



September 11, 2024
Taipei, Taiwan

2024 iPSC Research, Clinical Application, and Regulatory Considerations

Regulatory Considerations in Japan for Ensuring the Quality and Safety of iPSC-derived Products

Yoji SATO, Ph.D.

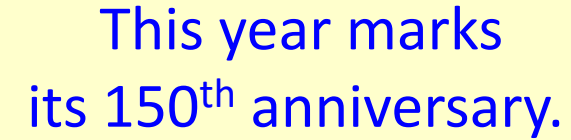
Head, Division of Drugs

(Immediate Former Head, Division of Cell-Based Therapeutic Products)

National Institute of Health Sciences, Japan

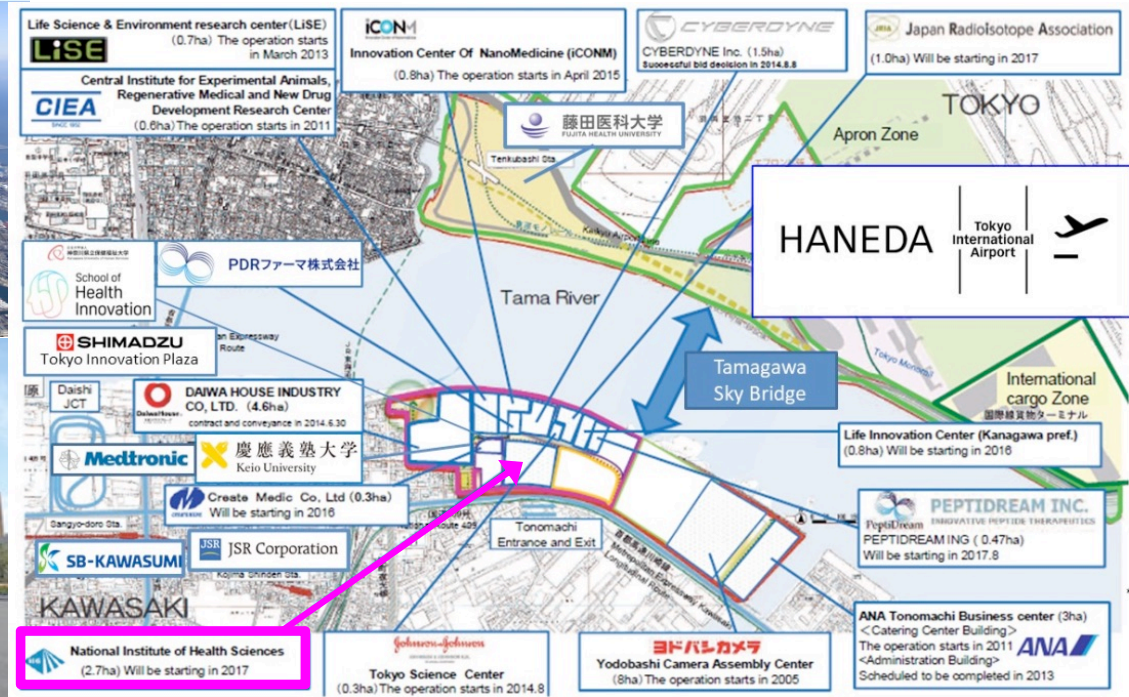
DISCLAIMER

The views and opinions expressed in this presentation are those of the presenter and do not necessarily represent the official policy or position of the Japanese National Institute of Health Sciences or the Japanese Ministry of Health, Labour & Welfare. Also, the presenter has no COI to disclose in connection with this presentation.



- **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**

An aerial photograph of the Haneda Airport area in Tokyo. The image shows the airport's runways and taxiways, surrounded by urban development and water bodies. A yellow arrow points to a specific area labeled 'KING SKYFRONT' and 'キングスカイフロント' in Japanese. The label 'Haneda Airport' and '羽田空港' is also present.



“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.**

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)] --- G1[]; 2[2. Characteristics and eligibility of cells to be used as raw materials] --- G1; 3[3. Eligibility of ancillary materials of human or animal origin, other than cell substrates] --- G1; 4[4. Establishment and management of cell banks as cell substrates] --- G1; G1 --- G1_Label[Safety & eligibility of raw materials]; 5[5. Manufacturing strategy and process validation to achieve reproducibility of the final product quality] --- G2[]; 6[6. Characterization of cells as active ingredients of the final product] --- G2; 7[7. Identification and specification of critical quality attributes of the final product (QC of the final product)] --- G2; 8[8. Comparability in the quality of products subject to changes in their manufacturing process/cell banks] --- G2; G2 --- G2_Label[Ensuring the quality of the final product]; 9[9. Design and interpretation of non-clinical safety studies and non-clinical proof-of-concept studies] --- G3[]; 10[10. Design and interpretation of tumorigenicity studies (especially for ESC/iPSC-derived products)] --- G3; 11[11. Immunogenicity of the final product] --- G3; 12[12. Biodistribution of administered cells in vivo and their behavior at the engraftment site] --- G3; G3 --- G3_Label[Prediction of safety & efficacy in the non-clinical phase]; 13[13. Design and interpretation of clinical trials] --- G4[]; 14[14. Efficacy and safety follow-up] --- G4; G4 --- G4_Label[Clinical Evaluation];
```
- 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?

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
- 
- The diagram groups the 14 challenges into four categories using colored brackets and labels:
- Safety & eligibility of raw materials** (Blue bracket): Includes items 1 through 4.
  - Ensuring the quality of the final product** (Red bracket): Includes items 5 through 8.
  - Prediction of safety & efficacy in the non-clinical phase** (Green bracket): Includes items 9 through 12.
  - Clinical Evaluation** (Purple bracket): Includes items 13 and 14.

# 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
- Safety & eligibility of raw materials
- Ensuring the quality of the final product
- Prediction of safety & efficacy in the non-clinical phase
- Clinical Evaluation

# **AGENDA (1)**

- 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?**



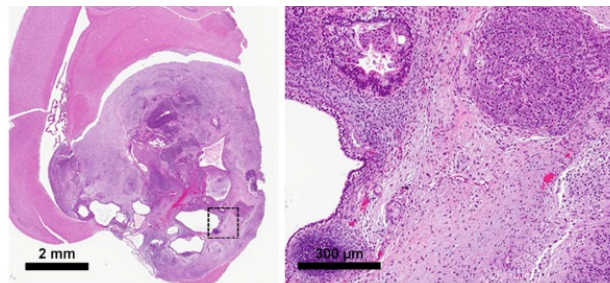
# AGENDA (1)

- 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?**

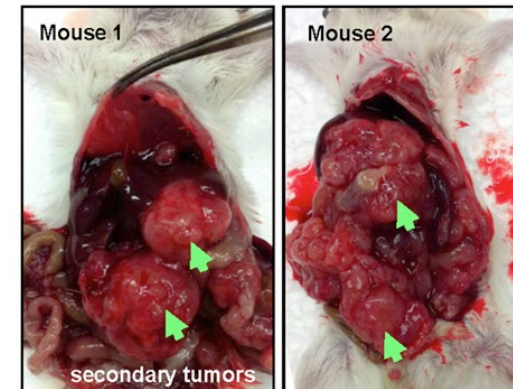
# Tumorigenicity

... 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**

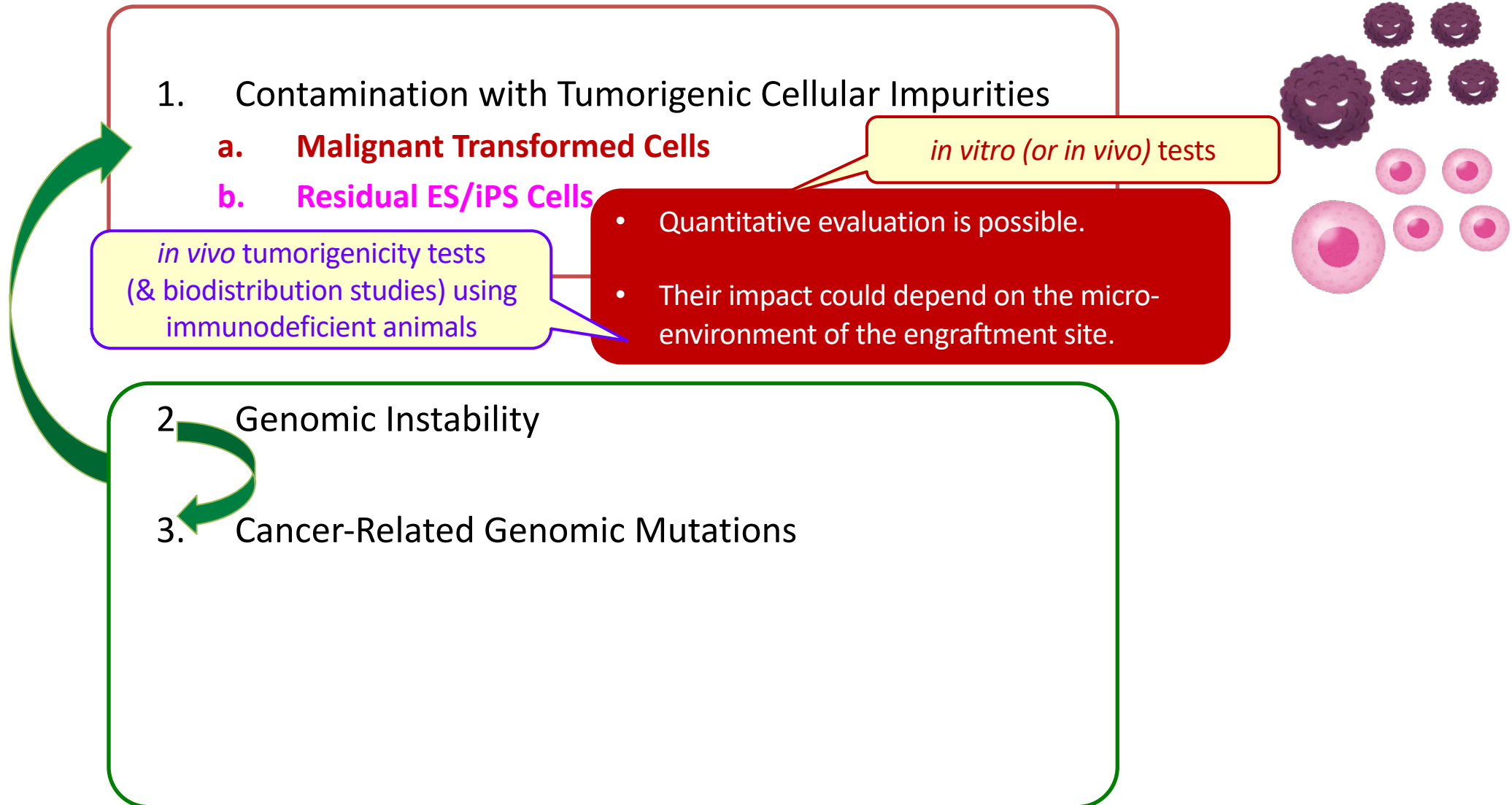
b. **Residual ES/iPS Cells**

## 2. Genomic Instability

## 3. Cancer-Related Genomic Mutations

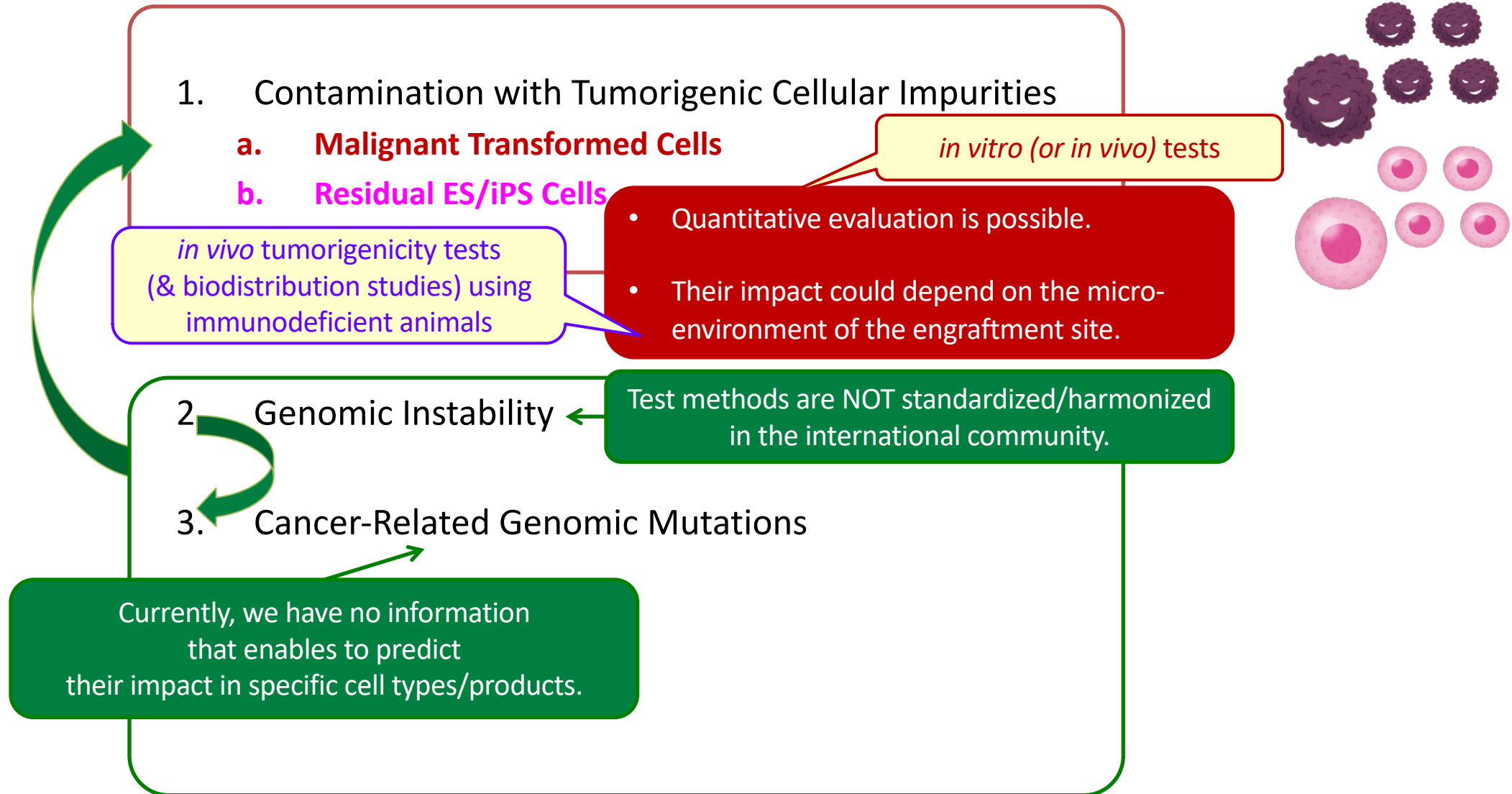


# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products

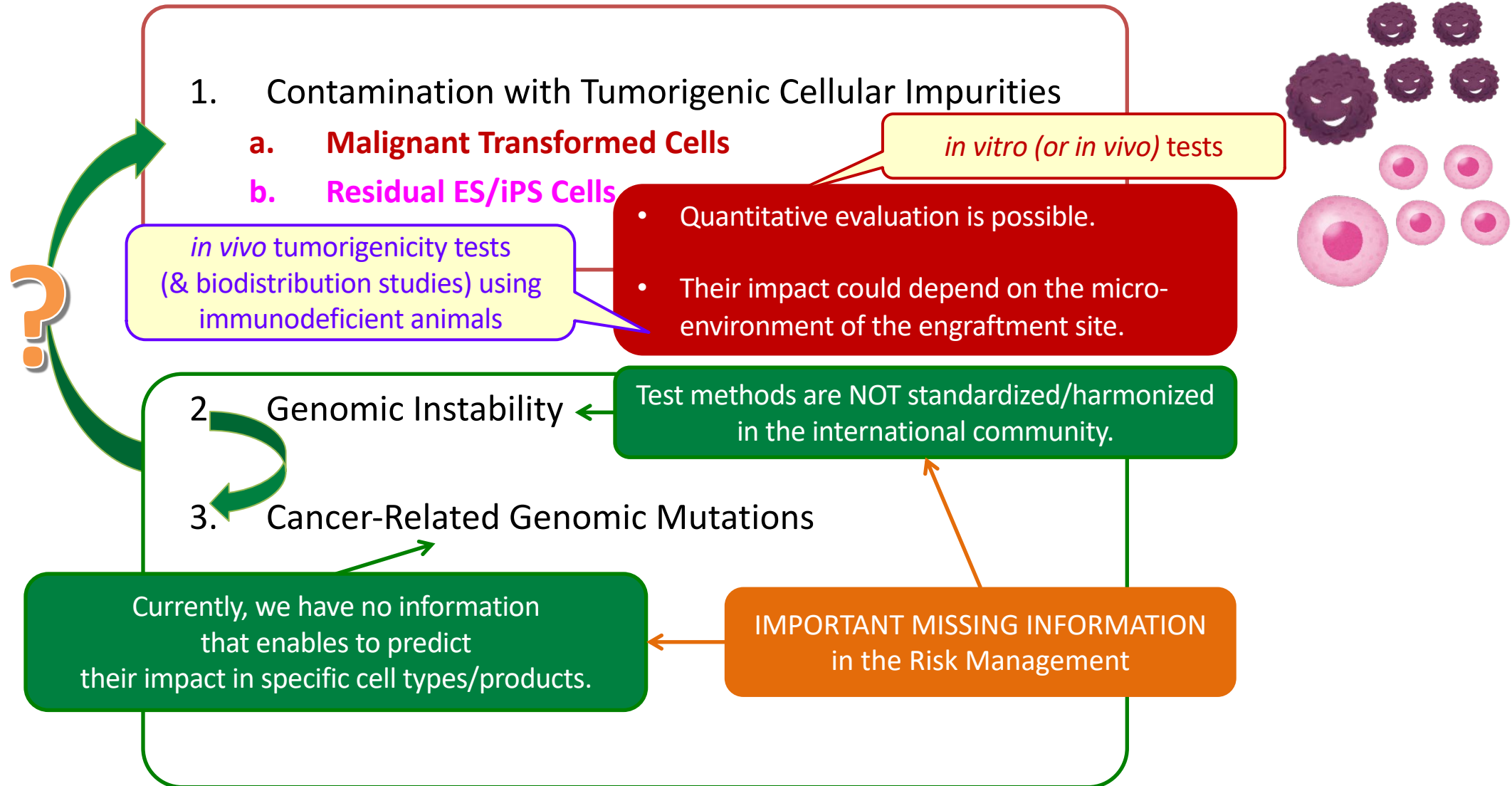




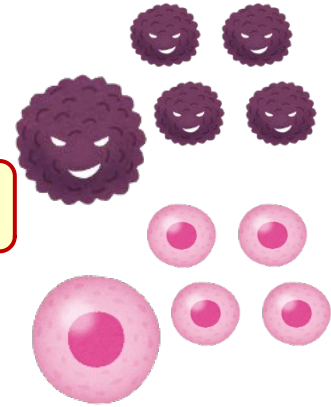
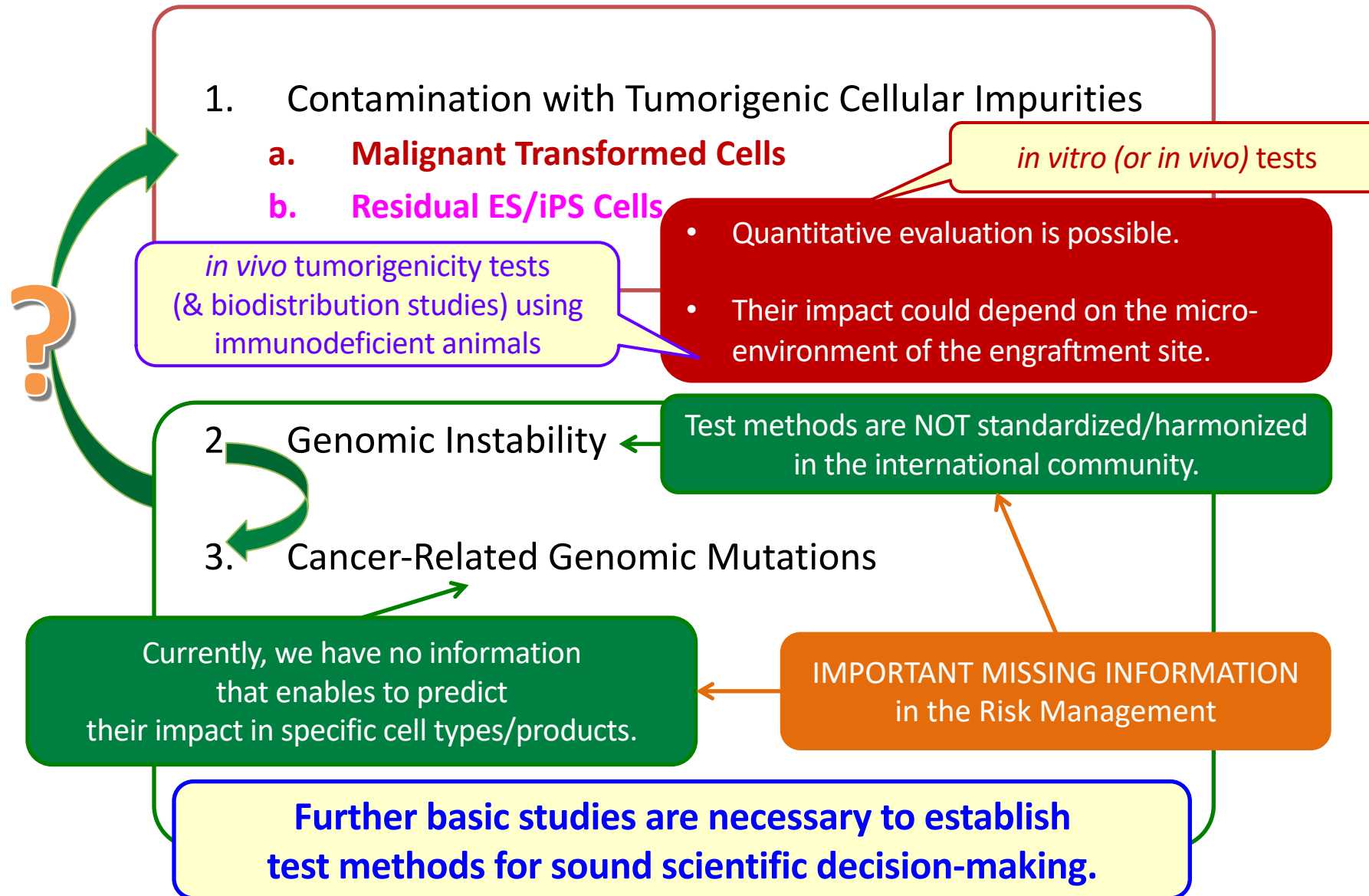
# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products



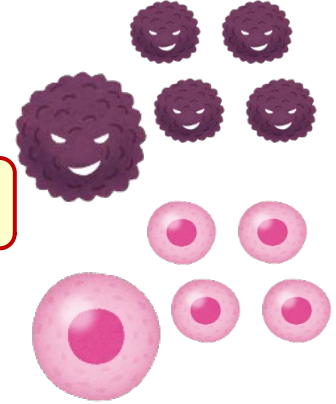
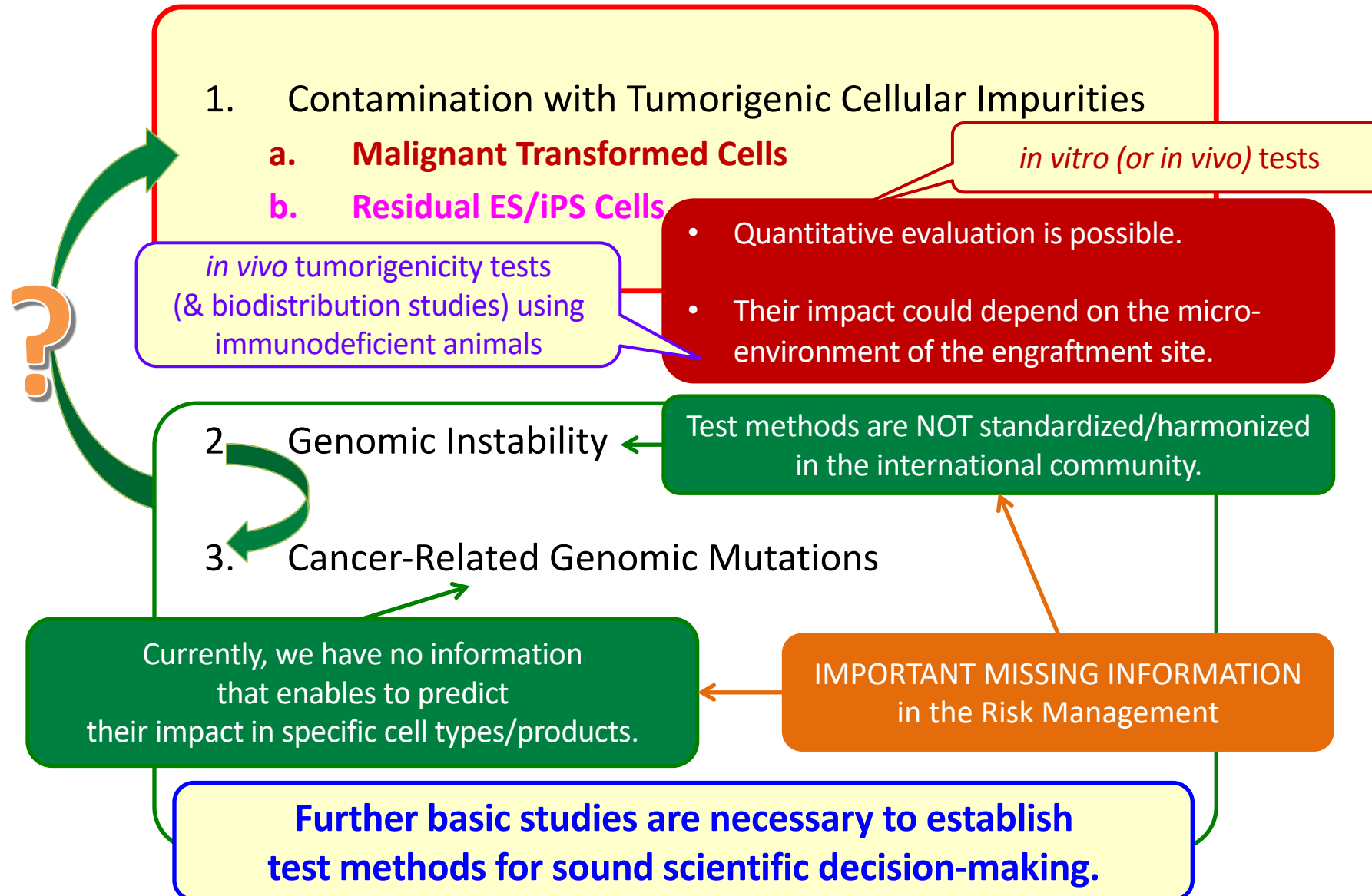
# Potential Hazards for the Tumorigenicity Risk of Pluripotent Stem Cell-Derived Therapeutic Products



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



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



# **AGENDA (1)**

- 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?**

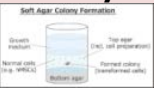




# Development of Test Methods for Detection of Transformed Cells



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

## In Vitro Assays

| Assays/<br>Platform | Conventional soft<br>agar colony formation<br> | Digital soft agar<br>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                                                                                                               |
| 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                                                                                         |



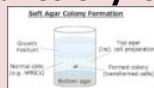


# Development of Test Methods for Detection of Transformed Cells



Tumorigenic Cellular Impurities   
=Hazards of PSC-Derived Products

## Example 1

### *In Vitro Assays*

| Assays/<br>Platform | Conventional soft<br>agar colony formation<br> | Digital soft agar<br>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                                                                                                               |
| 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                                                                   |

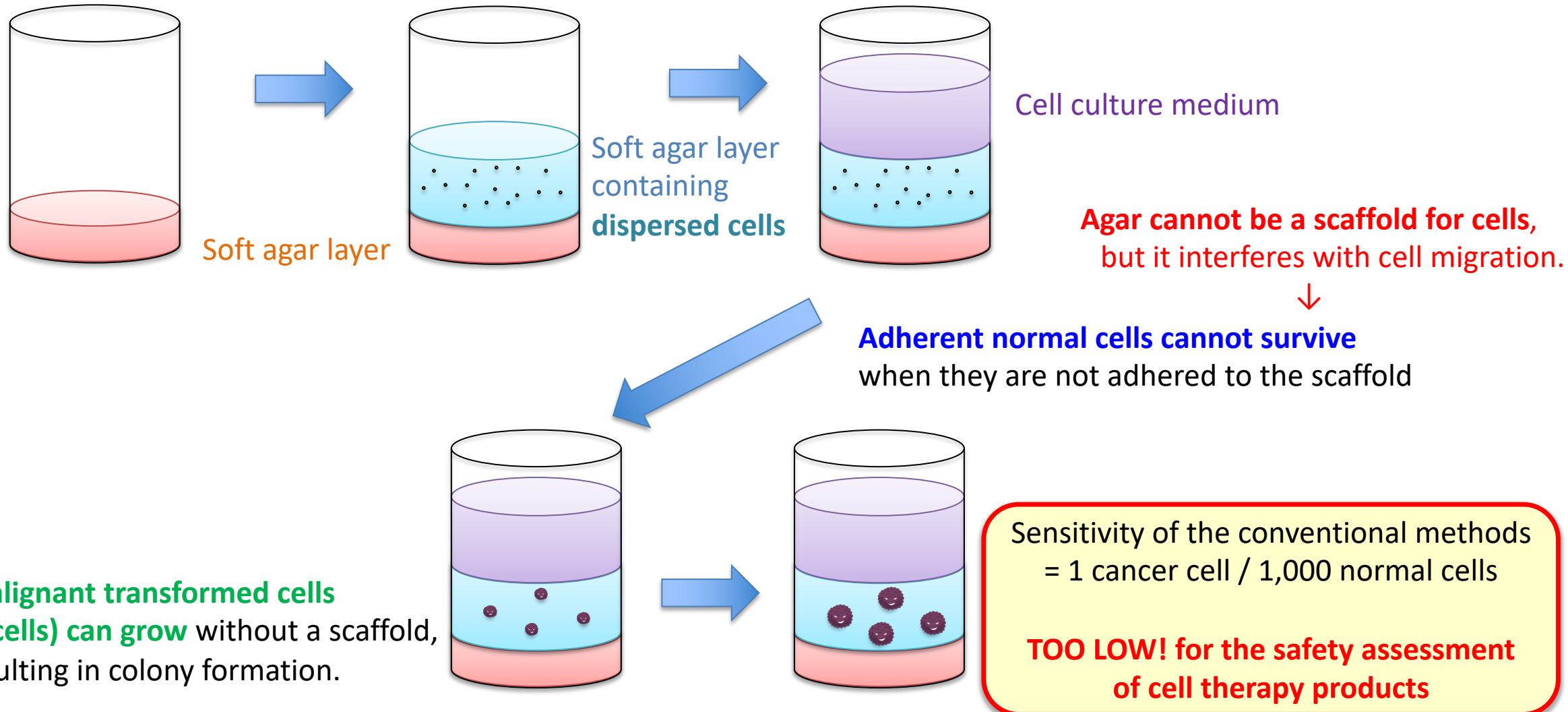
### *In Vivo Assay*

| 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                                                                                         |



# Conventional Soft Agar Colony Formation Assay

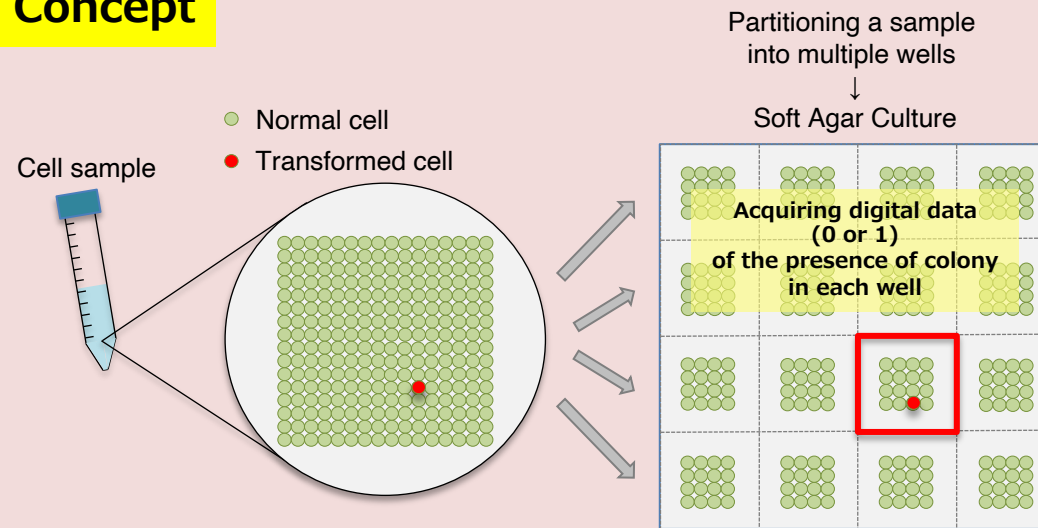
**Purpose:** Detection of scaffold-independent proliferation (= **malignant transformed cells**)





# 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

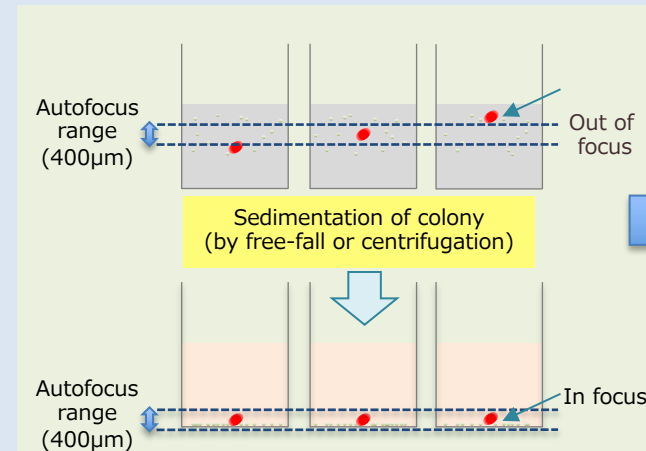
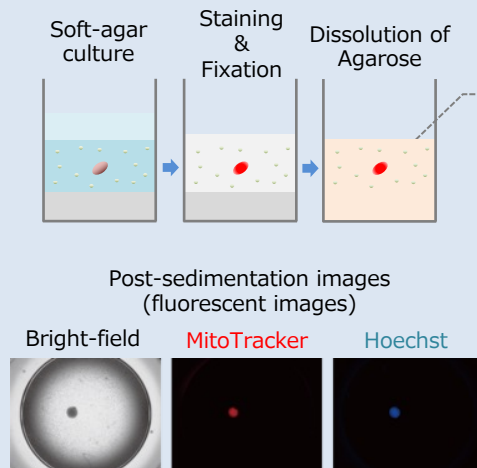


High S/N ratio

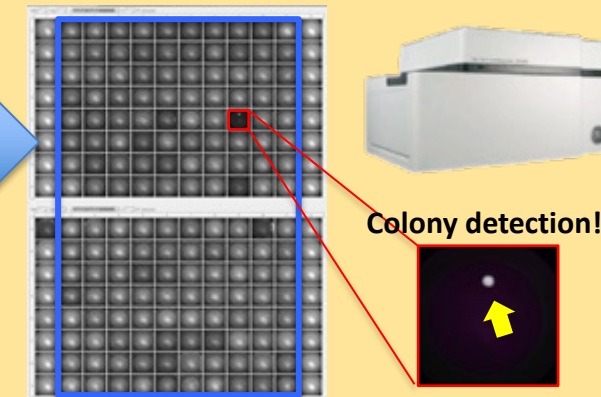


## Procedures

### Soft-agar culture & sample preparation

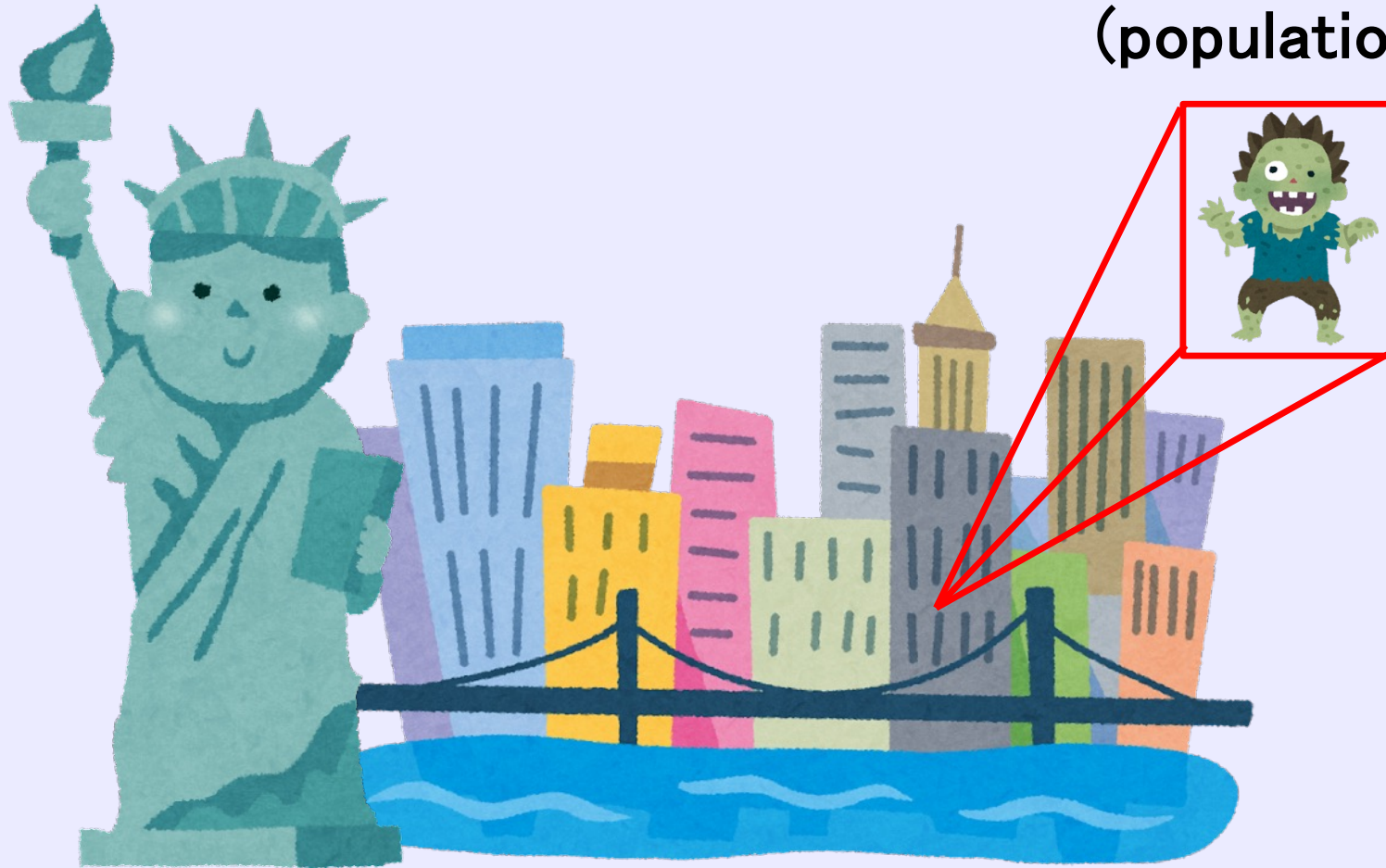


### High-throughput screening of colony formation using an imaging cytometer



**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**

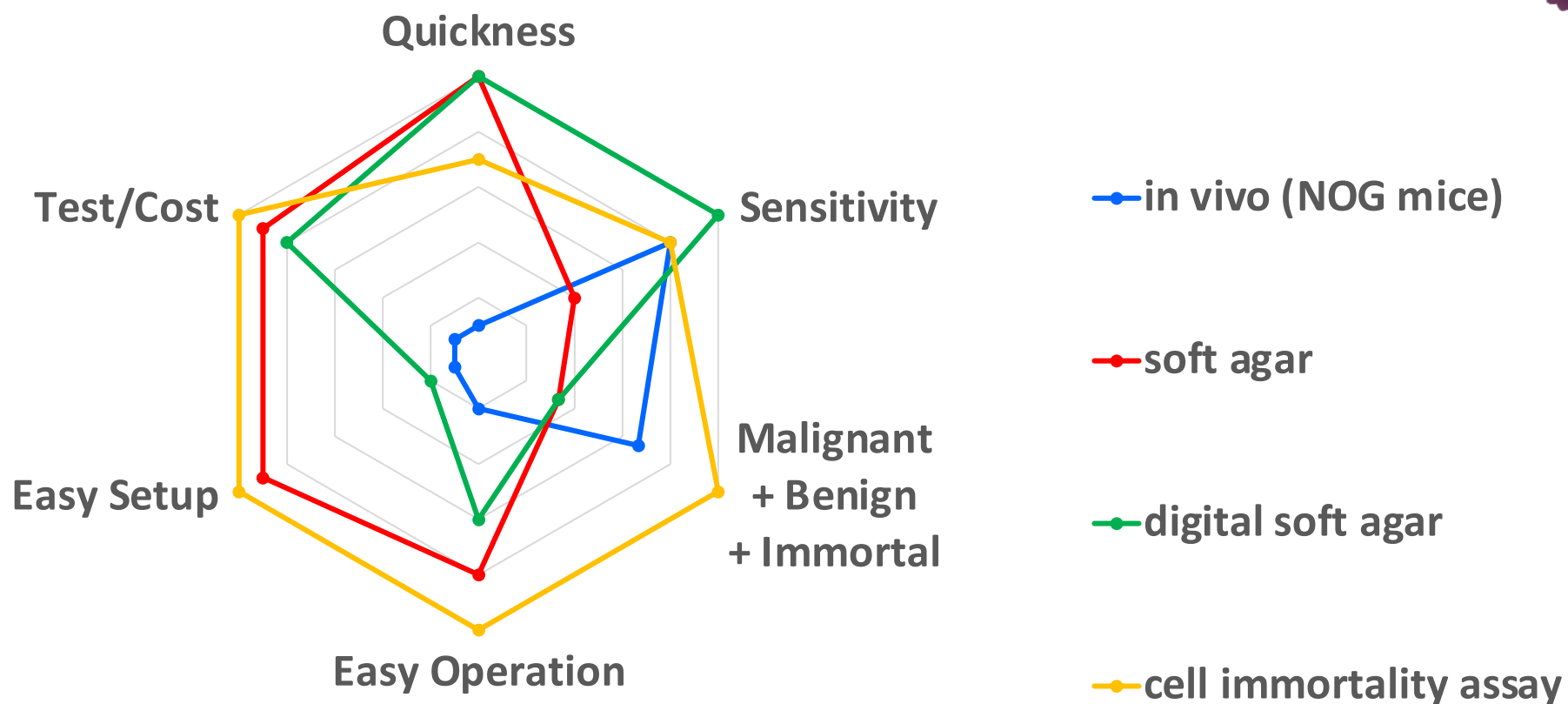
Comparable to the ability to find one zombie in New York City  
(population: about 8 million)





# Qualitative Comparisons of Test Methods for Detection of Transformed Cells

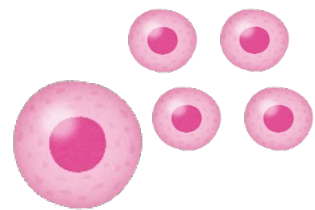
(based on our validation studies and past literature)



# AGENDA (1)




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?**

# 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

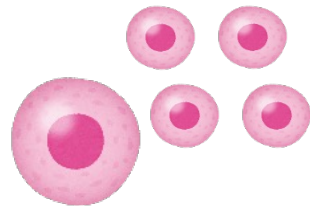
| Assays/ Platform | Tumorigenicity Test                                                                                                                                                                  |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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

| 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



# Highly-Efficient Culture (HEC) Assay

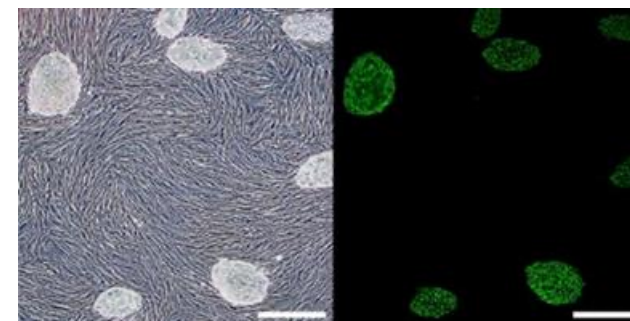
## Example 2

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. 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

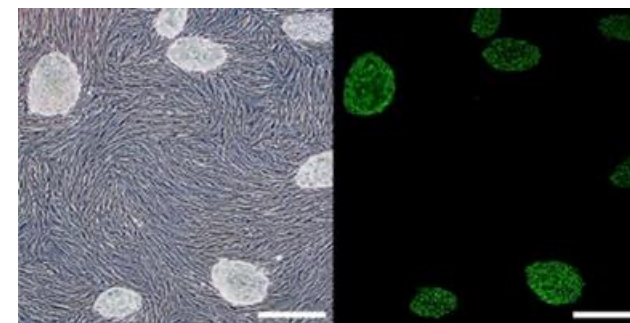
## Example 2

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. 2014<br>Garitaonandia et al.,<br>Scientific Reports. 2016 |

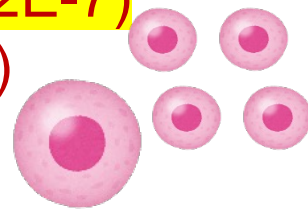
- ✓ is quite sensitive and has a potential to become more sensitive by improving culture system /colony detection method.



# 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!!)



## ABSTRACT

**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.

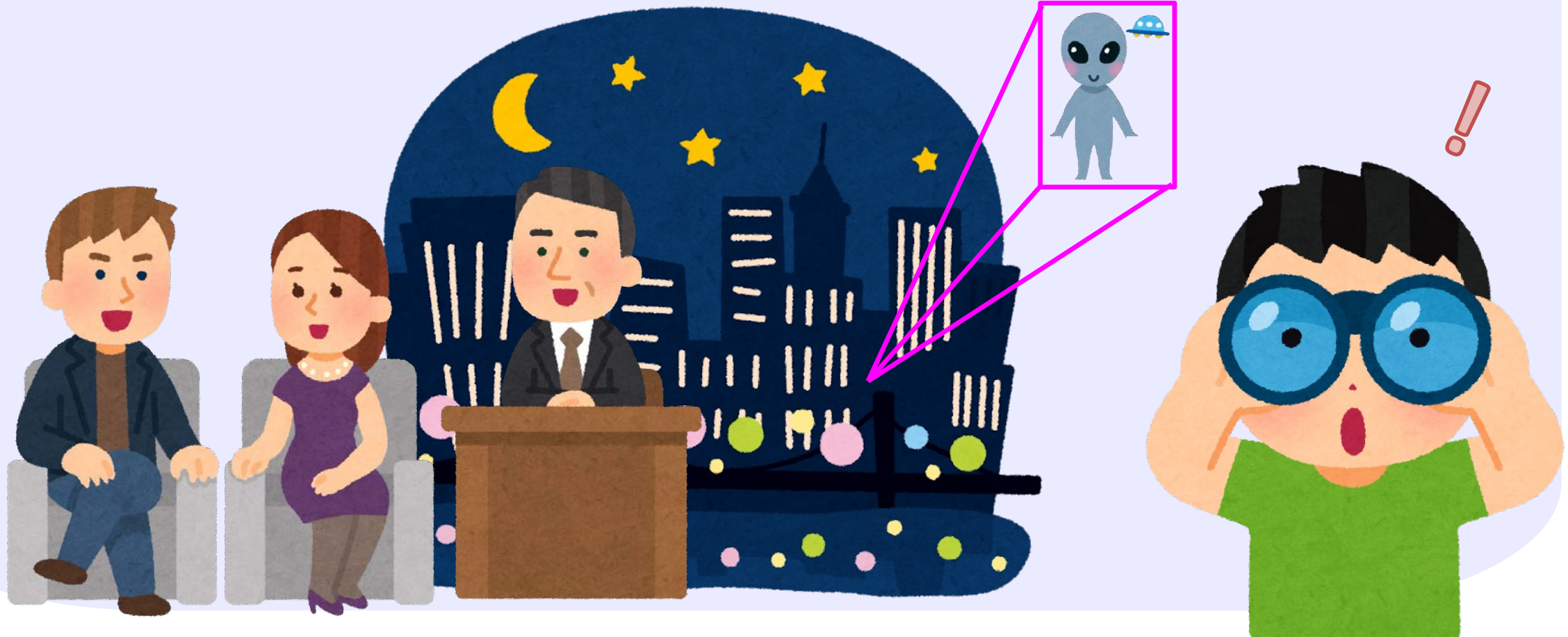
**Methods:** MEASURE first validated the detection sensitivity of HEC assay and then investigated the feasibility of magnetic-activated cell sorting (MACS) to improve sensitivity.

**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**

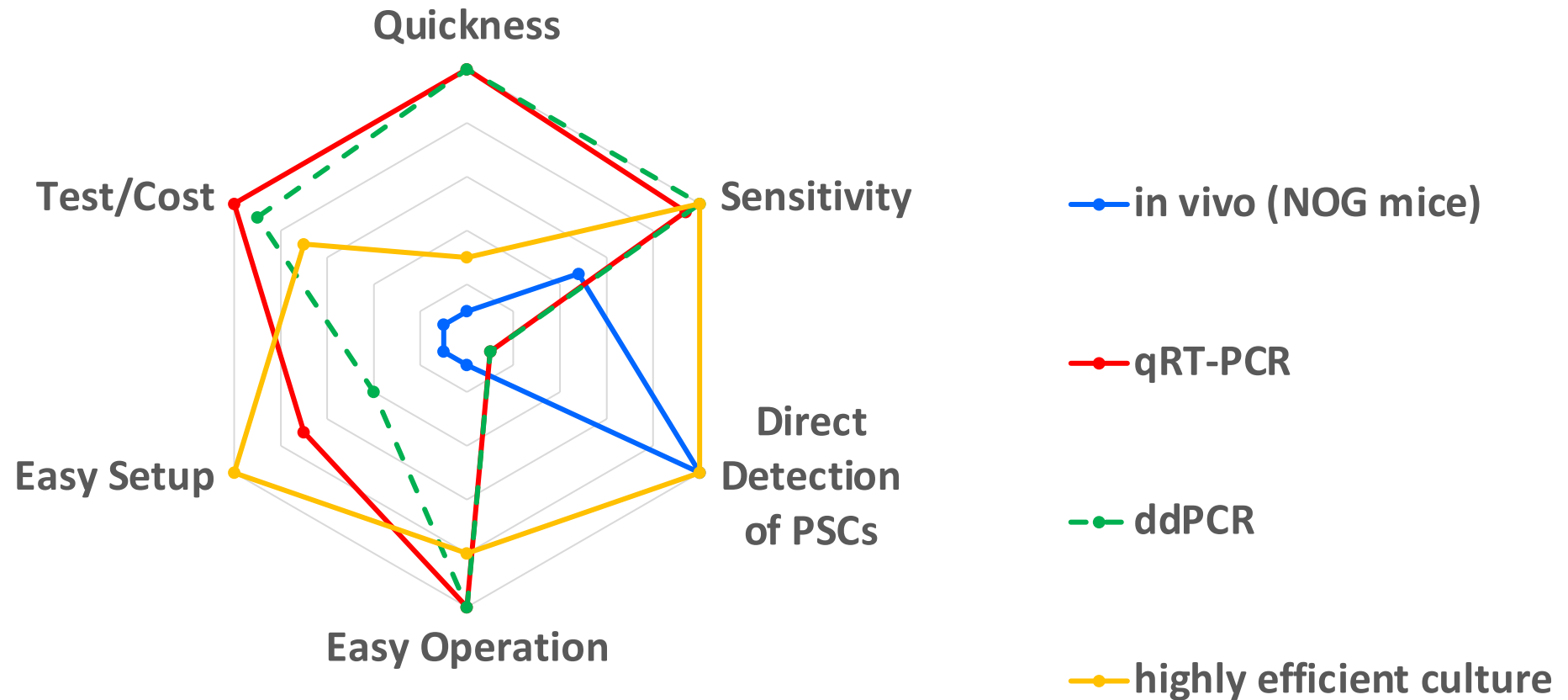
Comparable to the ability to find one alien in Los Angeles  
(population: about 4 million)





# Qualitative Comparisons of Test Methods for Detection of Residual PSCs

(based on our validation studies and past literature)



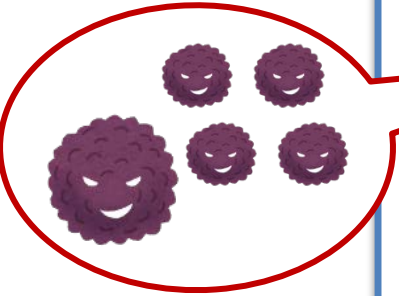
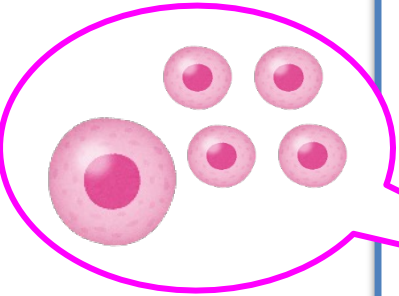
# “Points to Consider for Detection of Undifferentiated Pluripotent Stem Cells/Transformed Cells, Tumorigenicity Testing and Genomic Stability Evaluation of Human Cell-Processed Products” *[in Japanese]*

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

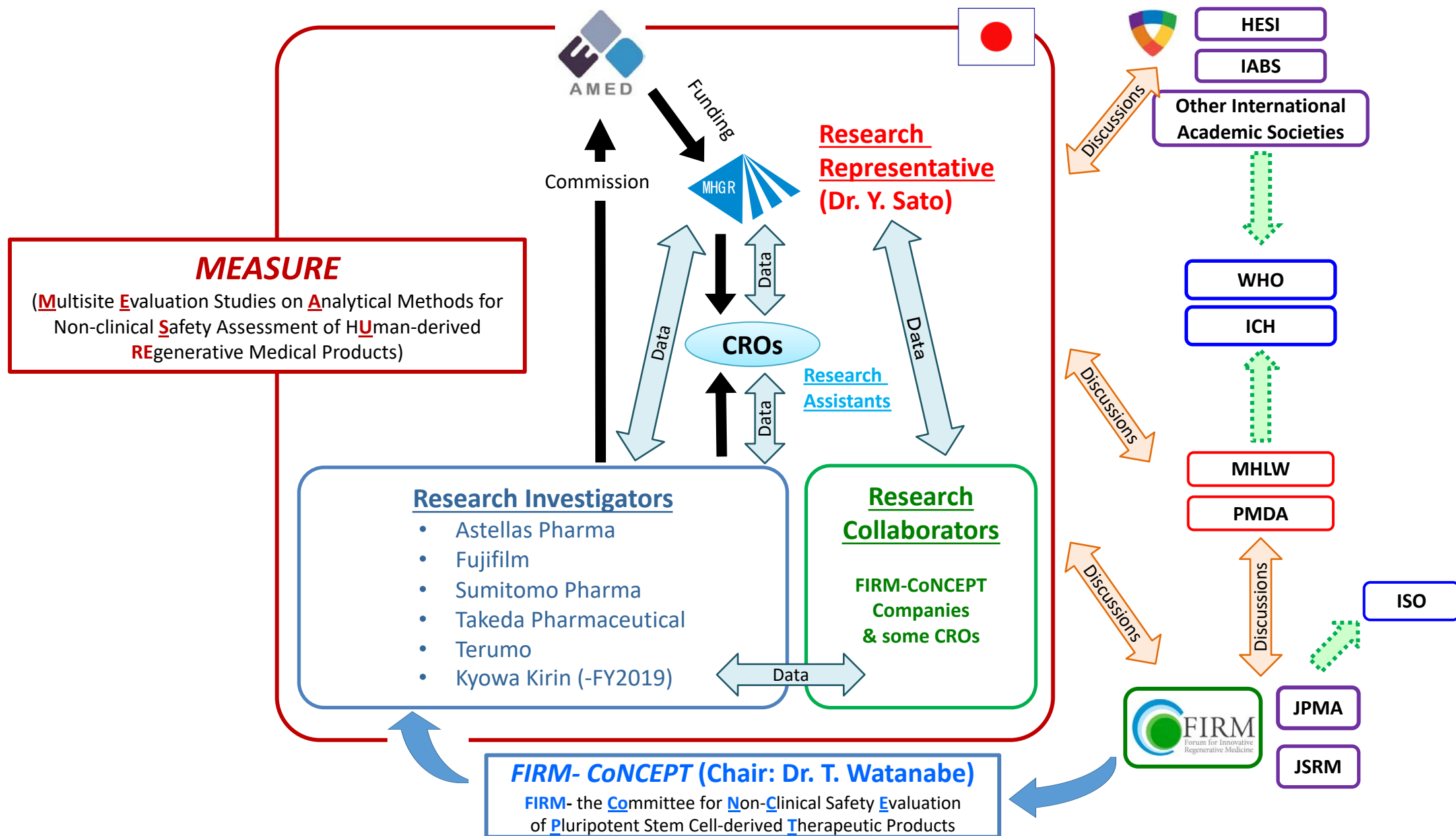


## Contents

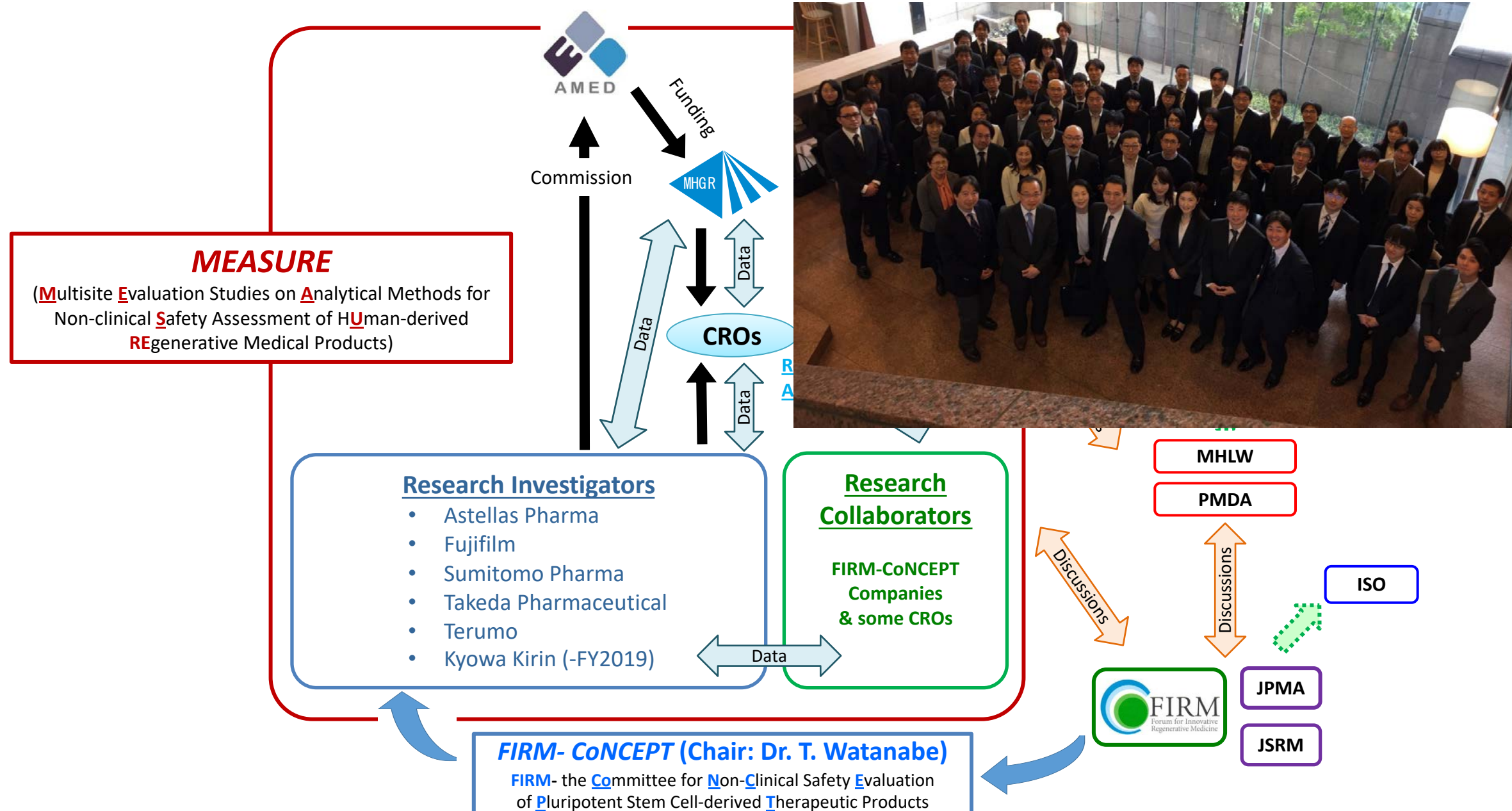
1. Introduction
2. Position of This Document
3. Glossaries
4. General Considerations
5. Tumorigenicity Tests for Human ES/iPS Cell-Processed Products
  - 5.1 Tumorigenicity Tests for **Quality Characterization of Starting Cell Substrate**
  - 5.2 Tests for **Quantification of Tumorigenic Cells in Intermediate 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
      - 5.2.2.1. **In vitro studies**
      - 5.2.2.2. **In vivo studies**
  - 5.3 Tests to **Evaluate the Tumorigenic Potential of Cells in the Final Products at the Site of Engraftment in Humans**
    - 5.3.1. Selection of test animals
    - 5.3.2. Selection of control cells
    - 5.3.3. Number of test animals
    - 5.3.4. Site, repeat number and mode of cell administration
    - 5.3.5. Duration of observation
    - 5.3.6. Observation of the site of administration
    - 5.3.7. Pathological evaluation of the site of administration
    - 5.3.8. Interpretation of the results
6. Tumorigenicity-related Studies for Human Somatic Cell-processed/Somatic Stem Cell-processed Products
  - 6.1. Tumorigenicity Tests for Quality Characterization of Starting Cell Substrate
  - 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)



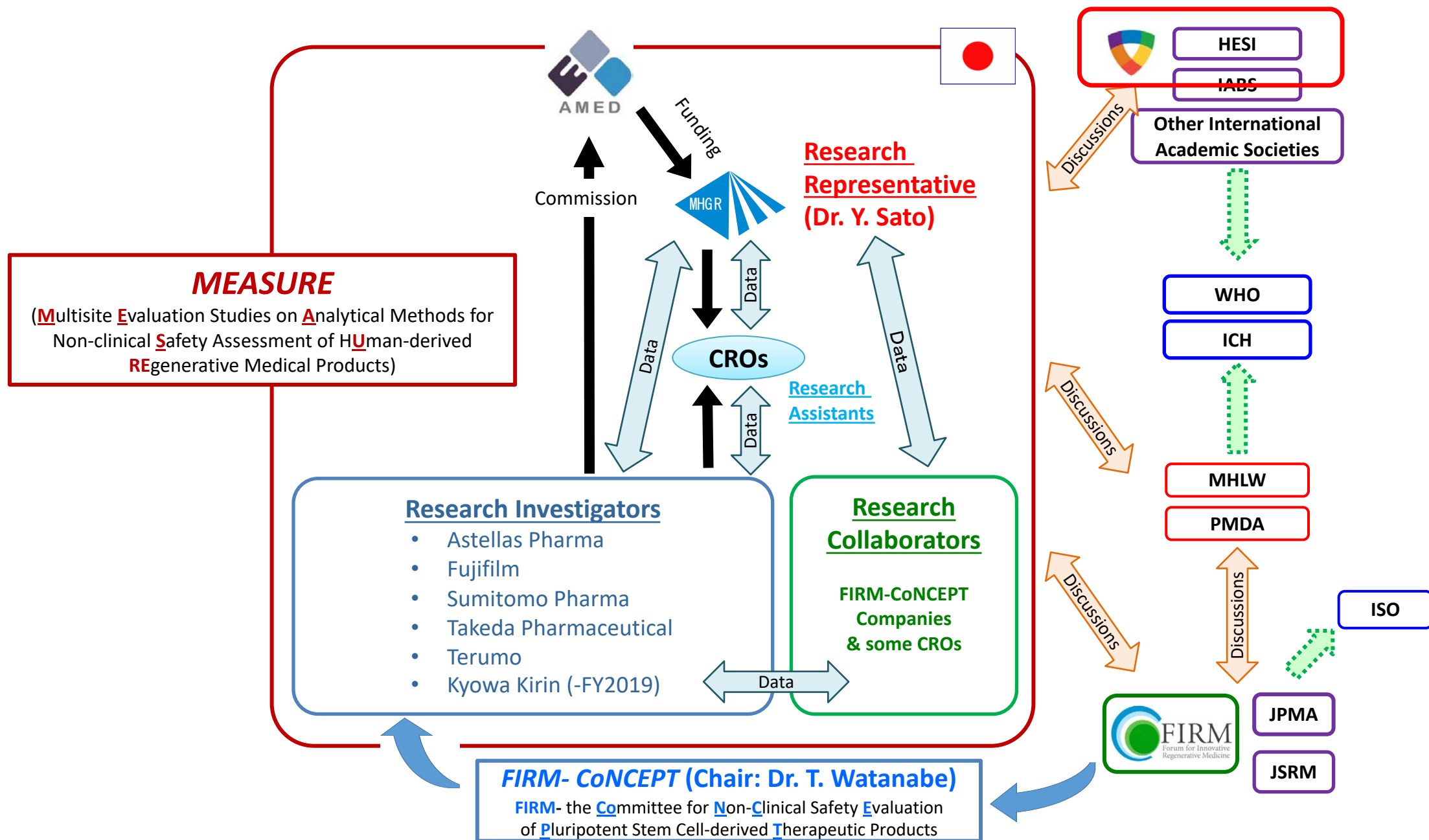
# Multisite Validation Studies on the Test Methods for Tumorigenicity Assessment of PSC-derived Products



# 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**  
HESI. (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**

**THE UNIVERSITY OF  
SYDNEY**



>100 Participants

>30 Organizations

## Government & Regulatory bodies:

**FDA**

**CBG  
M E B**  
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  
for residual iPSCs

ddPCR

HEC assay

Advanced  
sequencing for off  
target (CRISPR)

IL-2 for CAR-T  
*New in 2022!*

SACF/GILA  
(CRISPR)  
*New in 2022!*

- **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 for residual iPSCs

Advanced sequencing for off target (CRISPR)

IL-2 for CAR-T  
*New in 2022!*

SACF/GILA (CRISPR)  
*New in 2022!*

ddPCR

HEC assay



# 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>5,\*</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”.



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

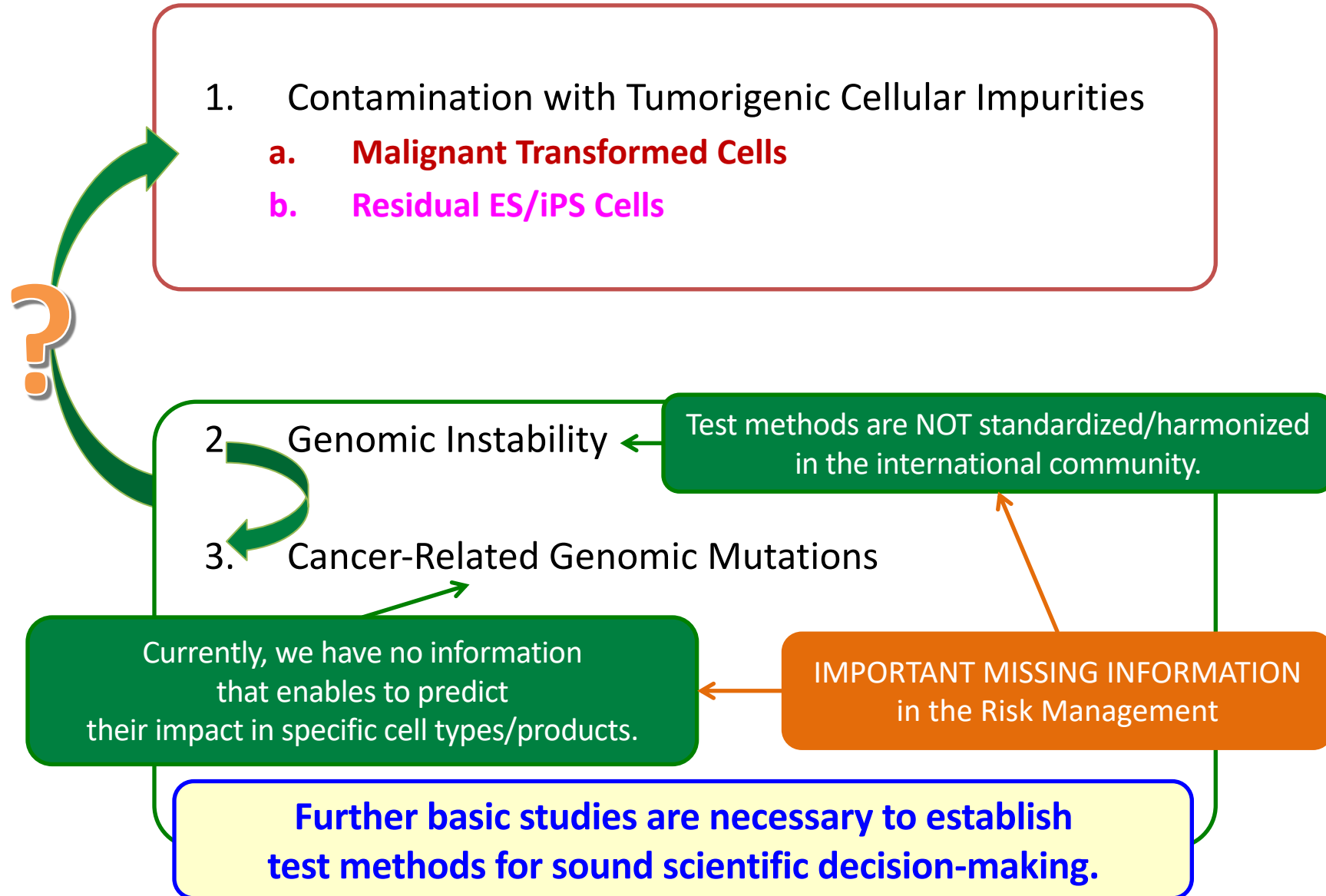


- Yasuda S, Bando K, Henry MP, Libertini S, Watanabe T, Bando H, Chen C, Fujimori K, Harada K, Kuroda T, Lemmens M, Marginean D, Moss D, Mouriès LP, Nicholas N, Smart MJ, Terai O, Sato Y. Detection of residual pluripotent stem cells in cell therapy products utilizing **droplet digital PCR**: an international multisite evaluation study. *Stem Cells Translational Medicine*. 2024:szae058. doi: 10.1093/stcltm/szae058. Online ahead of print.
- Watanabe T, Yasuda S, Kusakawa S, Kuroda T, Furukawa H, Futamura M, Shimizu S, Morishita A, Hata S, Koeda A, Komatsu K, Sato Y. Multisite studies for optimization of a **highly efficient culture assay** used for in vitro detection of residual undifferentiated human pluripotent stem cells intermingled in cell therapy products. *Regenerative Therapy*. 2024;26:315-323.
- Bando K, Kusakawa S, Adachi H, Yamamoto M, Iwata M, Kitanaka A, Ogimura E, Osada T, Tamura M, Terai O, Watanabe T, Yoda T, Yotsumoto T, Zaizen K, Sato Y. Protocol improvement and multisite validation of a **digital soft agar colony formation assay** for tumorigenic transformed cells intermingled in cell therapy products. *Cytotherapy*. 2024;26:769-777.
- Watanabe T, Yasuda S, Chen CL, Delsing L, Fellows M, Foldes G, Kusakawa S, Pereira Mouriès L, Sato Y. International evaluation study of an **HEC assay** for detection of residual human pluripotent stem cells in the products. *Regenerative Medicine*. 2023;18:219-227.
- Hirai T, Kono K, Kusakawa S, Yasuda S, Sawada R, Morishita A, Hata S, Wakita A, Kageyama T, Takahashi R, Watanabe S, Shiraishi N, Sato Y. Evaluation of the reproducibility and positive controls of **cellular immortality test** for the detection of immortalized cellular impurities in human cell-processed therapeutic products. *Regenerative Therapy*. 2022;21:540-546.
- Watanabe T, Yasuda S, Kusakawa S, Kuroda T, Futamura M, Ogawa M, Mochizuki H, Kikkawa E, Furukawa H, Nagaoka M, Sato Y. MEASURE: Multisite studies for validation and improvement of a **highly efficient culture (HEC) assay** for detection of undifferentiated human pluripotent stem cells intermingled in cell therapy products. *Cytotherapy*. 2021;23:176-183.
- Kamiyama Y, Naritomi Y, Moriya Y, Yamamoto S, Kitahashi T, Maekawa T, Yahata M, Hanada T, Uchiyama A, Noumaru A, Koga Y, Higuchi T, Ito M, Komatsu H, Miyoshi S, Kimura S, Umeda N, Fujita E, Tanaka N, Sugita T, Takayama S, Kurogi A, Yasuda S, Sato Y. **Biodistribution studies** for cell therapy products: Current status and issues. *Regenerative Therapy*. 2021;18:202-216.
- Sato Y, Bando H, Di Piazza M, Gowing G, Herberts C, Jackman S, Leoni G, Libertini S, MacLachlan T, McBlane JW, Pereira Mouriès L, Sharpe M, Shingleton W, Surmacz-Cordle B, Yamamoto K, van der Laan JW. Tumorigenicity assessment of cell therapy products: The need for **global consensus and points to consider**. *Cytotherapy*. 2019;21:1095-1111.

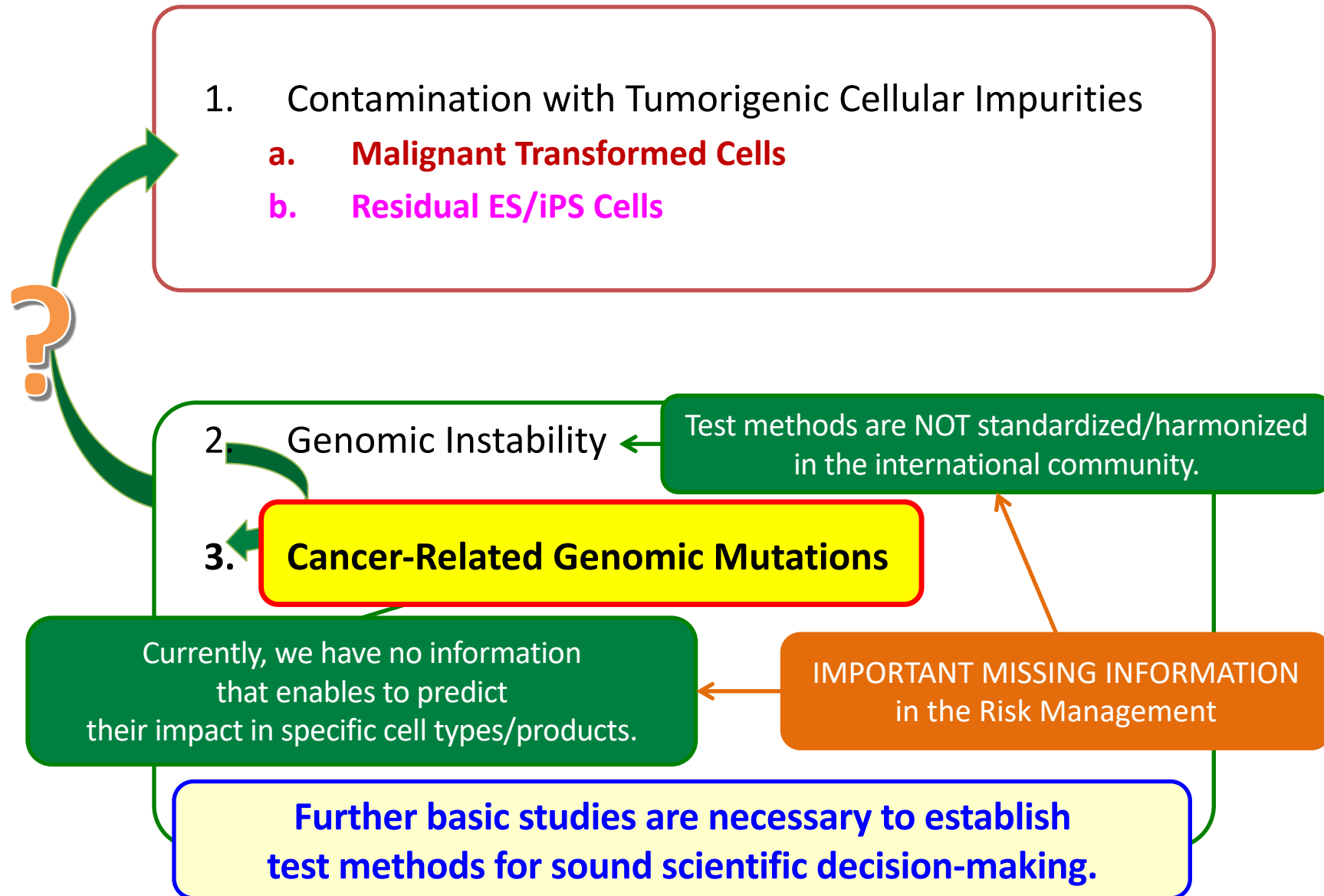
# **AGENDA (1)**

- 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



# 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)

— Hide authors and affiliations

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***



# 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)

— Hide authors and affiliations

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.

...means “we currently have no way”

**“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***



# “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)



## Table of Contents

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
        - 5.2.2.1. In vitro studies
        - 5.2.2.2. In vivo studies
    - 5.3 Tests to Evaluate the Tumorigenic Potential of End-product Cells at the Site of Engraftment in Human
      - 5.3.1. Selection of test animals
      - 5.3.2. Selection of control cells
      - 5.3.3. Number of test animals
      - 5.3.4. Site, repeat number and mode of cell administration
      - 5.3.5. Duration of observation
      - 5.3.6. Observation of the site of administration
      - 5.3.7. Pathological evaluation of the site of administration
      - 5.3.8. Interpretation of the results
  6. Tumorigenicity-related Studies for Human Somatic Cell-processed/Somatic Stem Cell-processed Products
    - 6.1. Tumorigenicity Tests for Quality Characterization of Starting Cell Substrate
    - 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)





## 7. General Considerations for Genomic Stability

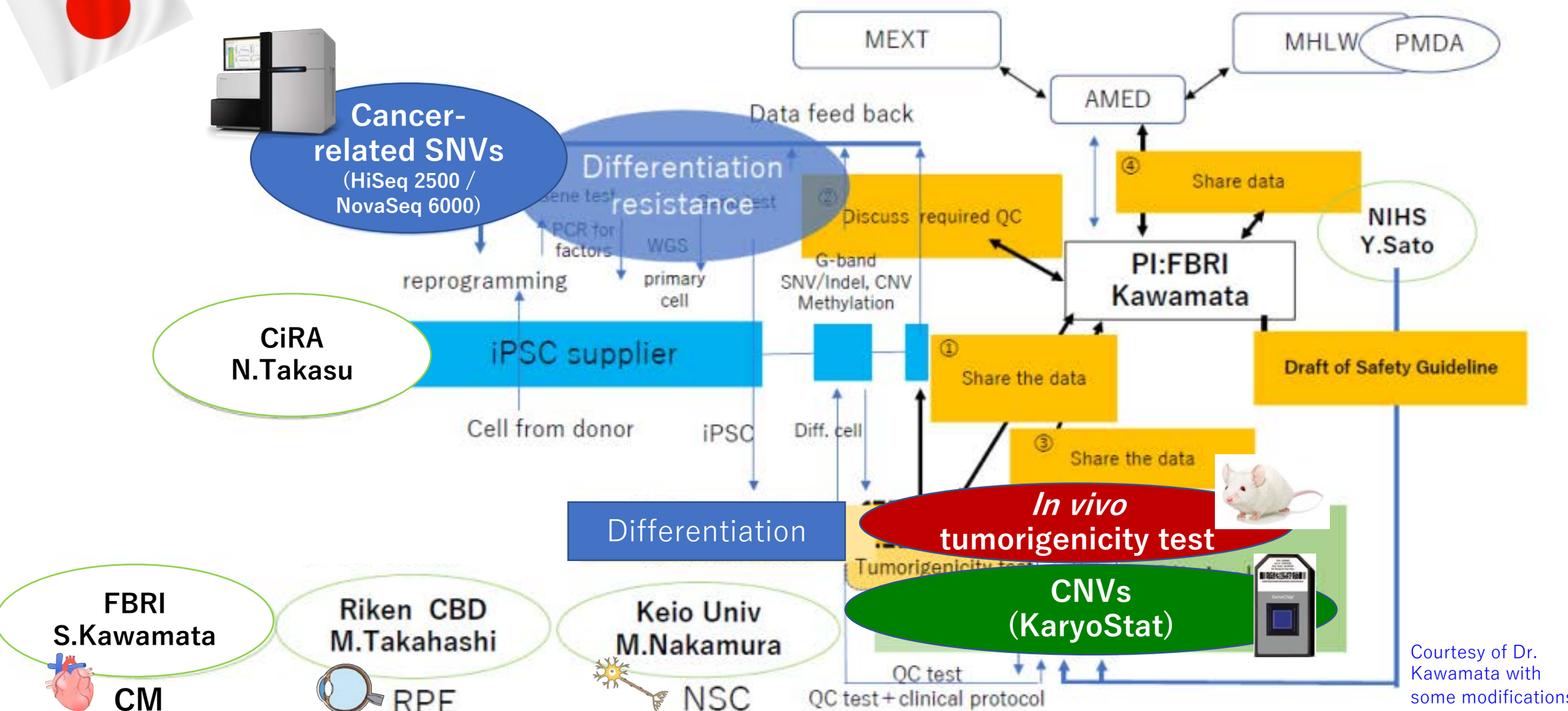
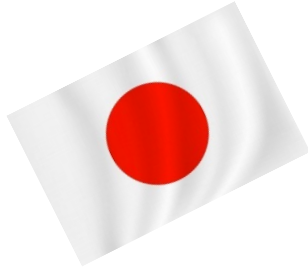
“Reduced genetic stability is a potential hazard with respect to tumorigenic risk because it is presumed to increase the probability of transformed cells through the increased probability of karyotypic abnormalities and genetic mutations.

....

Information from FISH and next-generation sequencing should be scientifically validated for relevance to tumorigenicity and evaluated for appropriateness for use as a test method, while the sensitivity of detection to genetic changes (type of mutation and its allele frequency) and the availability of appropriate controls should be considered as issues.”

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

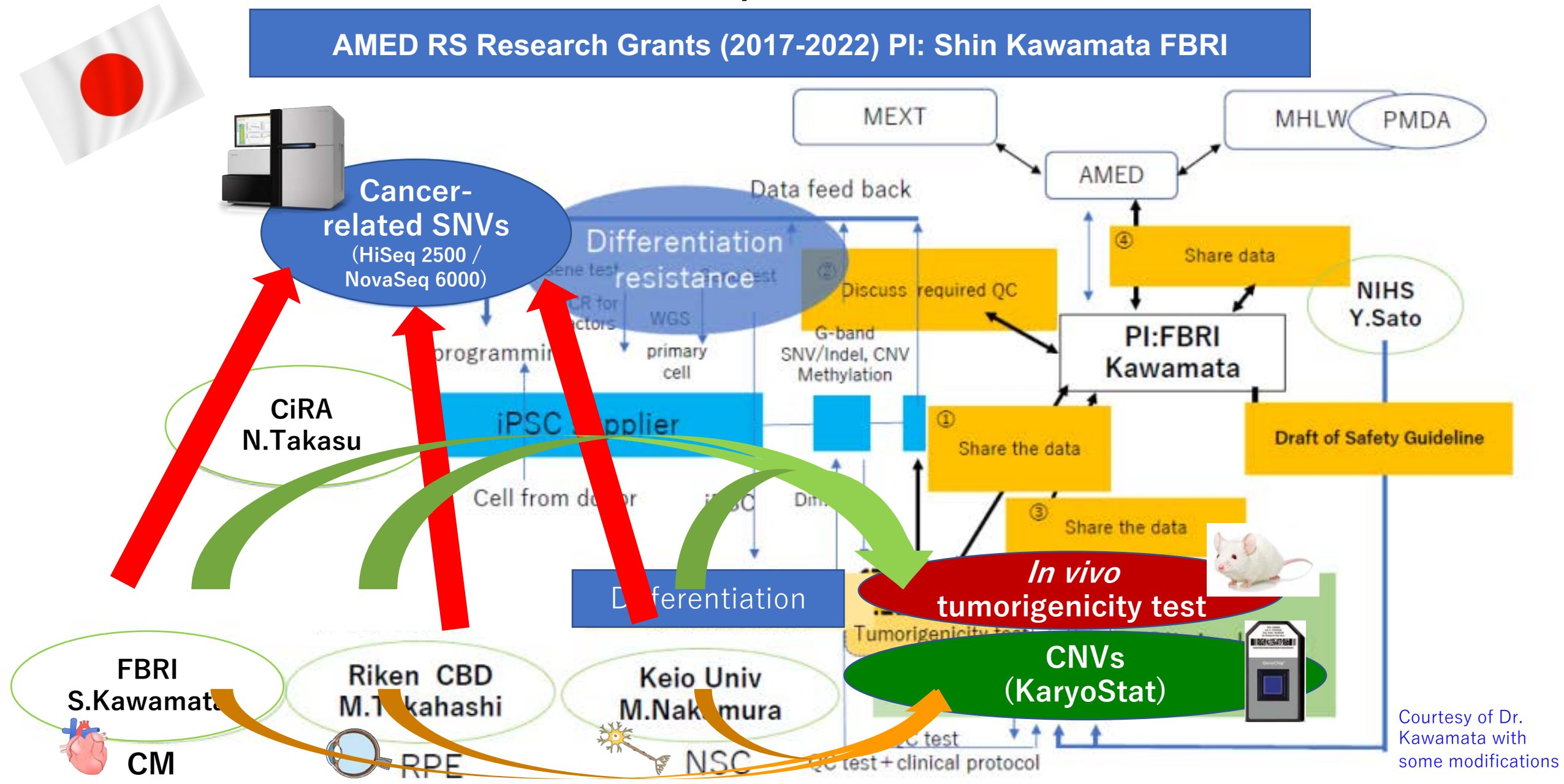
AMED RS Research Grants (2017-2022) PI: Shin Kawamata FBRI



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)               | <u>29%</u>             |
|                                       | 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        | <u>78% (Specificity)</u>        | <u>86%</u>             |
|                                       | Abnormal | 0      | 5        | <u>100% (Sensitivity)</u>       |                        |
| Predictivity                          |          | 100%   | 71%      | Correlation ratio $\eta$ : 0.75 |                        |
| Overall predictivity                  |          | 86%    |          |                                 |                        |
| Likelihood ratio for abnormal outcome |          | 0.0    | 4.5      |                                 |                        |

Yamamoto T, et al.,  
*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 type |                        |
|                                       |          |        |          |                                                   |                        |

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        | <u>78%</u> (Specificity)        | <u>86%</u>             |
|                                       | Abnormal | 0      | 5        | <u>100%</u> (Sensitivity)       |                        |
| Predictivity                          |          | 100%   | 71%      | Correlation ratio $\eta$ : 0.75 |                        |
| Overall predictivity                  |          | 86%    |          |                                 |                        |
| Likelihood ratio for abnormal outcome |          | 0.0    | 4.5      |                                 |                        |

Yamamoto T, et al.,  
*Stem Cells Transl Med.* 2022;11:527-538.

# 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            | <b>Autologous iPSCs</b>  | Exudative age-related macular degeneration | FBRI, RIKEN                                               | Non-commercial clinical research under the RM Safety Act | 2013         | 2014      |
| 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                                   | <b>Autologous iPSCs</b>  | 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                                 | <b>ESCs (Allogeneic)</b> | 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         | 2021      |
| 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         |           |
| 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>



<https://english.kyodonews.net/news/2020/01/47a1ba1f19f1-japan-researchers-conduct-worlds-1st-transplant-of-ips-heart-muscles.html>



<https://japan-forward.com/osaka-university-team-does-worlds-first-successful-ips-cell-derived-corneal-transplant/>

<https://www.sankei.com/article/20200521-B515HI55EBI6XMQ5AVIKYLXQVY/photo/UDRYD4AHVFJPDHGFB54X2ZSB2Q/>



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.



# Conclusions 1

- One of the safety and quality risks of iPS cell-derived products is their tumorigenicity. However, methods for evaluating the tumorigenicity of cell therapy products (CTP), including iPS cell-derived products, are not sufficiently developed/characterized.
- We have developed a number of *in vitro* and *in vivo* methods for evaluating tumorigenicity.
- By drafting and publishing guidelines on the performance and limitations of these tests, we have contributed to the facilitation of clinical applications of iPS cell-derived products in Japan.
- Validation of these test methods is currently underway with domestic and global stakeholders, which would contribute to the standardization and regulatory harmonization of the test methods in the future.
- iPS細胞由来製品の安全性・品質上のリスクとして、製品の造腫瘍性がある。しかし、iPS細胞由来製品を含む細胞治療製品（CTP）の造腫瘍性評価法は十分には整備されていません。
- 我々は、数多くの *in vitro* 又は *in vivo* の造腫瘍性評価法を開発してきました。
- これらの試験の性能と限界についてのガイドラインを執筆・発出することで、我々は日本におけるiPS細胞由来製品の促進に貢献してきました。
- 現在、国内外のステークホルダーと共同でこれらの試験法のバリデーションが進められており、将来の試験法の標準化・規制調和に貢献することが期待されています。



# Major Challenges in Regulatory Science of Cell Therapy Products

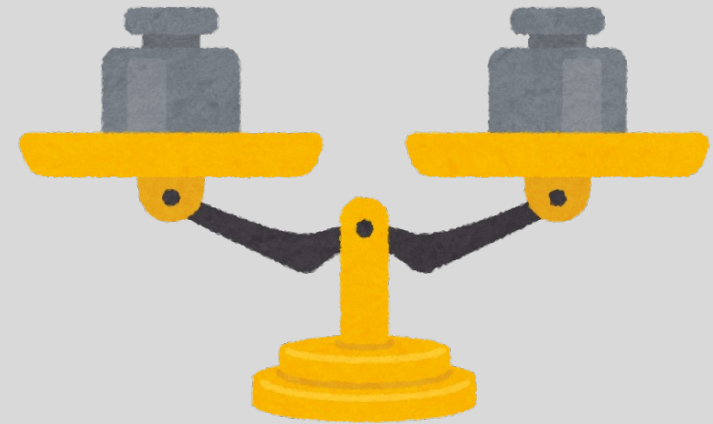
## What should be evaluated?

- 
- 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
- Safety & eligibility of raw materials
- Ensuring the quality of the final product
- Prediction of safety & efficacy in the non-clinical phase
- Clinical Evaluation

# **AGENDA (2)**

- 1. What is Comparability? – An Essential Requirement for Quality when Changing the Manufacturing Process of Cell Therapy Products –**
- 2. CQA Mining – A New Approach for Stem Cell Pharmacotaxonomy –**
- 3. MHLW Guideline for Comparability of Human Cell-Processed Products Subject to Changes in Their Manufacturing Process**

# Comparability



An essential requirement for quality when changing the manufacturing process of cell therapy products

# Essential requirement for changes in the manufacturing process of biological products, including CTPs

## 細胞加工製品を含むバイオ医薬品等の製造工程の変更時の必須要件

- The changes in the manufacturing process should **not adversely affect the product safety and efficacy**.
  - It is reasonable and effective to judge the pros and cons of changing the manufacturing method by **evaluating changes in the quality attributes of the product before and after the change**.
  - The need for confirmation in non-clinical and clinical trials is also determined by the content of the quality attribute evaluation.
- 製法変更によって少なくとも**製品の安全性と有効性に有害な影響を及ぼす変化がないこと**
  - 製法変更の是非は、変更前後の製品の**品質特性の変化を評価**することにより判断することが合理的かつ効果的。
  - 非臨床試験・臨床試験による確認の必要性も、品質特性の評価の内容次第で判断。

Comparable?

同等・同質?

# “Comparable” 「同等・同質」 → ICH Q5E

- A conclusion that products **have highly similar quality attributes before and after manufacturing process changes and that no adverse impact on the safety or efficacy**, including immunogenicity, of the drug product occurred. This conclusion can be based on an analysis of product quality attributes. In some cases, nonclinical or clinical data might contribute to the conclusion.
- **製造工程変更前後の製品が品質特性において高い類似性を有し、製剤の免疫原性を含む安全性、あるいは有効性に有害な影響が生じていないことをいう。**これは、製品の品質特性の分析に基づき判断できることが多いが、非臨床試験や臨床試験のデータを勘案する必要がある場合もある。



# Basic Approach for Assessing Comparability Before and After Manufacturing Process Change (= ICH Q5E)

## 製法変更前後での同等性・同質性の評価の基本的考え方

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.
- 
1. 製法変更前後の製品の品質特性の分析結果で評価・保証することを試みる。
  2. 製造工程変更前後の製品の品質特性に変化が認められ、また、品質特性と安全性及び有効性との関係が十分に解明されていないなどの理由により、同等性が十分に説明できない場合には、非臨床試験あるいは臨床試験の成績を組み合わせて評価する。

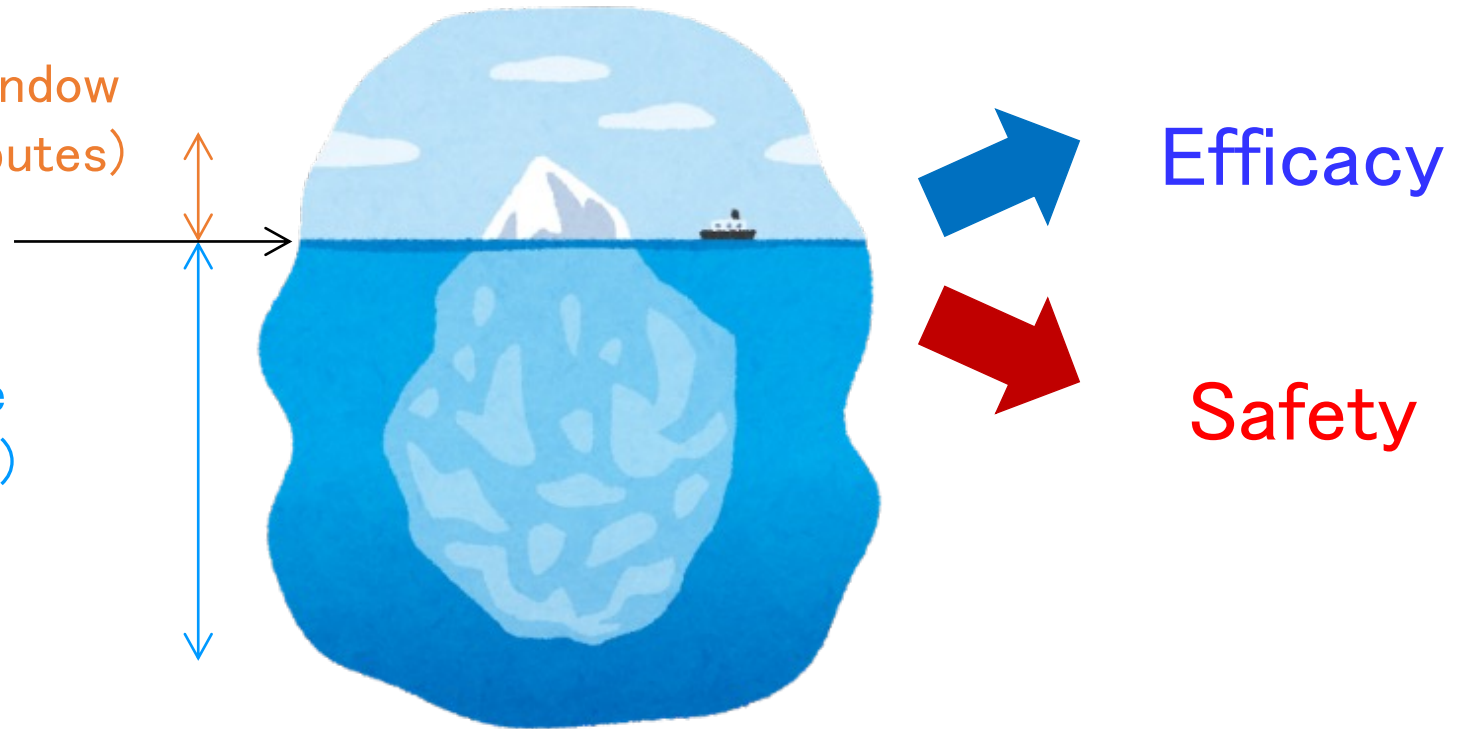
# Cell Therapy Products are Complex

## 細胞加工製品は複雑

Limited Characterization Window  
(Recognizable Quality Attributes)

Limit of Knowledge

Hidden/Unrecognizable  
(but Potentially Critical)  
Quality Attributes



...which creates UNCERTAINTY in the comparability assessment  
(観察可能な)品質特性データのみで同等性を評価・保証することは難しいと予想される

# Challenges in exploring and evaluating CQAs

## CQAを探索・評価する際の課題

Test methods for  
viral safety, sterility, and  
tumorigenicity

### ➤ Safety-related CQAs (characteristics and quantity of hazards)

Can you detect hazards and hazardous impurities that may have proliferative potential?

Do you understand the sensitivity of your assays?

= How can you avoid false negatives (and false positives)?

### ➤ Efficacy-related CQAs

How do you identify attributes linked to cellular functions that

... It's very difficult for products with unclear mechanisms

ウイルス安全性や無菌性  
造腫瘍性の評価方法

### ➤ 安全性関連のCQA(ハザードの質と量)

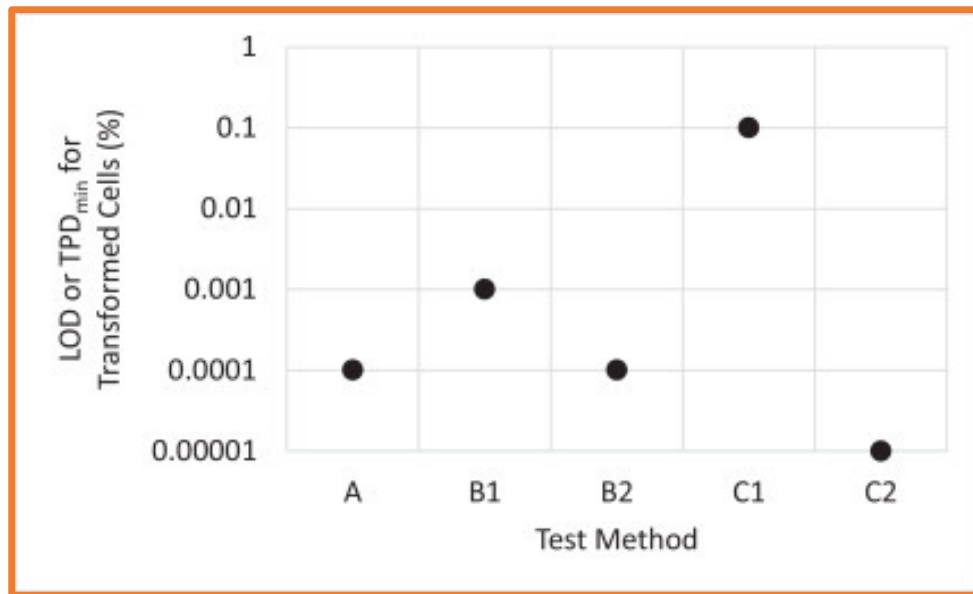
増殖能を示すハザード・有害不純物を漏れなく検出できているか？測定法の感度を理解しているか？

=偽陰性(&偽陽性)の回避

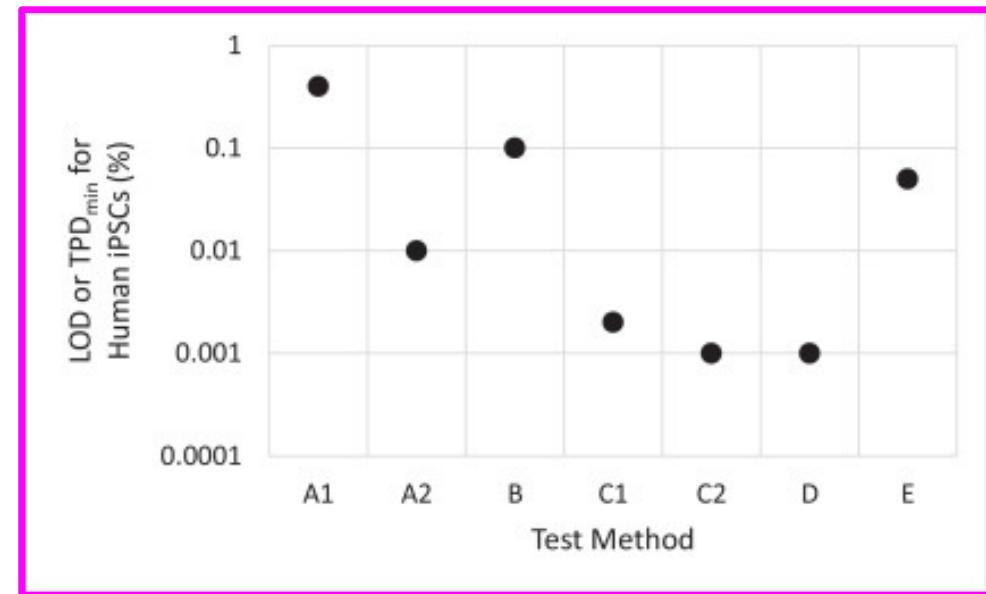
### ➤ 有効性関連のCQA

有効性を裏付ける細胞機能とリンクした細胞特性をいかに同定する(掘り当てる)か？

・・・作用機序が明確でない製品の場合は、とても難しい

**EXAMPLE****Limits of Detection (LODs) or Minimal Tumor Producing Doses (TPD<sub>min</sub>)****of Tumorigenic Cell Detection Tests****造腫瘍性細胞検出試験の検出限界(LODs)または最小腫瘍生成線量(TPDmin)****Transformed Cells in Normal Cells**

- A) TPD<sub>min</sub> of *in vivo* tumorigenicity test (HeLa cells/hMSC, s.c. into NOG mice)  
 B1) LOD of cell immortalization assay (immortalized hMSCs/hMSCs)  
 B2) LOD of cell immortalization assay (HeLa cells/hMSCs)  
 C1) LOD of conventional soft agar colony formation assay (HeLa cells/hMSCs)  
 C2) LOD of digital soft agar colony formation assay (HeLa cells/hMSCs)

**hiPSCs in Normal Cells**

- A1) TPD<sub>min</sub> of *in vivo* tumorigenicity test (hiPSCs/hRPE cells, s.c. into NOG mice)  
 A2) TPD<sub>min</sub> of *in vivo* tumorigenicity test (hiPSCs/hNDF, s.c. into NOG mice)  
 B) LOD of flow cytometry (hiPSCs/hRPE cells)  
 C1) LOD of conventional qRT-PCR (hiPSCs/hRPE cells)  
 C2) LOD of droplet digital RT-PCR (hiPSCs/human cardiomyocytes)  
 D) LOD of highly efficient culture assay (hiPSCs/hMSCs)  
 E) LOD of GlycoStem-HP method (hiPSCs/HEK293 cells).

# Challenges in exploring and evaluating CQAs

## CQAを探索・評価する際の課題

### ➤ Safety-related CQAs (characteristics and quantity of hazards)

Can you detect hazards and hazardous impurities that may have proliferative potential?

Do you understand the sensitivity of your assays?

**= How can you avoid false negatives (and false positives)?**

### ➤ Efficacy-related CQAs

How do you identify attributes linked to cellular functions that support efficacy?

**... It's very difficult for products with unclear mechanisms of action.**

### ➤ 安全性関連のCQA(ハザードの質と量)

増殖能を示すハザード・有害不純物を漏れなく検出できているか？測定法の感度を理解しているか？

**=偽陰性(&偽陽性)の回避**

### ➤ 有効性関連のCQA

有効性を裏付ける細胞機能とリンクした細胞特性をいかに同定する(掘り当てる)か？

**... 作用機序が明確でない製品の場合は、とても難しい**

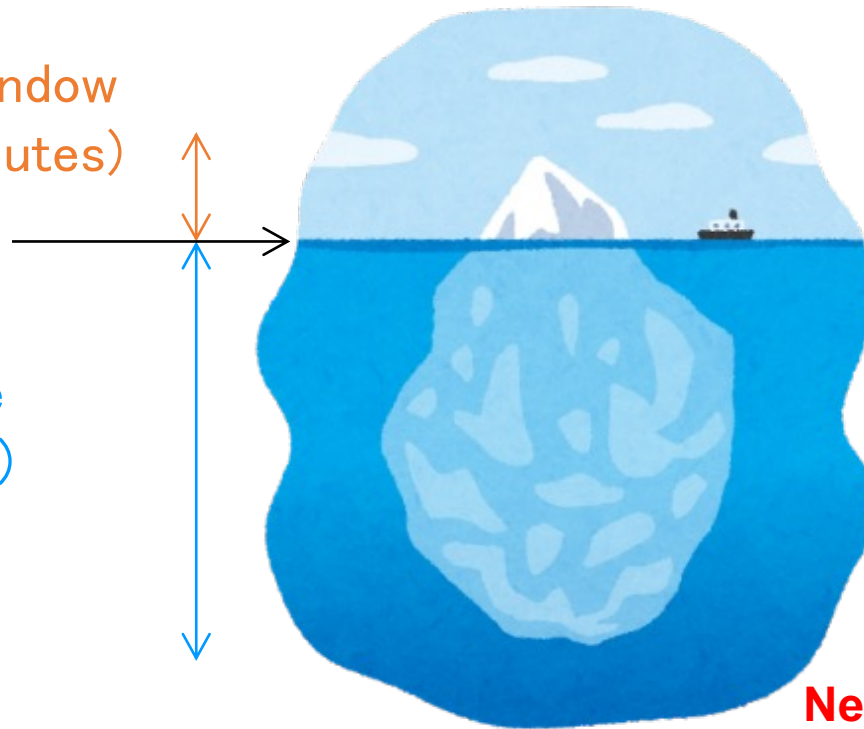
# Cell Therapy Products are Complex

## 細胞加工製品は複雑

Limited Characterization Window  
(Recognizable Quality Attributes)

Limit of Knowledge

Hidden/Unrecognizable  
(but Potentially Critical)  
Quality Attributes



Efficacy

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

**Need for understanding MOA and CQAs related to the efficacy or *in vitro* potency.**

**Need for a tool for uncovering hidden CQAs**



# **AGENDA (2)**

- 1. What is Comparability? – An Essential Requirement for Quality when Changing the Manufacturing Process of Cell Therapy Products –**
- 2. CQA Mining – A New Approach for Stem Cell Pharmacotaxonomy –**
- 3. MHLW Guideline for Comparability of Human Cell-Processed Products Subject to Changes in Their Manufacturing Process**

# CQA Mining



A New Approach for Stem Cell Pharmacotaxonomy

# The Starting Point for Pharmacology

## EXAMPLE: Isolation of Morphine

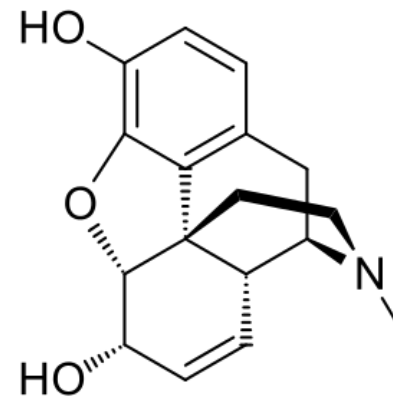
**Opium**, arguably the oldest herbal drug in human history, has always been in the spotlight throughout history as the only medicine that relieves pain and induces sleep.



In 1806, a German pharmacist Friedrich Sertürner (フリードリヒ・ゼルチュルナー) succeeded in the isolation of **morphine** from opium.

**= The starting point for their pharmacology (and toxicology)**

<https://ja.wikipedia.org/wiki/%E3%82%A2%E3%83%98%E3%83%B3>



[https://en.wikipedia.org/wiki/Friedrich\\_Sert%C3%BCrner](https://en.wikipedia.org/wiki/Friedrich_Sert%C3%BCrner)

At what stage is “regenerative medicine” as an academic field now?  
学問としての「再生医学」は今の段階にあるのか？

Crude Pharmaceuticals → → Separation Science/Analytical Chemistry → → Modern Pharmacology

composed of diverse chemicals

= Cell Therapy Products → → → → → → → ??? → → → → → → Science on their MOA

composed of complex and diverse cells

Science to understand  
the heterogeneity of  
cells and cell populations

「生薬」から「分離科学／分析化学」を経て「近代薬学」「薬理学」が成立

多様な化学物質の集合体

= 「細胞加工製品」から 「???」を経て 「再生医学」「細胞加工製品の薬理」を理解

複雑・多様な細胞  
の集合体

細胞・細胞集団の不均質性を  
理解するための科学

# Need for technology to understand heterogeneity

不均質性を理解するための技術が必要

For example, **even when there are a total of 1 million cells, only 10,000 of them may be effective.**



**“Visualization” of such heterogeneity and characterization of those 10,000 cells would make identifying CQAs related to efficacy easier.**

例えば、**総細胞数が100万個**あっても、**そのうち有効性を発揮するのは1万個**しかないという場合もありうる。

このような**不均質性を「見える化」**することで、**その1万個の細胞がどのような特性を持つのか**を明らかにすれば、**有効性に関連するCQA(重要品質特性)を発見しやすくなる(・・・と期待できる)**



# Single-Cell RNA-Seq Reveals *LRRC75A*-Expressing Cell Population Involved in VEGF Secretion of Multipotent Mesenchymal Stromal/Stem Cells Under Ischemia

Takumi Miura<sup>1,2,‡</sup>, Tsukasa Kouno<sup>3,‡</sup>, Megumi Takano<sup>1</sup>, Takuya Kuroda<sup>1</sup>, Yumiko Yamamoto<sup>3</sup>, Shinji Kusakawa<sup>1</sup>, Masaki Suimye Morioka<sup>3</sup>, Tohru Sugawara<sup>2,4</sup>, Takamasa Hirai<sup>1</sup>, Satoshi Yasuda<sup>1</sup>, Rumi Sawada<sup>1</sup>, Satoko Matsuyama<sup>1,5</sup>, Hideya Kawaji<sup>3,6</sup>, Takeya Kasukawa<sup>3</sup> , Masayoshi Itoh<sup>3</sup>, Akifumi Matsuyama<sup>5</sup>, Jay W. Shin<sup>3,7</sup>, Akihiro Umezawa<sup>2</sup>, Jun Kawai<sup>3,8</sup>, Yoji Sato<sup>\*,1,8,9</sup> 

<sup>1</sup>Division of Cell-Based Therapeutic Products, National Institute of Health Sciences, Kanagawa, Japan

<sup>2</sup>Center for Regenerative Medicine, National Center for Child Health and Development, Tokyo, Japan

<sup>3</sup>RIKEN Center for Integrative Medical Sciences, Yokohama, Japan

<sup>4</sup>Biopharmaceutical and Regenerative Sciences, Graduate School of Medical Life Science, Yokohama City University, Yokohama, Japan

<sup>5</sup>Center for Reverse TR, Osaka Habikino Medical Center, Osaka Prefectural Hospital Organization, Osaka, Japan

<sup>6</sup>Research Center for Genome & Medical Sciences, Tokyo Metropolitan Institute of Medical Science, Tokyo, Japan

<sup>7</sup>Genomic Institute of Singapore, Agency for Science, Technology and Research, Singapore

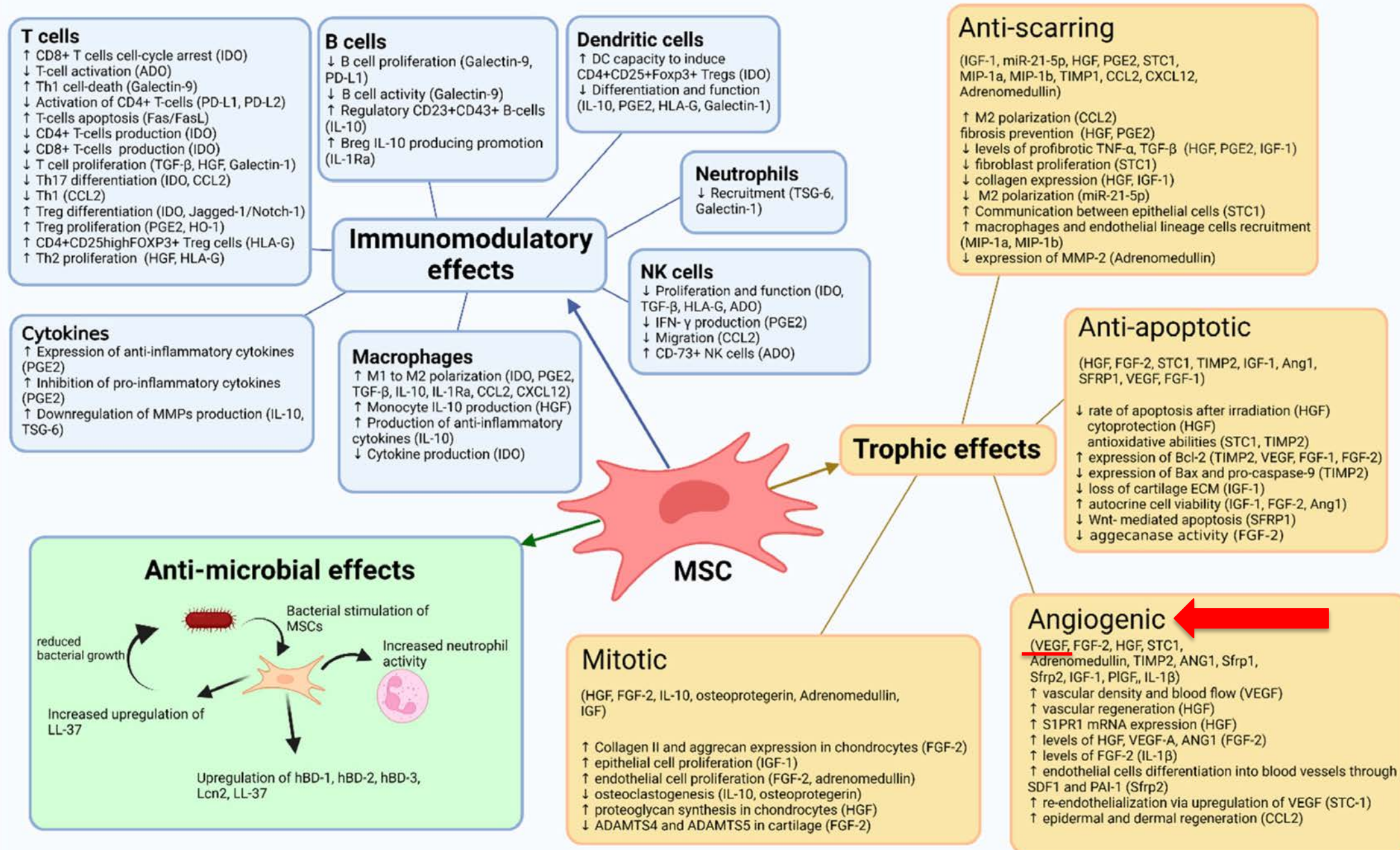
<sup>8</sup>Life Science Technology Project, Kanagawa Institute of Industrial Science and Technology, Kawasaki, Japan

<sup>9</sup>Department of Cellular and Gene Therapy Products, Graduate School of Pharmaceutical Sciences, Osaka University, Osaka, Japan

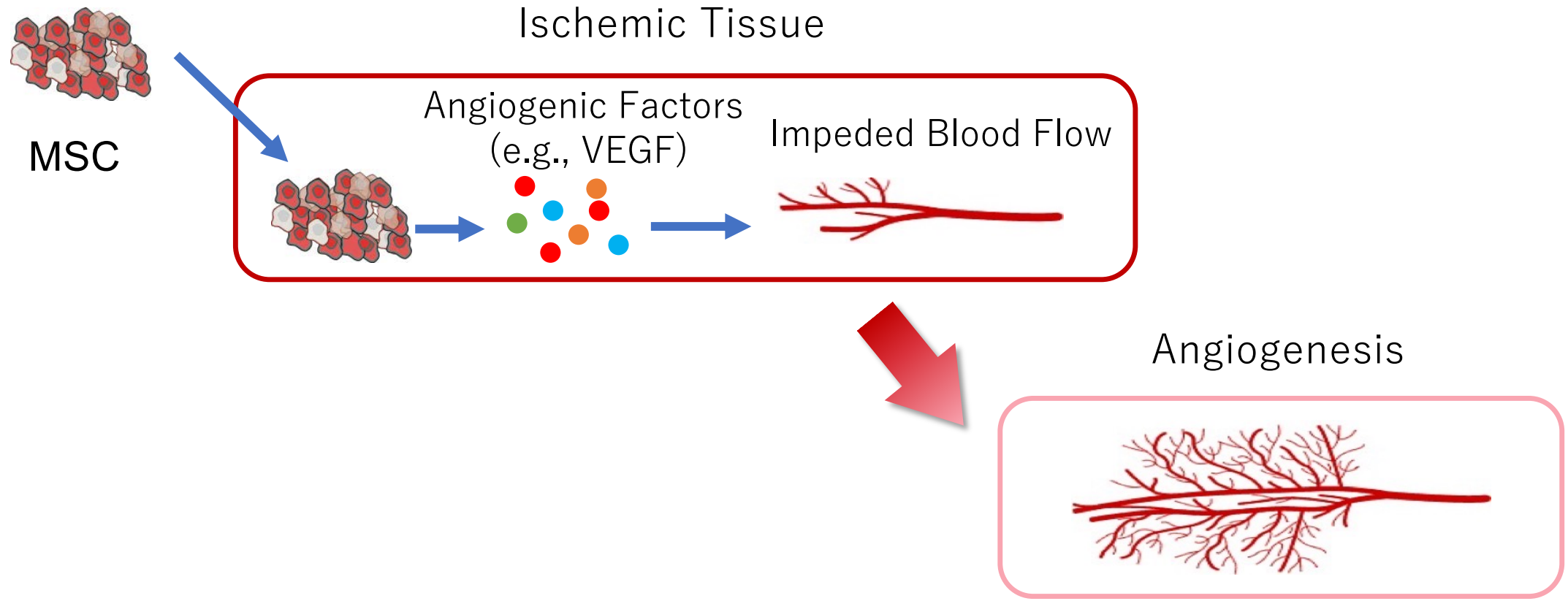
\*Corresponding author: Yoji Sato, PhD, Division of Cell-Based Therapeutic Products, National Institute of Health Sciences, 3-25-26 Tonomachi, Kawasaki Ward, Kawasaki City, Kanagawa 210-9501, Japan. Email: [yoji@nihs.go.jp](mailto:yoji@nihs.go.jp)

‡Contributed equally.

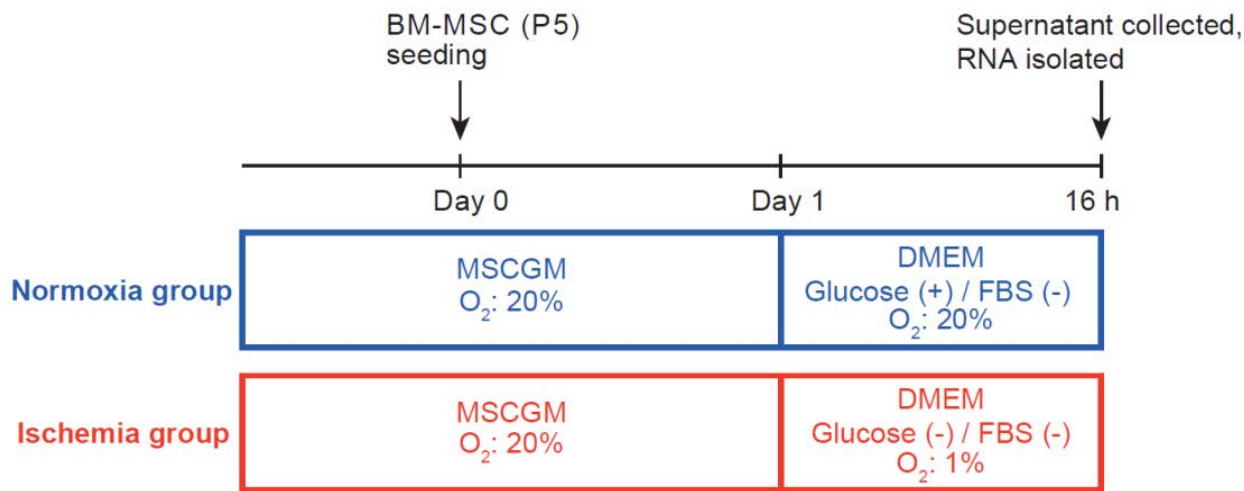




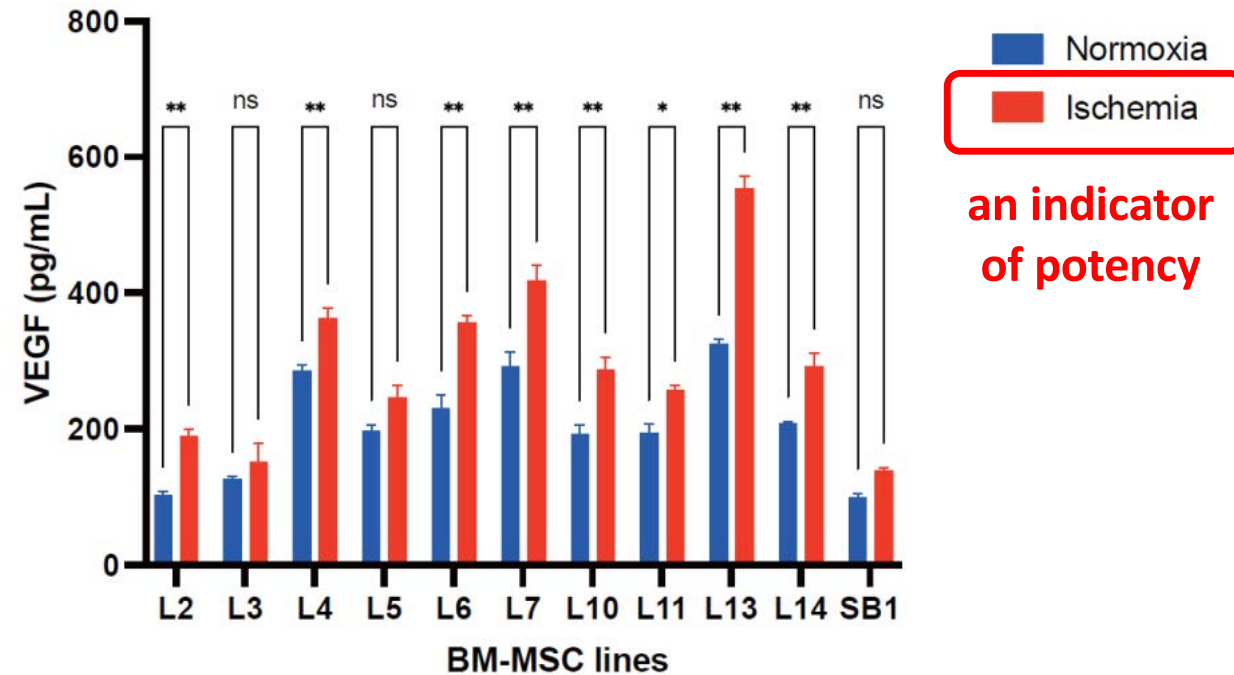
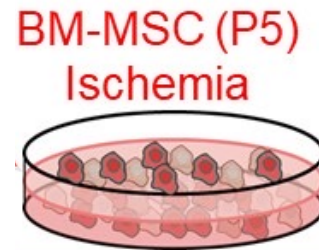
# Design of an experimental condition mimicking the environment of the engraftment site



# Design of an experimental condition mimicking the environment of the engraftment site



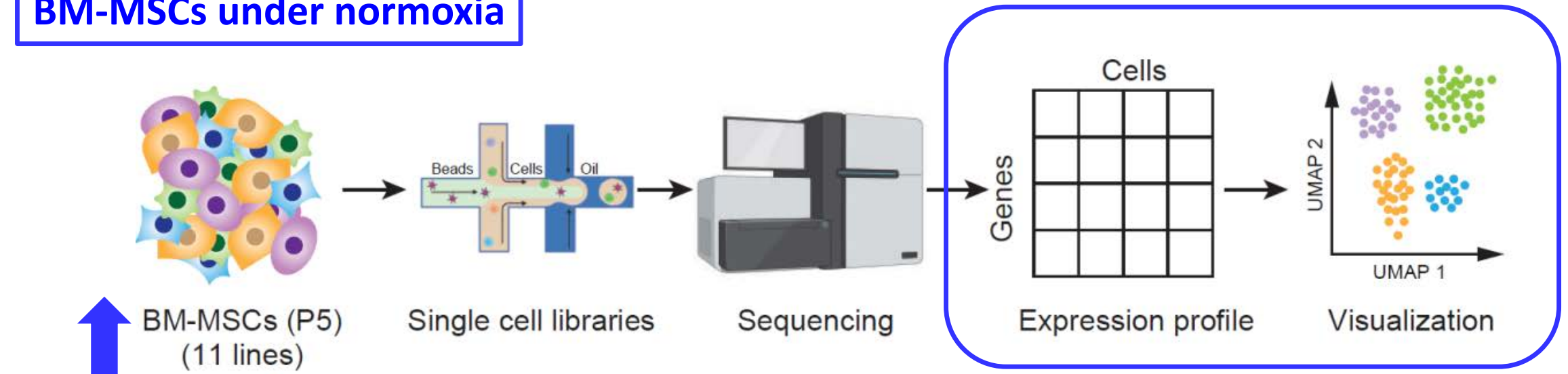
**BM-MSCs under ischemia**



**VEGF secretion varies widely between the lines.**

# Single-Cell Transcriptome Experiments

## BM-MSCs under normoxia



The data from the 11 lots of BM-MSCs were **combined** and subjected to clustering analysis to determine the composition of the subsets of “average BM-MSCs” (BM-MSCs as a population).



# Science on hMSCs

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs



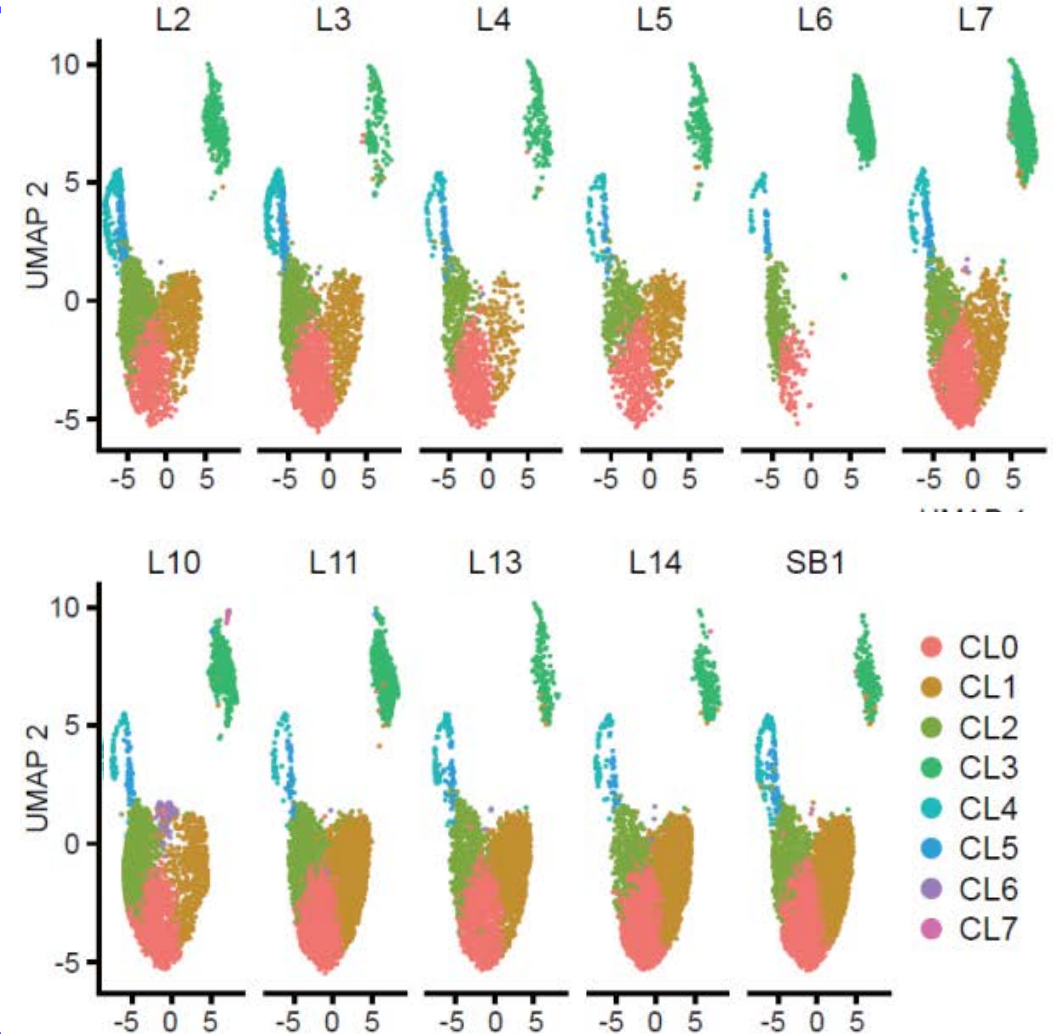
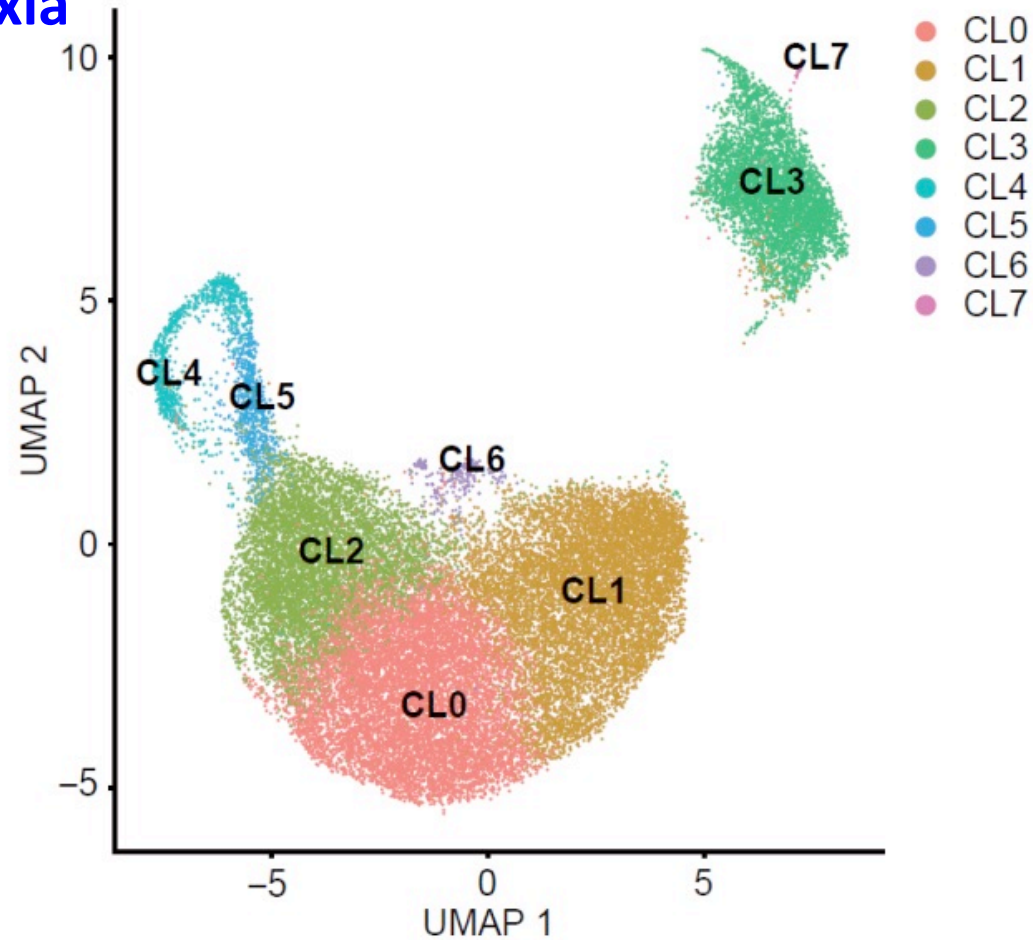
To estimate the heterogeneity of BM-MSCs in the population, all data from approximately equal numbers of cells derived from each line were clustered together.

母集団中のBM-MSCの不均一性を推定するため、各ライン由来のほぼ同数の細胞のデータを全部併せてクラスタリング

# Single-Cell Transcriptome Experiments

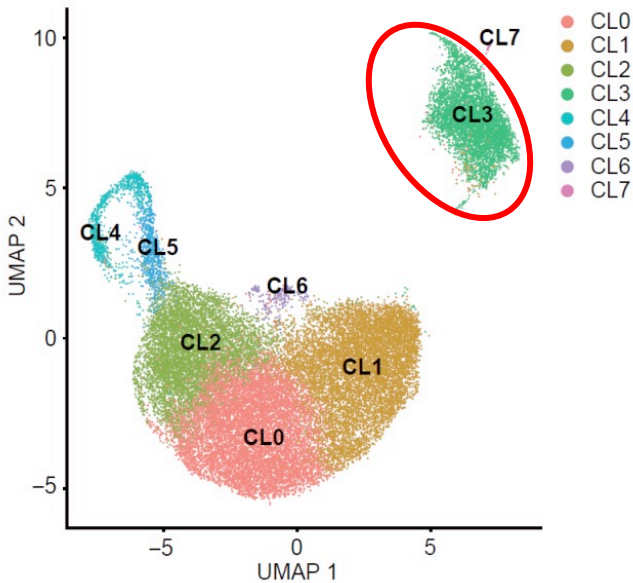
BM-MSCs (P5)

Normoxia

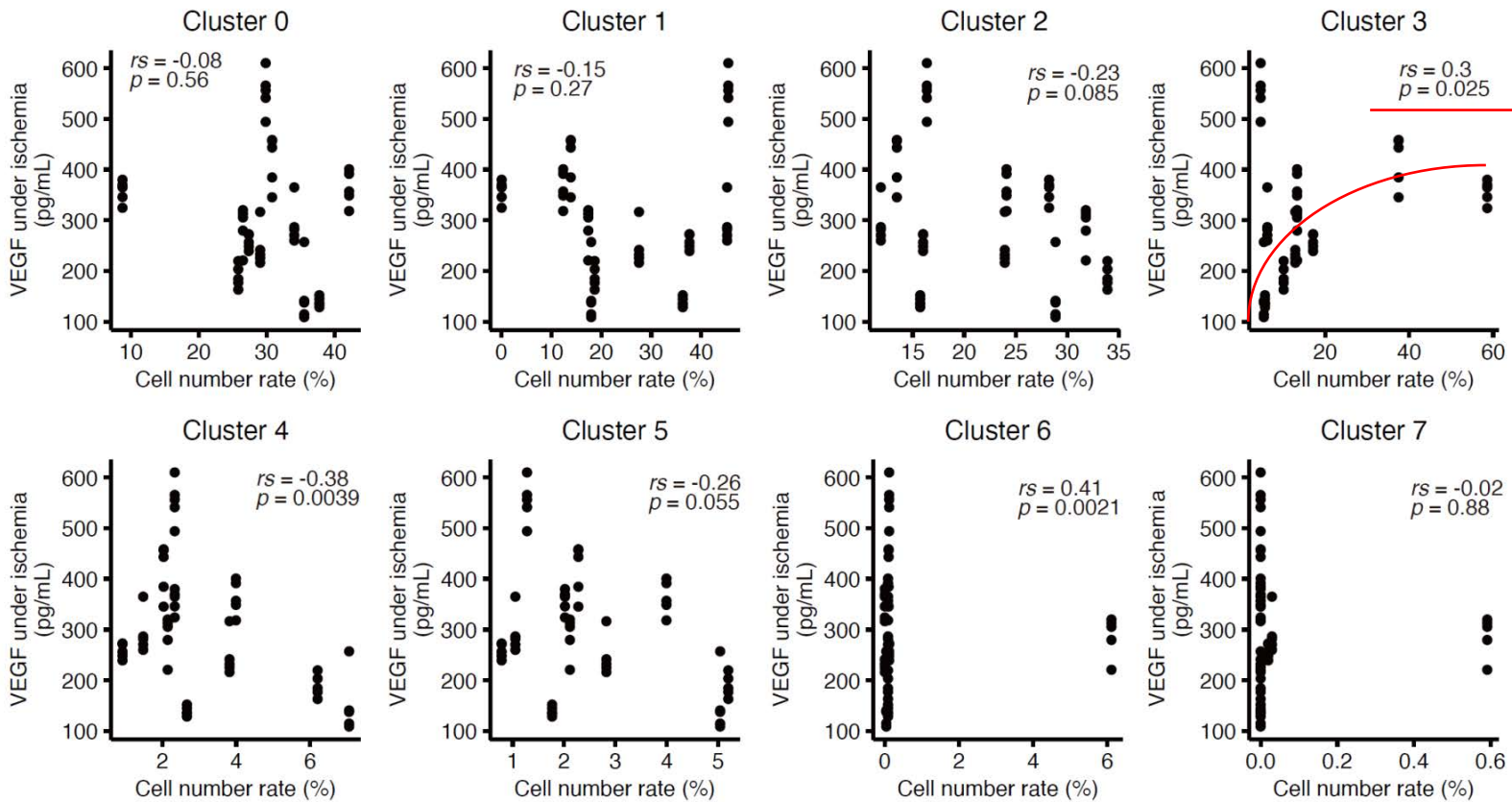
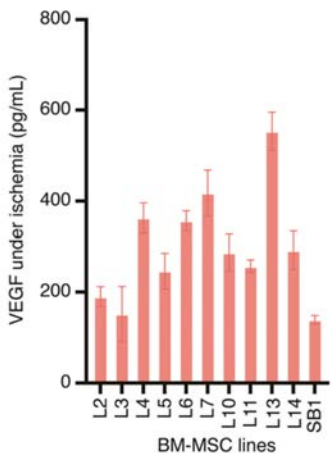
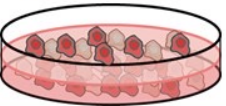


# Single-Cell Transcriptome Experiments

BM-MSCs (P5)  
Normoxia

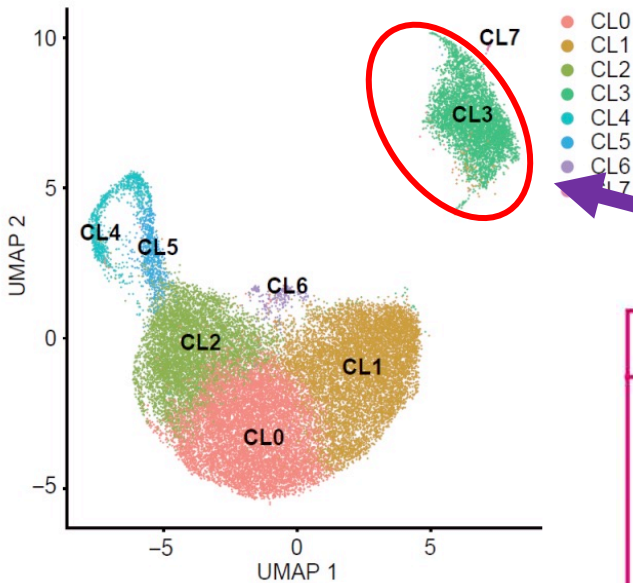


BM-MSC (P5)  
Ischemia



# Functional involvement of LRRC75A

BM-MSCs (P5)  
Normoxia

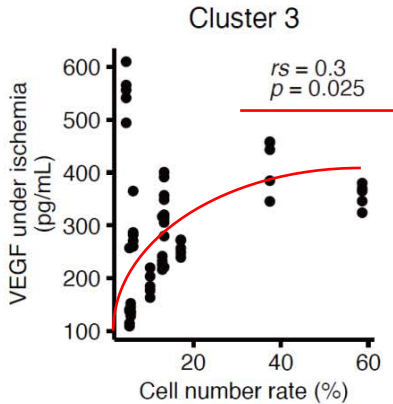


Top 20 upregulated genes of CL3

| Gene name | Ave log <sub>2</sub> FC |
|-----------|-------------------------|
| LRRC75A   | 1.0357                  |
| KRT7      | 0.8382                  |
| KRT16     | 0.7902                  |
| CL6       | 0.7815                  |

Hidden CQAs

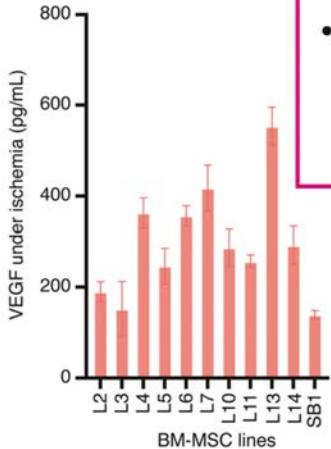
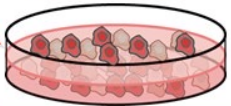
**LRRC75A is functionally involved in VEGF secretion during ischemia.**



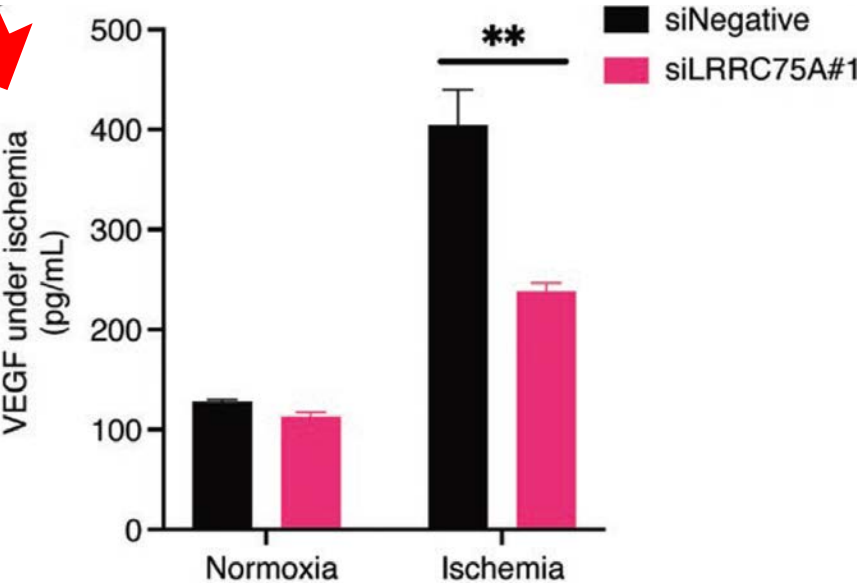
Research applications

- Identifying cell subpopulations and biomarkers that correlate with therapeutic efficacy of MSC-based therapeutic products
- Identifying critical quality attributes and setting specifications for MSC-based therapeutic products

BM-MSC (P5)  
Ischemia



|          |        |
|----------|--------|
| FLG      | 0.6049 |
| SH3BGRL3 | 0.5970 |
| TPM2     | 0.5859 |
| POLR2L   | 0.5555 |
| GADD45B  | 0.5543 |





# Science

## HYPOTHESIS

The expression of *LRRC75A* in CL3 regulates the VEGF secretion from hMSCs under ischemia.

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Bone Marrow-Derived hMSCs



a training set



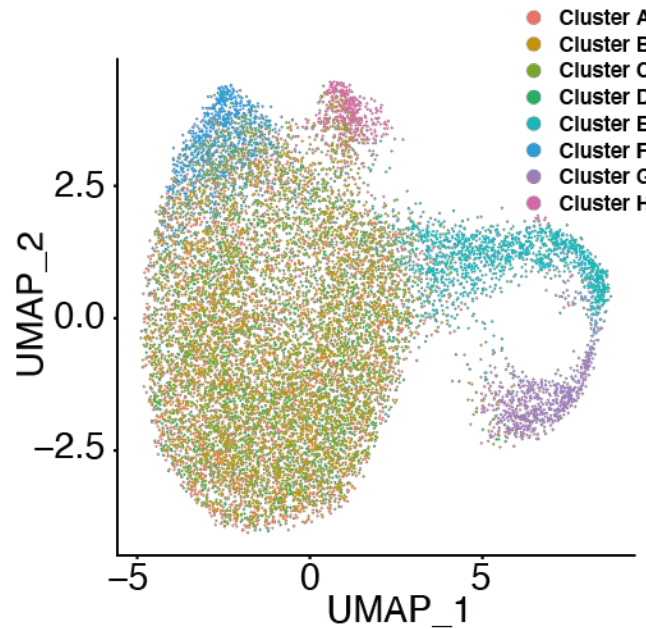
a test set



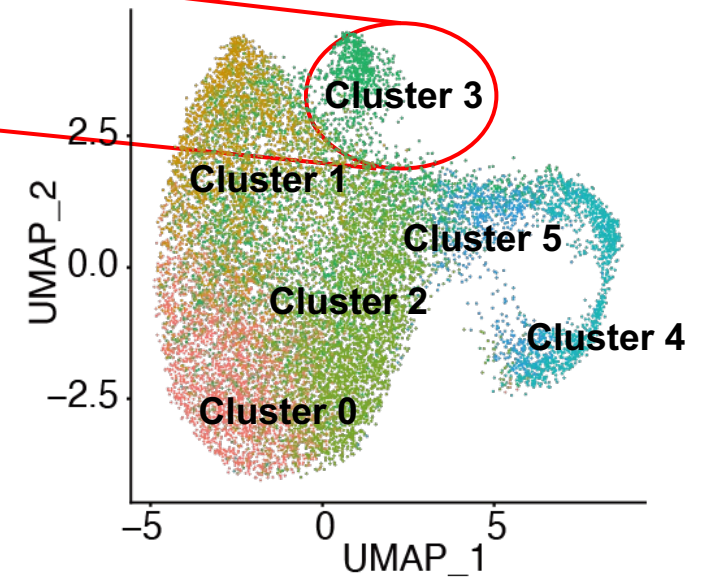
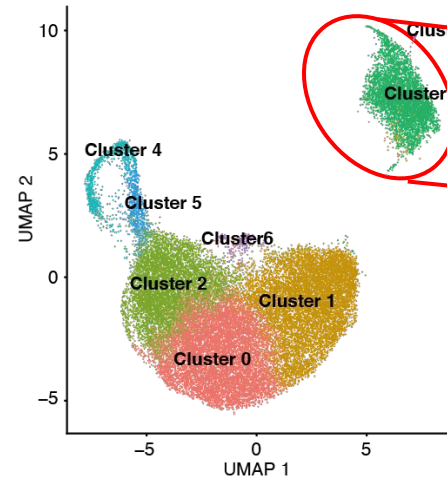


## Identification of CL3-like cells in another set of BM-MSCs

### scRNA-Seq Analysis for the Test Set (4 lines: L15 –L18)

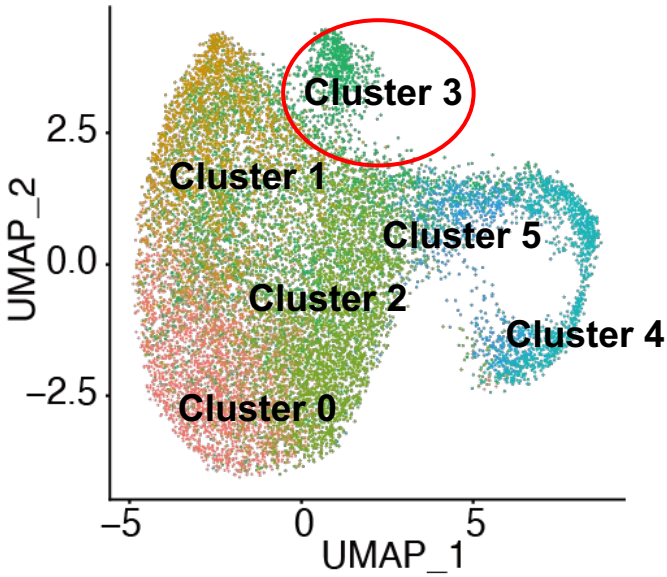


### Reference Data Set (L2–SB1)

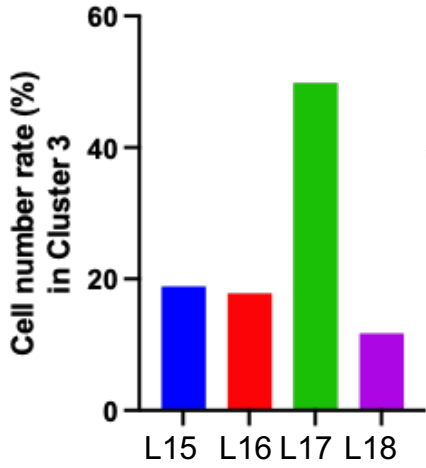


The test set data were merged using *FindTransferAnchors* function with the reference set and identified a CL3-like population.

# Identification of CL3-like cells in another set of BM-MSCs



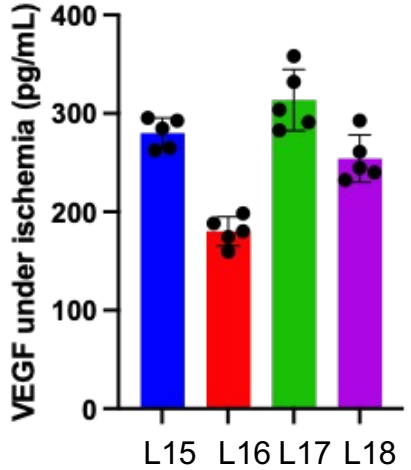
% Distribution of Cells  
in Each Line of the  
Test Set to CL3



BM-MSC lines

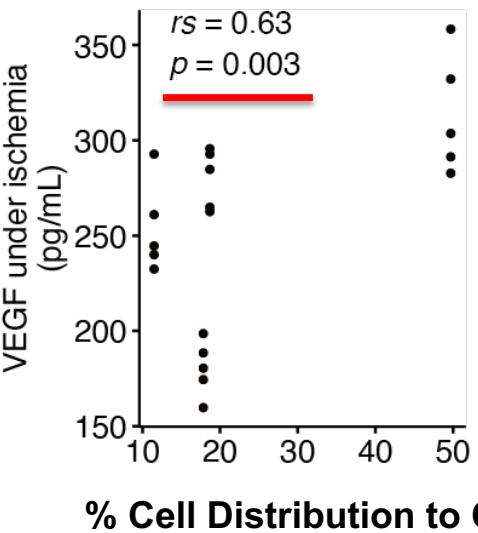
correlation

VEGF Production in  
Each Line  
(During Ischemia)



BM-MSC lines

Spearman's Rank Correlation  
Coefficient  
(% Cell Distribution vs. VEGF  
Production During Ischemia)



% Cell Distribution to CL3

# Science

## HYPOTHESIS

The expression of *LRRC75A* in CL3 regulates the VEGF secretion from hMSCs under ischemia.

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Adipose Tissue-Derived hMSCs



a training set

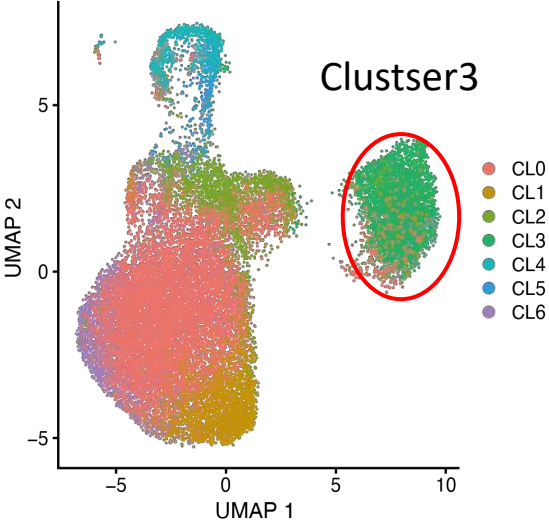
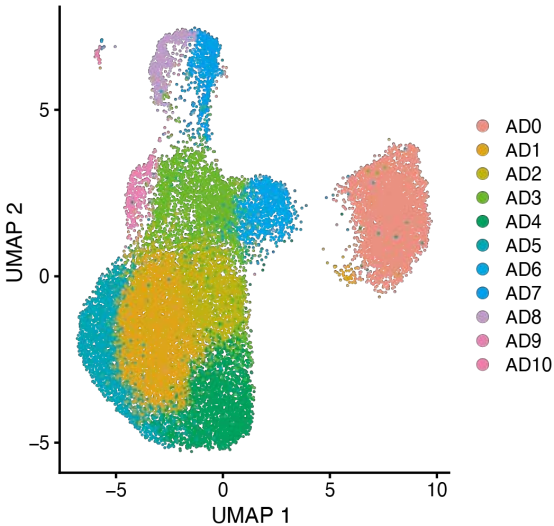
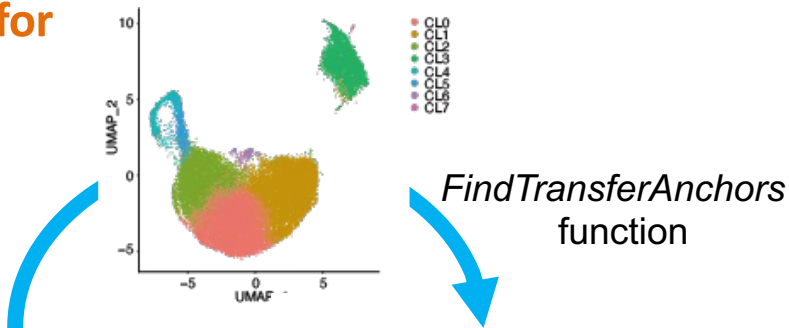


a test set

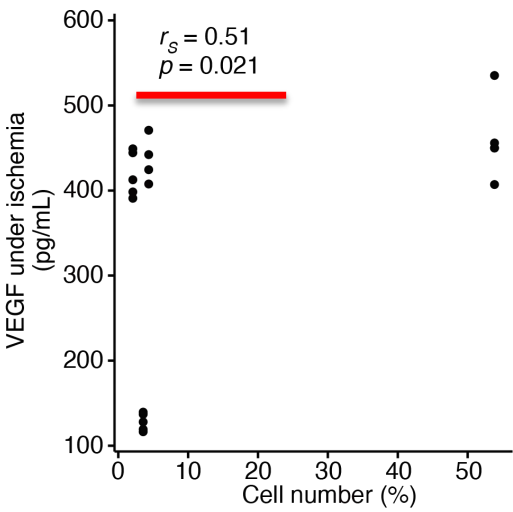


# CL3-like cells in adipose-derived MSCs (AD-MSCs)

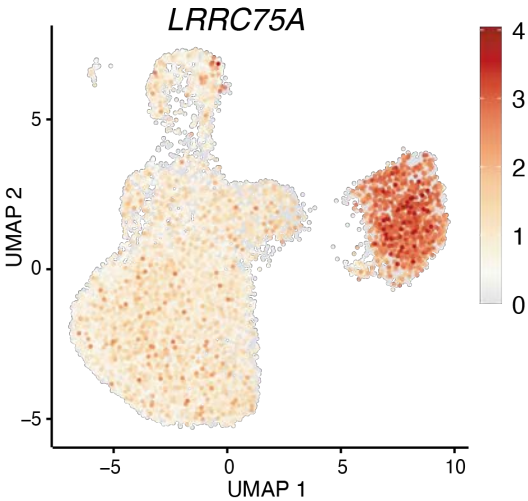
## scRNA-Seq Analysis for AD-MSCs (4 Lines)



## Spearman's Rank Correlation Coefficient (% Cell Distribution vs. VEGF Production During Ischemia)

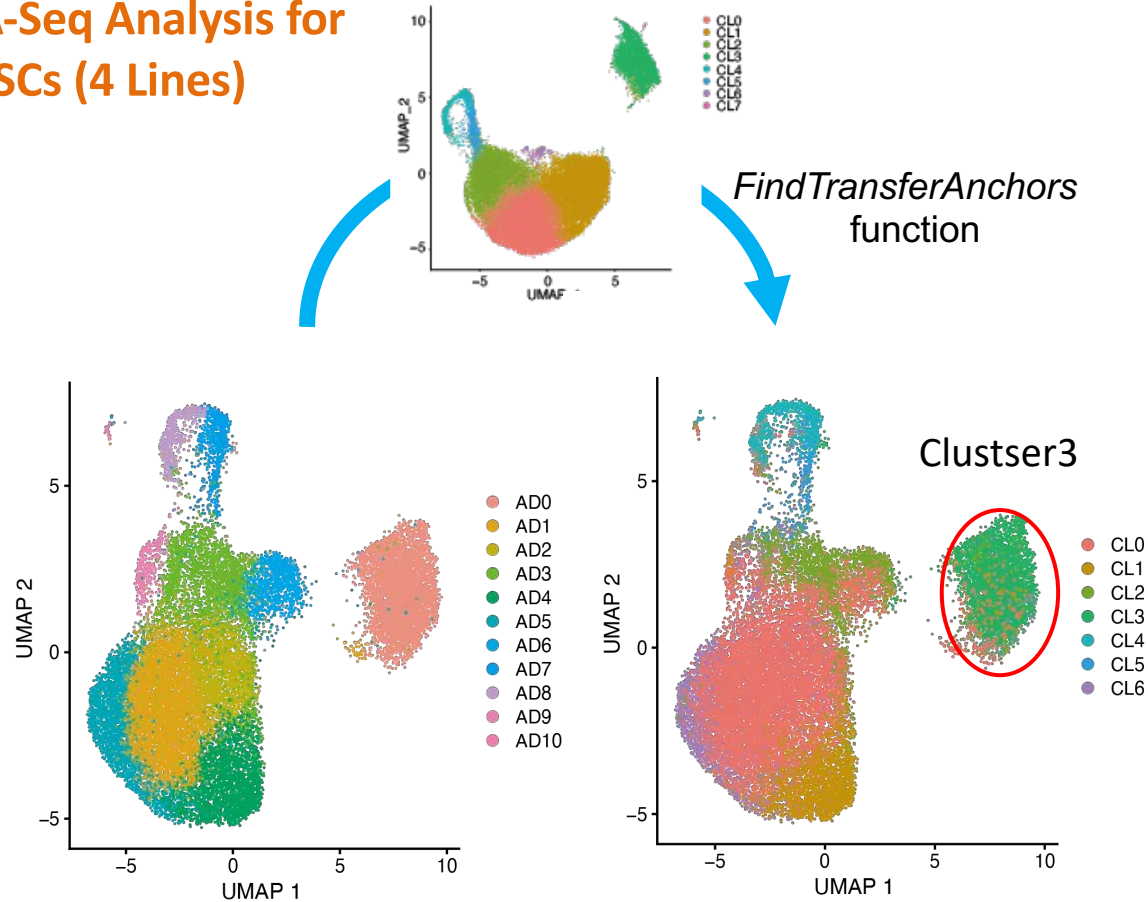


## Expression of *LRRC75A* in AD-MSCs

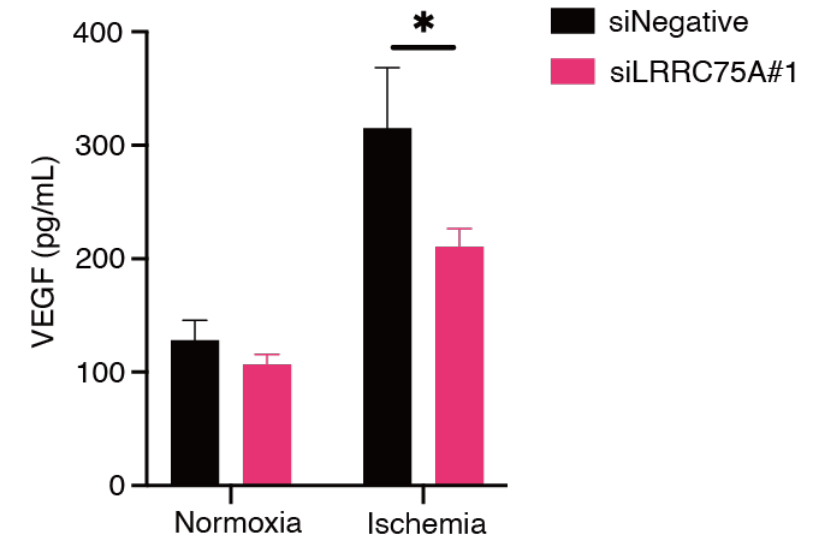


## CL3-like cells in adipose-derived MSCs (AD-MSCs)

### scRNA-Seq Analysis for AD-MSCs (4 Lines)



### Suppression of VEGF secretion in AD-MSCs by *LRRC75A* siRNA



In AD-MSCs,

- CL3-like cells contribute to VEGF production under ischemia.
- The expression of *LRRC75A* is high in CL3-like cells.
- KD of *LRRC75A* suppresses the secretion of VEGF.



# Science

## HYPOTHESIS

The expression of *LRRC75A* in CL3 regulates the VEGF secretion from hMSCs under ischemia.

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Adipose Tissue-Derived hMSCs

5 Lines of  
Umbilical Cord-Derived hMSCs



a training set

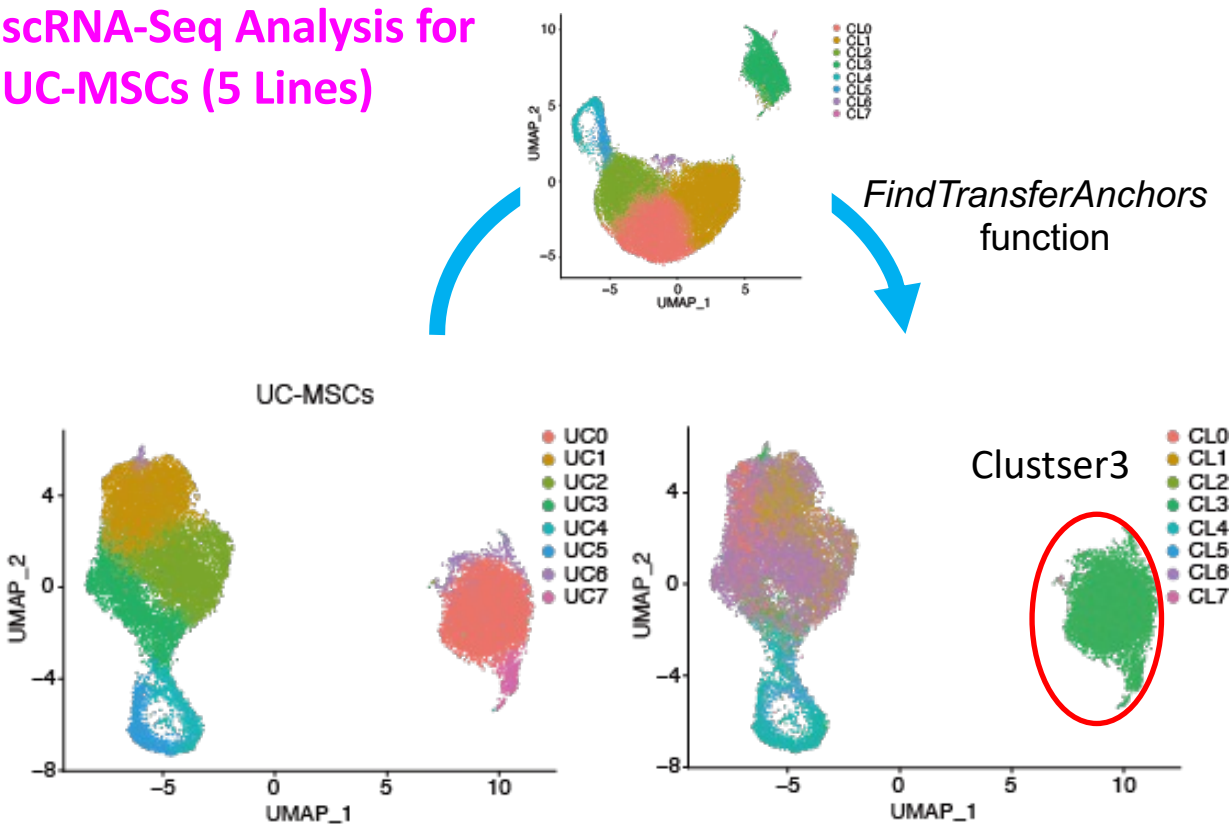


a test set

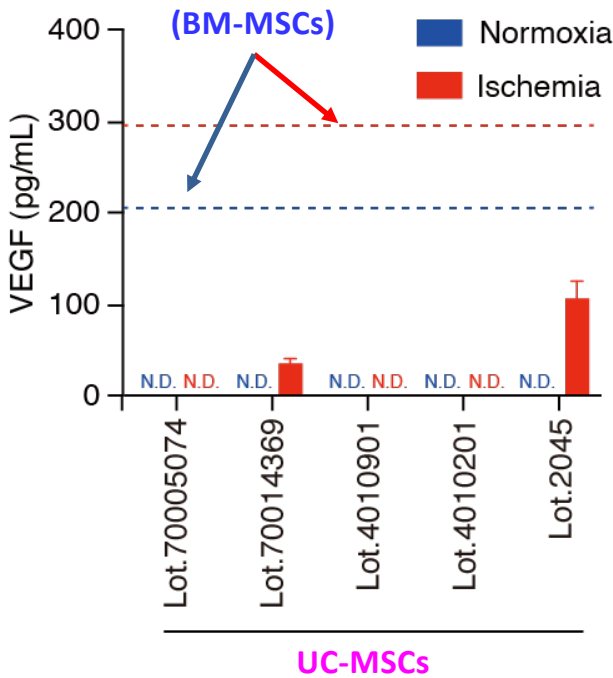


# CL3-like cells in umbilical cord-derived MSCs (UC-MSCs)

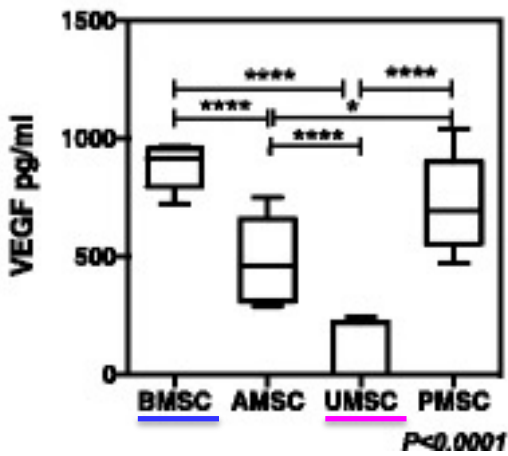
## scRNA-Seq Analysis for UC-MSCs (5 Lines)



## VEGF Production in Each Line (Normoxia/Ischemia)



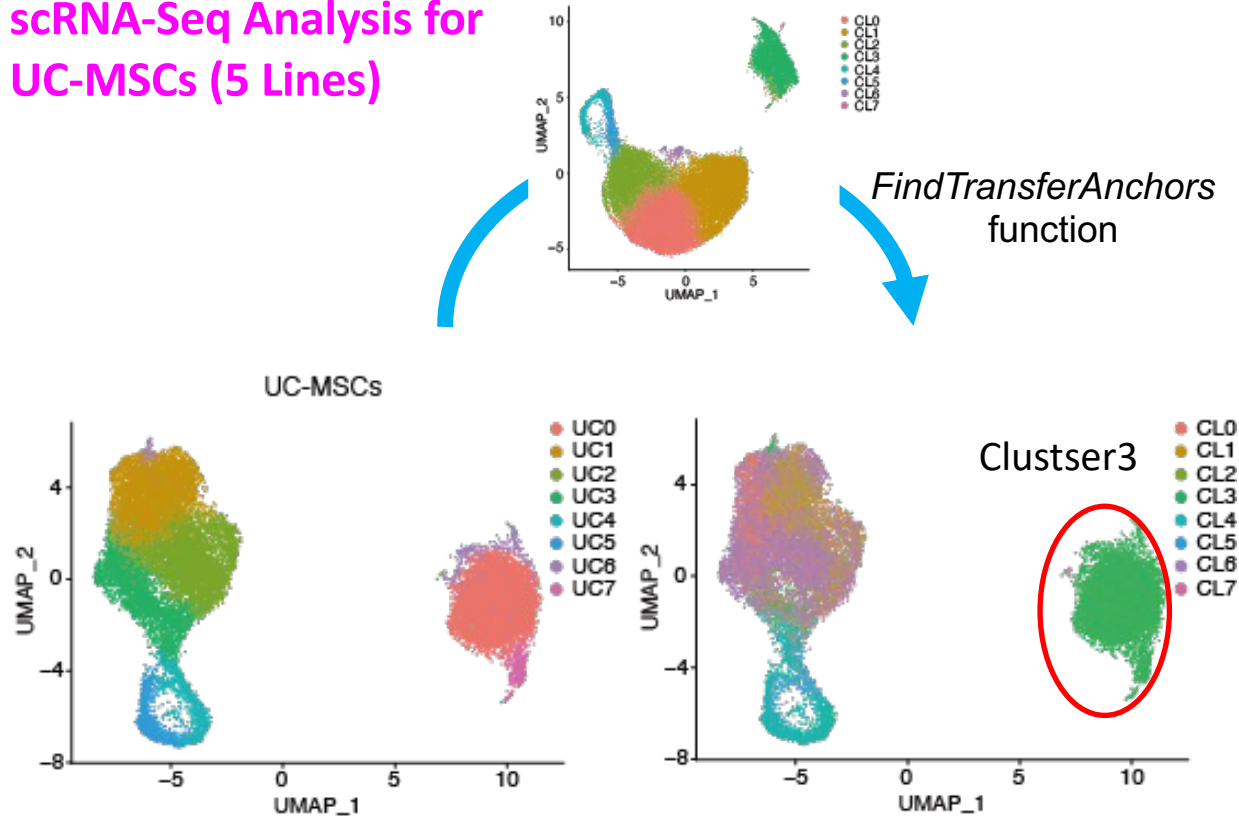
## Data from Another Group (Normoxia)



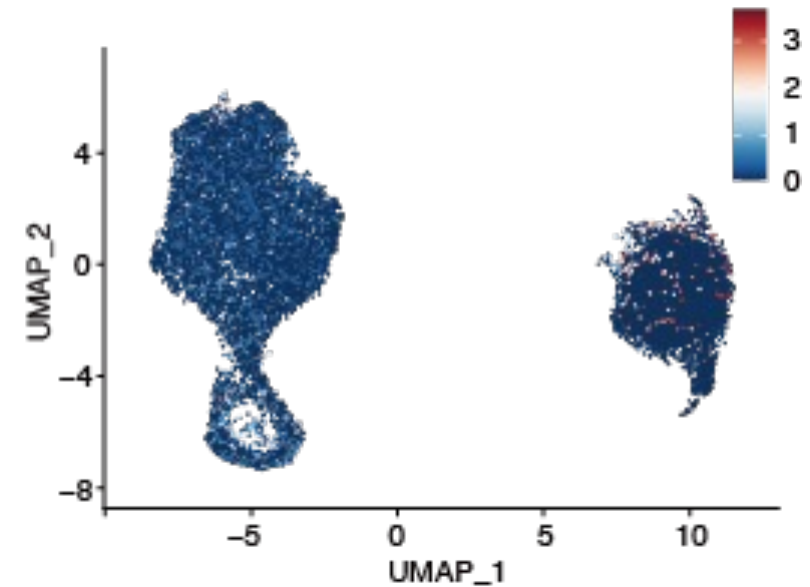
Du WJ, *et al. Stem Cell Res Ther.* 2016;7:163.

## CL3-like cells in umbilical cord-derived MSCs (UC-MSCs)

### scRNA-Seq Analysis for UC-MSCs (5 Lines)



### Expression of *LRRC75A* in UC-MSCs



Significantly fewer cells express high levels of  
*LRRC75A* in CL3-like cells.

# Science

## HYPOTHESIS

The expression of *LRRC75A* in CL3 regulates the VEGF secretion from hMSCs under ischemia.

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Adipose Tissue-Derived hMSCs

5 Lines of  
Umbilical Cord-Derived hMSCs



a training set



a test set



# Science

VERY LIKELY  
TO BE TRUE

## HYPOTHESIS

The expression of *LRRC75A* in CL3 regulates the VEGF secretion from hMSCs under ischemia.

The Populations of hMSCs  
(the Ideas in Plato's Philosophy)



*hMSCs*

*Bone Marrow-Derived hMSCs*

*Adipose Tissue-Derived hMSCs*

*Umbilical Cord-Derived hMSCs*

...

Specific Samples  
(Our Study)

11 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Bone Marrow-Derived hMSCs

4 Lines of  
Adipose Tissue-Derived hMSCs

5 Lines of  
Umbilical Cord-Derived hMSCs

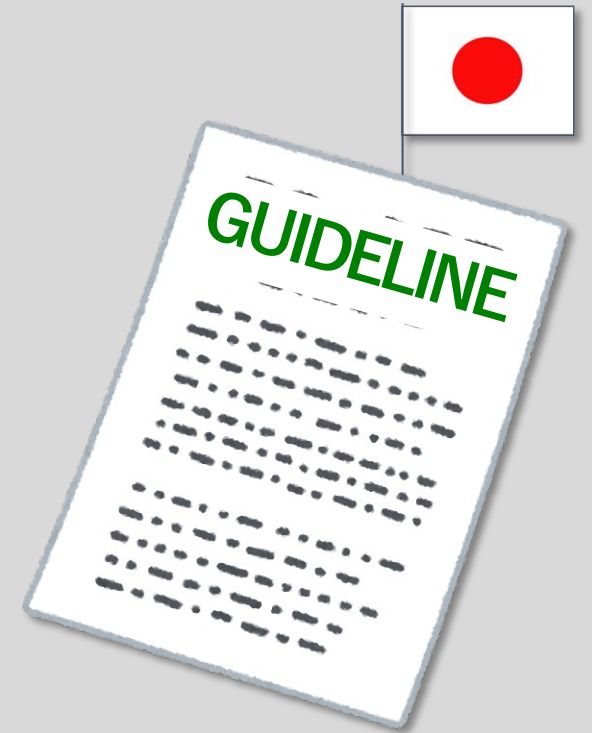




# **AGENDA (2)**

- 1. What is Comparability? – An Essential Requirement for Quality when Changing the Manufacturing Process of Cell Therapy Products –**
- 2. CQA Mining – A New Approach for Stem Cell Pharmacotaxonomy –**
- 3. MHLW Guideline for Comparability of Human Cell-Processed Products Subject to Changes in Their Manufacturing Process**

# MHLW Guideline for Comparability of Human Cell-Processed Products Subject to Changes in Their Manufacturing Process



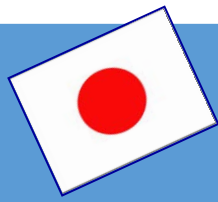


MHLW/PSEHB/MDED Notifications No. 0329-1

[The original Japanese document is already available at: <https://www.pmda.go.jp/files/000267916.pdf> ]

# (Draft) Guidance/Guideline Documents on the Comparability Assessment of Cell Therapy Products Subject to Changes in Their Manufacturing Process”

細胞治療製品の製造工程の変更に伴う同等性／同質性評価に関するガイダンス／ガイドライン(案)

| Country or Region   | EU/UK                                                                                                                                                                                                                                      | US                         | JP                                                                         |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Title               | Questions and answers: Comparability considerations for Advanced Therapy Medicinal Products (ATMP)                                                                                                                                                                                                                           | Manufacturing Changes and Comparability for Human Cellular and Gene Therapy Products [Draft]                  | Guideline for Comparability of Human Cell-Processed Products Subject to Changes in Their Manufacturing Process                                                |
| Source              | EMA/CAT/499821/2019<br><a href="https://www.ema.europa.eu/en/documents/other/questions-answers-comparability-considerations-advanced-therapy-medicinal-products-atmp_en.pdf">https://www.ema.europa.eu/en/documents/other/questions-answers-comparability-considerations-advanced-therapy-medicinal-products-atmp_en.pdf</a> | FDA/CBER<br><a href="https://www.fda.gov/media/170198/download">https://www.fda.gov/media/170198/download</a> | MHLW/PSEHB/MDED Notifications No. 0329-1<br><a href="https://www.pmda.go.jp/files/000267916.pdf">https://www.pmda.go.jp/files/000267916.pdf</a> [in Japanese] |
| Issued or Published | December 2019                                                                                                                                                                                                                                                                                                                | July 2023                                                                                                     | March 2024                                                                                                                                                    |

# AMED Research Project (FY2019-FY2021)

## “Research on the Comparability Assessment of Cell-Processed Products Subject to Changes in Their Manufacturing Process”

AMED研究事業(2019年度-2021年度)

「細胞加工製品の製造工程の変更に伴う同等性／同質性評価のあり方に関する研究」



### ➤ メンバー

荒戸 照世 (北海道大学)

内田 和久 (神戸大学)

梅澤 明弘 (国立成育医療研究センター)

岡崎 利彦 (大阪大学)

紀ノ岡正博 (大阪大学)

笹井 雅夫 (大阪大学)

佐藤 陽治 (国立医薬品食品衛生研究所；座長)

早川 堯夫 (国立医薬品食品衛生研究所,  
前 ICH Q5E 専門家作業部会ラポーター)

### ➤ Members

Teruyo ARATO (Hokkaido Univ.)

Kazuhisa UCHIDA (Kobe Univ.)

Akihiro UMEZAWA (NCCHD)

Toshihiko OKAZAKI (OSAKA Univ.)

Masahiro KINO-OKA (Osaka Univ.)

Masao SASAI (OSAKA Univ.)

Yoji SATO (NIHS, Chair)

Takao HAYAKAWA (NIHS,  
the Former Rapporteur of ICH Q5E EWG)

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS



## SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

### ヒト細胞加工製品の製造工程の変更に伴う同等性／同質性評価に関する指針



#### 1.2 背景

… 既存のICHガイドラインや国内関連法令等には、ヒト細胞加工製品の製造工程変更前後の製品の同等性／同質性を実証するために考慮すべき事項に焦点をあてた記載はなされていない。しかしいくつかのICHガイドラインや国内関連法令等においては、参考となる技術的情報が示されており、これらはヒト細胞加工製品の製造工程変更に伴う評価に際しても有用と考えられる(本文書「参考文献」の項に代表例を示す)。本文書は、主にICH Q5Eガイドライン「生物薬品(バイオテクノロジー応用医薬品／生物起源由来医薬品)の製造工程の変更にともなう同等性／同質性評価」の内容を踏まえつつ、ヒト細胞加工製品の製造工程変更前後の製品の同等性／同質性を実証するために品質特性評価の面からアプローチを行う際に必要な指針を提供するものである。

#### 1.2 Background

… The existing ICH documents and relevant domestic laws and regulations have not specifically addressed considerations for demonstrating comparability of human cell-processed products before and after a change to the manufacturing process. However, several ICH documents and relevant domestic laws and regulations have provided referential technical information that can also be useful for assessing process changes for human cell-processed product. (Representative examples are shown in the “References” section of this document.) This document is intended to provide the guidelines necessary to take an approach in terms of quality characterization to demonstrate the comparability of human cell-processed products before and after a change to the manufacturing process, mainly based on the ICH Q5E guideline “Comparability of Biotechnological/Biological Products Subject to Changes in Their Manufacturing Process.”



# ICH Q5E: COMPARABILITY OF BIOTECHNOLOGICAL/BIOLOGICAL PRODUCTS SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS



ICH Q5E: 生物薬品（バイオテクノロジー応用医薬品／生物起原由来医薬品）の  
製造工程の変更に伴う同等性／同質性評価

## 1.0 緒言

1.1 本ガイドラインの目的

1.2 背景

1.3 適用対象

1.4 一般原則

## 2.0 ガイドライン

2.1 同等性／同質性評価作業に関する留意事項

2.2 品質に関する留意事項

2.2.1 分析法

2.2.2 特性解析

## 1.0 INTRODUCTION

1.1 Objectives of the Guideline

1.2 Background

1.3 Scope

1.4 General Principles

## 2.0 GUIDELINES

2.1 Considerations for the Comparability Exercise

2.2 Quality Considerations

2.2.1 *Analytical Techniques*

2.2.2 *Characterisation*

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS

SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

ヒト細胞加工製品の製造工程の変更に伴う同等性／同質性評価に関する指針



## 1.0 緒言

### 1.1 本指針の目的

### 1.2 背景

### 1.3 適用対象

#### 1.3.1 適用対象製品

#### 1.3.2 適用対象製品の特徴

### 1.4 一般原則及びヒト細胞加工製品における基本的考え方

#### 1.4.1 一般原則

#### 1.4.2 ヒト細胞加工製品の同等性／同質性評価作業における基本的考え方

## 2.0 指針

### 2.1 同等性／同質性評価作業に関する留意事項

### 2.2 品質に関する留意事項

#### 2.2.1 分析法

#### 2.2.2 特性解析

## 1.0 INTRODUCTION

### 1.1 Objectives of the Guideline

### 1.2 Background

### 1.3 Scope

#### 1.3.1 *Applicable Products*

#### 1.3.2 *Characteristics of Applicable Products*

### 1.4 **General Principles** and Basic Concepts for Human Cell-Processed Products

#### 1.4.1 *General Principles*

#### 1.4.2 *Basic Concepts for Comparability Exercise of Human Cell-Processed Products*

## 2.0 GUIDELINES

### 2.1 Considerations for the Comparability Exercise

### 2.2 Quality Considerations

#### 2.2.1 *Analytical Techniques*

#### 2.2.2 *Characterisation*

# ICH Q5E: COMPARABILITY OF BIOTECHNOLOGICAL/BIOLOGICAL PRODUCTS SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS



ICH Q5E: 生物薬品（バイオテクノロジー応用医薬品／生物起源自来医薬品）の  
製造工程の変更にともなう同等性／同質性評価

2.2.3 規格及び試験方法

2.2.4 安定性

2.3 製造工程に関する留意事項

2.4 開発段階における製造工程変更時の同等性／同質性

2.5 非臨床試験及び臨床試験に関する留意事項

2.5.1 非臨床試験及び臨床試験を計画する際考慮すべき要素

2.5.2 試験の種類

3.0 用語集

4.0 参考文献

2.2.3 Specifications

2.2.4 Stability

2.3 Manufacturing Process Considerations

2.4 Demonstration of Comparability during Development

2.5 Nonclinical and Clinical Considerations

2.5.1 Factors to be Considered in Planning Nonclinical and Clinical Studies

2.5.2 Type of Studies

3.0 GLOSSARY

4.0 REFERENCES

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS

SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

ヒト細胞加工製品 の製造工程の変更に伴う同等性／同質性評価に関する指針



2.2.3 規格及び試験方法

2.2.4 最終製品の品質の安定性

2.3 製造工程に関する留意事項

2.4 開発段階における製造工程変更時の同等性／同質性

2.5 非臨床試験及び臨床試験に関する留意事項

2.5.1 非臨床試験及び臨床試験を計画する際考慮すべき要素

2.5.2 試験の種類

3.0 用語集

4.0 参考文献

Q&A

2.2.3 Specifications

2.2.4 Stability of Finished Product Quality

2.3 Manufacturing Process Considerations

2.4 Demonstration of Comparability during Development

2.5 Nonclinical and Clinical Considerations

2.5.1 Factors to Be Considered in Planning Nonclinical and Clinical Studies

2.5.2 Type of Studies

3.0 GLOSSARY

4.0 REFERENCES

Q&A

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS



## SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

### ヒト細胞加工製品 の製造工程の変更に伴う同等性／同質性評価に関する指針

#### 1.0 緒言

##### 1.1 本指針の目的

##### 1.2 背景

##### 1.3 適用対象

###### 1.3.1 適用対象製品

###### 1.3.2 適用対象製品の特徴

##### 1.4 一般原則及びヒト細胞加工製品における基本的考え方

###### 1.4.1 一般原則

###### 1.4.2 ヒト細胞加工製品の同等性／同質性評価作業における基本的考え方

#### 2.0 指針

##### 2.1 同等性／同質性評価作業に関する留意事項

##### 2.2 品質に関する留意事項

###### 2.2.1 分析法

###### 2.2.2 特性解析

#### 1.0 INTRODUCTION

##### 1.1 Objectives of the Guideline

##### 1.2 Background

##### 1.3 Scope

###### 1.3.1 Applicable Products

###### 1.3.2 Characteristics of Applicable Products

##### 1.4 General Principles and Basic Concepts for Human Cell-Processed Products

###### 1.4.1 General Principles

###### 1.4.2 Basic Concepts for Comparability Exercise of Human Cell-Processed Products

#### 2.0 GUIDELINES

##### 2.1 Considerations for the Comparability Exercise

##### 2.2 Quality Considerations

###### 2.2.1 Analytical Techniques

###### 2.2.2 Characterisation



# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS



## SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

### ヒト細胞加工製品 の製造工程の変更に伴う同等性／同質性評価に関する指針



#### 1.3.2 適用対象製品の特徴(抜粋)

「適用対象となるヒト細胞加工製品は、『医薬品、医療機器等の品質、有効性及び安全性の確保等に関する法律』に定められる再生医療等製品のうち、人の細胞に培養その他の加工を施すことにより製造されるものを指す。ヒト細胞加工製品は複雑で不均一な生細胞を成分として含むため、CQAを網羅的に観察することができるとは限らないこと、及び遺伝子組換え体細胞又は非組換え体細胞のタンパク質発現系から培養により産生されて高度に精製されることにより製造される生物薬品(バイオテクノロジー応用医薬品／生物起源由来医薬品)のように既存の一連の分析方法を用いての特性解析が可能であるとは限らないことに留意する必要がある。一方、ヒト細胞加工製品の同等性／同質性評価においては、特性解析のみならず、他の要因(例えば変更する製造工程の原理的な差分の説明を含めた評価を加えて判断することもありうる。個別製品の製造工程の変更に伴う同等性／同質性評価の充足性については、製造販売業者は規制当局に相談すること。・・・」

#### 1.3.2 Characteristics of Applicable Products (excerpts)

“Applicable human cell-processed products shall refer to regenerative medicine products specified in the “Act on Securing Quality, Efficacy and Safety of Products Including Pharmaceuticals and Medical Devices” that are manufactured by culturing or otherwise processing human cells. Because human cell-processed products contain complex and heterogeneous viable cell components, it should be noted that **their CQAs cannot always be observed comprehensively, and that they cannot always be characterized using an existing set of analytical procedures like biopharmaceuticals (biotechnological/biological products),** which are produced from recombinant or non-recombinant somatic cell protein expression systems by culture and highly purified. **On the other hand, it is also possible that, in the evaluation of the comparability of human cell-processed products, the decision may be made not only on the basis of characterization, but also on other factors (e.g., rationale differences in the manufacturing process to be changed).** As for the sufficiency of the comparability assessment following changes in the manufacturing process of individual products, the manufacturer should consult with the relevant regulatory authority. ...”

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS



SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

ヒト細胞加工製品の製造工程の変更に伴う同等性／同質性評価に関する指針

## 1.0 緒言

### 1.1 本指針の目的

### 1.2 背景

### 1.3 適用対象

#### 1.3.1 適用対象製品

#### 1.3.2 適用対象製品の特徴

### 1.4 一般原則及びヒト細胞加工製品における基本的考え方

#### 1.4.1 一般原則

#### 1.4.2 ヒト細胞加工製品の同等性／同質性評価作業における基本的考え方

## 2.0 指針

### 2.1 同等性／同質性評価作業に関する留意事項

### 2.2 品質に関する留意事項

#### 2.2.1 分析法

#### 2.2.2 特性解析

## 1.0 INTRODUCTION

### 1.1 Objectives of the Guideline

### 1.2 Background

### 1.3 Scope

#### 1.3.1 *Applicable Products*

#### 1.3.2 *Characteristics of Applicable Products*

### 1.4 **General Principles** and Basic Concepts for Human Cell-Processed Products

#### 1.4.1 *General Principles*

#### 1.4.2 *Basic Concepts for Comparability Exercise of Human Cell-Processed Products*

## 2.0 GUIDELINES

### 2.1 Considerations for the Comparability Exercise

### 2.2 Quality Considerations

#### 2.2.1 *Analytical Techniques*

#### 2.2.2 *Characterisation*

# GUIDELINE FOR COMPARABILITY OF HUMAN CELL-PROCESSED PRODUCTS



## SUBJECT TO CHANGES IN THEIR MANUFACTURING PROCESS

### ヒト細胞加工製品 の製造工程の変更に伴う同等性／同質性評価に関する指針



#### 1. 4. 2 ヒト細胞加工製品の同等性／同質性評価作業における基本的考え方(抜粋)

「低分子医薬品やICH Q5Eが対象とするバイオテクノロジー応用医薬品とは異なり、ヒト細胞加工製品の場合、有効成分である細胞の品質特性を分子レベルで網羅的に解析及び提示することが著しく困難であり、その一方で細胞集団の不均一性、並びに周辺環境の影響による細胞の形質の変化(例えば分化や脱分化)及び周辺環境に対する細胞の応答(例えば生理活性物質の放出)などを検討することが重要である。

従って、ヒト細胞加工製品では、現時点の技術で測定可能な品質特性をすべて挙げたとしても、有効性及び安全性の同等性／同質性を十分に保証するために必要な必須品質特性すべてを完全に網羅・同定できているとは限らない。・・・」

#### 1.4.2 *Basic Concepts for Comparability Exercise of Human Cell-Processed Products (excerpts)*

“Unlike low-molecular-weight pharmaceuticals and biotechnological products subject to ICH Q5E, for human cell-processed products, there are significant difficulties in comprehensively analyzing and presenting the quality attributes of cells as the active ingredient at a molecular level, whereas it is important to examine the heterogeneity of cell population, phenotypical changes attributable to the surrounding environment (e.g., differentiation and dedifferentiation), and cellular responses to the surrounding environment (e.g., release of bioactive substances).

Therefore, even if all quality attributes measurable with current technology are listed for human cell-processed products, it may not always be assured that all critical quality attributes necessary to fully assure the comparability of efficacy and safety have been completely covered and identified. ...”

# Conclusions 2

- Because of the complexity and heterogeneity of the cells as the active ingredient of cell therapy products (CTPs), even if we list all of the quality attributes that we can recognize, it may not be possible to fully identify and encompass all of the CQAs necessary to assure the efficacy and safety of the CTPs after their manufacturing changes.
- **Avoidance of false negatives is critical in the evaluation of safety-related CQAs, and it is important to understand the sensitivity and specificity of the test methods.**
- **Identification of cell subpopulations and biomarkers that correlate with potency/efficacy through single-cell transcriptome analysis and other methods, and use of these as CQAs, will help establish manufacturing methods to reproducibly produce effective CTPs.**
- In Japan, the guideline document for the comparability assessment of CTPs subject to changes in their manufacturing process, which is based on ICH Q5E, has just been issued.
- 細胞治療製品（CTP）の有効成分である細胞は複雑で不均質であるため、認知しうる品質特性をすべて列挙したとしても、製造変更後のCTPの有効性と安全性を保証するために必要なCQAをすべて特定・網羅することはできない可能性がある。
- **安全性関連のCQAの評価においては偽陰性の回避が最重要課題であり、試験法の感度や特異度を把握することが重要である。**
- **シングル・セル・トランスクリプトーム解析などにより、力価／有効性と相関する細胞亜集団やバイオマーカーを同定し、これらをCQAとすることは、有効な細胞治療製品を再現性高く製造する製法の確立に役立つと考えられる。**
- 日本では、ICH Q5Eをもとに、CTPの製法変更前後の品質の同等性評価に関するガイドラインが最近発出された。



# ACKNOWLEDGMENTS (Tumorigenicity)

I would like to express my sincere appreciation to:

- The member companies of the Committee for Non-Clinical Safety Evaluation of Pluripotent Stem Cells-derived Therapeutic Products, the Forum for Innovative Regenerative Medicine (**FIRM-CoNCEPT**)
- The member companies of the Japan Association of Contract Laboratories for Safety Evaluation (**JACL**) and the other Japanese companies that are participating or participated in **MEASURE 1/2**
- Global public and private sector organizations that are participating or participated in **HESI CT-TRACS** joint research
- Our collaborators in the AMED Research Project for Regulatory Harmonization and Evaluation of Medical Products
- Our collaborators (**Dr. Shin Kawamata**, etc.) in the AMED Research Project for Practical Application of Regenerative Medicine
- The Secretariat of the Forum for Innovation in Regenerative Medicine (**FIRM**)
- **AMED** Regulatory Science Division and Regenerative Medicine R&D Division
- **PMDA** Regenerative Medicine Products Review Division
- The Medical Device Review and Management Division, Ministry of Health, Labour and Welfare (**MHLW**),  
and
- **All of my excellent and hard-working colleagues** at the Division of Cell-Based Therapeutic Products, National Institute of Health Sciences



# ACKNOWLEDGMENTS (CQA Mining& Comparability)

- **Collaborators**

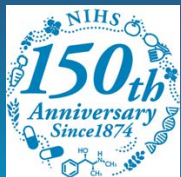
- Takumi Miura<sup>1,2</sup>, Tsukasa, Kouno<sup>3</sup>, Megumi Takano<sup>1</sup>, Takuya Kuroda<sup>1</sup>, Yumiko Yamamoto<sup>3</sup>,
- Shinji Kusakawa<sup>1</sup>, Masaki Suimye Morioka<sup>3</sup>, Tohru Sugawara<sup>2,4</sup>, Takamasa Hirai<sup>1</sup>, Satoshi Yasuda<sup>1</sup>,
- Rumi Sawada<sup>1</sup>, Satoko Matsuyama<sup>1,5</sup>, Hideya Kawaji<sup>3,6</sup>, Takeya Kasukawa<sup>3</sup>, Masayoshi Itoh<sup>3</sup>,
- Akifumi Matsuyama<sup>5</sup>, Jay W. Shin<sup>3,7</sup>, Akihiro Umezawa<sup>2</sup>, Jun Kawai<sup>3,8</sup>

- <sup>1</sup> Division of Cell-Based Therapeutic Products, National Institute of Health Sciences, Kanagawa, Japan
- <sup>2</sup> Center for Regenerative Medicine, National Center for Child Health and Development, Tokyo, Japan
- <sup>3</sup> RIKEN Center for Integrative Medical Sciences, Yokohama, Japan
- <sup>4</sup> Biopharmaceutical and Regenerative Sciences, Graduate School of Medical Life Science, Yokohama City University, Yokohama, Japan
- <sup>5</sup> Center for Reverse TR, Osaka Habikino Medical Center, Osaka Prefectural Hospital Organization, Osaka, Japan
- <sup>6</sup> Research Center for Genome & Medical Sciences, Tokyo Metropolitan Institute of Medical Science, Tokyo, Japan
- <sup>7</sup> Genomic Institute of Singapore, Agency for Science, Technology and Research, Singapore
- <sup>8</sup> Life Science Technology Project, Kanagawa Institute of Industrial Science and Technology (KISTEC), Kawasaki, Japan

- **Funded by**



神奈川県  
Kanagawa Prefectural Government



# Thank you for your attention!

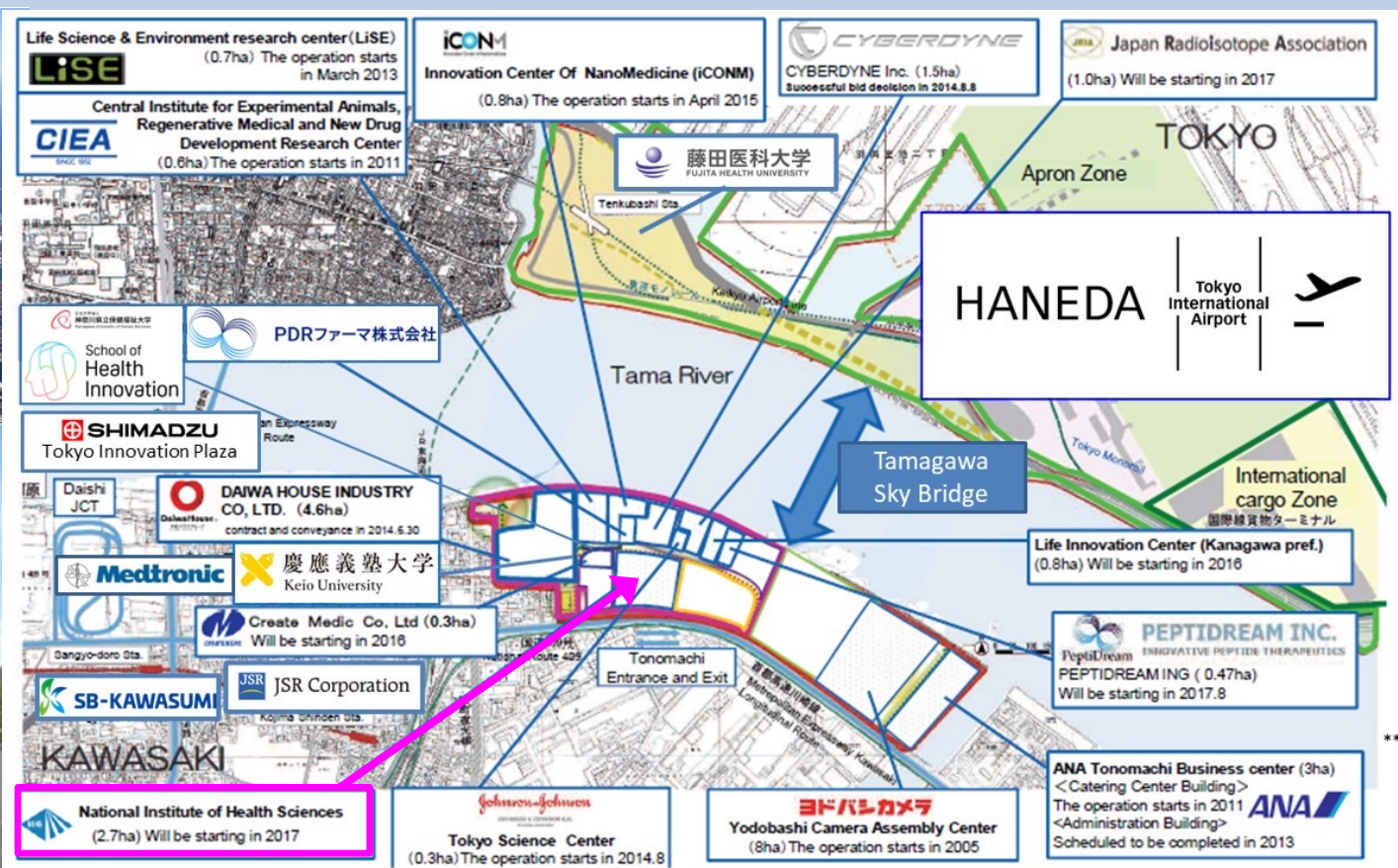
**Yoji SATO, Ph.D.**

Head, Division of Drugs

National Institute of Health Sciences

3-25-26 Tonomachi, Kawasaki Ward, Kawasaki City 210-9501, Japan

E-mail: [yoji@nihs.go.jp](mailto:yoji@nihs.go.jp)



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

<http://www.city.kawasaki.jp/en/page/0000038680.html>