



# Managing Accelerated Development Industry Experience

CASSS 2019 Cell & Gene Therapy Products Symposium

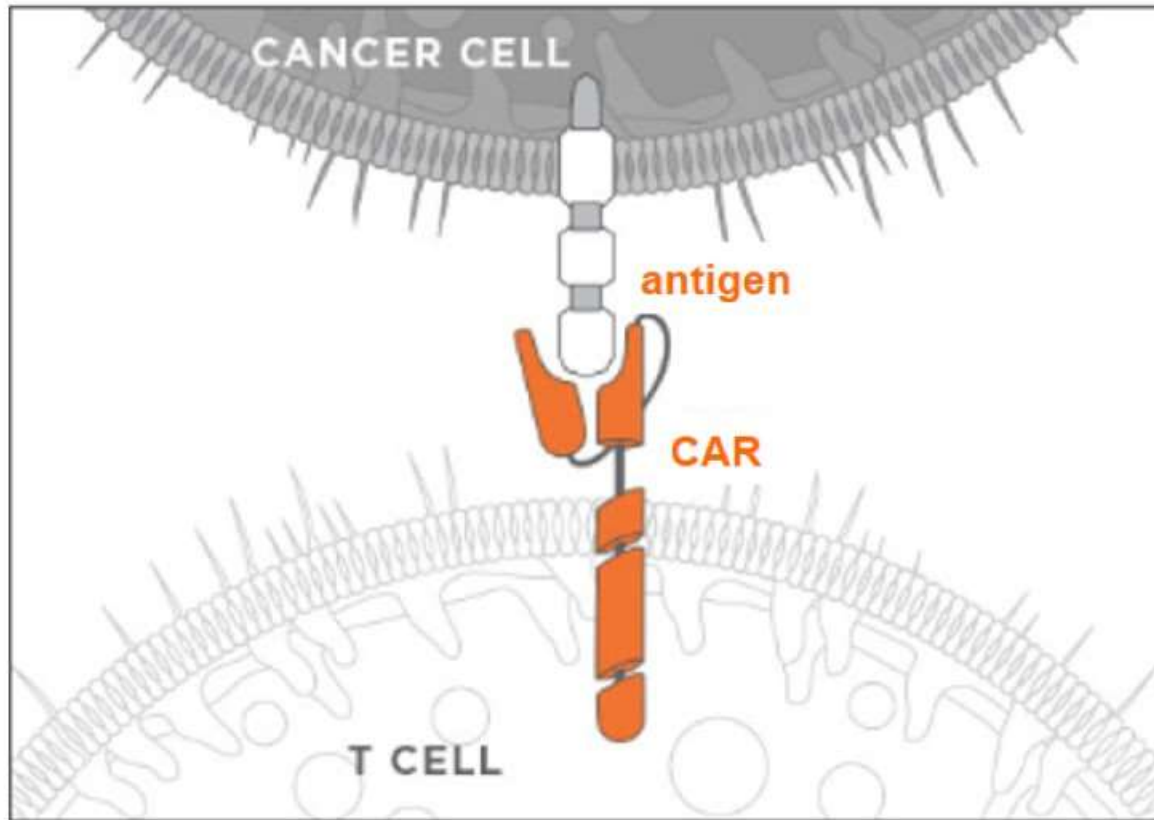
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# CAR T cell therapy



- **Transformative potential**
  - Rapid clinical development to help patients in need
  - Field in early stages

# Region-specific regulations for genetically modified cells

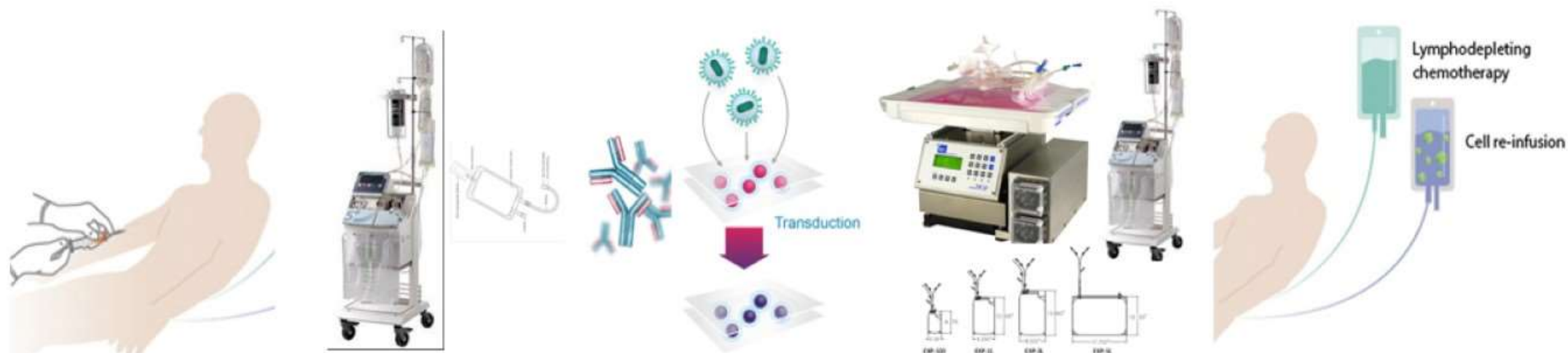
Additional measures to ensure environmental and patient safety  
prior to clinical trial initiation

- US
  - Up until August 2018, NIH had reporting requirements under Appendix M of the NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules
  - Apr 2019: Removal of these reporting requirements with NIH finalized
- EU
  - GMO applications required per country
- Japan
  - Strategic Consultations required prior to a Clinical Trial Notification for Regenerative Medicine products
  - Confirm product is not subject to the Cartagena Act in Japan

Understanding region-specific needs is critical for enabling global development



# Autologous CAR T cell manufacturing



Leukapheresis

PBMC  
Isolation

Cell Activation,  
and Transduction

Cell Expansion,  
Harvest,  
Cryopreservation

Infusion

Apheresis  
material obtained  
from patient via  
standard  
leukapheresis  
collection

PBMCs isolated

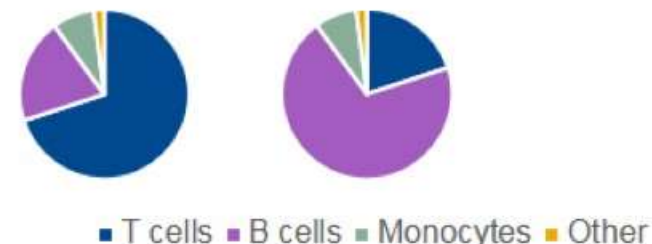
Culture initiated, T  
cells activated, and  
transduced with  
vector to insert  
CAR sequence

CAR T cells  
expanded to  
therapeutic dose,  
formulated and  
cryopreserved.  
QC/QA release

CAR T cells  
infused into  
patient after  
lymphodepleting  
chemotherapy

# Development challenges

- Variability in starting cell composition
  - Wide process variability
- Limited starting cell material
  - May require different approaches for process characterization and product characterization
  - Begin commercial planning while still in learning phase
- Vector manufacturing and cell processing require optimization in order to enable consistent commercial supply of the CAR T product
- Setting drug product specifications can be difficult since mechanism of action is not straightforward
- Limited platform and/or industry knowledge





# Keys to success

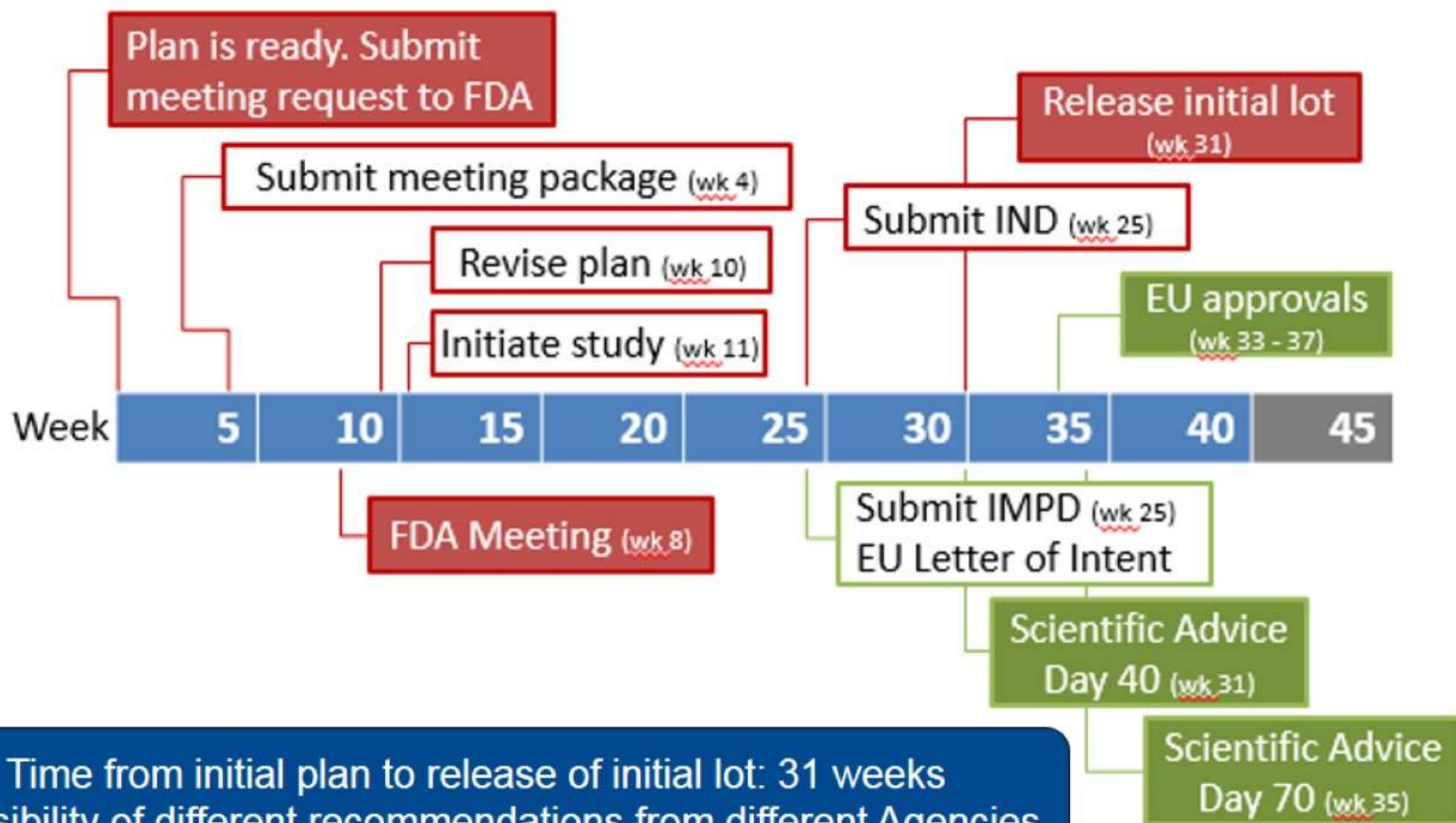
- Prioritization of CMC changes and implementation prior to pivotal trial
  - Addition of manufacturing sites?
  - Fresh or frozen starting cells?
  - Raw materials of biological origin to be replaced and/or dual sourced?
  - New analytical methods?
- Retain sufficient samples
- Proactive discussions with Agencies as needed
  - BTD and RMAT designation allow for timely interactions with the FDA
  - PRIME designated products have an early CHMP Rapporteur appointment and an EMA quality specialist
  - During clinical development of regenerative medicine products, CMC information is mainly communicated through preliminary meetings and consultations with the PMDA, which is different from other product categories in Japan

# Case study: site addition for an ATMP

- **Change: Manufacturing site addition for an autologous CAR T**
  - Vector or drug product for the pivotal trial manufactured at site A
  - Commercial vector or drug product to be manufactured at site B
- **Context**
  - Rapid development often requires manufacturing to start in site A
  - Understanding of the manufacturing process is evolving
- **Considerations**
  - Demonstration of analytical comparability is key
  - Clinical manufacturing experience at site B prior to commercial manufacturing is desirable
- **Approaches**
  - Separate formal Agency meetings
  - Frequent interactions with an Agency

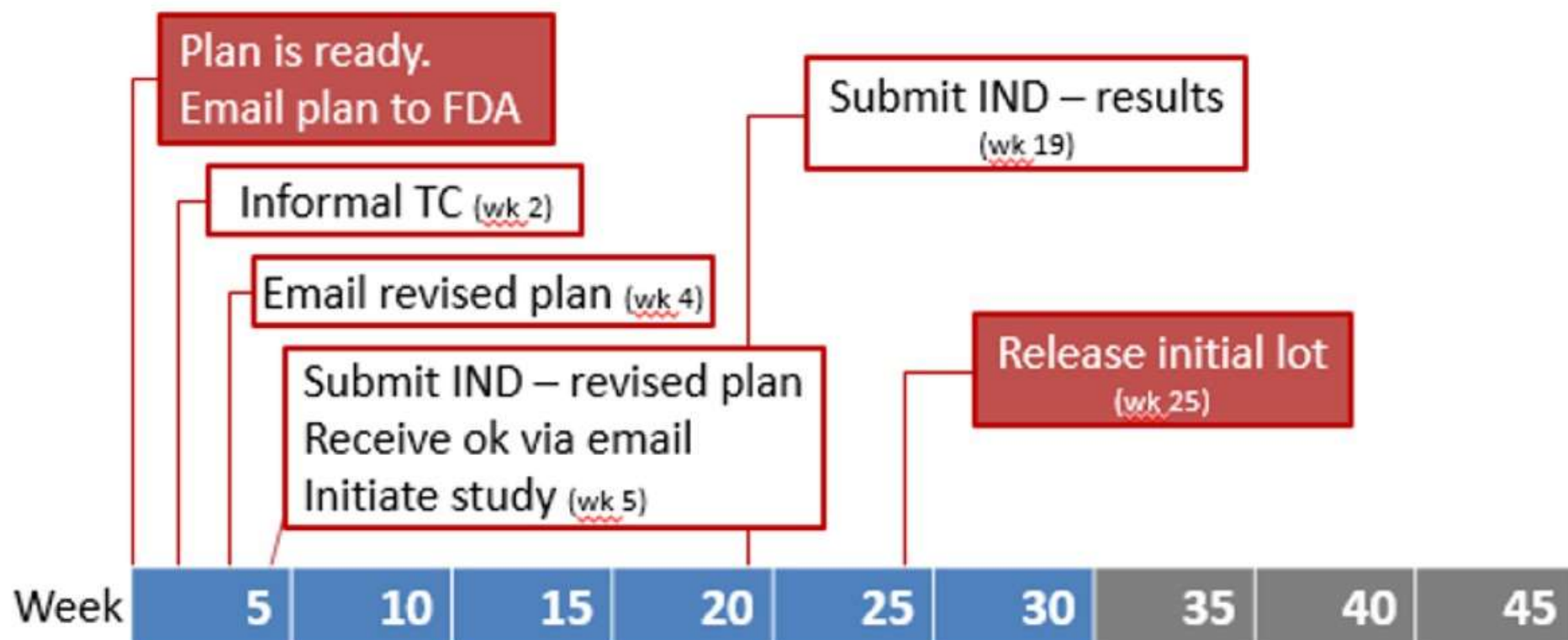


# Typical interaction during development: formal meetings





# Proactive, frequent interactions with Health Authorities



Time from initial plan to release of initial lot: 25 weeks  
Less risk due to confirmation of revised plan prior to execution  
Input from one Agency only

# Summary

- Regulatory tools to enable fast-to-market cell and gene therapy products
  - BTD, RMAT, PRIME designations help enable rapid development
  - Mechanism to confirm the best approach for asking questions is also helpful
- Additional efforts which could help expedite development
  - Standardization of analytical methods
  - Certification scheme for critical raw materials in the EU
  - Consultative advice