

Quality by Design & Protein Characterization

IsrAnalytica

Tel Aviv

February 8th, 2010

Steven Kozlowski, Director
Office of Biotechnology Products

OPS, CDER, FDA



Outline

- QbD for Biotech Products
- Characterization
- Quality Attributes, Safety & Efficacy

Some of the content is speculative and this talk should not be used in lieu of regulations, published FDA guidances and direct discussions with the agency

1902 Biologics Control Act

- The "Virus-Toxin Law,"
 - Regulatory authority over the processes used to make biological products, or biologics
 - Responsibility to ensure their safety
- Drivers for Law
 - A horse named Jim whose tetanus-contaminated serum was used to produce a diphtheria antitoxin that caused the deaths of thirteen children in St. Louis, Missouri.
 - Contaminated smallpox vaccine which killed nine children in Camden, New Jersey.

1938 Federal Food Drug & Cosmetic Act

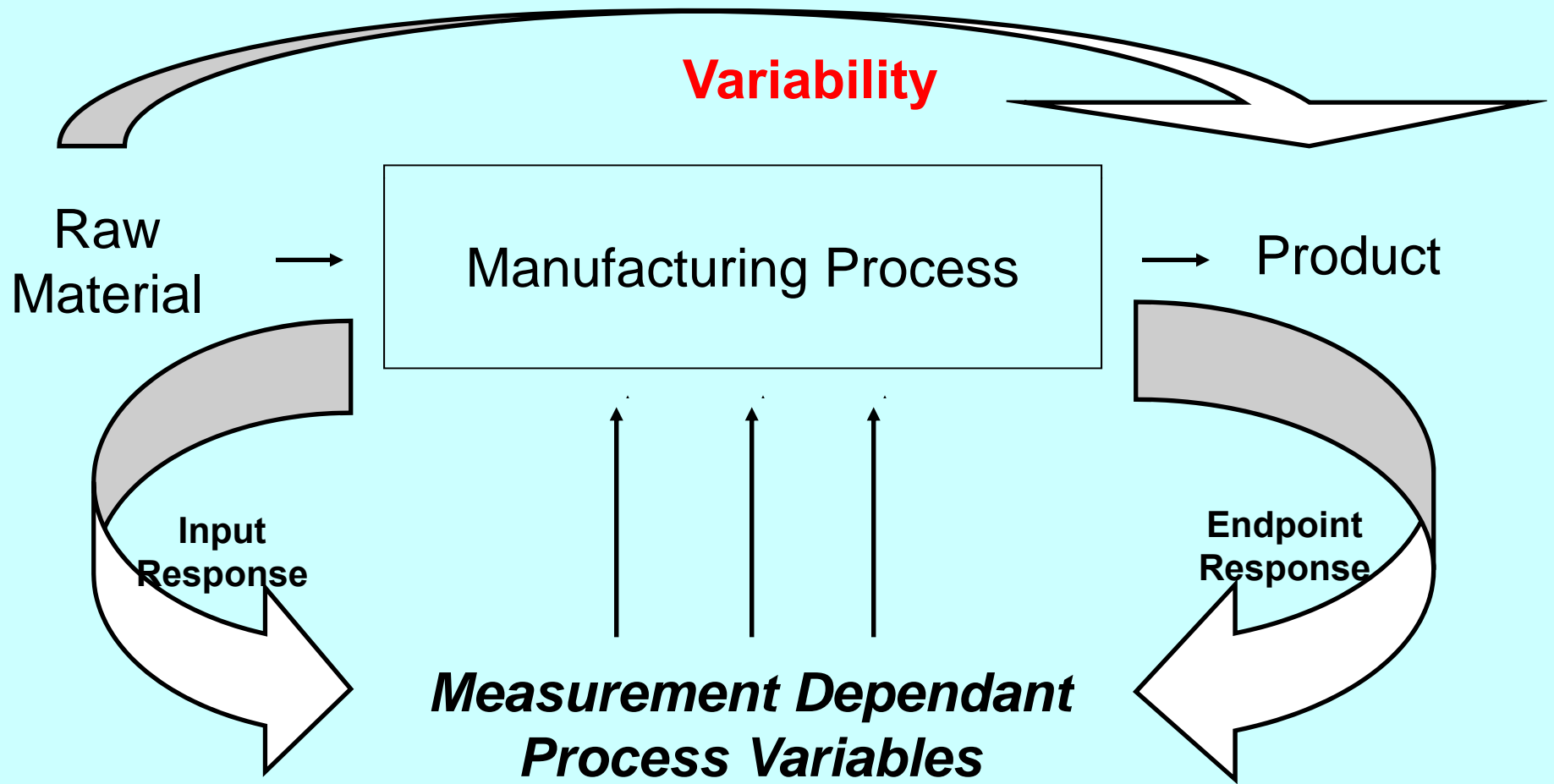
- New Drug Application (NDA)
 - Drug composition, manufacturing & quality
 - Report on safety
- Driver of Law
 - In 1937, S. E. Massengill Co., a pharmaceutical manufacturer, created a preparation of sulfanilamide using diethylene glycol (DEG) as a solvent, and called the preparation "Elixir Sulfanilamide"
 - More than 100 deaths
 - Under Pure Food & Drug Act of 1906
 - Just misbranded "Elixir"

Quality in the 21st Century

- In 2002, FDA identified a series of ongoing problems in pharmaceutical manufacturing problems
 - High costs regulatory compliance
 - Poor innovation & efficiency / Lack of agility
- Quality by Design (QbD)
 - A systematic approach to development that begins with predefined objectives and emphasizes product and process understanding and process control, based on sound science and quality risk management (ICH Q8R2)

Manufacturing Process

Biologics: The Process is the Product

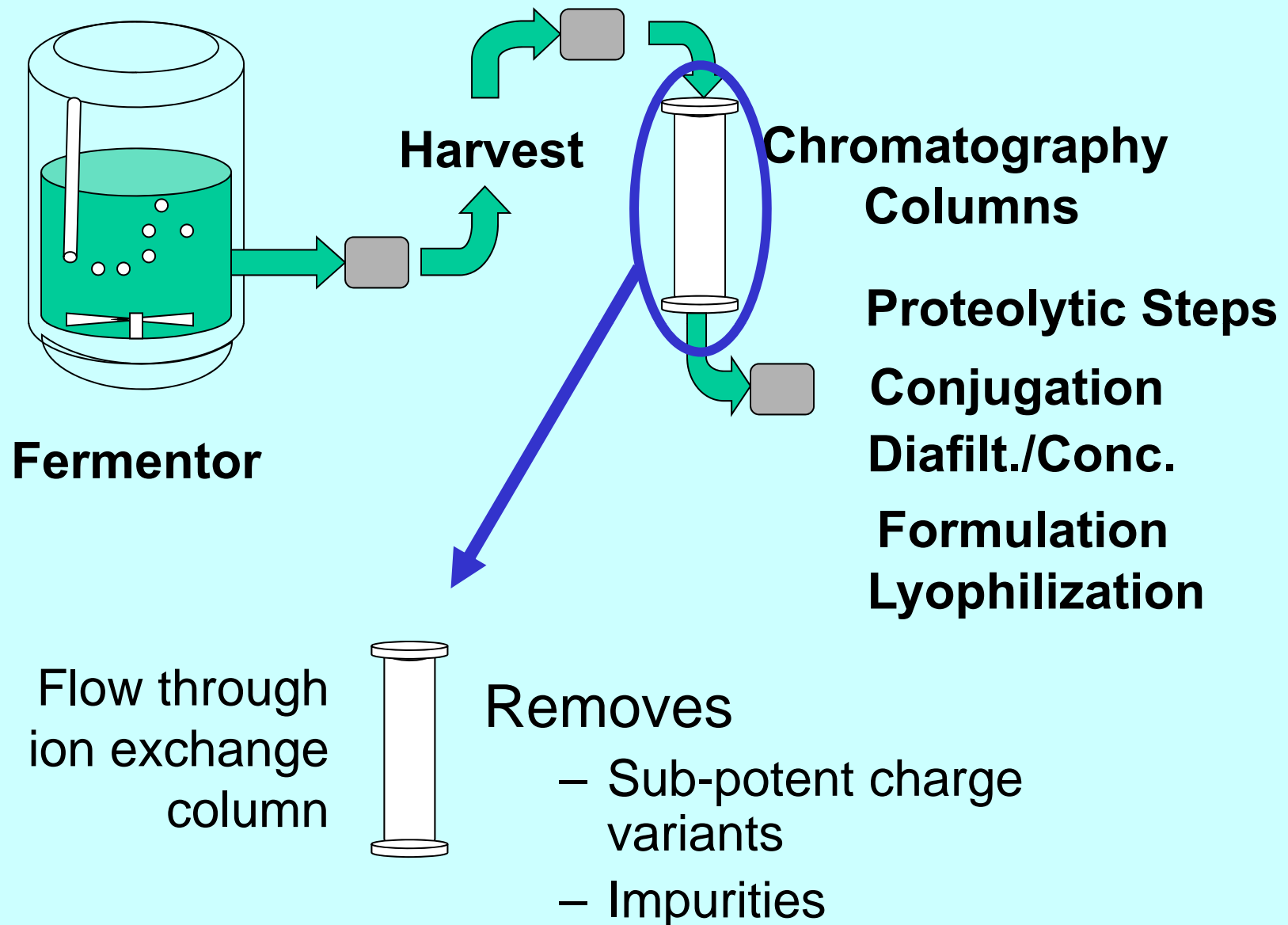


Jon Clark

ICH Q8R2: Design Space

- Definition
 - The multidimensional combination and interaction of input variables (e.g., material attributes) and process parameters that have been demonstrated to provide assurance of quality
- Regulatory Flexibility
 - Working within the design space is not considered a change
- Important to Notice
 - Design space is proposed by the applicant and is subject to regulatory assessment and approval

Biotechnology Manufacturing Process

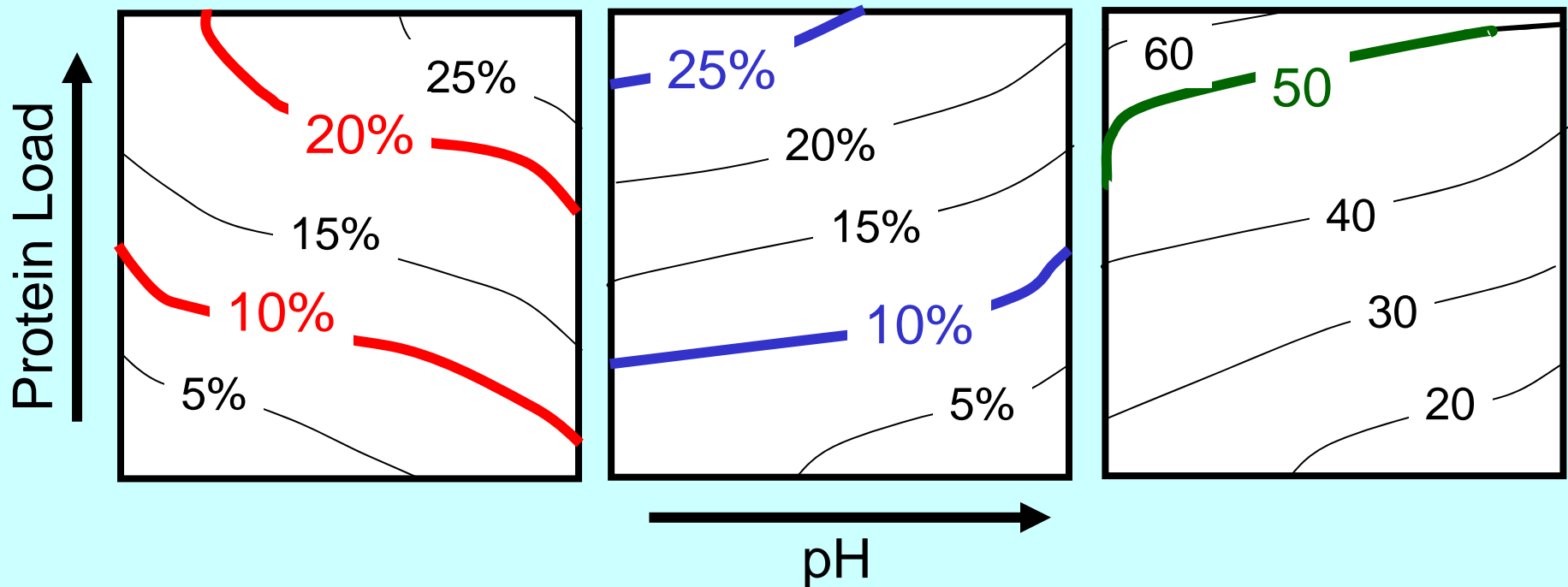


Surface Responses of Important Product Attributes

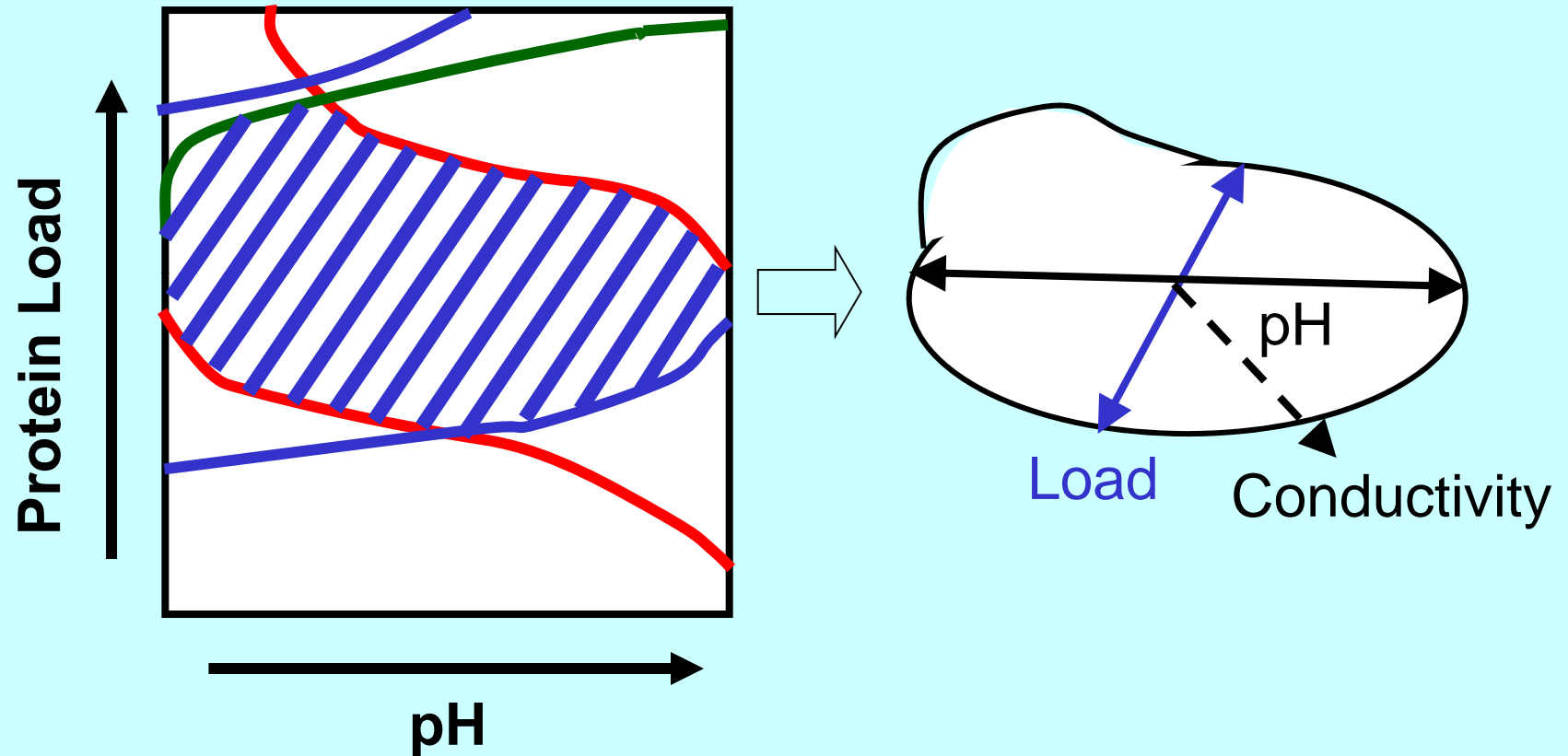
Basic Variants
10-20%

Acidic Variants
10-25%

Impurity
 ≤ 50 ng/mg

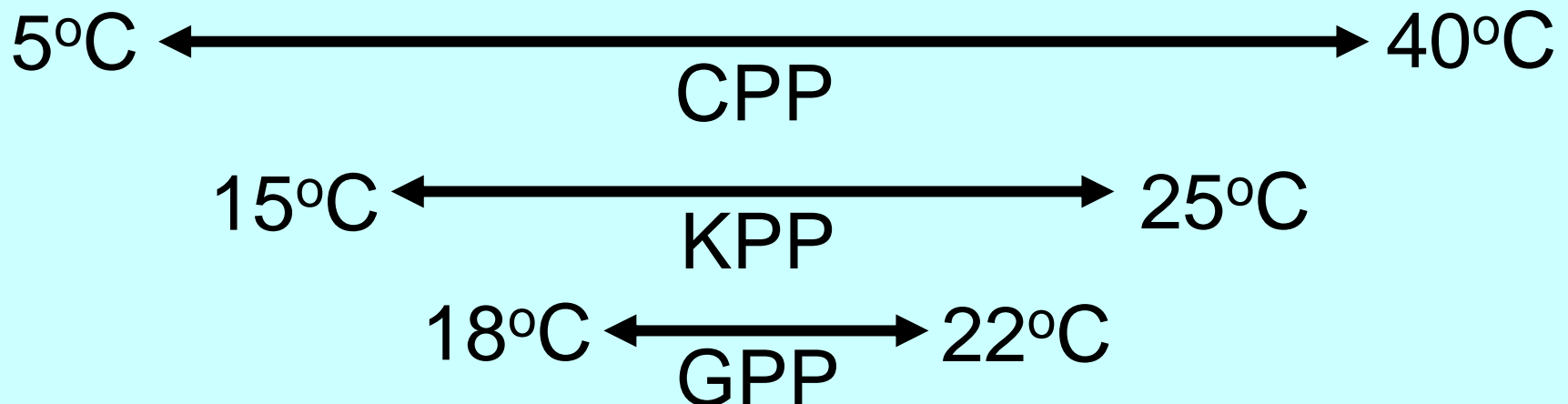


Overlay of Response Surfaces into an Initial Design Space



What is in the Design Space?

- **Critical Process Parameter (CPP):** A process parameter whose variability has an impact on a critical quality attribute and therefore should be monitored or controlled to ensure the process produces the desired quality. (ICH Q8R)
- How do we deal with uncertainty in impact?
- A CPP is a function of the range evaluated

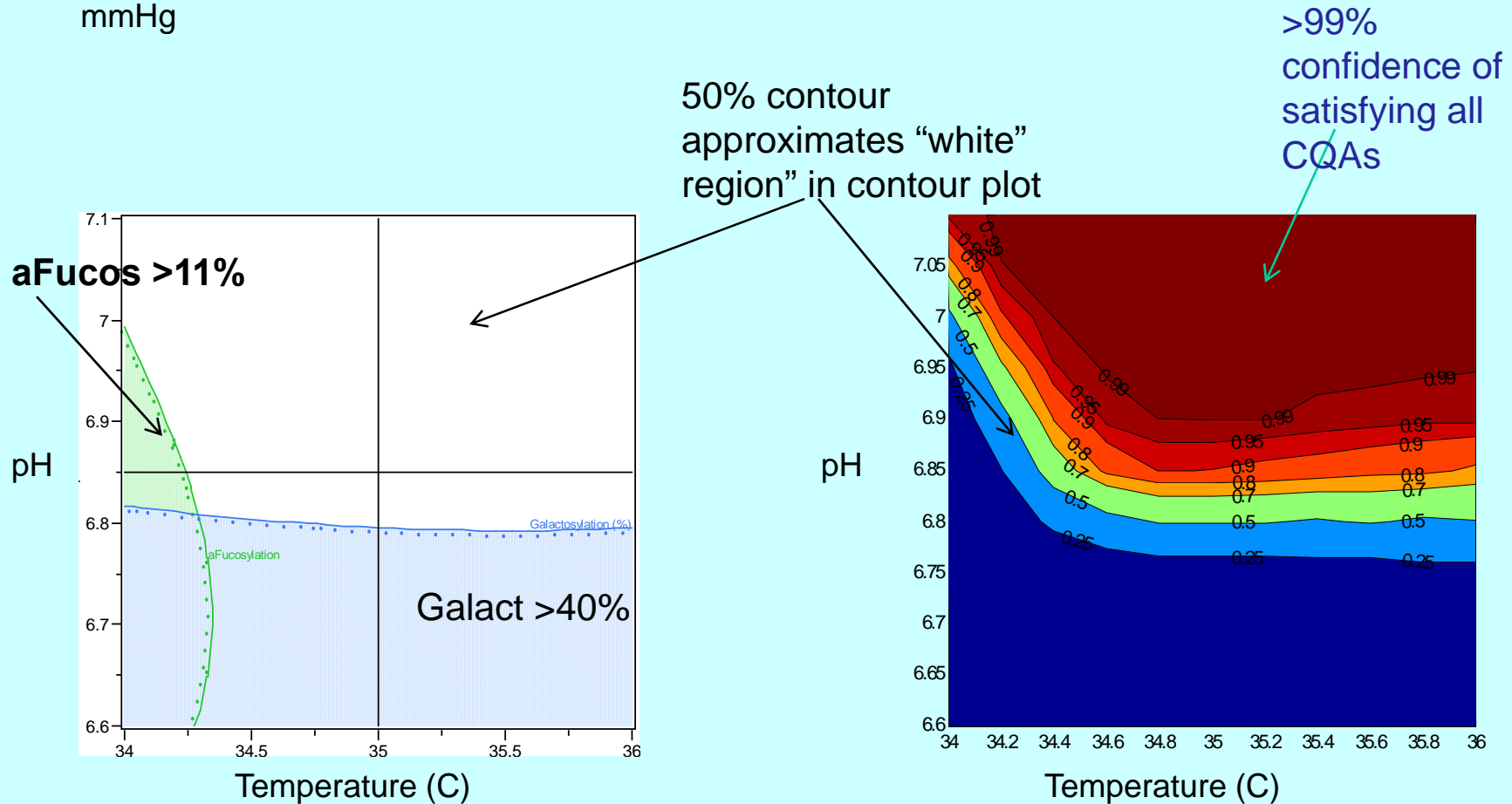


Initial Design Space Weaknesses

- Based on model (DOE)
 - Predictions are extrapolations
 - inside as well as outside explored space
- Missed factors
- Missed interactions at screening
 - Each factor alone has little impact
 - Larger risk with complex processes
 - A-Mab interaction risk score is of value
- Missed important responses
 - Larger risk with complex products
 - Interactions between responses
- Experiments done at lab scale

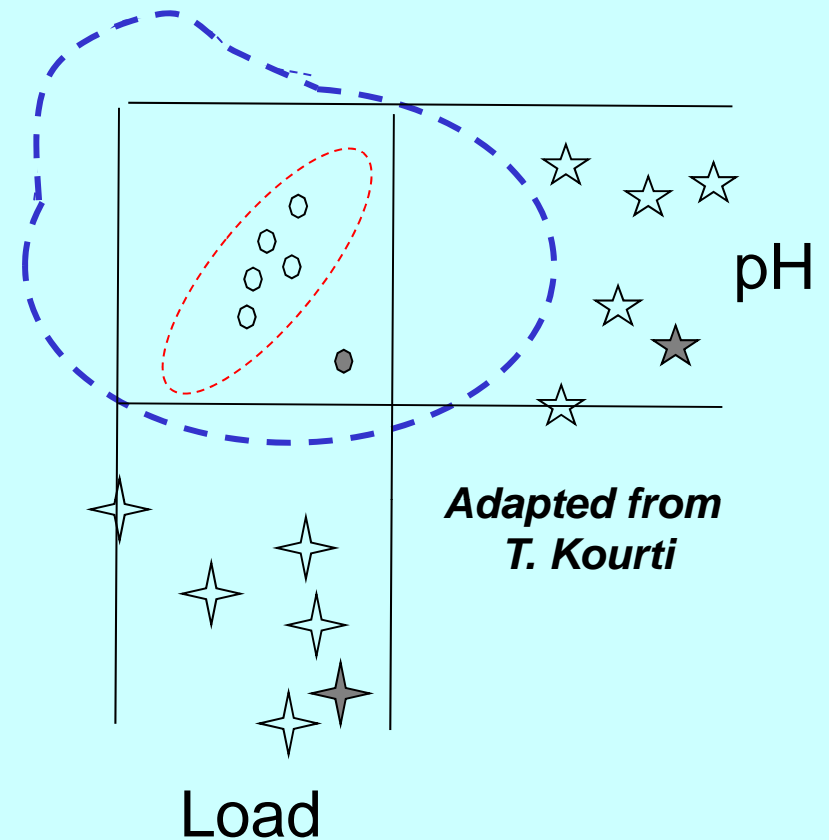
A-Mab Design Space Based on Process Capability Bayesian Reliability

Example: Day 15, Osmo=360 mOsm and pCO₂=40 mmHg



Lifecycle Approach

- Managing uncertainty
 - **Complex products**
 - **Complex processes**
 - **1st Prin. Models rare**
- Multivariate SPC
 - **Facilitates moving across scales**



Dimensionless
Variables

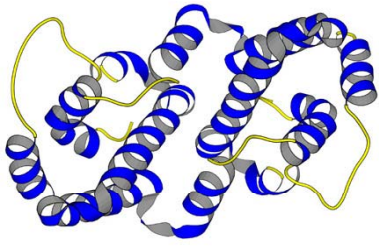
Engineering Approaches
To Modeling

QbD Implementation

- Link to small-molecule learnings
 - ONDQA pilot and application experience
- ICH IWG, Q8R, Q9, Q10
- ICH Q11
- OBP staff participating in conferences, forums and training on QbD
 - Design of Experiments Training
- **OBP Pilot**
- **Mock Case Studies**

Outline

- QbD for Biotech Products
- **Characterization**
- Quality Attributes, Safety & Efficacy

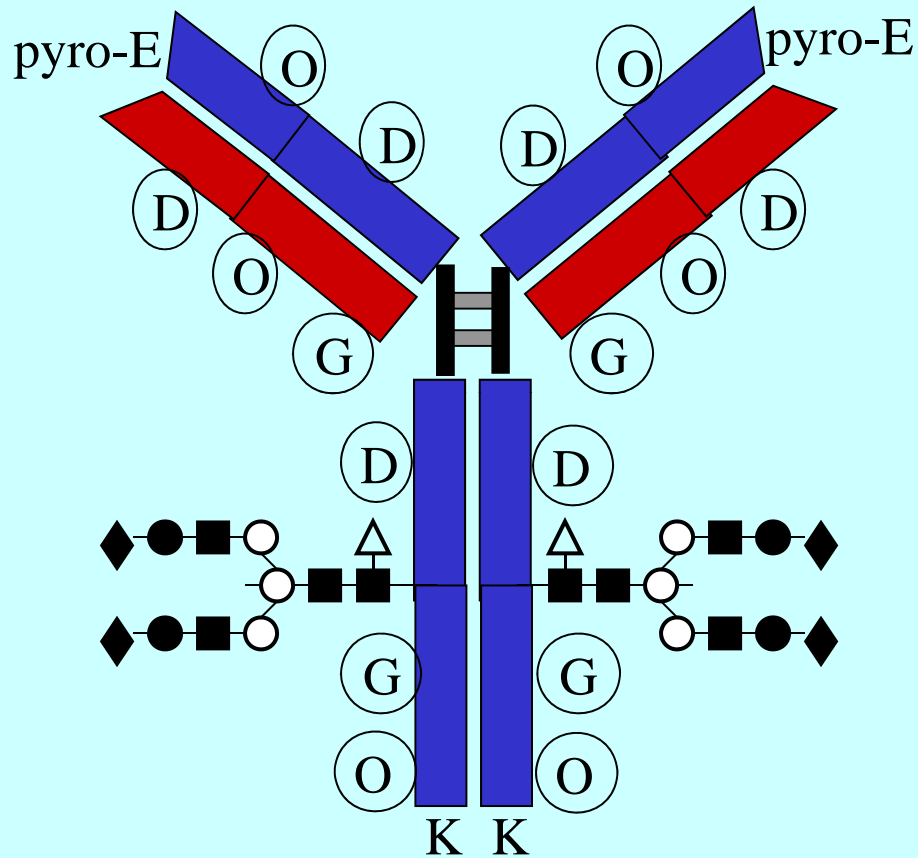


Protein Heterogeneity



- Amino Acid Substitution
- Truncation
- Folding
- Mismatched S-S bonds
- N- and C-terminal mods
- Aggregation
- Multimer Dissociation
- Denaturation
- Acetylation
- Fatty acylation
- Deamidation
- Oxidation
- Carbamylation
- Carboxylation
- Formylation
- γ -Carboxyglutamic acid
- O-linked Glycosylation
- N-linked Glycosylation
- Methylation
- Phosphorylation
- Sulphation
- Glycation

Attributes & Combinatorics



- Pyro-Glu (2)
- Deamidation (3 x 2)
- Methionine oxidation (3 x 2)
- Glycation (2 x 2)
- High mannose, Fucosylation G0, G1, G1, G2 (10)
- Sialylation (+5)
- C-term Lys (2)

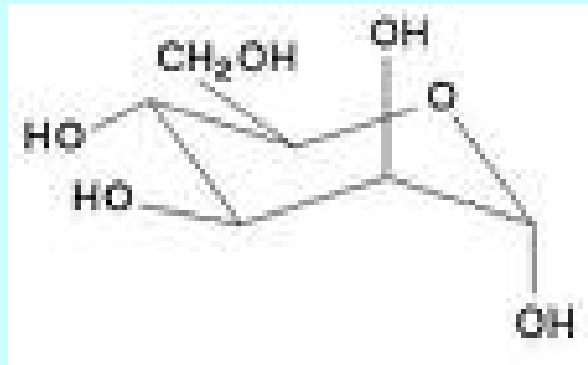
• $(8460)^2 \approx$
75 million

• $2 \times 6 \times 6 \times 4 \times (10+5) \times 2 = 8460$

Questions

- Do these matter?
- How much matters?
- Do combinations matter (interactions)?
- How independent are these attributes?

Glycosylation (N or O)



Mannose ○

Fucose △

Galactose ●

N-Acetyl-Glucosamine ■

Sialic Acid ◆

Antibody Glycosylation Effects

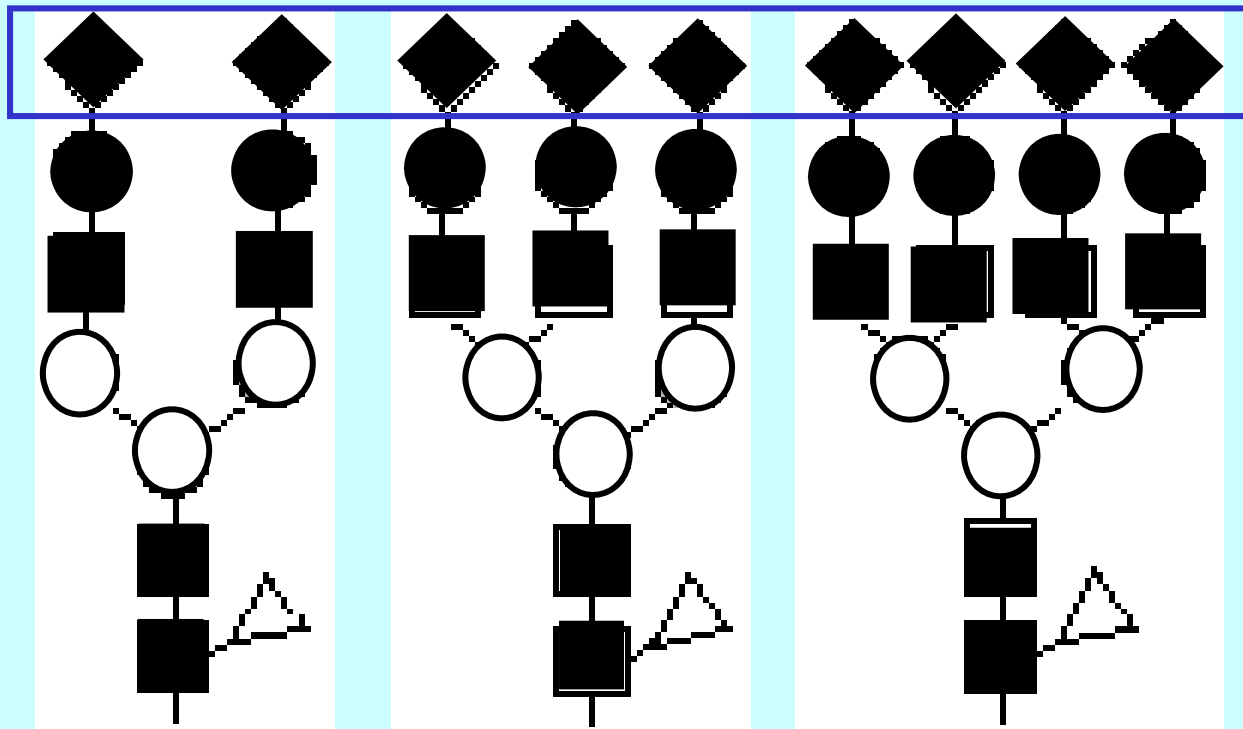
- Small amounts can matter
 - Defucosylation
 - 50-fold increase in FcR γ IIIa binding
 - Large increase in ADCC
- Interactions
 - Evaluation of defucosylation with three different oligosaccharide backbones
 - Glycobiology 2006 17:104
 - ADCC highest- Defucosyl-complex
 - ADCC intermediate- Defucosyl-hybrid, Fucosyl-complex, High mannose
 - ADCC lower- Fucosyl-hybrid

Antibody Glycosylation Questions

- Sialylation & defucosylation together?
 - Ipsilateral
 - Opposite half antibodies
- Dual versus single sialylation on each biantennary glycoform?
- Sialylation or defucosylation on both half antibody biantennary glycoforms?
- Location α 1-6 versus α 1-2 chains of biantennary complex?
- Approaches?
 - Modeling
 - Linking half antibody glycoforms together
 - Purification strategies

Protein Complex N-linked Glycans

- Tetraantennary species appear to contribute more to overall bioavailability (increased half life) of a protein product than tri-antennary structures

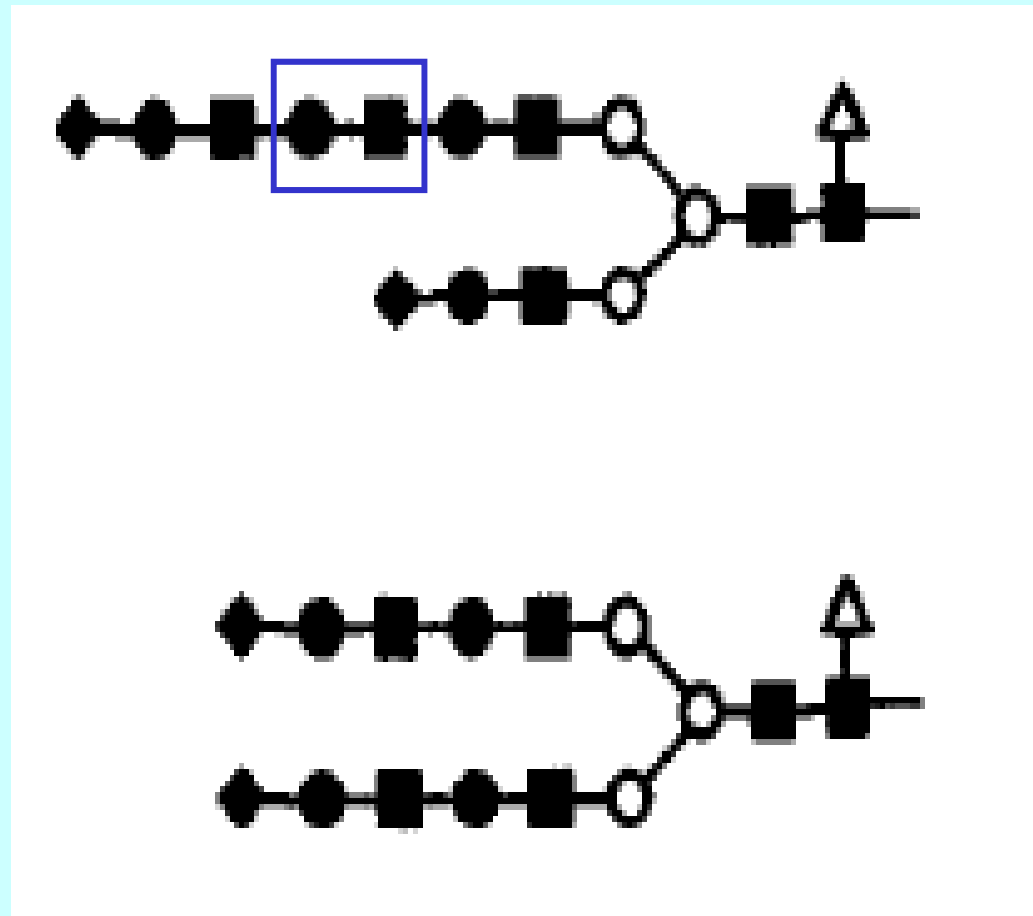


Terminal Sialic Acid (SA) prevents binding to asialoglycoprotein R, enhancing availability at other sites

- Small changes in tetraantennary content and the presence or absence of terminal SA can have a significant impact on bioavailability (potentially S & E)

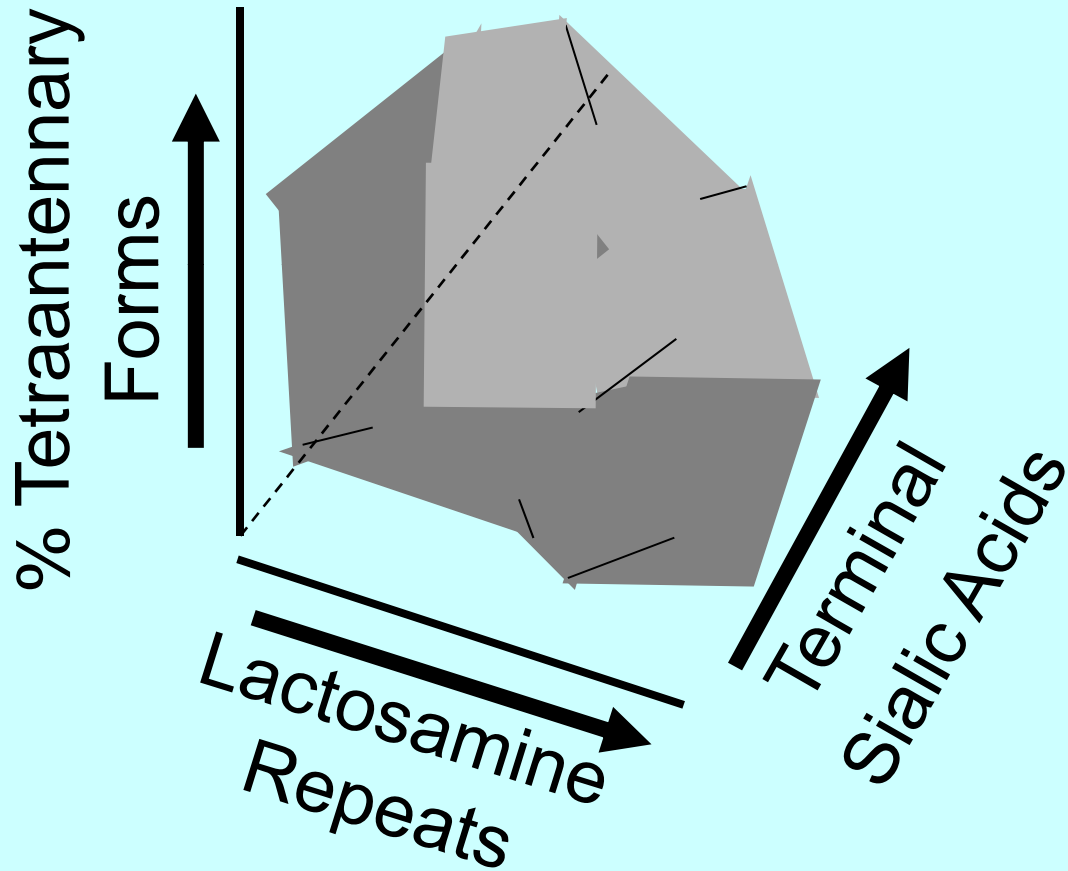
Complex N-linked Glycans

- Repeating units of N-acetyl glucosamine and galactose
- Elongation of the oligosaccharide leading to greater hydrodynamic radius
- Associated with increase in *in vivo* potency presumably via increased bioavailability



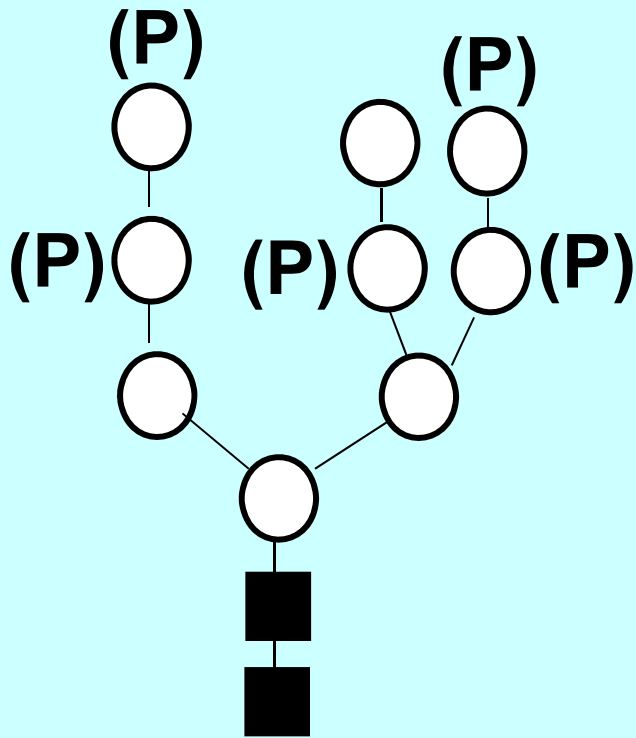
This & prior slide from Barry Cherney

Attribute Space



- Bioactivity
- Clearance

Lysosomal Enzymes



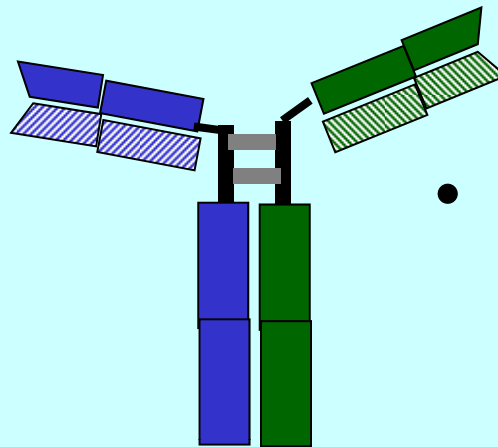
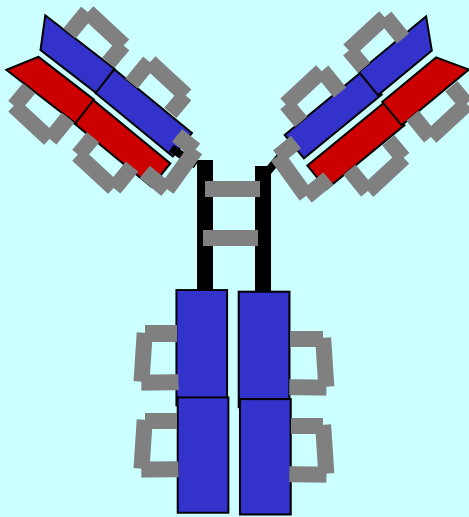
- Carbohydrate-remodeled acid alpha-glucosidase... demonstrates improved delivery to muscles of Pompe mice.
 - Biochem J. 2005 Aug 1;389(Pt 3):619-28.
- remodeled-rhGAA was internalized approx. 20-fold more efficiently
- Small amounts could matter

Interaction with other attributes that may impact activity?

Other Changes

- Gal- α 1-3-galactose
 - Cetuximab made in murine cells have this glycosylation-link to anaphylaxis (NEJM 2008 358:1109)
 - CHO cells can produce this glycosylation (Nat Biotech 2010 28:1153)
- Labile changes: O-GlcNAc
 - Cytoplasmic proteins: Some therapeutic proteins? Other labile changes?
- Total PEG content unchanged but a change in PEG distribution across sites changed PK > 2 fold

Antibodies & Disulfides



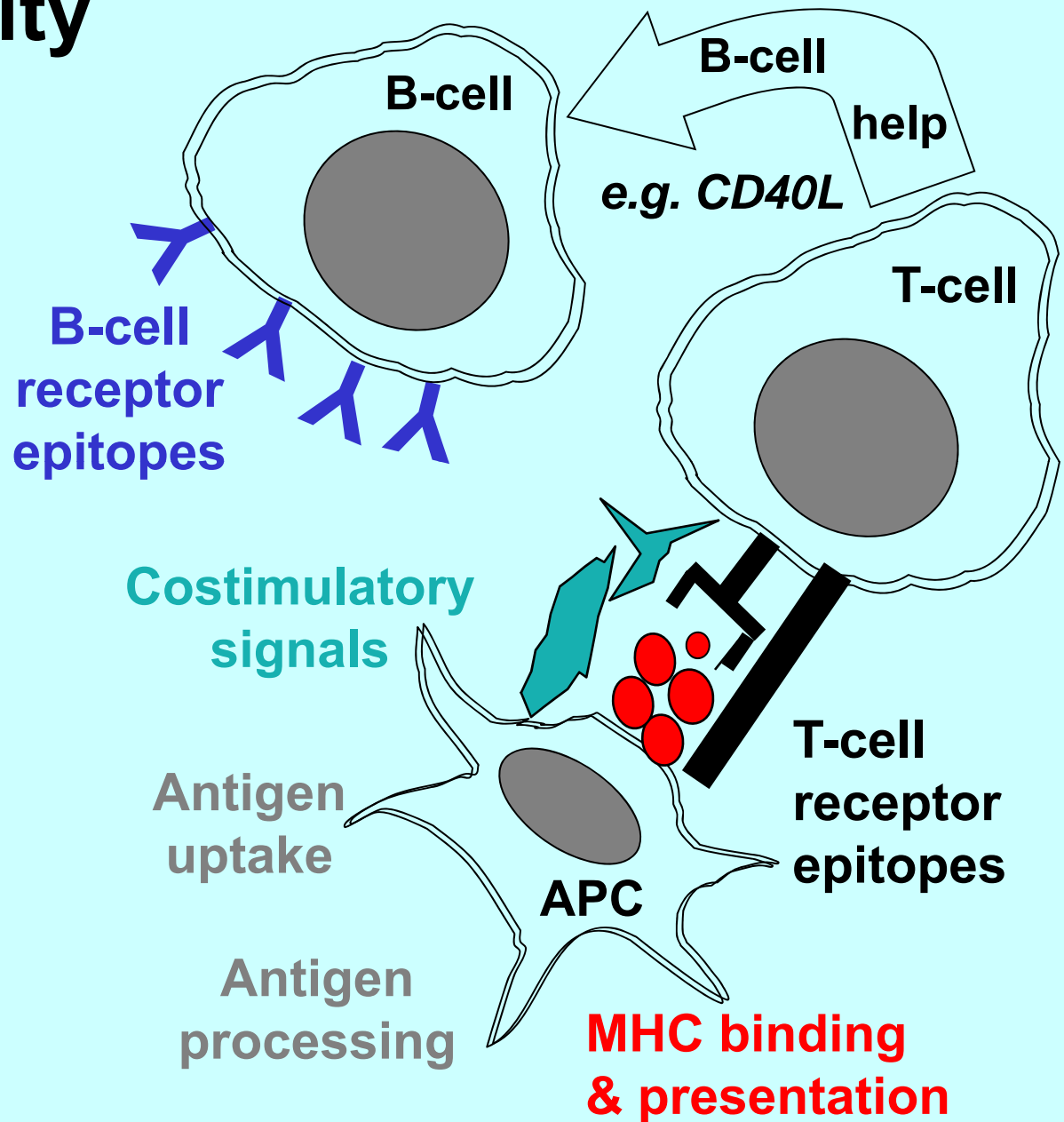
- IGG1 has 16 disulfide bonds with differential susceptibility to reduction
 - Can impact on stability & effector functions
 - *Anal. Chem.* 2010 82:5219
- Sensitive to manufacturing process
 - *Biotechnology & Bioengineering* 2010 106:452

- IGG4 short hinge
 - Labile inter-chain disulfide bonds with half-antibody exchange
 - *Immunology* 2002 105:19

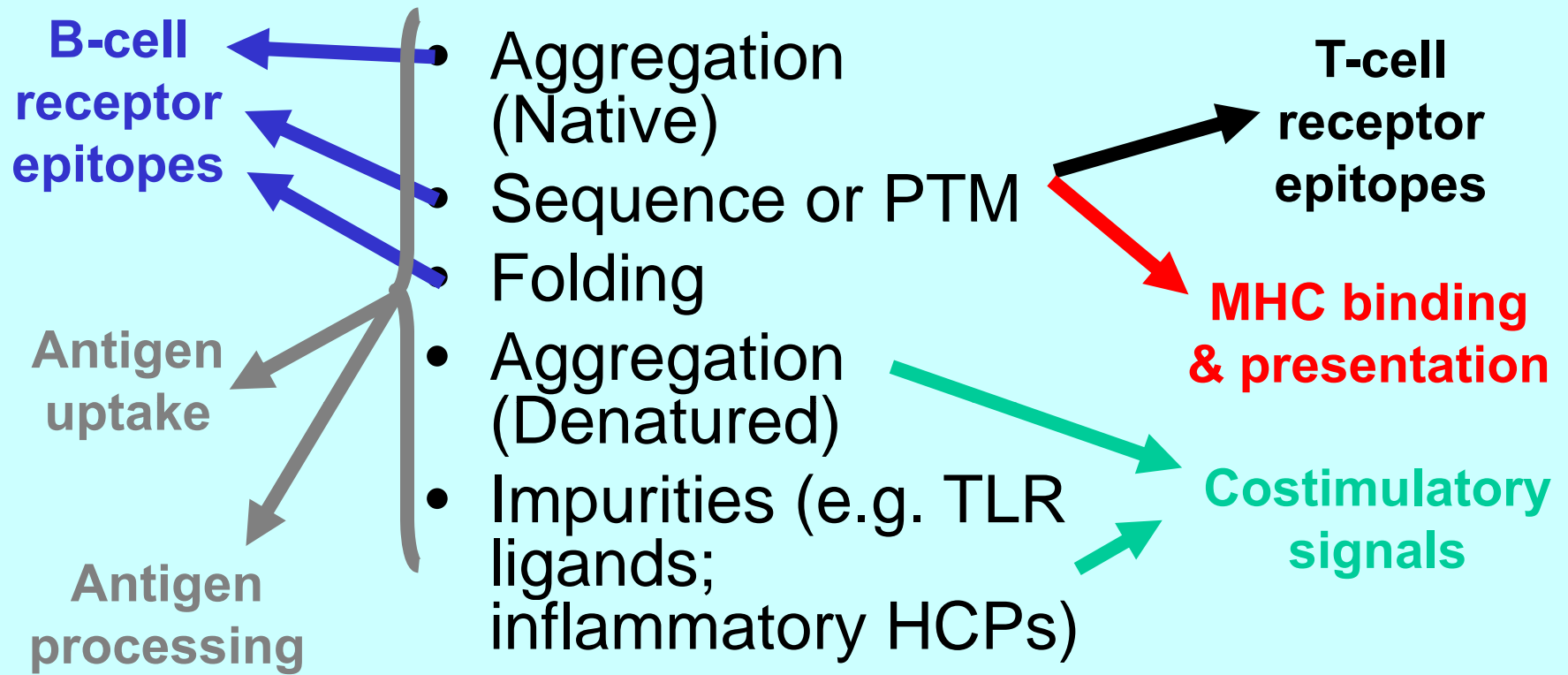
- IGG2-Disulfide form A converts to form B over time
 - *JBC* 2008 283:29266
- IGG2-Disulfide form B appears less potent than form A for some cell surface targets
 - Less effective bivalent binding?
 - *JBC* 2008 283:16212
- There is an IGG2 Disulfide form A/B
- Trisulfide bonds
 - *Anal. Chem.* 2009 81:6148

Immunogenicity

- There are many aspects to development of an immune response.
- These events often need to interact in a multi-dimensional way
- Protein attributes may impact one or many of these



Immunogenicity



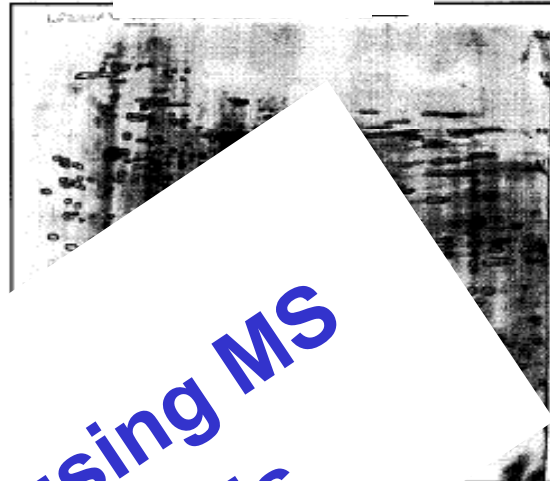
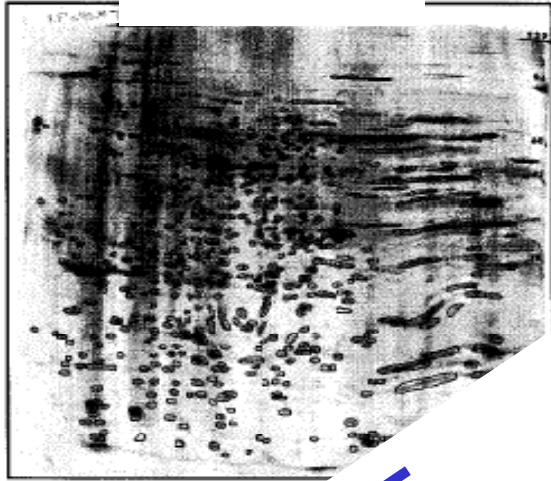
- *Citrullinated MBP digested at a greater rate by Cathepsin D*
- *Deamidation: linkage connecting isoaspartic acid residue and its C-terminus neighbor are not recognized by most proteases*
- *Truncation: revelation of cryptic sites*

Adapted from
Amy Rosenberg

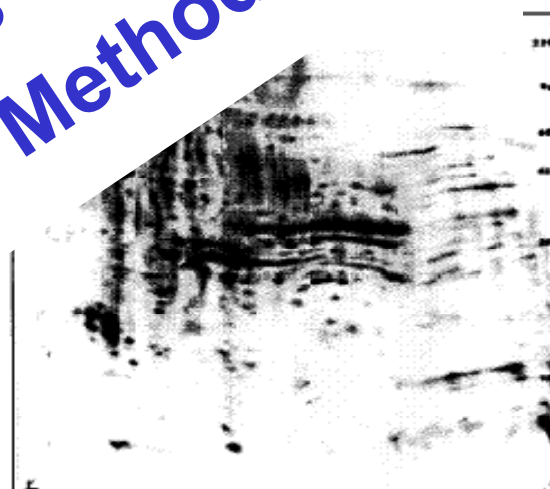
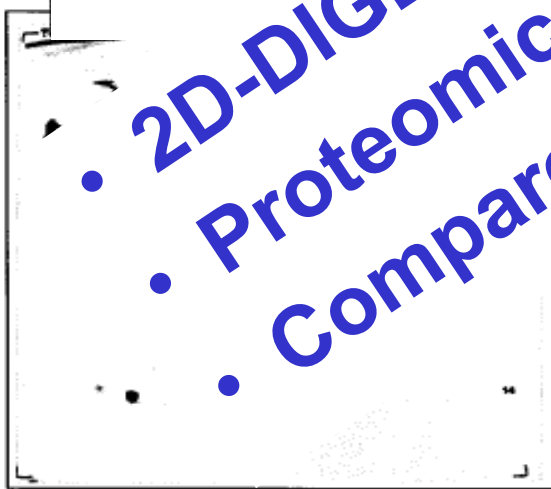
Immunogenicity

- An immune response usually involves multiple steps
 - Thus different attributes may interact in immunogenicity
- Erythropoietin PRCA increase associated with multiple changes
 - Changed formulation and primary packaging
 - HSA to polysorbate: syringes & non-coated rubber
- Immune responses can be generated with very small amounts of antigen
 - A low level of an immunogenic variant can matter

Impurities: Host Cell Proteins



Silver stain of
HCP assay
standards



Western blots

- 2D-DIGE
- Proteomics using MS
- Compare Methods

Commercial HCP
Assay Antibody

Specific HCP
Assay Antibody

From
Barbara Rellahan

Charge Variants

- Bennett talk Aug 2008 regarding efalizumab change in PK
 - Increase C-term processing & acidic forms
 - Increase galactosylation
- IgG1 charge variants do not impact IV or SC PK in rats (MAbs 2010 15: Epub)
 - Combinatoric effect? Better model?
- Another MAb: Lower potency in basic variant

Size Variants

- Tissue-Type Plasminogen Activator
 - Native sc-tPA occurs as two glycoforms. Type I sc-tPA is fully glycosylated, while type II lacks glycosylation at Asn-184. Type II is cleaved faster and has higher levels of activity
- Protein internal cleavage that lowers potency
- MAb pre-monomer peak
 - During the CHO manufacturing process an extra sequence of light chain can be translated (panitumumab EMA EPAR)
- Metal ions leaching from packaging leading to metalloprotease cleavage of product
 - Impact on stability

- **Aggregates**
 - *BioPharm Int* 2008 21(11)
- Shape
- Interaction
- Composition
- Conformation
- Functionality

Large Size Variants

- **Size**
 - *J Pharm Sci* 2009 98:1201
 - *J Pharm Sci* 2010 99:3302

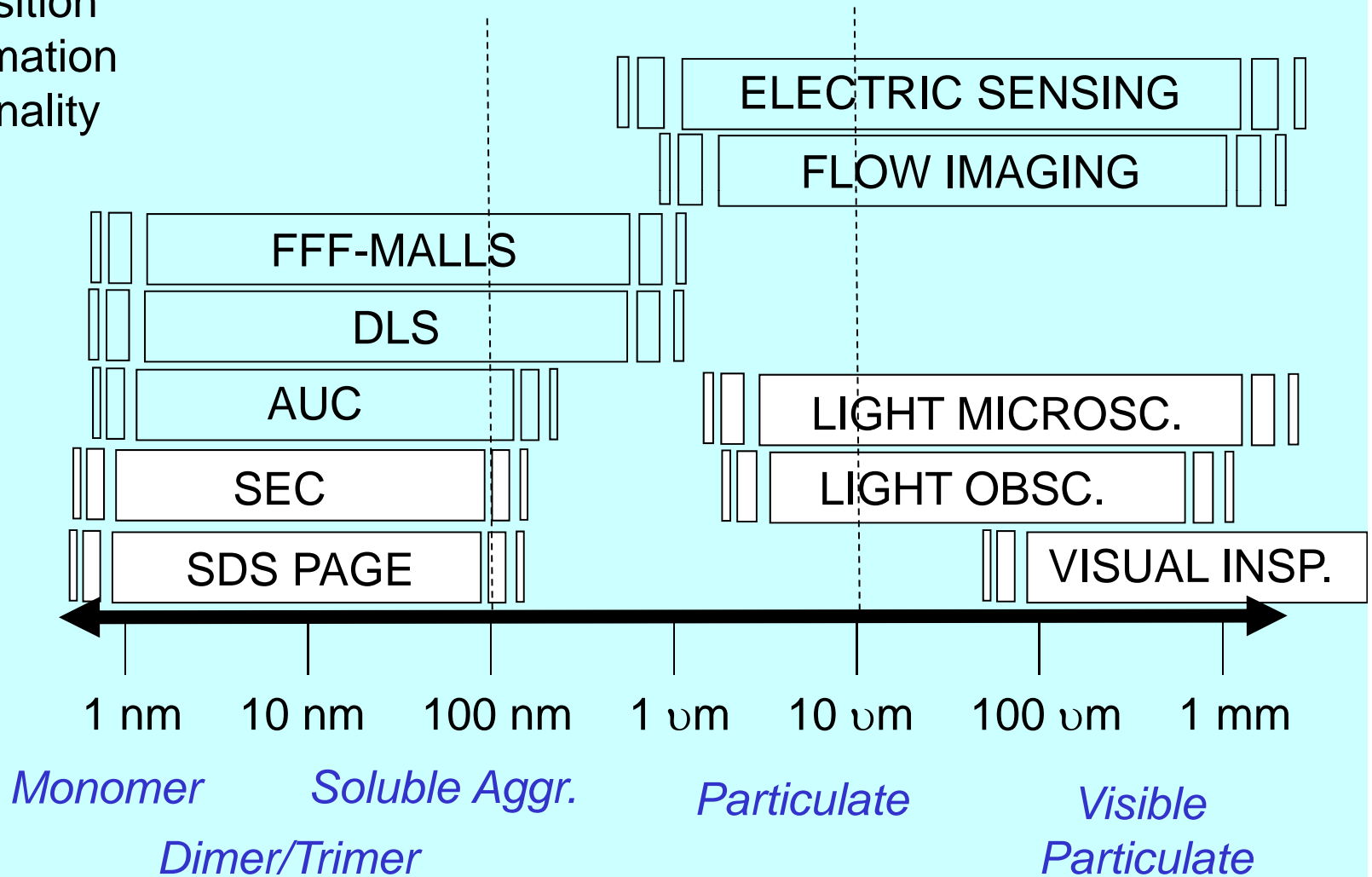


Fig adapted from *J Pharm Sci* 2010 99:3302 & *Curr Biopharm Tech* 2009 10:373

Characterization

- Setting an unachievable bar?
 - Nat Biotechnol, 2005. **23**(9): p. 1054-8
- No!
- Advances in characterization are opportunities
 - Important to understand what attributes are present and how they can vary
- Methods to use
- How to deal with greater information
 - Need a balance between flexibility & uncertainty
 - Links to clinical performance

Characterization Technologies Relevance

Resolution

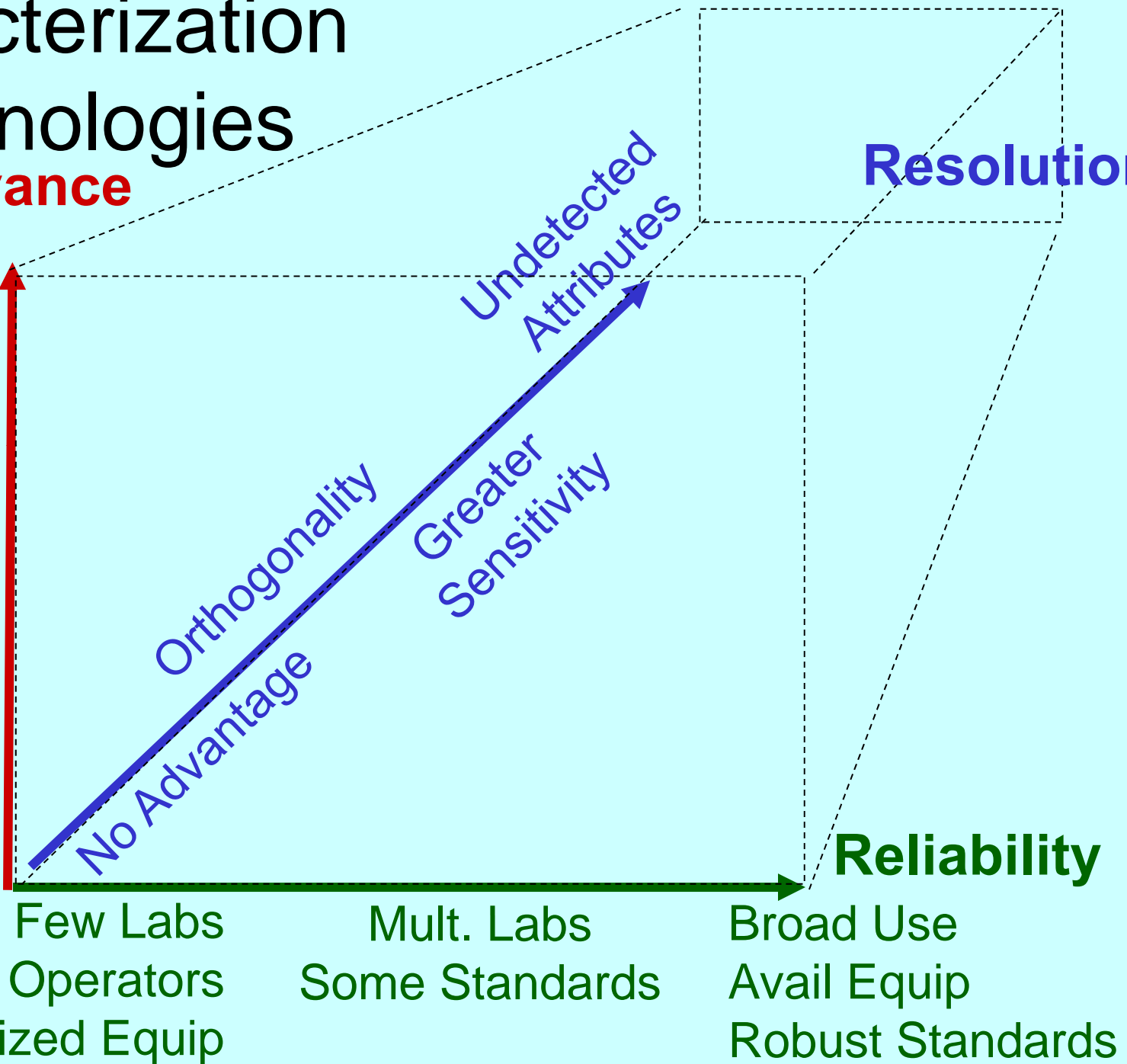
Likely
Impact

Potential
Impact

No Info.

Unlikely
Impact

Identity



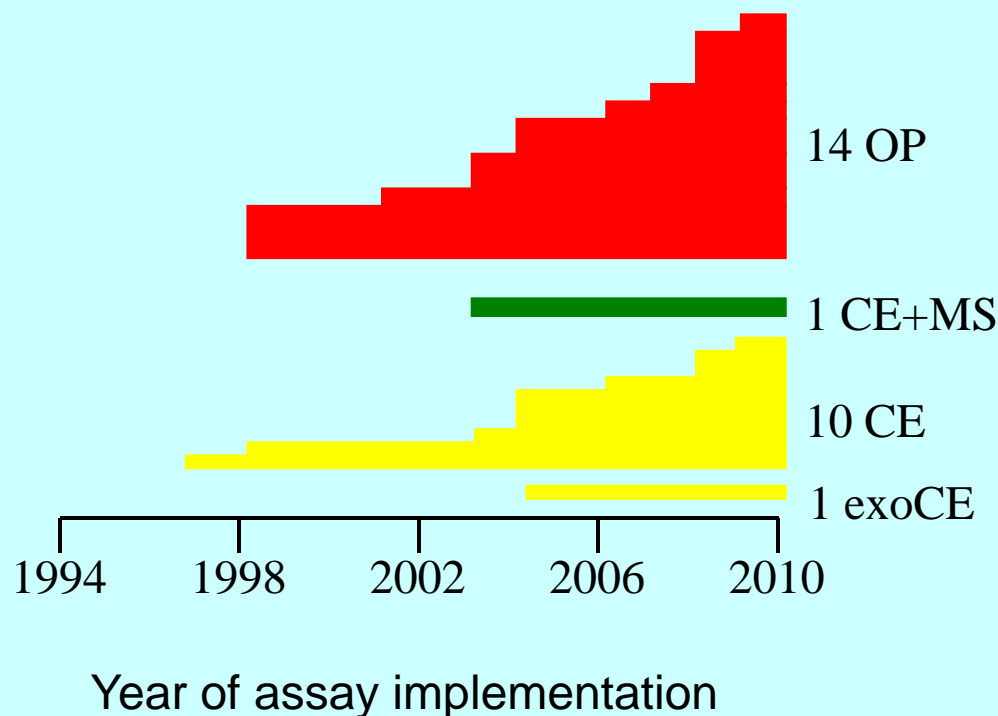
CE Applications for Biologics (from Wassim Nashabeh, GNE)

1981-1983	Initial Publication of “Zone Electrophoresis in Open Tubular Glass Capillaries” in Analytical Chemistry (81), followed by a paper in “Science” (83)—both widely credited with the launch of modern CE
1983-1988	Increased use in academic labs and few characterization or feasibility studies in industry (often in collaboration with academic labs)
1989	First international symposium HPCE (high performance capillary electrophoresis) held in Boston with the introduction of first commercial CE instruments, indicating growing use within academic centers—First conference was chaired by Prof Barry Karger
1997	Submission and approval by the FDA of two CE methods to be used as part of the control system QC release for a MAB—cIEF (identity) and Glycan analysis
1999	Launch of “CE in the Biotech and Pharmaceutical Industry” Symposium, reflecting acceptance and growing use in Pharma—Symposium is currently in its 12th year with international attendance and regulators on Organizing Committee; Also first mention of “CE” in ICH Q6B in appendix 6.1.2 (c)
2001-2005	Advances in instrumentation continued with significant expansion in applications (including CE-MS for Characterization), imaged cIEF and the introduction of platform methods
2006-present	Method becomes routine, with general chapters being developed in pharmacopeias
2010	ICH Q4B—Global Harmonization of the General Chapter on CE in USP, EP, JP

CE for Evaluating Glycosylation

Database: Glyco-assays over last 16 years
Read, Park & Brorson, Submitted

- Other glyco-analytic method
 - OP= oligosaccharide profiling

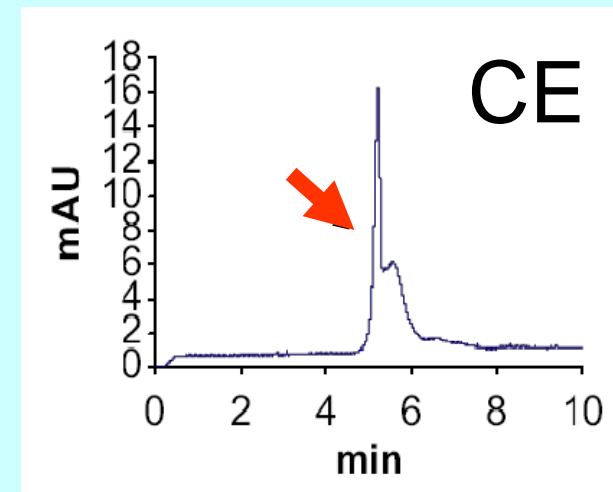


- 23 BLAs
- Most BLA applications contain glyco-analytic data
 - More for product characterization vs. lot release
- CE= Capillary electrophoresis
- Many other modalities not covered here
 - MS, combinations

Heparin Adverse Events

- Oversulfated chondroitin sulfate is a contaminant in heparin (Nat Biotechnol. 2008 Jun;26(6):669-75)
- CE is a routine assay for current complex product
 - would have picked up contaminant in crude, API or finished product

Biomaterials. 2008
(36):4808-14.



Update Analytical Methods

Regulatory agencies should have a transparent approach to newly discovered pre-existing variability

WCBP 2011 Assay Modernization

– *A Good Idea, But Not as Easy as It Sounds*

- Implementation of rapid microbiological methods for sterility testing
 - Three alternative methods evaluated only one comparable in sensitivity
 - Rajesh Gupta, *OCBQ, CBER, FDA*
- Use of NMR to identify polysaccharides in a polyvalent vaccine
 - NMR data on solvents showed LOD method was inaccurate
 - Thus the weight-based concentration of polysaccharide components was inaccurate
 - Robert Sitrin, *Merck & Co, Inc.*
- NMR method to assess OSCS contaminant
 - Also detected other variants- acetylated heparin
 - Edward Chess, *Baxter Healthcare Corporation*

Outline

- QbD for Biotech Products
- Characterization
- **Quality Attributes, Safety & Efficacy**

Critical Quality Attributes

Critical Quality Attribute (CQA): *A physical, chemical, biological or microbiological property or characteristic that should be within an appropriate limit, range, or distribution to ensure the desired product quality*
[Q8R]

- Biological Studies
 - In vitro
 - Animal
 - Clinical
- Prior Knowledge
 - Platform
 - Related products

Uncertainties: A continuum

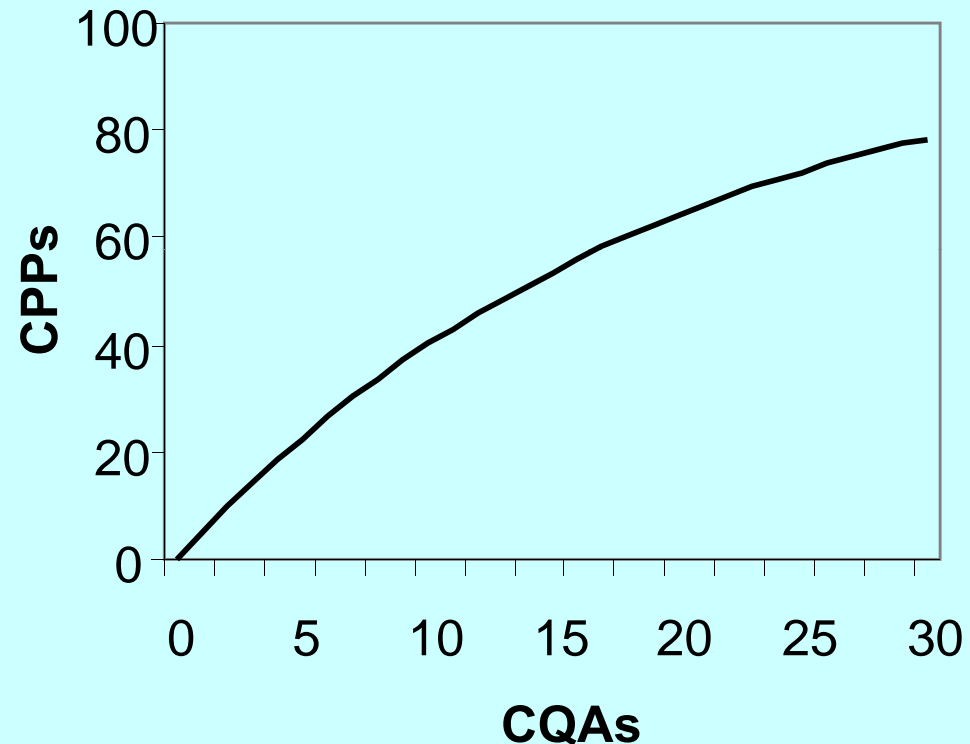
Risk Assessment & Ranking Approaches

Good Science; Consider Interactions

CQAs & Process Limitations

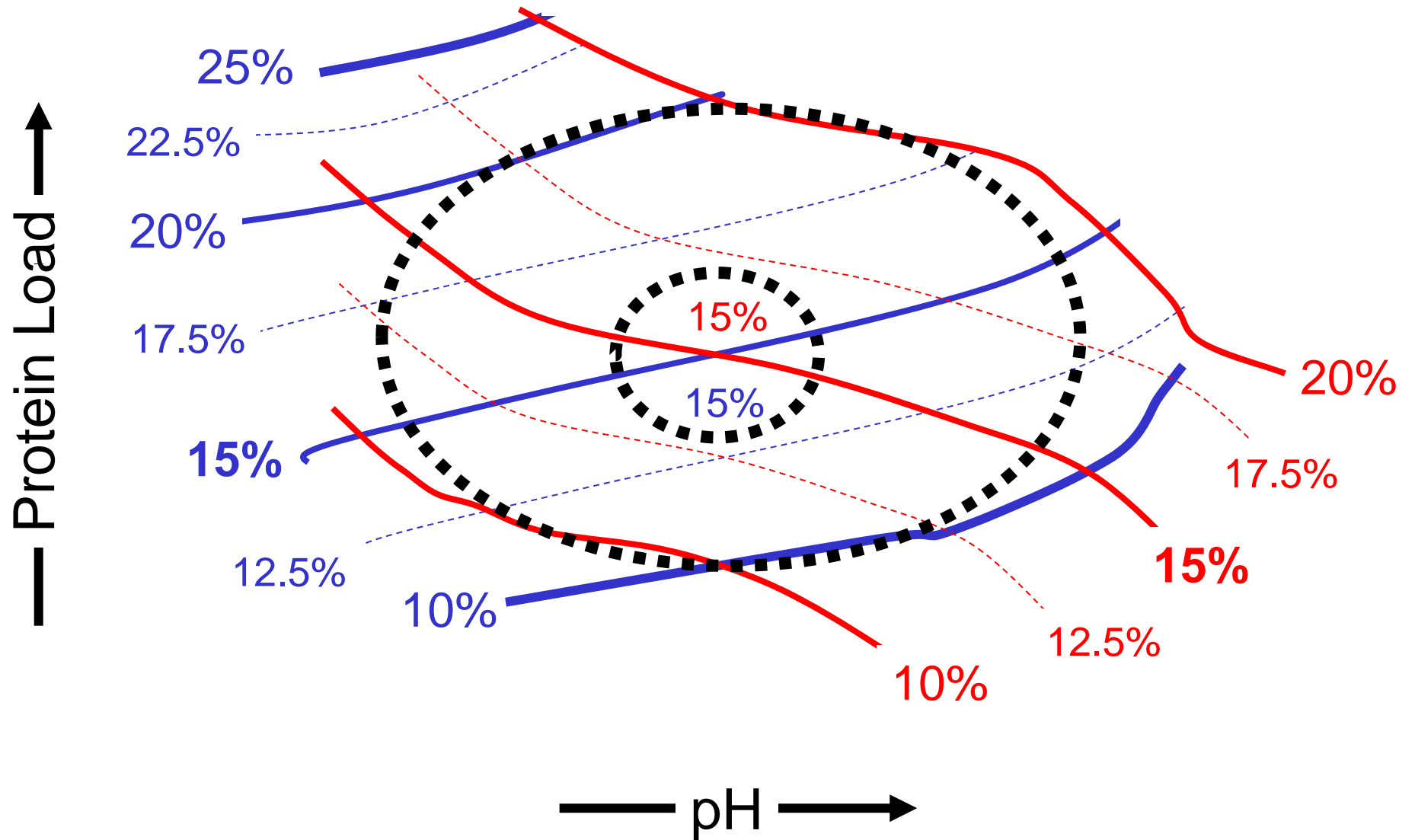
Assumptions

- 100 potentially important parameters
- 5% chance a parameter impacts a CQA
- CQAs are independent (big assumption)

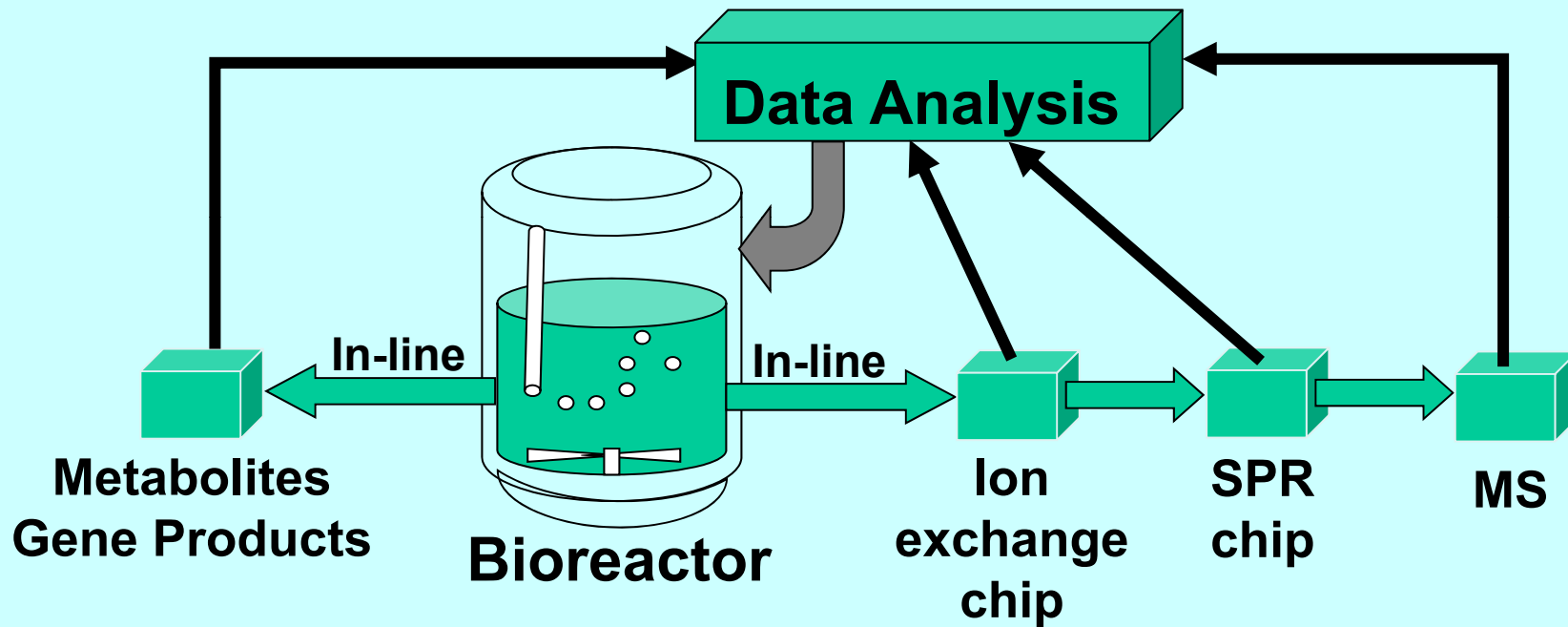


Acceptable ranges for CQAs

Delivering Targeted Product Attributes

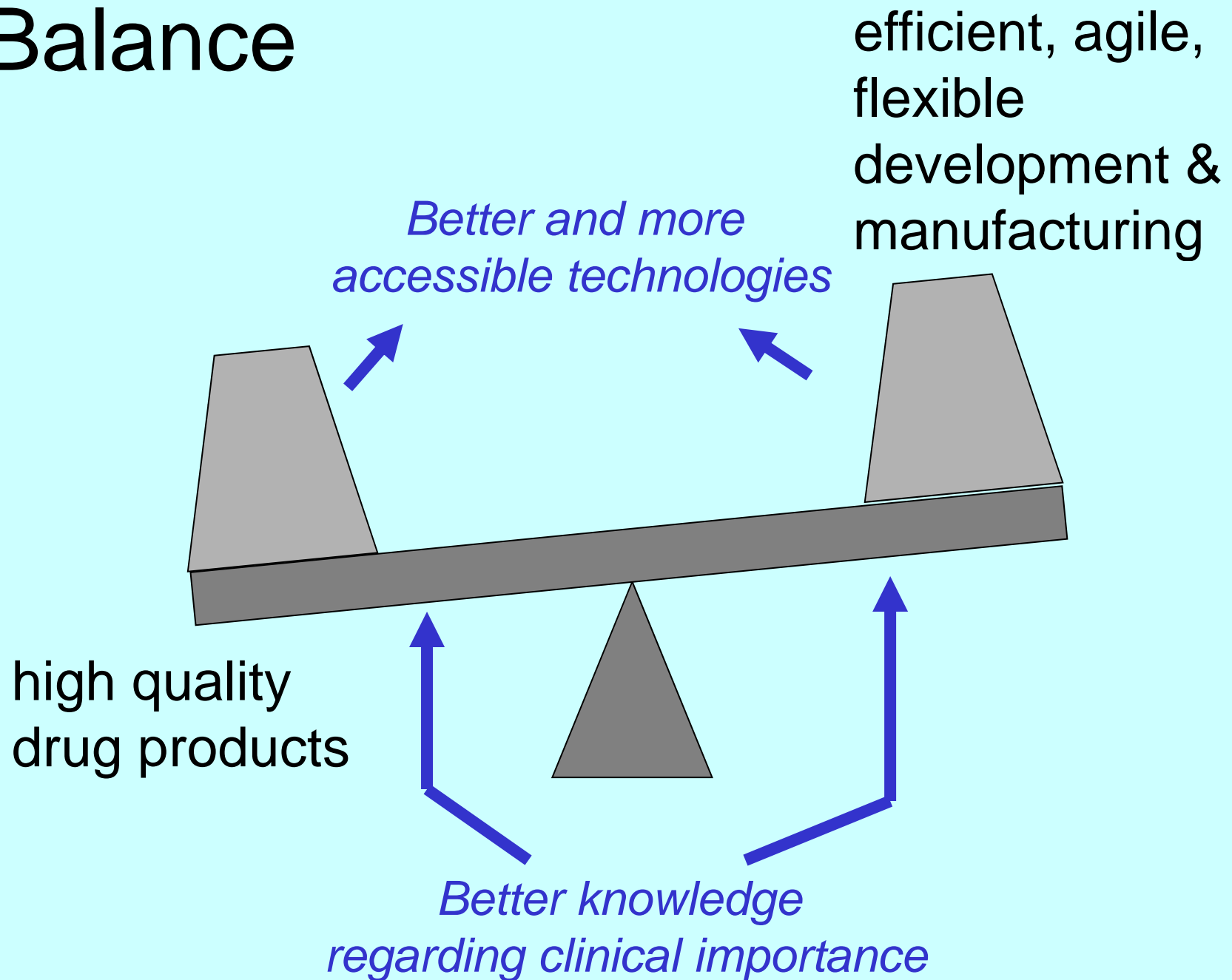


Advanced Analytics & Manufacturing



Better cell line selection & engineering

Balance



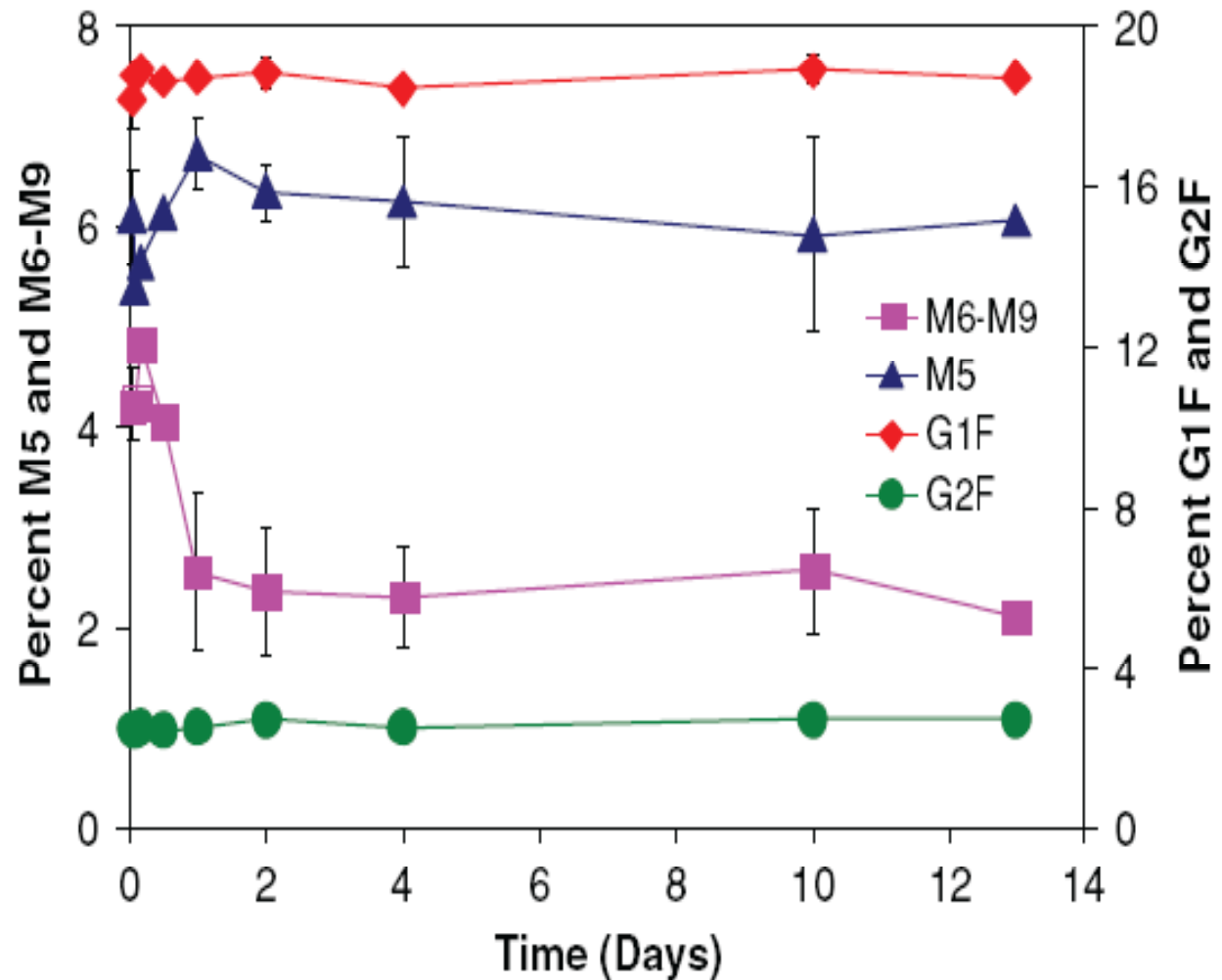
Clinical Data to Assess Attributes

- High exposure to variants (with differing attributes) in dose escalation studies
 - Very small numbers
- *Bio-distribution*
 - *Labeled proteins and imaging (F18-PET?)*
- PK/PD of variants
- Analysis of randomized clinical trial data
 - Lot to lot variability
 - Stability
- Post market surveillance data linked to lot#

A Single PK Study to Assess Variants

The effect of Fc glycan forms on Human IgG2 antibody clearance
In humans
Chen, Liu, and Flynn,
Glycobiology, 2009 Mar; 19 (3):240-9

...human IgG2 was affinity purified
From human PK samples



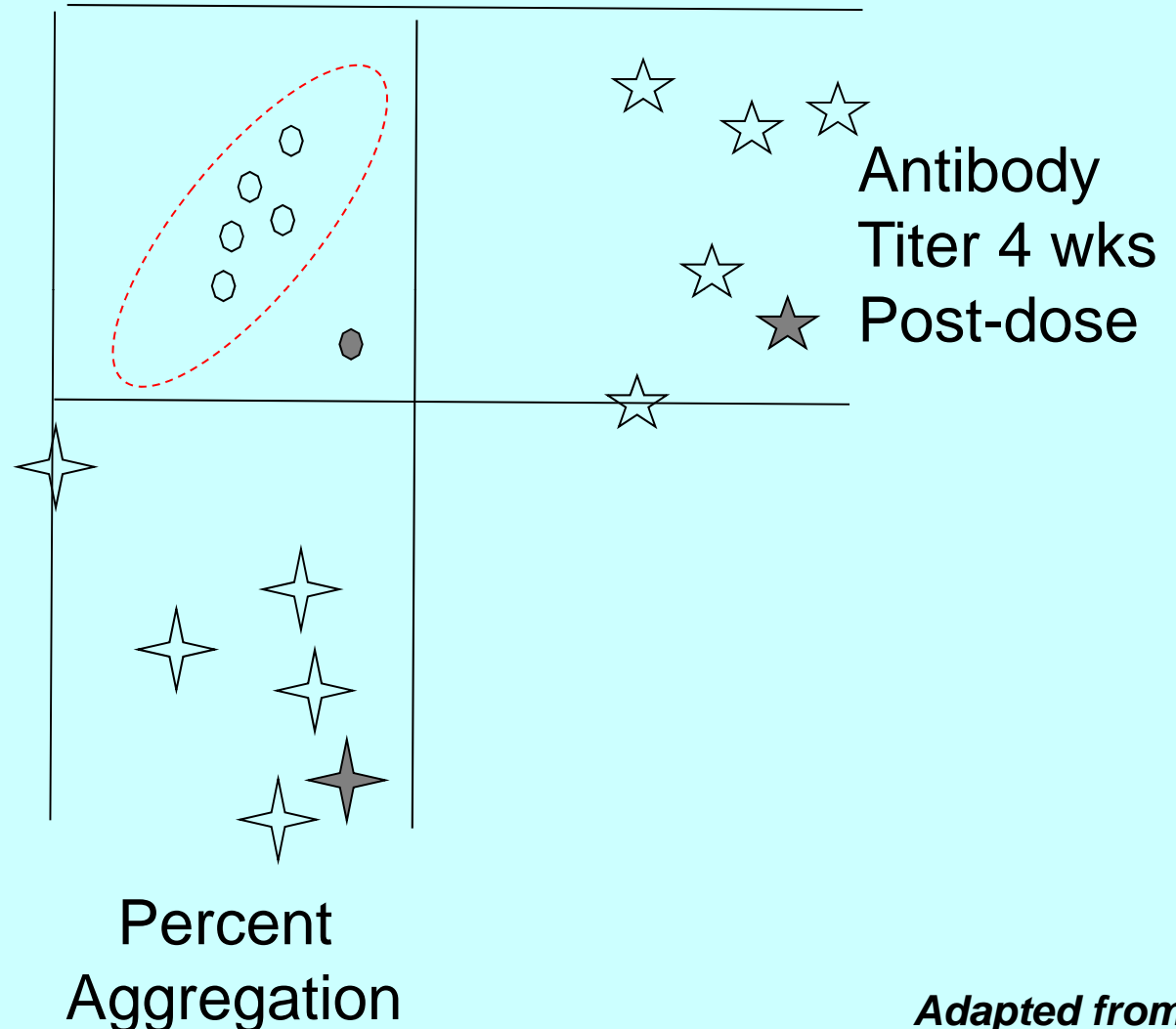
Imagine if variants could be imaged in vivo?

Analysis of Clinical Trail Data

Lot to lot variability

Challenges

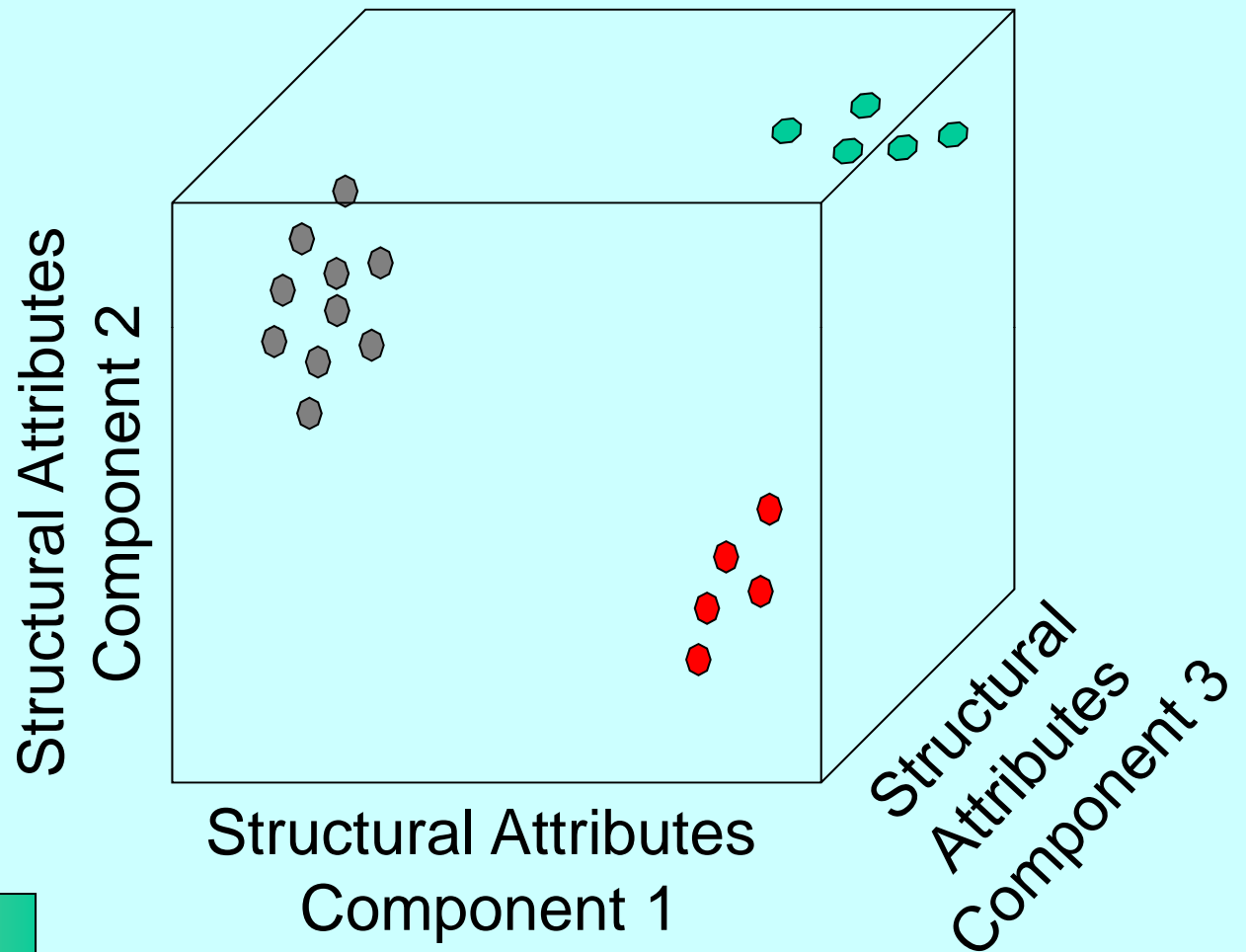
- Few lots may be used
- Lots may have very similar attributes
 - Clinical trialists not enthusiastic about “dirty” lots
- For trials with repeat dosing, each patients will be exposed to multiple lots



*Adapted from
T. Kourti*

Multivariate Approaches to Product Attributes in Humans

- Many, many attributes
- Many outcomes
- Multivariate Statistical Analysis
- PCA



Clinical/Biomarker 1

Low Inter-
 mediate **High**

Wishful Thinking

Post-market Data and Quality

- Identifying brand, dosage form & lot#
- Capturing unusual conditions
 - Storage
 - Damaged containers
 - Microwaving prior to use
- Evaluating data capture on inspection
- Bar-coding
- Not just for AERs but many databases
 - Sentinel
- *Impact of systems biology & personalized medicine*
 - *Quality impacts more noticeable as expectation of safety and effectiveness increases*

Closing

- Quality by Design approaches can improve manufacturing efficiency and product quality
- Characterize, characterize, characterize
 - Need to understand what can vary before evaluating impact
 - Need to understand relationships between attributes and potential attribute interactions
- Science based updating of analytics
 - Regulatory approaches to facilitate
- Science & Risk-based linkages of Q, S & E
 - Apply science to understand the impact of quality
 - Use of clinical data
 - Capture quality in passive & active surveillance

Credits

- Patrick Swann
- Barry Cherney
- Amy Rosenberg
- Barbara Rellahan
- Emily Shacter
- Kathleen Clouse
- Susan Kirshner
- Moheb Nasr
- Ali Al-Hakim
- Christine Moore
- Keith Webber
- Wassim Nashabeh
- Eric Read
- Kurt Brorson