                                             |
| Route            | Subcutaneous transplantation                                                                                                                                                         |
| Positive control | iPS cells                                                                                                                                                                            |
| Duration         | 17-30 weeks                                                                                                                                                                          |
| Pros             | Direct evaluation in micro environment (expected clinical use site)                                                                                                                  |
| Cons             | High cost, Long time, Especial facility, Low through put, Histopathological evaluation to confirm tumor origin from whether residual undifferentiated iPS cells or transformed cells |
| Sensitivity      | to detect 1000 hiPS cells in 2.5/10 <sup>5</sup> hRPE with 50% probability                                                                                                           |
| Reference        | Kanemura et al., Sci Rep. 2013; Kawamata et al., J Clin Med. 2015                                                                                                                    |



\*: eg. cultured on laminin-521 in Essential 8 medium

# Development of Test Methods for Detection of Residual Undifferentiated PSCs




Example 2



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

In Vitro Assays

In Vivo Assay

| Assays/<br>Platform | Flow cytometry<br>      | qRT-PCR<br> | Droplet Digital<br>PCR<br> | Direct detection<br>using a highly<br>efficient<br>amplification<br>method* |
|---------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Positive control    | iPS cells                                                                                                | iPS cells                                                                                    | iPS cells                                                                                                   | iPS cells                                                                   |
| Duration            | 1 day                                                                                                    | 6 hours                                                                                      | a few hours                                                                                                 | about a week                                                                |
| Marker              | TRA-1-60 etc                                                                                             | Lin28                                                                                        | Lin28                                                                                                       | -                                                                           |
| Pros                | Simple/quick                                                                                             | Simple/quick,<br>High sensitivity                                                            | Simple/quick,<br>High sensitivity                                                                           | Direct detection,<br>High sensitivity                                       |
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| Assays/Platform  | Tumorigenicity Test                                                                                                                                                                  |
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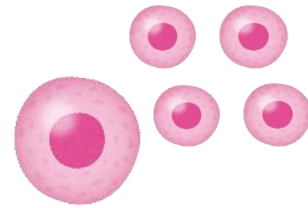
\*: eg. cultured on laminin-521 in Essential 8 medium



# Highly-Efficient Culture (HEC) Assay

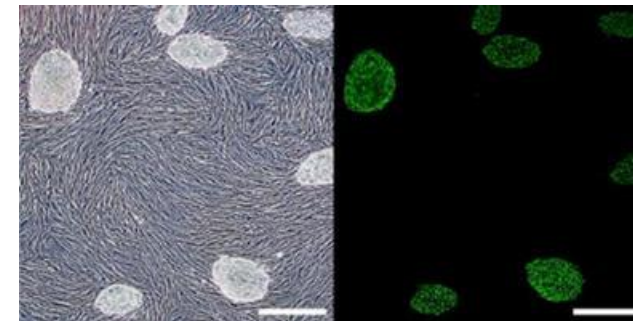
## Example 2

detects **residual undifferentiated pluripotent stem cells (PSCs)** in cell therapy products using highly efficient culture system which favors the growth of PSCs



### This assay ...

- ✓ is able to directly detect a trace amount of undifferentiated PSCs by measuring the number of colonies originated from a single PSC.



Tano et al., PLoS ONE.  
2014

| Assays/<br>Platform | <b>Highly efficient<br/>culture assay</b>                                           |
|---------------------|-------------------------------------------------------------------------------------|
| Positive<br>control | iPS cells <i>etc</i>                                                                |
| Duration            | about a week                                                                        |
| Marker              | TRA-1-60 <i>etc</i>                                                                 |
| Pros                | Direct detection,<br>High sensitivity                                               |
| Cons                | Time-consuming,<br>Low throughput                                                   |
| Sensitivity         | <b>1/10,000 - 1/100,000</b>                                                         |
| Reference           | Tano et al., PLoS ONE.<br>2014<br>Garitaonandia et al.,<br>Scientific Reports. 2016 |

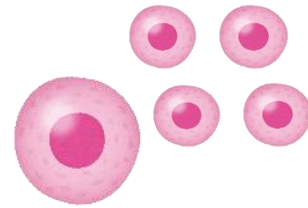
- ✓ is quite sensitive and has a potential to become more sensitive by improving culture system /colony detection method.



# Highly-Efficient Culture (HEC) Assay

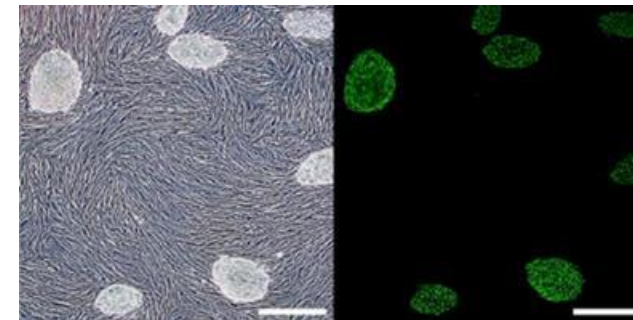
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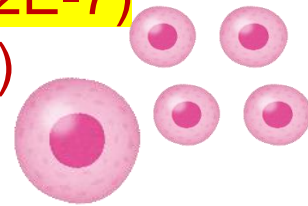
|                     |                                                                                  |
|---------------------|----------------------------------------------------------------------------------|
| Assays/<br>Platform | <b>Highly efficient<br/>culture assay</b>                                        |
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| Duration            | about a week                                                                     |
| Marker              | TRA-1-60 <i>etc</i>                                                              |
| Pros                | Direct detection,<br>High sensitivity                                            |
| Cons                | Time-consuming,<br>Low throughput                                                |
| Sensitivity         | <b>1/10,000 - 1/100,000</b>                                                      |
| Reference           | Tano et al., PLoS ONE. 2014<br>Garitaonandia et al.,<br>Scientific Reports. 2016 |

- ✓ is quite sensitive and has a potential to become more sensitive by improving culture system /colony detection method.

# Improvement of detection method for residual undifferentiated iPS cells (tumorigenic cells) in differentiated cells derived from human iPS cells



Detection of iPS cells in differentiated cells  
at a ratio of 1 in 5 million (**2E-7**)  
(WORLD RECORD!!)



## A B S T R A C T

**Background aims:** The Multisite Evaluation Study on Analytical Methods for Non-Clinical Safety Assessment of Human-Derived Regenerative Medical Products (MEASURE) is a Japanese experimental public–private partnership initiative, which aims to standardize methodology for tumorigenicity evaluation of human pluripotent stem cell (hPSC)-derived cell therapy products (CTPs). Undifferentiated hPSCs possess tumorigenic potential, and thus residual undifferentiated hPSCs are one of the major hazards for the risk of tumor formation from hPSC-derived CTPs. Among currently available assays, a highly efficient culture (HEC) assay is reported to be one of the most sensitive for the detection of residual undifferentiated hPSCs.

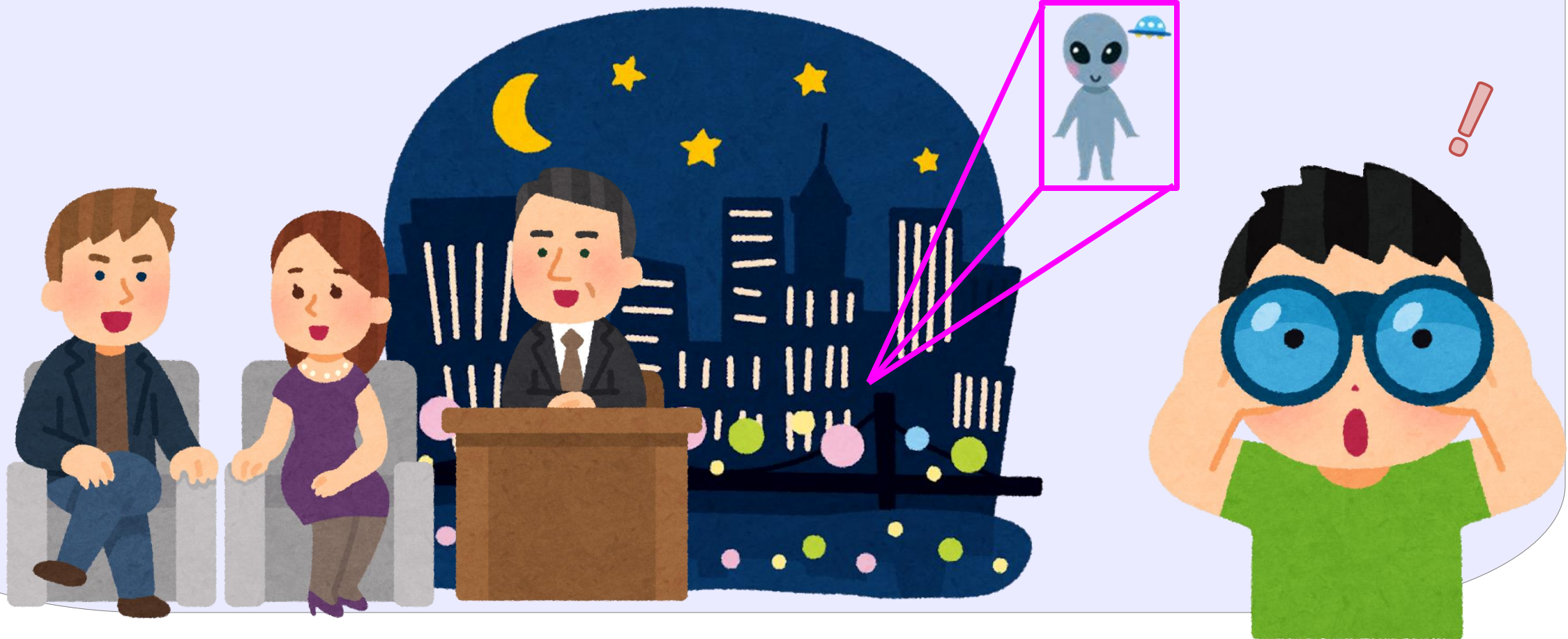
**Methods:** MEASURE first validated the detection sensitivity of HEC assay and then investigated the feasibility of magnetic-activated cell sorting (MACS) to improve sensitivity.

**Results:** The multisite experiments confirmed that the lower limit of detection under various conditions to which the human induced pluripotent stem cell lines and culture medium/substrate were subjected was 0.001%. In addition, MACS concentrated cells expressing undifferentiated cell markers and consequently achieved a detection sensitivity of 0.00002%.

**Conclusions:** These results indicate that HEC assay is highly sensitive and robust and that the application of MACS on this assay is a promising tool for further mitigation of the potential tumorigenicity risk of hPSC-derived CTPs.

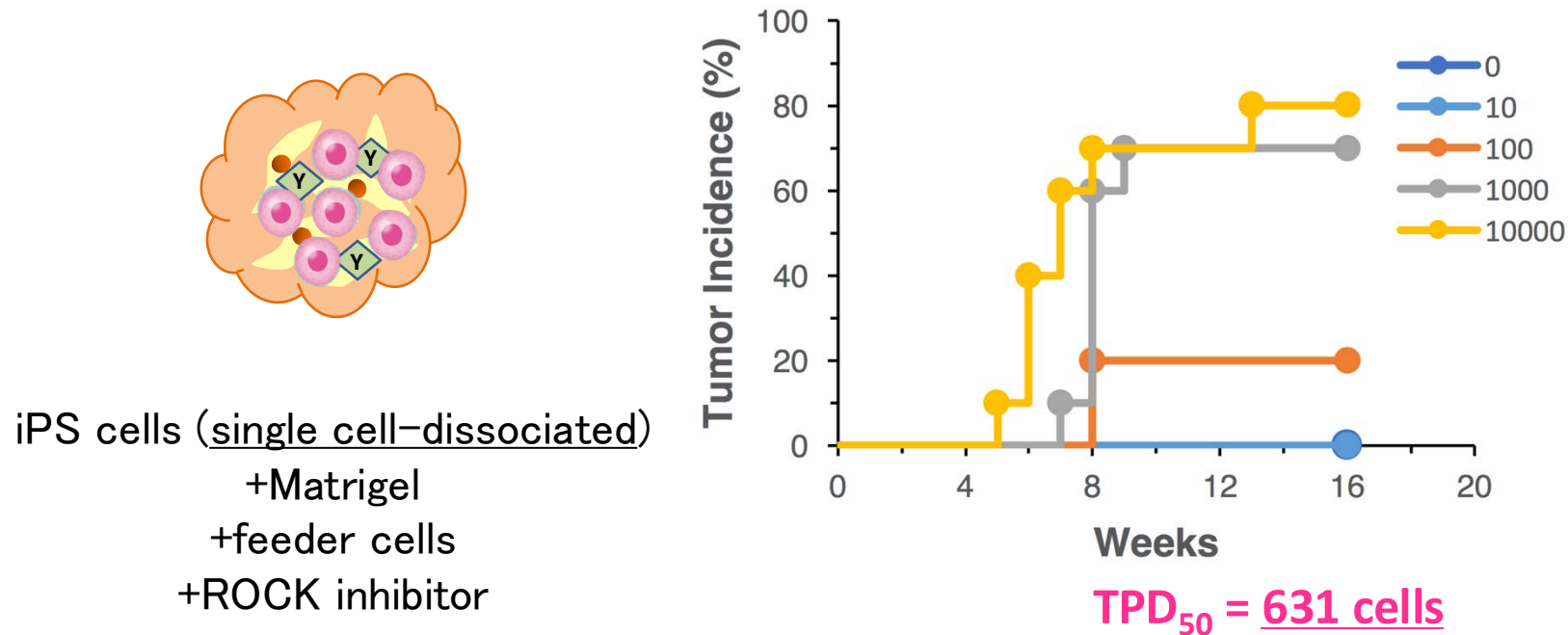
**The improved Highly-Efficient Culture (HEC) Assay** has achieved the ability to detect residual iPSCs in differentiated cells at a ratio of **1 in 5 million**

Comparable to the ability to find one alien in Los Angeles  
(population: about 4 million)



# *In vivo* Tumorigenicity Test using NOG mice subcutaneously transplanted with iPSCs


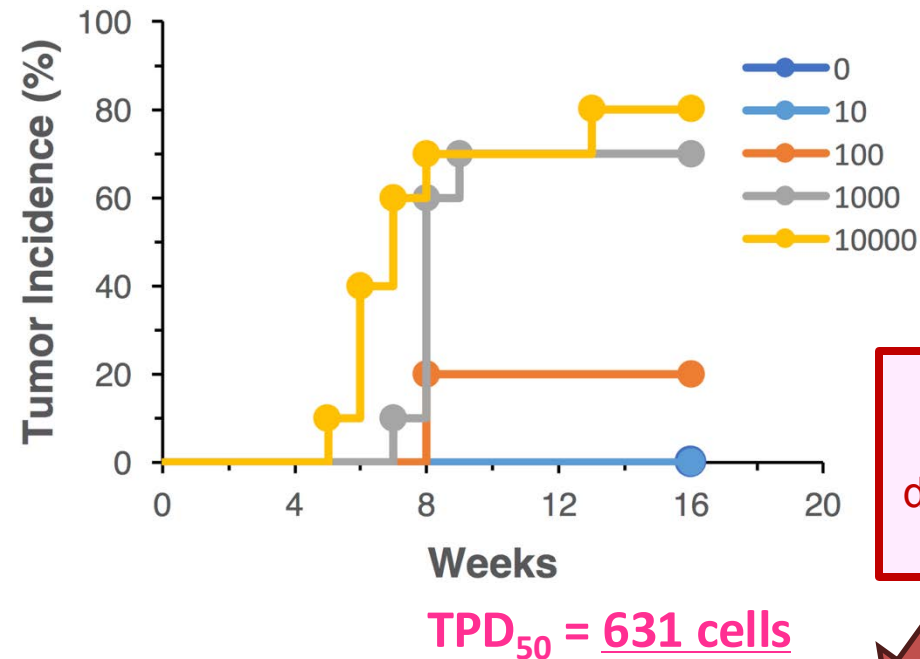
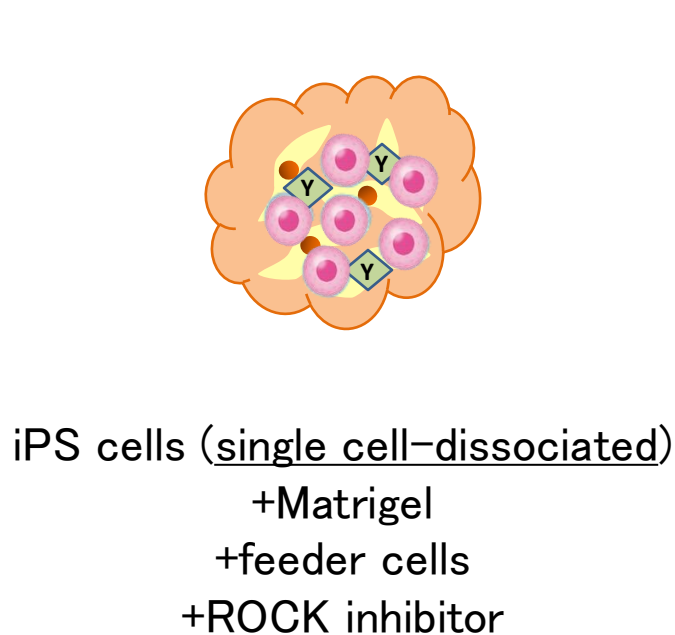
Yasuda et al.,  
PLoS One 2018



When iPS cells were most efficiently engrafted in severely immunodeficient mice, TPD<sub>50</sub> was 631 cells.  
If  $10^6$  and  $10^7$  cells are injected, TPD<sub>50</sub> = 631 would correspond to:  
**0.06% ( $6E-4$ ) and 0.006% ( $6E-5$ ), respectively.**

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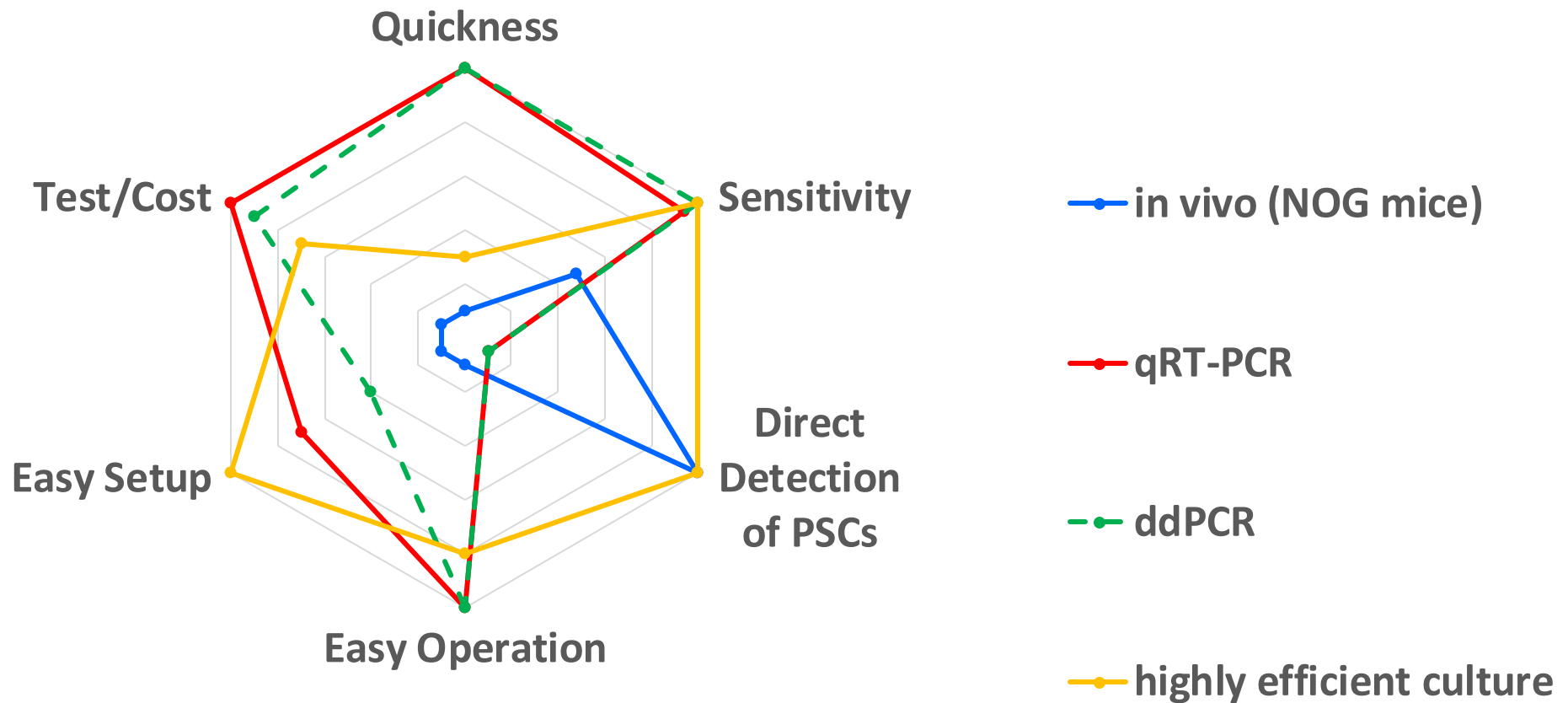
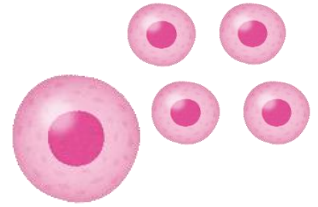


HEC Assay (*in vitro*)  
detects iPS cells in  
differentiated cells at a ratio  
of 1 in 5 million (**2E-7**)

When iPS cells were most efficiently engrafted in severely immunodeficient mice, TPD<sub>50</sub> was 631 cells.  
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# Qualitative Comparisons of Test Methods for Detection of Residual PSCs

(based on our validation studies and past literature)



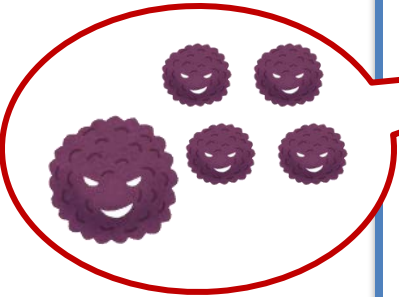
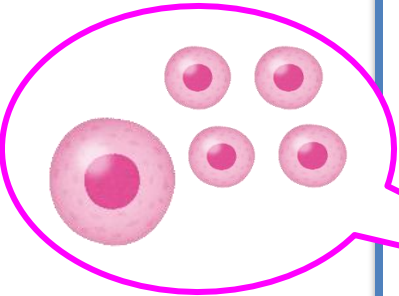
# “Points to Consider for Detection of Undifferentiated Pluripotent Stem Cells/Transformed Cells, Tumorigenicity Testing and Genomic Stability Evaluation of Human Cell-Processed Products” *[in Japanese]*

(Annex of Notification No. 0627-1 Issued on June 27, 2019, Pharmaceutical and Food Safety Bureau, MHLW)

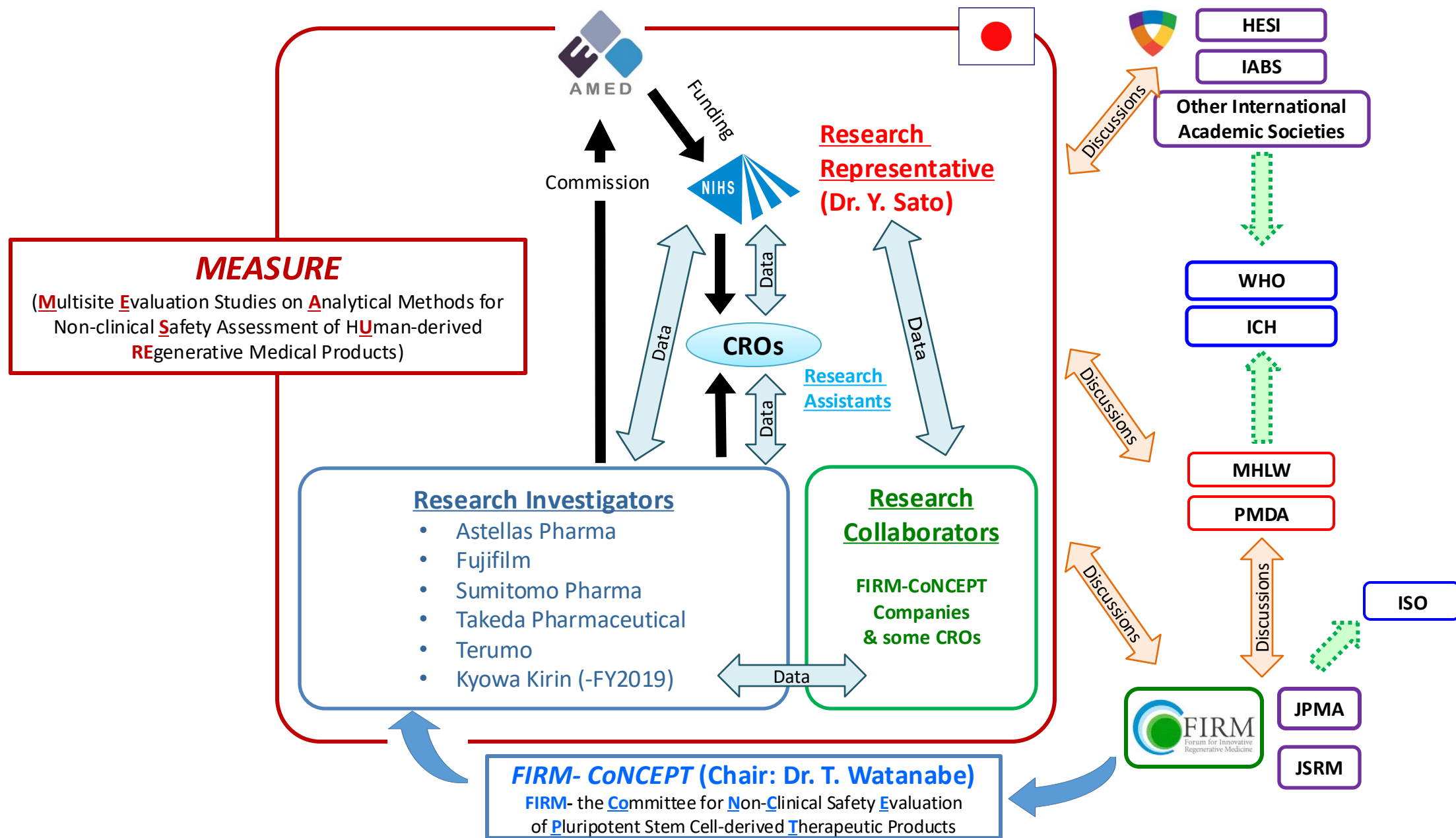


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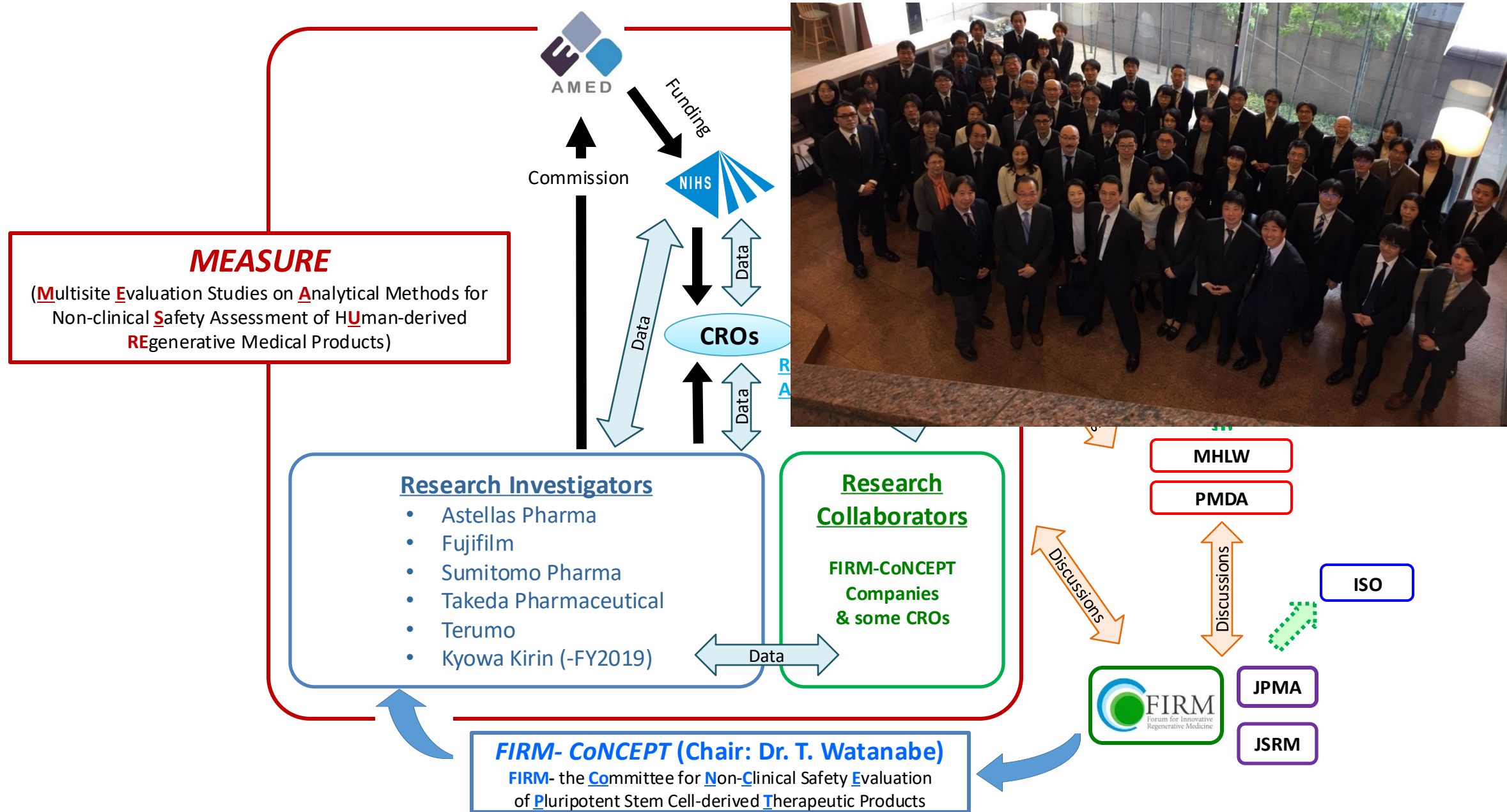
1. Introduction
  2. Position of This Document
  3. Glossaries
  4. General Considerations
  5. Tumorigenicity Tests for Human ES/iPS Cell-Processed Products
    - 5.1 Tumorigenicity Tests for **Quality Characterization of Starting Cell Substrate**
    - 5.2 Tests for **Quantification of Tumorigenic Cells in Intermediate or Final Products**
      - 5.2.1. Tests for **detection of undifferentiated pluripotent stem cells** in intermediate or final products
        - 5.2.1.1. **In vitro studies**
        - 5.2.1.2. **In vivo studies**
      - 5.2.2. Tests for **detection of transformed cells** in intermediate or final products
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    - 5.3 Tests to **Evaluate the Tumorigenic Potential of Cells in the Final Products at the Site of Engraftment in Humans**
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      - 5.3.4. Site, repeat number and mode of cell administration
      - 5.3.5. Duration of observation
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    - 6.2. Considerations for Tumorigenicity Testing for Final Products
  7. General Considerations for Genomic Stability
- Reference literature  
Tables Details of detection methods for residual undifferentiated iPS/ES cells and malignant transformed cells  
Reference information (experimental protocols of the test methods)



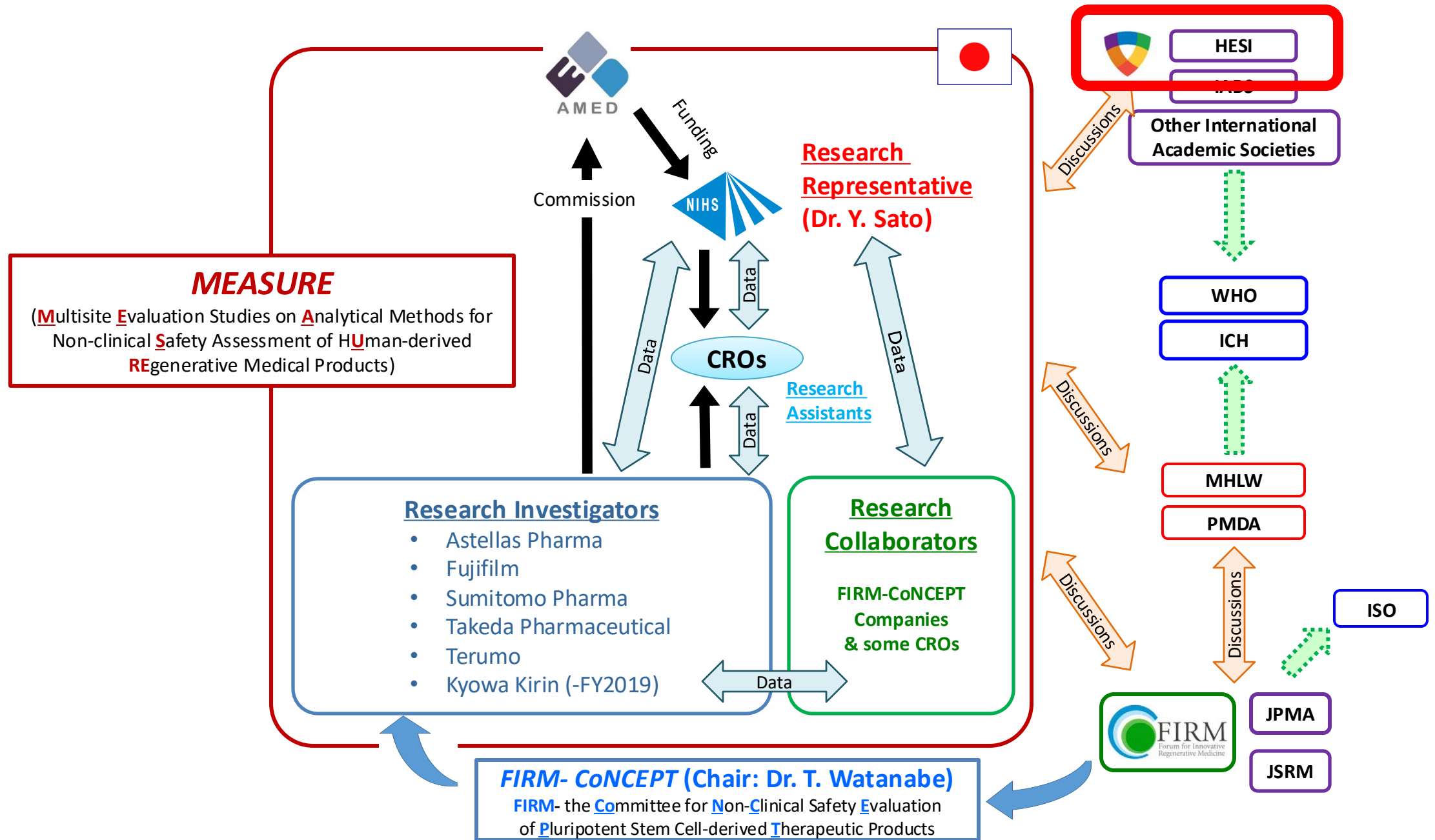
# Multisite Validation Studies on the Test Methods for Tumorigenicity Assessment of PSC-derived Products



# Multisite Validation Studies on the Test Methods for Tumorigenicity Assessment of PSC-derived Products



# Multisite Validation Studies on the Test Methods for Tumorigenicity Assessment of PSC-derived Products



## NGOs / Consortia:

**CATAPULT**  
Cell Therapy

**eatris**

European infrastructure  
for translational medicine

**FIRM**  
Forum for Innovative  
Regenerative Medicine

**CT-TRACS**  
**Members**  
(2022 data)

## Universities/ Research Centers:

**UNIVERSITÄT  
KLINIKUM FREIBURG**

**KING'S  
College  
LONDON**  
University of London

1884

Memorial Sloan Kettering  
Cancer Center

**Newcastle  
University**

**The  
University  
Of  
Sheffield.**

**Stanford** | **Cardiovascular  
Institute**

**UCL**

**Universiteit  
Leiden**

**WAGENINGEN  
UNIVERSITY & RESEARCH**

**THE UNIVERSITY OF  
SYDNEY**

**HESI**



>100 Participants

>30 Organizations

## Government & Regulatory bodies:

**FDA**

**CBG  
MEB**  
Medicines Evaluation Board

**MHRA**  
Regulating Medicines and Medical Devices

**NIH**

National Institutes  
of Health

**NIHS**

**NIST**  
National Institute of  
Standards and Technology

**astellas**  
Leading Light for Life

**AstraZeneca**

**Athersys  
inc.**

**BAYER**

**Bristol Myers Squibb™** **Broken String  
Biosciences**  
Unlocking future therapies

**CELLular  
Dynamics  
international**

**Celsense**

**charles river**

**cytiva** **MILLIPORE  
SIGMA**

**CRISPR  
THERAPEUTICS**

**janssen**

**NOVARTIS**

**Roche**

**SANOFI**

**SONOMA  
BIOTHERAPEUTICS**

**Sumitomo  
Pharma**

**Takeda**

**TWINSTRAND™  
BIOSCIENCES**

**VisiCELL  
MEDICAL**

Courtesy of Dr. Lucilia Mouriès, HESI

- **Public-Private Collaborative effort**
- >100 participants
- >35 organizations

## CT-TRACS (Cell Therapy: TRacking, Circulation and Safety) Committee

*To facilitate the translation of cell-based therapies to the clinic by driving the development of **tools, methods** and **knowledge** required to evaluate safety and fate of therapeutic cells.*

### Co-Chairs

- Mick Fellows (AstraZeneca)
- Tineke van der Hoorn (CBG-MEB)

### HESI Staff

- Lucilia Mouriès
- Connie Chen

### PoA/ BIODISTRIBUTION WG

Brooke Hefler (Celsense)  
Vladimir Ponomarev (MSKCC)



Collaboration with Japanese Consortium  
FIRM-CoNCEPT & AMED MEASURE

### TUMORIGENICITY WG

Hiroto Bando (Showadenko)  
Charlotte de Wolf (CBG-MEB)

Cell Tracking DB

Education &  
Outreach

Research  
*New in 2022!*

Multi-site studies  
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Advanced  
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# Position Paper of HESI CT-TRACS Tumorigenicity WG

## Addressing Challenges & Needs



*Cytotherapy*. 2019;21:1095-1111

*Cytotherapy*, 2019; 21: 1095–1111



### REVIEW

International Society  
ISCT  
Cell & Gene Therapy

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

Y. SATO<sup>1</sup>, H. BANDO<sup>2,\*</sup>, M. DI PIAZZA<sup>3</sup>, G. GOWING<sup>4</sup>, C. HERBERTS<sup>5,†</sup>, S. JACKMAN<sup>6</sup>,  
G. LEONI<sup>7</sup>, S. LIBERTINI<sup>8</sup>, T. MACLACHLAN<sup>9</sup>, J.W. MCBLANE<sup>10</sup>,  
L. PEREIRA MOURIÈS<sup>11</sup>, M. SHARPE<sup>7</sup>, W. SHINGLETON<sup>12,‡</sup>, B. SURMACZ-CORDLE<sup>7</sup>,  
K. YAMAMOTO<sup>13</sup> & J.W. VAN DER LAAN<sup>1\*</sup>

<sup>1</sup>Division of Cell-Based Therapeutic Products, National Institute of Health Sciences, Kawasaki, Japan, <sup>2</sup>FUJIFILM Corporation, Tokyo, Japan, <sup>3</sup>Boehringer Ingelheim Pharmaceuticals, Ridgefield, Connecticut, USA, <sup>4</sup>FUJIFILM Cellular Dynamics, Inc., Madison, Wisconsin, USA, <sup>5</sup>Medicines Evaluation Board, Utrecht, The Netherlands, <sup>6</sup>Charles River Laboratories, Horsham, Pennsylvania, USA, <sup>7</sup>Cell and Gene Therapy Catapult, London, UK, <sup>8</sup>Novartis Institutes for BioMedical Research, Basel, Switzerland, <sup>9</sup>Novartis Institutes for BioMedical Research, Cambridge, Massachusetts, USA, <sup>10</sup>Medicines & Healthcare Products Regulatory Agency, London, UK, <sup>11</sup>Health and Environmental Sciences Institute (HESI), Washington, DC, USA, <sup>12</sup>GE Healthcare, Cambridge, UK, and <sup>13</sup>Takeda Pharmaceutical Company Limited, Tokyo, Japan

Chair of the EMA/CHMP Safety Working Party  
(at the time of publication)

### Abstract

“[...] 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”.

[https://www.isct-cytotherapy.org/article/S1465-3249\(19\)30861-8/fulltext](https://www.isct-cytotherapy.org/article/S1465-3249(19)30861-8/fulltext)



# Multi-site Validation Studies by HESI CT-TRACS and MEASURE Consortium (FIRM-CoNCEPT & NIHS) on Test Methods for Tumorigenicity Assessment of Cell Therapy Products

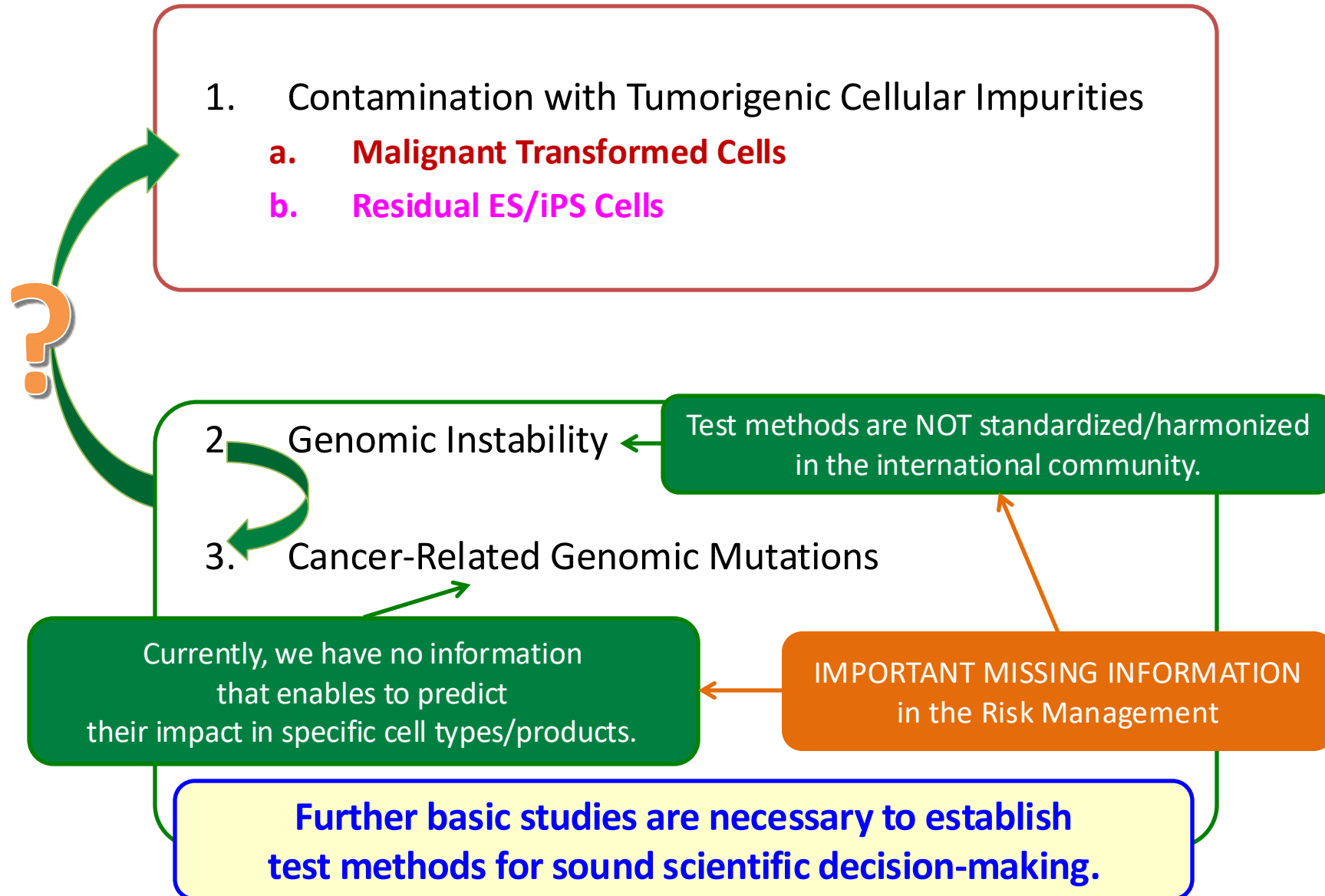


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# AGENDA

1. **What is tumorigenicity? –The risk of tumorigenesis and its hazards–**
2. **Development of highly sensitive test methods for the detection of transformed cells in human cell therapy products**
3. **Development of highly sensitive test methods for the detection of residual pluripotent stem cells in human ES/iPS cell-derived products**
4. **How much are genomic mutations predictive of abnormal tissue formation from human iPSC-derived products after engraftment?**

# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products





# The human body is a mosaic of different genomes

*Survey finds that ‘normal’ human tissues are riddled with mutations.*

Nature (NEWS on 06 June 2019)

<https://www.nature.com/articles/d41586-019-01780-9>

## RESEARCH ARTICLE

### RNA sequence analysis reveals macroscopic somatic clonal expansion across normal tissues

Keren Yizhak<sup>1</sup>, François Aguet<sup>1</sup>, Jaegil Kim<sup>1</sup>, Julian M. Hess<sup>1</sup>, Kirsten Kübler<sup>1,2,3</sup>, Jonna Grimsby<sup>1</sup>, Ruslana Frazer<sup>1</sup>, Hailei Zhang<sup>1</sup>, Nicholas J. Haradhvala<sup>1,2</sup>, Daniel Rosebrock<sup>1</sup>, Dimitri Livitz<sup>1</sup>, Xiao Li<sup>1</sup>, Eila Arich-Landkof<sup>1,2</sup>, Noam Shores<sup>1</sup>, Chip Stewart<sup>1</sup>, Ayellet V. Segrè<sup>1,3,4</sup>, Philip A. Branton<sup>5</sup>, Paz Polak<sup>6</sup>, Kristin G. Ardlie<sup>1</sup>, Gad Getz<sup>1,2,3,7,\*</sup>

<sup>1</sup>Broad Institute of MIT and Harvard, Cambridge, MA, USA.

<sup>2</sup>Center for Cancer Research, Massachusetts General Hospital, Boston, MA, USA.

<sup>3</sup>Harvard Medical School, Boston, MA, USA.

<sup>4</sup>Ocular Genomics Institute, Department of Ophthalmology, Massachusetts Eye and Ear, Boston, MA, USA.

<sup>5</sup>Biorepositories and Biospecimen Research Branch, Cancer Diagnosis Program, National Cancer Institute, Bethesda, MD, USA.

<sup>6</sup>Oncological Sciences, Icahn School of Medicine at Mount Sinai Hospital, New York, NY, USA.

<sup>7</sup>Department of Pathology, Massachusetts General Hospital, Boston, MA, USA.

\*Corresponding author. Email: [gadgetz@broadinstitute.org](mailto:gadgetz@broadinstitute.org)

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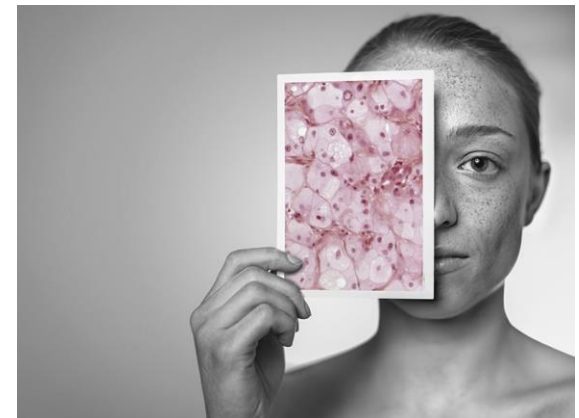
Science 07 Jun 2019:  
Vol. 364, Issue 6444, eaaw0726  
DOI: 10.1126/science.aaw0726

### Somatic mosaicism in normal tissues

Somatic cells can accumulate mutations over the course of an individual's lifetime. This generates cells that differ genetically at specific loci within the genome. To explore how this genetic diversity in individuals contributes to disease, Yizhak *et al.* developed a method to detect mutations from RNA sequencing data (see the Perspective by Tomasetti). Applying this method to Cancer Genome Atlas samples and normal samples from the Genotype-Tissue Expression (GTEx) project generated a tissue-specific study of mutation accumulation. Somatic mutations were detected in nearly all individuals and across many normal human tissues in genomic regions called cancer hotspots and in genes that play a role in cancer. Interestingly, the skin, lung, and esophagus exhibited the most mutations, suggesting that the environment generates many human mutations.

**“Researchers now need to find ways to sort out which of those cells will become tumours and which are ‘normal’ ”**

***Cristian Tomasetti, Johns Hopkins Medicine***



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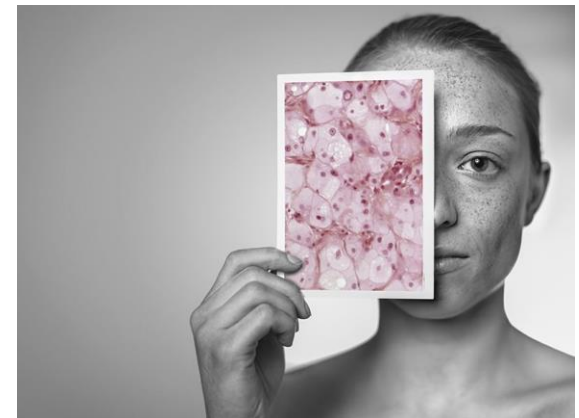
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...means “we currently have no way”

“Researchers now need to find ways to sort out

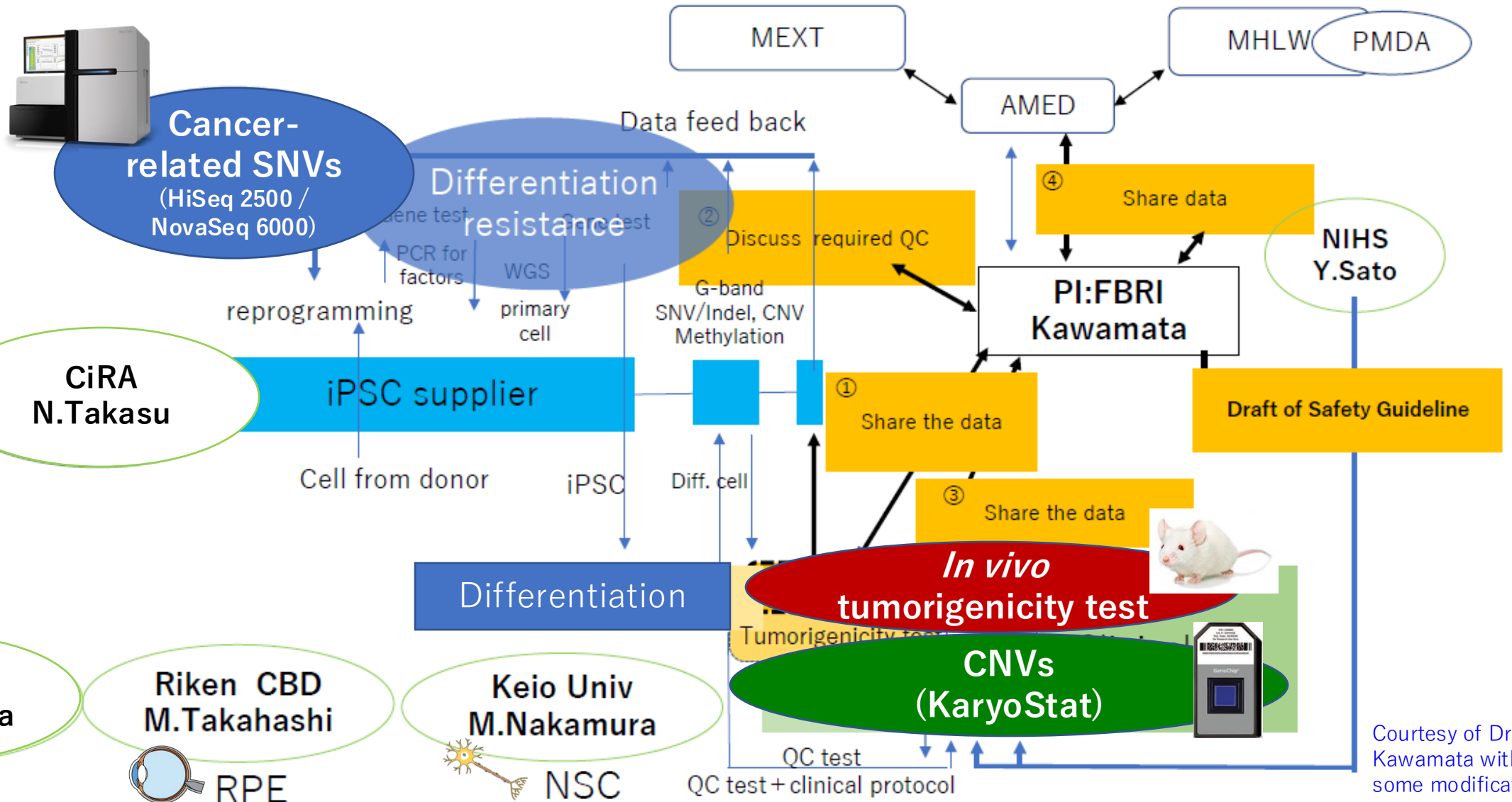
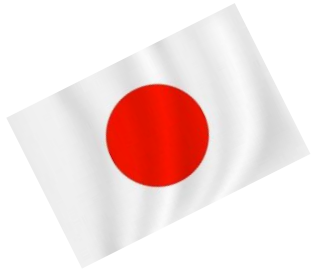
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*Cristian Tomasetti, Johns Hopkins Medicine*



# Study on the correlation between genomic variation in human iPS cell-derived products and abnormal tissue formation after implantation into immunodeficient animals

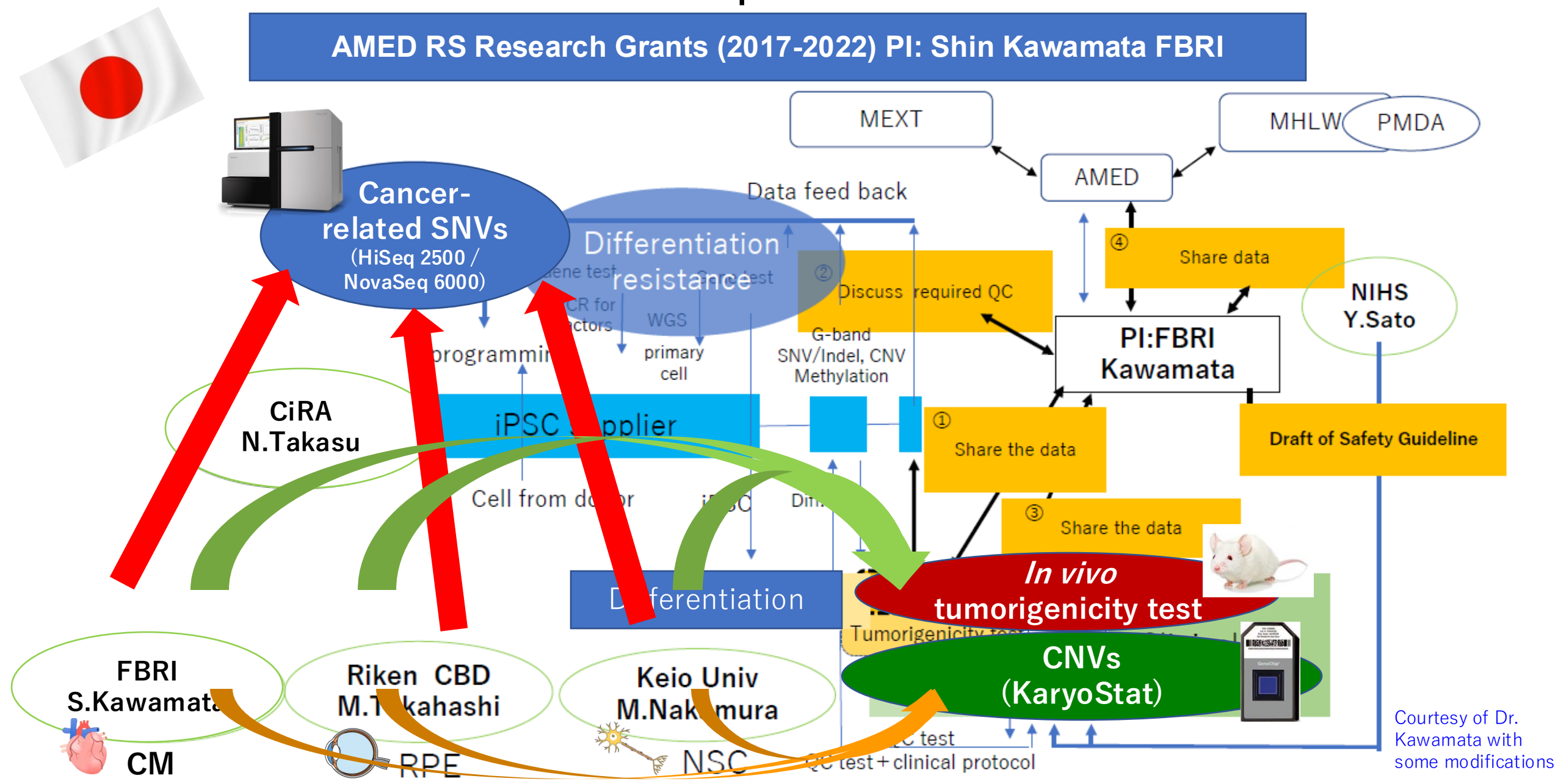
AMED RS Research Grants (2017-2022) PI: Shin Kawamata FBRI



Courtesy of Dr. Kawamata with some modifications

# Study on the correlation between genomic variation in human iPS cell-derived products and abnormal tissue formation after implantation into immunodeficient animals

AMED RS Research Grants (2017-2022) PI: Shin Kawamata FBRI



# Study on the correlation between genomic variation in human iPS cell-derived products and abnormal tissue formation after implantation into immunodeficient animals

A.

| Explanatory variables in PSC-derivatives |             |        |        | Outcome variable     |
|------------------------------------------|-------------|--------|--------|----------------------|
| Cell line                                | Cell typing | SNV    | CNV    | Histological finding |
| 16E84                                    | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| 16E84                                    | CMs         | SNV(+) | CNV(+) | Normal               |
| 16E85                                    | RPEs        | SNV(-) | CNV(+) | Normal               |
| 16E85                                    | CMs         | SNV(+) | CNV(-) | Normal               |
| 16H12                                    | RPEs        | SNV(+) | CNV(-) | Normal               |
| 16H12                                    | non-CMs     | SNV(+) | CNV(-) | Normal               |
| 15M38                                    | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| 15M38                                    | non-CMs     | SNV(-) | CNV(+) | Abnormal             |
| 1210B2                                   | NSCs        | SNV(+) | CNV(-) | Normal               |
| Ff-WJ                                    | NSCs        | SNV(-) | CNV(-) | Normal               |
| Ff-I01                                   | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| Ff-I01                                   | NSCs        | SNV(-) | CNV(+) | Abnormal             |
| H9                                       | RPEs        | SNV(-) | CNV(-) | Normal               |
| H9                                       | CMs         | SNV(-) | CNV(-) | Normal               |

B. Explanatory variable: SNV (in COSMIC Cancer Gene Census or Shibata's List)

| Explanatory variable                  |          | SNV(-) | SNV(+)   | Discriminative ratio            | Overall predictability |
|---------------------------------------|----------|--------|----------|---------------------------------|------------------------|
| Expectancy                            |          | Normal | Abnormal |                                 |                        |
| Outcome variable                      | Normal   | 4      | 5        | 44% (Specificity)               | 29%                    |
|                                       | Abnormal | 5      | 0        | 0% (Sensitivity)                |                        |
| Predictivity                          |          | 44%    | 0%       | Correlation ratio $\eta$ : 0.56 |                        |
| Overall Predictivity                  |          | 29%    |          |                                 |                        |
| Likelihood ratio for abnormal outcome |          | 2.3    | 0.0      |                                 |                        |

C. Explanatory variable: CNV ( - : CNV  $\leq 3$ ; + : CNV  $> 4$ )

| Explanatory variable                  |          | CNV(-) | CNV(+)   | Discriminative ratio            | Overall predictability |
|---------------------------------------|----------|--------|----------|---------------------------------|------------------------|
| Expectancy                            |          | Normal | Abnormal |                                 |                        |
| Outcome variable                      | Normal   | 7      | 2        | 78% (Specificity)               | 86%                    |
|                                       | Abnormal | 0      | 5        | 100% (Sensitivity)              |                        |
| Predictivity                          |          | 100%   | 71%      | Correlation ratio $\eta$ : 0.75 |                        |
| Overall predictivity                  |          | 86%    |          |                                 |                        |
| Likelihood ratio for abnormal outcome |          | 0.0    | 4.5      |                                 |                        |

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*Stem Cells Transl Med.* 2022;11:527-538.

# Study on the correlation between genomic variation in human iPS cell-derived products and abnormal tissue formation after implantation into immunodeficient animals

A.

| Explanatory variables in PSC-derivatives |             |        |        | Outcome variable     |
|------------------------------------------|-------------|--------|--------|----------------------|
| Cell line                                | Cell typing | SNV    | CNV    | Histological finding |
| 16E84                                    | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| 16E84                                    | CMs         | SNV(+) | CNV(+) | Normal               |
| 16E85                                    | RPEs        | SNV(-) | CNV(+) | Normal               |
| 16E85                                    | CMs         | SNV(+) | CNV(-) | Normal               |
| 16H12                                    | RPEs        | SNV(+) | CNV(-) | Normal               |
| 16H12                                    | non-CMs     | SNV(+) | CNV(-) | Normal               |
| 15M38                                    | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| 15M38                                    | non-CMs     | SNV(-) | CNV(+) | Abnormal             |
| 1210B2                                   | NSCs        | SNV(+) | CNV(-) | Normal               |
| Ff-WJ                                    | NSCs        | SNV(-) | CNV(-) | Normal               |
| Ff-I01                                   | RPEs        | SNV(-) | CNV(+) | Abnormal             |
| Ff-I01                                   | NSCs        | SNV(-) | CNV(+) | Abnormal             |
| H9                                       | RPEs        | SNV(-) | CNV(-) | Normal               |
| H9                                       | CMs         | SNV(-) | CNV(-) | Normal               |

B. Explanatory variable: SNV (in COSMIC Cancer Gene Census or Shibata's List)

| Explanatory variable                  |          | SNV(-) | SNV(+)   | Discriminative ratio                                | Overall predictability |
|---------------------------------------|----------|--------|----------|-----------------------------------------------------|------------------------|
| Expectancy                            |          | Normal | Abnormal |                                                     |                        |
| Outcome variable                      | Normal   | 4      | 5        | 44% (Specificity)                                   | 29%                    |
|                                       | Abnormal | 5      | 0        | 0% (Sensitivity)                                    |                        |
| Predictivity                          |          | 44%    | 0%       | Correlation ratio $\eta$ : 0.56                     |                        |
| Overall Predictivity                  |          | 29%    |          |                                                     |                        |
| Likelihood ratio for abnormal outcome |          | 2.3    | 0.0      | CNVs may help predict a formation, including 1 term |                        |
|                                       |          |        |          |                                                     |                        |

CNVs may help predict abnormal tissue formation, including tumorigenesis, after product implantation.

C. Explanatory variable: CNV ( - : CNV  $\leq 3$ ; + : CNV  $> 4$ )

| Explanatory variable                  |          | CNV(-) | CNV(+)   | Discriminative ratio            | Overall predictability |  |
|---------------------------------------|----------|--------|----------|---------------------------------|------------------------|--|
| Expectancy                            |          | Normal | Abnormal |                                 |                        |  |
| Outcome variable                      | Normal   | 7      | 2        | 78% (Specificity)               | 86%                    |  |
|                                       | Abnormal | 0      | 5        | 100% (Sensitivity)              |                        |  |
| Predictivity                          |          | 100%   | 71%      | Correlation ratio $\eta$ : 0.75 |                        |  |
| Overall predictivity                  |          | 86%    |          |                                 |                        |  |
| Likelihood ratio for abnormal outcome |          | 0.0    | 4.5      |                                 |                        |  |

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# Clinical Applications of iPSC/ESC-Derived Products in Japan

## in Non-Commercial Clinical Researches under the RM Safety Act and Commercial Clinical Trials under the PMD ACT



As of October 21, 2023; \*\* According to a newspaper report

| Final Product                                      | Starting Cells           | Target Disease                             | Institution(s)                                            | Type of Clinical Trial                                   | IMP Approval | FIH Trial |
|----------------------------------------------------|--------------------------|--------------------------------------------|-----------------------------------------------------------|----------------------------------------------------------|--------------|-----------|
| Retinal pigment epithelial cells                   | <i>Autologous iPSCs</i>  | Exudative age-related macular degeneration | FBRI, RIKEN                                               | Non-commercial clinical research under the RM Safety Act | 2013         | 2014      |
| Retinal pigment epithelial cells                   | Allogeneic iPSCs         | Exudative age-related macular degeneration | Kobe City Medical Center, Osaka Univ., Kyoto Univ., RIKEN | Non-commercial clinical research under the RM Safety Act | 2017         | 2017      |
| Dopaminergic neural progenitor cells               | Allogeneic iPSCs         | Parkinson's disease                        | Kyoto Univ.                                               | Clinical trial under the PMD Act                         | 2018         | 2018      |
| Platelets                                          | <i>Autologous iPSCs</i>  | Aplastic anemia                            | Kyoto Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2018         | 2019      |
| Corneal epithelial cells                           | Allogeneic iPSCs         | Corneal epithelial stem cell exhaustion    | Osaka Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2019         | 2019      |
| Hepatocytes                                        | <i>ESCs (Allogeneic)</i> | Congenital urea cycle disorder             | NCCHD                                                     | Clinical trial under the PMD Act                         | 2019         | 2019      |
| Cardiomyocytes                                     | Allogeneic iPSCs         | Ischemic cardiomyopathy                    | Osaka Univ.                                               | Clinical trial under the PMD Act                         | 2019         | 2020      |
| Neural progenitor cells                            | Allogeneic iPSCs         | Subacute spinal cord injury                | Keio Univ. etc.                                           | Non-commercial clinical research under the RM Safety Act | 2019         | 2021      |
| Retinal photoreceptor cells                        | Allogeneic iPSCs         | Retinitis pigmentosa                       | Kobe City Eye Hospital                                    | Non-commercial clinical research under the RM Safety Act | 2020         | 2020      |
| NKT cells                                          | Allogeneic iPSCs         | Recurrent or advanced head and neck cancer | Chiba Univ., RIKEN                                        | Clinical trial under the PMD Act                         | 2020         | 2020      |
| Cartilage                                          | Allogeneic iPSCs         | Knee articular cartilage injury            | Kyoto Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2020         | (2021)**  |
| Retinal pigment epithelial cells                   | Allogeneic iPSCs         | Retinal pigment epithelial insufficiency   | Kobe City Eye Hospital                                    | Non-commercial clinical research under the RM Safety Act | 2021         | 2021      |
| Innate lymphoid Cells/NK cells Expressing GPC3-CAR | Allogeneic iPSCs         | Ovarian cancer                             | Kyoto Univ., NCRI                                         | Clinical trial under the PMD Act                         | 2021         | 2021      |
| Platelets                                          | Allogeneic iPSCs         | Thrombocytopenia                           | Megakaryon, Kyoto Univ., CiRA-F                           | Clinical trial under the PMD Act                         | 2021         | 2022      |
| Corneal endothelial cells                          | Allogeneic iPSCs         | Bullous keratopathy                        | Keio Univ.                                                | Non-commercial clinical research under the RM Safety Act | 2021         | 2023      |
| Cardiomyocytes                                     | Allogeneic iPSCs         | Ischemic Cardiomyopathy                    | Heartseed, Novo Nordisk                                   | Clinical trial under the PMD Act                         | 2021         | 2023      |

# Clinical Applications of iPSC/ESC-Derived Products in Japan

## in Non-Commercial Clinical Researches under the RM Safety Act and Commercial Clinical Trials under the PMD ACT

As of October 21, 2023; \*\* According to a newspaper report



| Final Product                               | Starting Cells    | Target Disease                             | Institution(s)                                            | Type of Clinical Trial                                   | IMP Approval | FIH Trial |
|---------------------------------------------|-------------------|--------------------------------------------|-----------------------------------------------------------|----------------------------------------------------------|--------------|-----------|
| Retinal pigment epithelial cells            | Autologous iPSCs  | Exudative age-related macular degeneration | FBRI, RIKEN                                               | Non-commercial clinical research under the RM Safety Act | 2013         | 2014      |
| Retinal pigment epithelial cells            | Allogeneic iPSCs  | Exudative age-related macular degeneration | Kobe City Medical Center, Osaka Univ., Kyoto Univ., RIKEN | Non-commercial clinical research under the RM Safety Act | 2017         |           |
| Dopaminergic neural progenitor cells        | Allogeneic iPSCs  | Parkinson's disease                        | Kyoto Univ.                                               | Clinical trial under the PMD Act                         | 2018         |           |
| Platelets                                   | Autologous iPSCs  | Aplastic anemia                            | Kyoto Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2018         |           |
| Corneal epithelial cells                    | Allogeneic iPSCs  | Corneal epithelial stem cell exhaustion    | Osaka Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2019         |           |
| Hepatocytes                                 | ESCs (Allogeneic) | Congenital urea cycle disorder             | NCCHD                                                     | Clinical trial under the PMD Act                         | 2019         |           |
| Cardiomyocytes                              | Allogeneic iPSCs  | Ischemic cardiomyopathy                    | Osaka Univ.                                               | Clinical trial under the PMD Act                         | 2019         |           |
| Neural progenitor cells                     | Allogeneic iPSCs  | Subacute spinal cord injury                | Keio Univ. etc.                                           | Non-commercial clinical research under the RM Safety Act | 2019         |           |
| Retinal photoreceptor cells                 | Allogeneic iPSCs  | Retinitis pigmentosa                       | Kobe City Eye Hospital                                    | Non-commercial clinical research under the RM Safety Act | 2020         |           |
| NKT cells                                   | Allogeneic iPSCs  | Recurrent or advanced head and neck cancer | Chiba Univ., RIKEN                                        | Clinical trial under the PMD Act                         | 2020         |           |
| Cartilage                                   | Allogeneic iPSCs  | Knee articular cartilage injury            | Kyoto Univ.                                               | Non-commercial clinical research under the RM Safety Act | 2020         |           |
| Retinal pigment epithelial cells            | Allogeneic iPSCs  | Retinal pigment epithelial insufficiency   | Kobe City Eye Hospital                                    | Non-commercial clinical research under the RM Safety Act | 2021         |           |
| Lymphoid Cells/NK cells expressing GPC3-CAR | Allogeneic iPSCs  | Ovarian cancer                             | Kyoto Univ., NCRI                                         | Clinical trial under the PMD Act                         | 2021         |           |
| Platelets                                   | Allogeneic iPSCs  | Thrombocytopenia                           | Megakaryon, Kyoto Univ., CIRA-F                           | Clinical trial under the PMD Act                         | 2021         | 2022      |
| Corneal endothelial cells                   | Allogeneic iPSCs  | Bullous keratopathy                        | Keio Univ.                                                | Non-commercial clinical research under the RM Safety Act | 2021         | 2023      |
| Cardiomyocytes                              | Allogeneic iPSCs  | Ischemic Cardiomyopathy                    | Heartseed, Novo Nordisk                                   | Clinical trial under the PMD Act                         | 2021         | 2023      |



<https://nd.natureasia.com/figure/4438/56992/phone/1>



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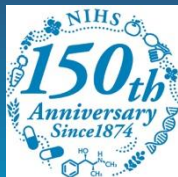


Our research has contributed to clinical applications of PSC-derived products through the development of test methods for the assessment of their quality and safety.

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# Thank you for your attention!

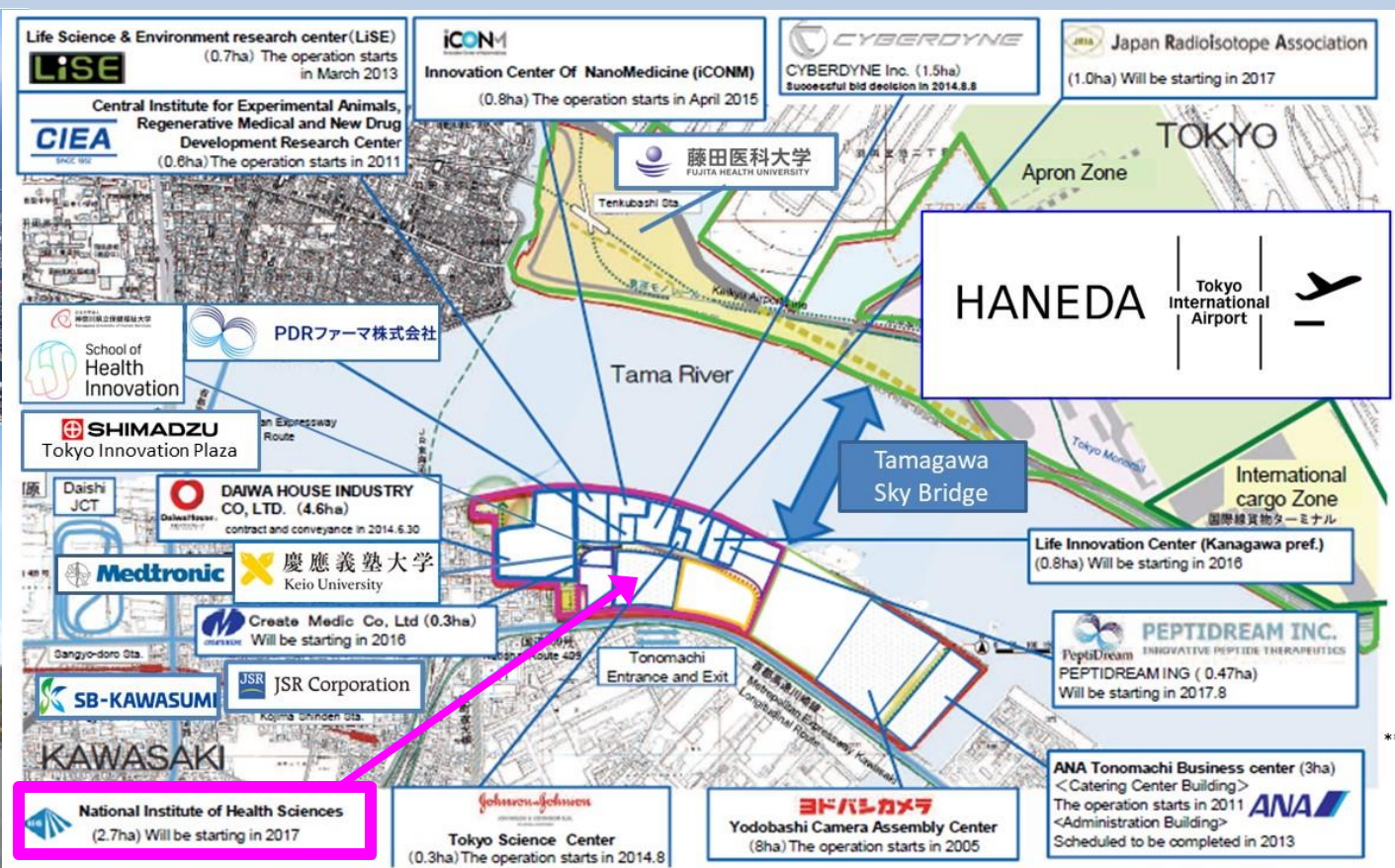
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<https://www.oag.com/hubs/air-canda-787.jpg>

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