



# Are Cell Therapy Standards the Right Approach?

The Bioprocessing Summit, Boston 2019

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1

## STANDARDS

### Types

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One issue is 'standards' cover a range of things, so its not always clear what people mean;

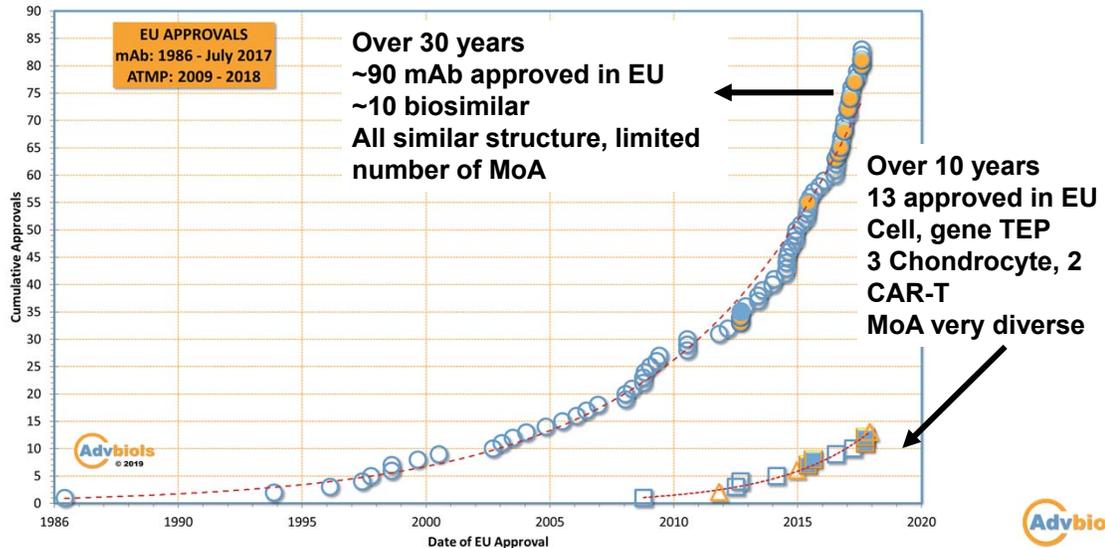
- ▶ Document standards (focus here)
  - ▶ Guidelines (range of sources, incl. regulators)
  - ▶ Pharmacopoeia monographs (chapters are guidance)
  - ▶ In-house SOPs etc
  - ▶ ISO, ASTM, etc (consensus standards)
  - ▶ Etc.
- ▶ Physical standards
  - ▶ WHO reference standards
  - ▶ Pharmacopoeia reference standards
  - ▶ In-house reference materials



2

## STANDARDS

### Considering monoclonal antibodies



## Web-search

- ▶ Basically nothing came up for document standards for mAbs
  - ▶ ISO, ASTM etc
- ▶ Quite a lot about reference standards for mAbs
  - ▶ Easier to understand why
  - ▶ Relates mostly to biosimilars

## ISO STANDARDS

### All the ISO documents for area = Biotechnology

<ul style="list-style-type: none"> <li>ISO 20387:2018 Biotechnology -- Biobanking -- General requirements for biobanking</li> <li>ISO/CD TS 20388 <a href="#">[Under development]</a> Biotechnology -- Biobanking -- Collection, processing, storage and transport of biological material</li> <li>ISO 20391-1:2018 Biotechnology -- Cell counting -- Part 1: General guidance on cell counting</li> <li>ISO 20391-2 <a href="#">[Under development]</a> Biotechnology -- Cell counting -- Part 2: Experimental design and statistical method performance</li> <li>ISO 20395:2019 Biotechnology -- Requirements for evaluating the performance of quantitative target sequences -- qPCR and dPCR</li> <li>ISO/CD 20397-2 <a href="#">[Under development]</a> Biotechnology -- General requirements for massive parallel sequencing -- quality of sequencing data</li> <li>ISO/TS 20399-1:2018 Biotechnology -- Ancillary materials present during the production of cell lines: General requirements</li> <li>ISO/TS 20399-2:2018 Biotechnology -- Ancillary materials present during the production of cell lines: Best practice guidance for ancillary material suppliers</li> </ul>	<ul style="list-style-type: none"> <li>ISO/TS 20399-3:2018 Biotechnology -- Ancillary materials present during the production of cellular therapeutic products -- Part 3: Best practice guidance for ancillary material users</li> <li>ISO/DIS 20688-1 <a href="#">[Under development]</a> Biotechnology -- Nucleic acid synthesis -- Part 1: Requirements for the production and quality control of synthesized oligonucleotides</li> <li>ISO/DIS 21709 <a href="#">[Under development]</a> Biotechnology -- Biobanking -- Process and quality requirements for establishment, maintenance and characterization of mammalian cell lines</li> <li>ISO/DIS 21710 <a href="#">[Under development]</a> Biotechnology -- Specification on data management and publication in microbial resource centers</li> <li>ISO/DIS 21899 <a href="#">[Under development]</a> Biotechnology -- Biobanking -- General requirements for the validation and verification of processing methods for biological material in biobanks</li> <li>ISO/DIS 21973 <a href="#">[Under development]</a> Biotechnology -- General requirements for transportation of cells for therapeutic use</li> <li>ISO/CD 23033 <a href="#">[Under development]</a> Biotechnology -- Analytical methods -- General guidelines for the characterization and testing of cellular therapeutic products</li> <li>ISO/CD TS 23105 <a href="#">[Under development]</a> Biotechnology -- Biobanking -- Collection, processing, storage and transportation criteria for plant biological material</li> </ul>	60.60	60.60	ISO/TC 276	60.60	ISO/TC 276
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## ISO STANDARDS

### Even pharmaceutical equipment has few

ICS	Field	Standard and/or project (s)	Stage	TC
11.120.01	Pharmaceutics in general	<ul style="list-style-type: none"> <li>ISO 11418-1:2016 Containers and accessories for pharmaceutical preparations -- Part 1: Drop-dispensing glass bottles</li> </ul>	60.60	ISO/TC 76
11.120.10	Medicaments <i>Including medical prescriptions and medicinal herbs</i>	<ul style="list-style-type: none"> <li>ISO 11418-2:2016 Containers and accessories for pharmaceutical preparations -- Part 2: Screw-neck glass bottles for syrups</li> </ul>	60.60	ISO/TC 76
11.120.20	Wound dressings and compresses	<ul style="list-style-type: none"> <li>ISO 11418-2:2016/Amd 1:2017</li> </ul>	60.60	ISO/TC 76
11.120.99	Other standards related to pharmaceutics <i>Including equipment for pharmaceutical industry</i>	<ul style="list-style-type: none"> <li>ISO 11418-3:2016 Containers and accessories for pharmaceutical preparations -- Part 3: Screw-neck glass bottles (veral) for solid and liquid dosage forms</li> <li>ISO 11418-3:2016/Amd 1:2017</li> <li>ISO 11418-4:2005 Containers and accessories for pharmaceutical preparations -- Part 4: Tablet glass bottles</li> <li>ISO 11418-5:2015 Containers and accessories for pharmaceutical preparations -- Part 5: Dropper assemblies</li> <li>ISO 11418-7:2016 Containers and accessories for pharmaceutical preparations -- Part 7: Screw-neck vials made of glass tubing for liquid dosage forms</li> <li>ISO 21976:2018 Packaging -- Tamper verification features for medicinal product packaging</li> </ul>	60.60 60.60 90.20 60.60 60.60 60.60	ISO/TC 76 ISO/TC 76 ISO/TC 76 ISO/TC 76 ISO/TC 76 ISO/TC 122



## STANDARDS

### Why are there few/no consensus standards for mAbs?

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- ▶ All biological medicinal products (biologics) are inherently different (as are biological raw materials)
  - ▶ Most are new active substances, so unique
  - ▶ But even biosimilars (and me-too) have a different process (no /little knowledge of innovator process)
- ▶ The process is different for each (and proprietary) and influences;
  - ▶ Process-related impurities
  - ▶ Product-related impurities
  - ▶ And also post-translational modifications can differ, e.g. glycosylation (proteins)
  - ▶ for cell therapy we can assume a bigger impact



7

## STANDARDS

### Biosimilars

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- ▶ There are a few monographs for biotech (protein) active substances, e.g. erythropoietin, insulin
- ▶ Some argue (myself included) these are not useful
  - ▶ Because of previous slide (they are incomplete), need to be case-by-case
  - ▶ Not how you establish biosimilarity (some have made this mistake)
  - ▶ Not needed for me-too as they do full development (just like a new active substance)
- ▶ Suggests standards for the cellular active should not be attempted.

Note: the idea of a biosimilar cell therapy is currently implausible scientifically, and likely completely impractical or impossible (autologous)



8

## STANDARDS

### What standards might be useful?

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#### Materials

- ▶ Standards for biological materials are (previous slides) unlikely to be very helpful
- ▶ Not many chemical materials that don't have a monograph.



9

## STANDARDS

### What standards might be useful?

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#### Analytical Methods

- ▶ Pharmacopoeia monographs need to be validated methods (inter/intra lab), which is challenging given the diversity of samples that might be tested.
  - ▶ Potency is product and indication specific – so not possible.
  - ▶ Bioassays in general are unlikely to be suitable for a monograph
  - ▶ Cell counting seems deceptively simple, yet isn't amenable to this approach (cell type, matrix etc).
- ▶ Leaves guideline approaches (flexible)
  - ▶ Which is mostly where we are now, the developer has to develop and validate their methods.



10

## STANDARDS

Often get misused.

International Society for Cellular Therapy  
ISCT

Cytotherapy (2006) Vol. 8, No. 4, 315–317

Taylor & Francis  
Taylor & Francis Group

### POSITION PAPER

#### Minimal criteria for defining multipotent mesenchymal stromal cells. The International Society for Cellular Therapy position statement

M. Dominici<sup>1</sup>, K. Le Blanc<sup>2</sup>, I. Mueller<sup>3</sup>, I. Slane-Cortzenbach<sup>4</sup>, F.C. Marini<sup>5</sup>,  
D.S. Krause<sup>6</sup>, R.J. Deans<sup>7</sup>, A. Keating<sup>8</sup>

<sup>1</sup>Laboratory of Cell Biology and Advanced Cancer Therapy, Oncology-Hematology, <sup>2</sup>Center for Allogeneic Stem Cell Transplantation, Department of Life

Cell Stem Cell  
Forum

#### MSC-Based Product Characterization for Clinical Trials: An FDA Perspective

Michael Mendicino,<sup>1,2,\*</sup> Alexander M. Bailey,<sup>3</sup> Keith Wonnacott,<sup>2</sup> Robert  
<sup>1</sup>Office of the Commissioner (OC), Office of the Chief Scientist (OCS), Office of  
Hampshire Boulevard, Silver Spring, MD 20993, USA  
<sup>2</sup>Center for Biologics Evaluation and Research (CBER), Office of Cellular, Tissue  
Therapy (DCGT), 1401 Rockville Pike, Rockville, MD 20852, USA  
<sup>3</sup>CBER, OCTGT, Division of Clinical Evaluation and Pharmacology/Toxicology  
\*Correspondence: m.mendicino.phd@gmail.com (M.M.), steven.bauer@fda.hhs.gov  
<http://dx.doi.org/10.1016/j.stem.2014.01.013>

"In their 2006 position paper, ISCT emphasized that their proposed identifying criteria were not to be confused with final product lot release specifications developed for clinical trials (Dominici et al., 2006). Interestingly, literature and regulatory submission descriptions appear to indicate that many researchers believe otherwise."



## STANDARDS

Just to clarify, I do appreciate the potential value of standards.

FOCUS N... MANUFACTURING

BioProcess International 10(4) April 2012

### Standards Can Help Bring Cell Therapy Products to Market

Ben Sheridan, Glyn Stacey, Alison Wilson, Patrick Ginty,  
Christopher Bravery, and Damian Marshall





Consulting on Advanced Biologicals

**THANK YOU FOR LISTENING**

**Questions?**