# THE EUROPEAN DIRECTORATE FOR THE QUALITY OF MEDICINES & HEALTHCARE (EDQM)







lame / Company	ATMP	Approval	Description / Indication
nondroCelect	TEP	2009 - 2016	Autologous cartilage cells / Repair of cartilage defects of the knee
ybera	GTMP	2012-2017	Alipogene tiparvovec (AAV-1 – Lipoproteine lipase gene) / Familial lipoprotein lipase deficiency (LPLD)
ACI	TEP	2013-2014	Autologous chondrocytes / Repair of cartilage defects of the knee
ovenge	CTMP	2013-2015	sipuleucel-T (autologous PBMC activated with PAP-GMSF colony-stimulating factor) / Prostate Cancer
loclar	TEP	2015	Autologous human corneal epithelial cells Moderate to severe limbal stem-cell deficiency caused by burns
lygic	GTMP	2015	Talimogene laherparepvec (HSV-1-derived virus GM-CSF) Melanoma
imvelis	GTMP	2016	Autologous CD34+ cells transduced with retroviral vector encoding the human adenosine deaminase (ADA) cDNA sequence ADA-SCID deficiency
ierox	TEP	2017	Spheroids of human autologous matrix-associated chondrocytes
fisel (darvadstrocel)	CTMP	2018	Expanded allogenic adipose-derived mesenchymal stem cells Treatment of perianal fistulas in patients with Crohn's disease
nriah (Tisagenlecleucel)	GTMP	2018	CD19-directed genetically modified autologous T-cell immunotherapy Treatment of B-cell precursor acute lymphoblastic leukemia that is refractory or in second or later relapse, relapsed or refractory (r/r) large B-cell lymphoma
carta icabtagene ciloleucel)	GTMP	2018	CD19-directed genetically modified autologous T cell immunotherapy Treatment of relapsed or refractory large B-cell lymphoma after two or more lines of systemic therapy
cturna pretigene neparvovec)	GTMP	2018	AAV vector-based gene therapy Treatment of biallelic RPE65 mutation-associated retinal dystrophy
itegio/LentiGlobin	GTMP	June 2019 Conditional MA	Autologous CD34+ cells transduced with a lentiviral vector encoding the human βAT87Q-globin gene Treatment of transfusion-dependent β-thalassemia (TDT) in patients with non-β0/β0 genotypes
1	,0	52 Cli	inical Trials srway Worldwide by End of Q3 2019 GENE THERAPY GENE THERAPY GENE-MODIFIED CELL THERAPY CELL THERAPY CELL THERAPY CELL THERAPY



Directive 2001/83/EC on medicinal products for human use
Directive 2001/83/EC on medicinal products for human use and amendments
♦ A biological medicinal product is a product, the active substance of which is a biological substance. A biological substance is a substance that is produced by or extracted from a biological source and that needs for its characterisation and the determination of its quality a combination of physicochemical-biological testing, together with the production process and its control.
Immunological medicinal products (e.g. vaccines, serums, allergens) Medicinal products derived from human blood and human plasma (e.g. albumin, coagulation factors, human immunoglobulins) Biotechnology products: e.g. Recombinant human proteins (e.g. insulin, growth hormone), Recombinant monoclonal Antibodies Advanced therapy medicinal products (ATMPs)
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Directive 2001/83/EC on medicinal products for human use
Directive 2001/83/EC on medicinal products for human use and amendments
A biological medicinal product is a product, the active substance of which is a biological substance. A biological substance is a substance that is produced by or extracted from a biological source and that needs for its characterisation and the determination of its quality a combination of physicochemical-biological testing, together with the production process and its control.
Any other substances used for manufacturing or extracting the active substance(s) but from which this active substance is not directly derived, such as reagents, culture media, foetal calf serum, additives, and buffers involved in chromatography, etc. are known as raw materials.
=> Essential and overarching directive, but not sufficient to address all types of biologics
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ATMP regulatory framework	
<ul> <li>Regulation 1394/2007 (overarching legislation for ATMPs)</li> <li>Creation of the Committee for Advanced Therapies (CAT) within the EMA</li> <li>European centralised procedure for MA, to benefit from the pooling of expertise from EU mem states</li> <li>Hospital exemption under strict rules</li> </ul>	ıber
+ Amendments of Directive 2001/83/EC (e.g. Commission Directive 2009/120/EC) (include specific rules concerning the authorization, traceability and pharmacovigilance of ATMPs)	
<ul> <li>+ Guidelines on Good Manufacturing Practice for Advanced Therapy Medicinal Products (22/11/2017</li> <li>+ Additional legislation and guidelines on GLP, GMP, clinical trials, Pharmacovigilance, Medical device</li> <li>+ EMA Guideline on human cell-based medicinal products</li> <li>+ European Pharmacopoeia texts</li> </ul>	') 25
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## Ph. Eur. texts applicable to gene and cell therapies

#### **General overarching texts**

5.14 Gene transfer medicinal products for human use 5.2.12 Raw materials of biological origin for the production of cell-based and gene therapy medicinal products

#### Monographs

Bovine serum (2262) Human haematopoietic stem cells (2323)

### **Methods: numeration & viability**

2.7.23 Numeration of CD34+/CD45+ cells in haematopoietic products 2.7.24 Flow cytometry

- 2.7.28 Colony-forming cell assay for human haematopoietic progenitor cells
- 2.7.29 Nucleated cell count and viability
- 2.6.35 Quantification and characterisation of residual host-cell DNA

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#### !! Monographs on Insulins (0838, 1637, 1638), G-CSF (2206), GM-CSF (1641), Erythropoietin (1316), Interferon gamma (1440), Trypsin (0694) define requirements for substances used as APIs and might not be adapted for use as raw materials

2.6.1 Sterility

2.6.14 Bacterial endotoxins

2.6.7 Mycoplasmas

5.1.7 Viral safety

5.2.8 (TSE)

2.6.30 Monocyte-activation test

Microbiology aspects & viral safety

5.1.6 Alternative methods for control of microbiological quality

## 2.6.27 Microbiological examination of cell-based preparations edom 0









1. Scope	
2. Risk A	sessment
3. Gener	al requirements
Or	gin, Production, General quality requirements (ID/Tests/Assay/Ref. Mat-batch), Storage, Labelling
4. Sera a	Id serum replacements (incl. Blood and other cellular components, platelet lysates, conditioned media)
	4.1 Definition / 4.2 Production / 4.3 Identification / 4.4 Tests / 4.5 Assay
5. Protei	is produced by recombinant DNA technology (incl. Growth actors, cytokines, hormones, enzymes and mAbs)
	5.1 Definition / 5.2 Production / 5.3 Identification / 5.4 Tests / 5.5 Assay
6. Protei	is extracted from biological material incl. enzymes (e.g. trypsin), polyclonal Abs, other proteins (e.g. albumin), peptides
	6.1 Definition / 6.2 Production / 6.3 Identification / 6.4 Tests / 6.5 Assay
7 Vect	Drs.

### 5.2.12 - Introduction

- Published for information: not legally binding but reflects the consensus of Ph. Eur. member states
- Biological nature triggers the need for specific quality requirements
- Clarify the responsibility
- Address the quality of raw materials at early stage of development to avoid extra work
- Risk-based evaluation of the impact of the raw material on the medicinal product

5.2.12 Raw materials of biological origin for the production of cell-based and gene therapy medicinal products

1. Scope

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Raw materials are used for manufacturing or extracting the active substance(s) but <u>are not intended</u> to form part of the active substance

<ul> <li>Applies to:</li> <li>sera and serum replacement;</li> <li>proteins produced by recombinant DNA technology;</li> <li>proteins extracted from biological materials;</li> <li>vectors.</li> </ul>	<ul> <li>Not in the scope:</li> <li>chemically synthesised raw materials: e.g. basal media (purely composed of chemicals);</li> <li>synthetic peptides or polynucleotides;</li> <li>medical devices and plastics.</li> </ul>

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5.2.12 Raw materials of biological origin for the production of cell-based and gene therapy medicinal products Scope 1. 2. **Risk Assessment** 2. RISK ASSESSMENT Evaluation of the impact of the raw material on the quality, safety and efficacy of cell-based/gene therapy medicinal products must be performed by the user of the raw material. No single measure or combination of measures can guarantee the quality, functionality and safety of a raw material for its intended use. Therefore, a risk assessment must consider Evaluation of the impact must be performed by the user the biological origin and traceability of the raw material, the production steps applied to it and the ability of the drug Origin and traceability material from the final medicinal product. Risk factor must be evaluated in relation to the Any risk factor must be evaluated in relation to the clinical benefit/risk of the cell-based or gene therapy medicinal clinical benefit/risk product. When evaluating the risk posed by the raw material to the final medicinal product, the exposure of a patient to residual amounts of raw material with potential harmful effects (e.g. adverse immune reactions) should be considered in relation to the clinical benefit/risk of the cell-based or gene therapy medicinal product. edom 16 ©2020 EDQM, Council of Europe. All rights reserved.



1.	Scope	
2.	Risk Assessment	
3.	General requirements	
	Origin, Production, General quality r	equirements (ID/Tests/Assay/Ref. Mat_batch), Storage, Labelling
	Risks to be minimized	Due to the inherent risk of transmitting adventitious agents, it is recommended to minimise, wherever possible, the use of raw materials of human or animal origin. If such raw materials are required for the production of cell-based/gene therapy medicinal products, appropriate measures are taken to minimise the risks of transmitting adventitious agents such as viruses, prions, bacteria and protozoa.
	Traceability required Donation <-> final product	For human blood and tissue-derived materials, only carefully evaluated donors who have been adequately tested for infectious transmissible agents may be used. These materials comply with appropriate EU and/or national legislation applicable to transplantation and transfusion. Traceability measures enable each donation to be followed from the donation to the raw material and to the final product, and vice-versa.

S	Scope				
F	Risk Assessment				
(	General requirements				
	Origin, <u>Production</u> , General quality requirements (ID/Tests/Assay/Ref. Mat_batch), Storage, Labelling				
	<ul> <li>Suitable quality management system</li> <li>Suitable in-process controls</li> <li>Sterility or known microbial contamination</li> <li>Additives</li> </ul>	<ul> <li>The production process is optimised to consistently minimise and/or remove adventitious agents and harmful impurities, whils retaining the quality of the raw material. This can be achieved using one or a combination of the following measures: <ul> <li>using validated inactivation/removal procedures such as gamma sterilisation or low pH during chromatography, where possible;</li> <li>demonstrating the ability of a production process to minimise, remove or inactivate adventitious agents or harmful impurities;</li> <li>testing for adventitious agents or harmful impurities.</li> </ul> </li> <li>A raw material is sterile and produced under aseptic conditions and/or subject to terminal sterilisation, unless otherwise justified. If the raw material is not sterile, the level of microbial contamination must be known.</li> <li>Additives, such as stabilisers, may be added to the raw material. In cases where antibiotics and stabilisers of biological origin are used in the production of the raw material, their presence is justified and careful consideration is given to their selection, use, quality and concentration in the raw material, as well as their impact on the actual raw material itself.</li> </ul>			

5.2.12 Raw materials of biological origin for the production of cell-based and gene therapy medicinal products



Scope	
Risk Assessment	
General requirements	
Origin, Production, General quality requirements (II	D/ <u>Tests</u> /Assay/Ref. Mat_batch), Storage, Labelling
<ul> <li>3-3-2. TESTS</li> <li>Tests that may be applicable to raw materials include the following (see also the sections below for specific raw materials):</li> <li>Appearance. Liquid or reconstituted freeze-dried raw materials comply with the limits defined for the particular raw material with regard to degree of opalescence (2.2.1) and degree of coloration (2.2.2).</li> <li>Solubility. Freeze-dried raw materials dissolve completely in the prescribed volume of reconstituting liquid within a specified time, at a specified temperature, as defined for the particular raw material.</li> <li>Osmolality (2.2.35): within the limits defined for the particular raw material.</li> </ul>	<ul> <li>Total protein (2.5.33): within the limits defined for the particular raw material.</li> <li>Related substances. The content of product-related substances is within the limits defined for the particular raw material.</li> <li>Microbiological control. Depending on the raw material concerned, it complies with the test for sterility (2.6.1) or the microbial contaminants. Depending on the raw material concerned, relevant virus contamination is determined.</li> <li>Bacterial endotoxins (2.6.14): less than the limit defined for the particular raw material.</li> <li>Mycoplasmas (2.6.7). Raw materials are free from mycoplasmas.</li> </ul>
<ul> <li>pH (2.2.3): within the limits defined for the particular raw material.</li> <li>Elemental impurities: within the limits defined for the</li> </ul>	Stabiliser.         Where applicable, it complies with the limits defined for the particular raw material.           Water         (2.5.12).         Freeze-dried raw materials comply with the limits defined for the particular raw material.

5.2.12 Raw materials of biological origin for the production of cell-based and gene therapy medicinal products 1. Scope **Risk Assessment** 2. 3. General requirements Origin, Production, General quality requirements (ID/Tests/Assay/Ref. Mat\_batch), Storage, Labelling 3-3-3. ASSAY Content. The content (e.g. protein content)/composition of the raw material is determined by an appropriate qualified method. Biological activity. Where relevant, the biological activity is determined by a suitable assay. Where relevant (e.g. for enzymes), the biological activity is expressed per milligram of total protein (specific activity). edom 23 ©2020 EDQM, Council of Europe. All rights reserved.



Scope
Risk Assessment
General requirements
Origin, Production, General quality requirements (ID/Tests/Assay/Ref. Mat_batch), Storage, Labelling
Sera and serum replacements
4.1 Definition / 4.2 Production / 4.3 Identification / 4.4 Tests / 4.5 Assay
Proteins produced by recombinant DNA technology
5.1 Definition / 5.2 Production / 5.3 Identification / 5.4 Tests / 5.5 Assay
e.g. growth factors, cytokines, hormones, enzymes, monoclonal antibodies
Specific activity of the produced proteins
Supplementary tests for derived proteins, residual host-cell or vector DNA, related proteins

1.	Scope
2.	Risk Assessment
3.	General requirements
	Origin, Production, General quality requirements (ID/Tests/Assay/Ref. Mat_batch), Storage, Labelling
4.	Sera and serum replacements
	4.1 Definition / 4.2 Production / 4.3 Identification / 4.4 Tests / 4.5 Assay
5.	Proteins produced by recombinant DNA technology
	5.1 Definition / 5.2 Production / 5.3 Identification / 5.4 Tests / 5.5 Assay
6.	Proteins extracted from biological material
	6.1 Definition / 6.2 Production / 6.3 Identification / 6.4 Tests / 6.5 Assay
	e.g. enzymes, polyclonal Abs, other proteins (e.g. albumin)
	Supplementary tests for process-related impurities
	Assay for protein content and biological activity

1.	Scope		
2.	Risk Assessment		
3.	General requirements		
	Origin, Production, General quality requirements (ID/Tests/Assay/Ref. Mat_batch), Storage, Labelling		
4.	Sera and serum replacements		
	4.1 Definition / 4.2 Production / 4.3 Identification / 4.4 Tests / 4.5 Assay		
5.	Proteins produced by recombinant DNA technology		
	5.1 Definition / 5.2 Production / 5.3 Identification / 5.4 Tests / 5.5 Assay		
6.	Proteins extracted from biological material		
	6.1 Definition / 6.2 Production / 6.3 Identification / 6.4 Tests / 6.5 Assay		
7.	Vectors		













First version	2.6.27. MICROBIOLOGICAL CONTROL OF CELLULAR PRODUCTS	2.6.27. MICROBIOLOGICAL EXAMINATION OF CELL-BASED
	GENERAL PRECAUTIONS GROWTH PROMOTION TEST METHOD VALIDATION TESTING OF THE PREPARATION TO BE EXAMINED OBSERVATION AND INTERPRETATION OF RESULTS	<ol> <li>INTRODUCTION</li> <li>SAMPLE COMPOSITION</li> <li>SAMPLE COMPOSITION</li> <li>SAMPLE SIZE</li> <li>A. RATIONALE FOR METHOD SELECTION</li> <li>GENERAL CONSIDERATIONS</li> <li>GENERAL PRECAUTIONS</li> <li>GENERAL PRECAUTIONS</li> <li>C. HANDLING CONSTRAINTS</li> <li>SAMPLE SIZE</li> <li>Sampling</li> <li>METHODS FOR MICROBIOLOGICAL EXAMINATION OF CELL-BASED PREPARATIONS</li> <li>I. AUTOMATED GROWTH-BASED METHOD</li> <li>I.I. Growth promotion test</li> <li>I.S. Testing of the preparation to be examined</li> <li>I.4. Observation and interpretation of results</li> <li>2. ALTERNATIVE METHODS</li> <li>J. Combination of preculturing and detection by alternative methods</li> <li>J.2. Direct detection by alternative methods (5.1.6)</li> <li>J.2. Method validation</li> </ol>
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## 3-1-2. Method suitability

### • New: Supplement 10.3

A clarification has been carried out in section 3-1-2. Method suitability. This section has been modified to avoid confusion between 'validation' and 'confirmation of the suitability of the method' for the automated growth-based method. The critical parameters described are to be verified as part of confirmation of method suitability.

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3-1-2. Method suitability

For a validated automated growth-based method only a confirmation of the suitability of the method for the given cell-based preparation must be performed. The test system is validated with respect to specificity (absence of false positive results), sensitivity, reproducibility and robustness. Regardless of the type of cell-based preparation, the

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