

Justification of Specifications (JOS): *What Product and Process Development was all About*

Christopher A Bravery

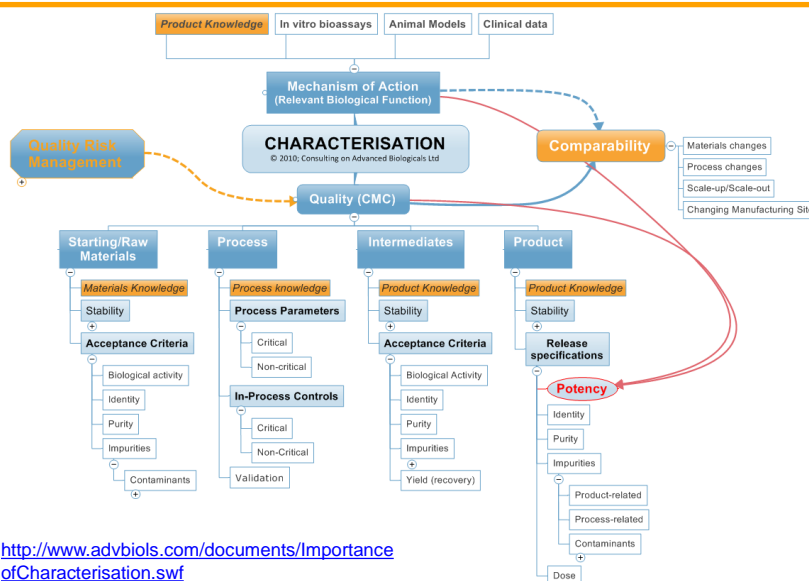
cbravery@advbiols.com

1



Consulting on Advanced Biologicals

The Importance of Characterisation



2

<http://www.advbiols.com/documents/Importance of Characterisation.swf>

FDA Common Causes of Hold Actions: Post-Phase 1

- Critical assays (potency, identity, other) are not...
- ... validated, reproducible, quantitative, sensitive, specific, biologically relevant
- Stability program inadequate, unsuitable, or absent
- **Characterization data insufficient to establish lot release specifications**
- Comparability not adequately demonstrated
- Safety issues
 - High levels of bioburden resulting from contamination

From: Investigational new drugs submitted to the Food and Drug Administration that are placed on clinical hold: the experience of the Office of Cellular, Tissue and Gene Therapy. *Cytotherapy*,10:3, 312 – 316; 2006
[DOI:10.1080/14653240801910905](https://doi.org/10.1080/14653240801910905)

3



Consulting on Advanced Biologicals

FDA BLA Issues

- Significant change(s) made late in development, without adequate product comparability data
 - Viral clearance evaluation studies may be needed
- Process validation data incomplete, inadequate, or absent
- Inadequate stability studies
- **Characterization data inadequate to support establishing specifications**
- Consistent manufacturing inadequately demonstrated
- Compliance issues - contract manufacturers, finish and fill facilities

4



Consulting on Advanced Biologicals

Introduction

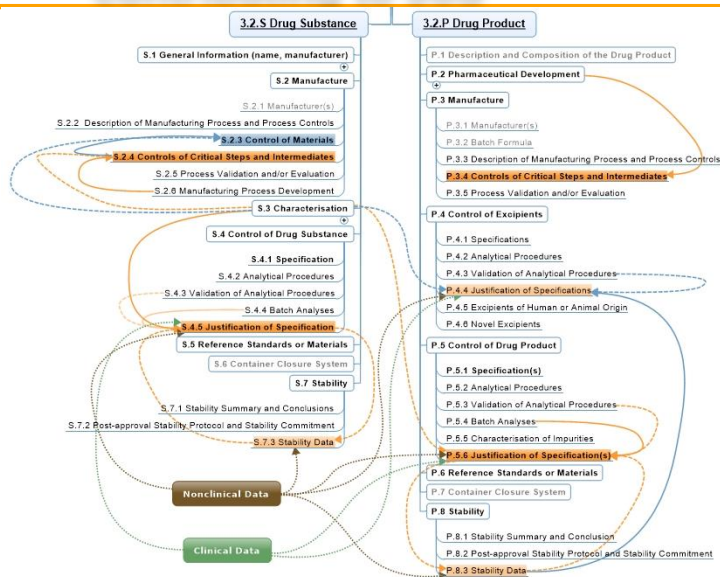
- ✓ What does 'justification of specifications' (JOS) mean?
- ✓ How do you justify specifications
 - ✓ During clinical development
 - ✓ For Approval
- ✓ Final thoughts

5



Consulting on Advanced Biologicals

Dossier sections potentially contributing to JoS



6



JOS during clinical development

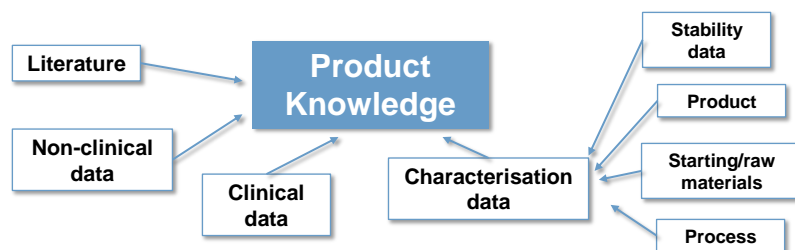
- Specifications preliminary and uncertain
- Limited data to justify specifications
- Early stage focus on safety critical specifications
 - E.g. sterility (no growth), adventitious agents (negative), Endotoxin
- Examples I have seen in IMPD/IND CTD sections
 - N/A !?
 - The specifications of the excipient are based on the CoA (for culture media sold for in vitro use)!?
- While such statements may get approved it is your responsibility to consider whether your specifications are reasonable.

7



Consulting on Advanced Biologicals

What is JOS: Product Specifications

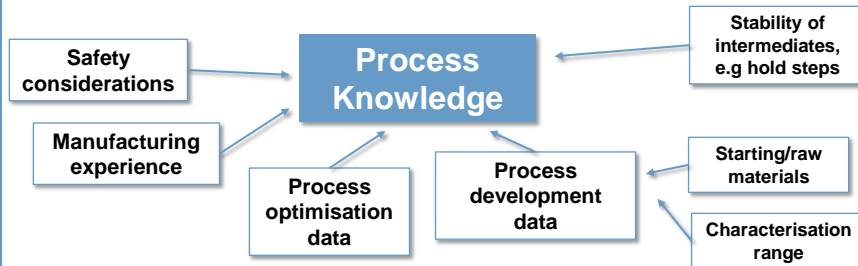


8



Consulting on Advanced Biologicals

What is JOS: Process Specifications



9



Consulting on Advanced Biologicals

JOS for Market Approval

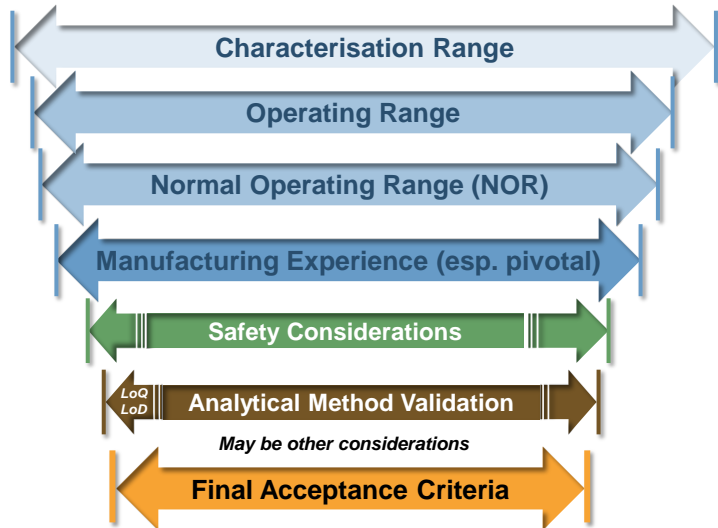
- Specifications need detailed justifications
- This requires that characterisation is complete and comprehensive
 - Starting/Raw materials specifications
 - Product specifications
 - Intermediates (e.g. cell banks, stored intermediates)
 - Process specifications
 - Stability specifications
 - Process parameters

10



Consulting on Advanced Biologicals

JOS: Specifications

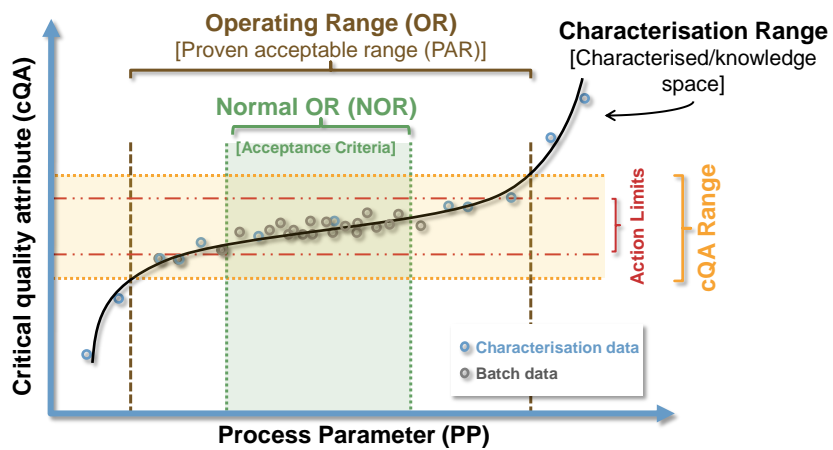


11



Consulting on Advanced Biologicals

Defining Specifications

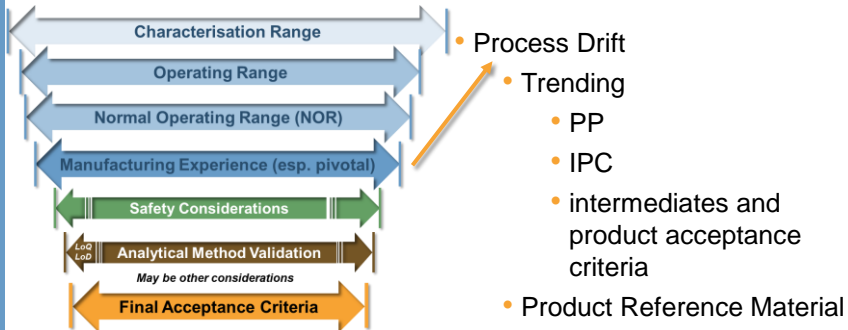


12



Consulting on Advanced Biologicals

JOS: Process Specifications

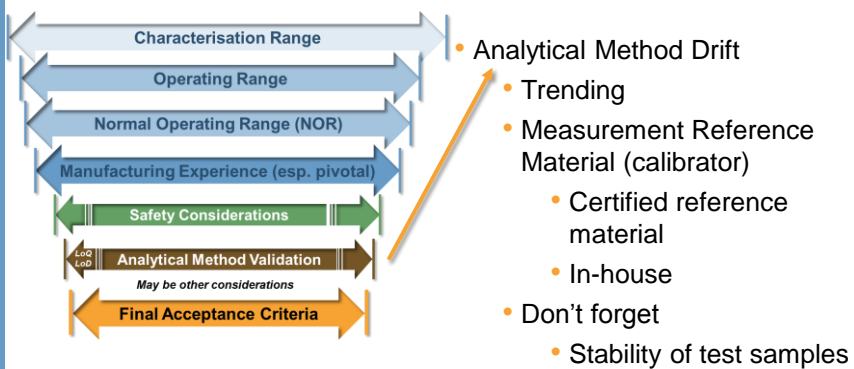


13



Consulting on Advanced Biologicals

JOS: Process Specifications



14



Consulting on Advanced Biologicals

Product Specification (hard) Example: Potency

- ✓ Characterisation range
 - ✓ Hard to determine
 - ✓ Helpful to have *in vivo* pharmacology model/potency assay
 - ✓ Ability to test non/sub-potent product
 - ✓ Confirm *in vitro* potency/surrogate potency measures can identify non/sub-potent product
 - ✓ *Ex vivo* organ/tissue culture models
 - ✓ Bioassays
 - ✓ Surrogate potency measures
- ✓ Identify at least a threshold for potency (potent or not)
- ✓ Look for correlation to clinical outcome measures

15



Consulting on Advanced Biologicals

Warning!

Just because your potency assay is quantitative for an analyte doesn't mean it is quantitative of potency.

- The *measurand* may also not directly correlate to potency
- Potency determination may need to be multi-parameter
- Not all parameters will be quantitative measurements
 - E.g. threshold when measuring mRNA or cytokine/GF level of cell population

16



Consulting on Advanced Biologicals

ICH Q6B: JOS

- The setting of specifications for DS and DP is part of an overall control strategy which includes control of raw materials and excipients, IPC, process evaluation/validation, adherence to GMP, stability testing, and testing for consistency of lots. When combined in total, these elements provide assurance that the appropriate quality of the product will be maintained. **Since specifications are chosen to confirm the quality rather than to characterize the product, the manufacturer should provide the rationale and justification for including and/or excluding testing for specific quality attributes.**
- Specifications are linked to a manufacturing process.
- Specifications should account for the stability of DS and DP.
- Specifications are linked to preclinical and clinical studies.
- Specifications are linked to analytical procedures.

17



Consulting on Advanced Biologicals

Conclusions

- ✓ Specifications are set to control and confirm the quality of the product for a specific qualified/validated process.
- ✓ Specifications are set based on manufacturing experience and all other relevant information.
- ✓ Specifications should be justified (sound reasons that can be explained).
 - ✓ Important to record reasons (development is a long process, key staff may turn-over)
 - ✓ Detailed JOS will be needed for approval and most will require data beyond averages from batch records.

18



Consulting on Advanced Biologicals