#### bluebirdbio

**Comparability Strategies for Autologous Genetically Modified Hematopoietic Stem Cells** LET'S RECODE THE STORY (GM-HSC)

Mike Havert



#### • Employee and stockholder - bluebird bio



# **Overview**

- Introduce GM-HSC and product pipeline
  - -Variable starting materials
  - -Analytics under development
- •Manufacturing changes and approaches for demonstrating comparability
  - -Analytical Equivalence and Split Apheresis
  - -Analytics and Manufacturing improvements



# bluebird bio products and pipeline





#### **GM-HSC treatment and manufacture overview**



#### Potential treatments based on genetic modification of stem cells





Adapted from Hematopoietic Stem Cell in Acute Myeloid Leukemia Development, Sérgio Paulo Bydlowski and Felipe de Lara Janz

# **GM-HSC** historical development





# **GM-HSC** manufacture and controls



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# Allo-HPC/cord blood cell products



BLA 125397 HemaCord (Hematopoietic Progenitor Cells-Cord)

Product Characteristics <sup>2</sup>	Testing	Sample (Type and Timing)	Results of Product Testing
Safety	Infectious diseases – Testing Required. (21 CFR 1271.45 through 1271.90)	Maternal peripheral blood obtained within 7 days of cord blood collection – Type and Timing Required. (21 CFR 1271.80(a) and (b))	All tests negative except non- treponemal test for syphilis when confirmatory test is negative. (Cytomegalovirus (CMV) results are recorded.) CMV – Report
	Sterility – Bacterial and fungal cultures – Testing Required. (21 CFR 211.165(b), and 21 CFR 610.12)	HPC-C (pre- cryopreservation) **	No growth
	Hemoglobin	Cord blood*	No homozygous homoglobinopathy
Purity and Potency <sup>3</sup>	Total nucleated cells (TNC)	HPC-C (pre- cryopreservation)	≥ 5.0 x 10 <sup>8</sup> TNC ***/ unit HPC-C
	Viable nucleated cells	HPC-C (pre- cryopreservation)	≥ 85% viable nucleated cells
	Viable CD34+ cells (flow cytometry)	HPC-C (pre- cryopreservation)	≥ 1.25 x 10 <sup>6</sup> viable CD34+ cells ****/ unit HPC-C
Identity	Human leukocyte	Cord blood	Devel
	antigen (HLA) Typing		Report
	Confirmatory HLA typing	Attached segment of HPC-C	Confirms initial typing
	Blood Group and Rh	Coord blood	Desert

Other purity and potency assays may be considered under the BLA.

\* Cord blood = a sample of unmanipulated cord blood. A red cell sample or other cord blood aliquot obtained after volume reduction may be used for testing with appropriately validated reagents or test systems.

\*\* Sample may be obtained before or after addition of the cryoprotectant.

\*\*\* Based on 20 kg recipient, a target dose of ≥ 2.5 x 10<sup>7</sup> nucleated cells/kg and ≥ 70% post-thaw recovery = 1.7 x 10<sup>7</sup> nucleated cells/kg.



# Variability of CD34+ cell concentration

Median CD34/µL throughout mobilization\*





\*Uchida et al. Haematologica 2020 "Safe and efficient peripheral blood stem cell collection in patients with sickle cell disease "

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#### bluebird bio manufacturing has changed over time

- Facility (CMO)
- Process
- Materials
- Intermediates
- Specification
- Analytical procedures
- Excipients

How do we know the product is still safe?

How do we know the product is still effective?

How do we know the products are comparable?



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#### **Mitigation High Risk** Technology Low Frequency Transfer Change **Moderate Risk** Control Low Risk **High Frequency**



## **Technology transfer**

- Transfer of manufacturing processes and/or analytical procedures between facilities or laboratories
- Technology transfers take the outputs of process or method development activities and transfer the knowledge to a different location where a process or analytical procedure will be operated.





ISPE Good Practice Guide: Technology Transfer 3<sup>rd</sup> Edition

WHO guidelines on transfer of technology in pharmaceutical manufacturing

# Technology transfer overview





#### Regulatory standards for evaluating risk under IND

- CMC changes that impact Safety 21 CFR 312.42(b)(1)(i)
  - FDA may place a proposed or ongoing Phase 1 investigation on clinical hold if it finds that: Human subjects are or would be exposed to an <u>unreasonable and significant risk</u> of illness or injury
- CMC changes that impact Efficacy 21 CFR 312.42(b)(4)
  - FDA may place a proposed or ongoing investigation that is <u>not designed to be adequate and</u> <u>well-controlled</u>
  - Applies to all trials, but usually used for phase 3/pivotal





## Types of comparability exercises

- Analytical
- Nonclinical / animal model
- Clinical



# Analytical comparability considerations

ICH Q5E Comparability of Biotechnological/Biological Products Subject to Changes in Their Manufacturing Process



- Pre-change vs Post-change
  - Full scale vs lab scale manufacturing runs
  - Retrospective or prospective?
  - Lot retains
  - Split apheresis
- Sample size how many?
- What are analytics?
  - Lot release (validated?)
  - More than release
    - Characterization tests
    - In process test
    - Stability data
- Statistical assessment regarding equivalence
  - Demonstrating sameness
  - Setting study criteria



## Split Apheresis comparability

- Split starting material eliminates person-to-person variability
- Healthy donor
- Test panel (no potency) can restore gene expression to cells that already have it
  - Total nucleated cells (TNC)
  - -%CD34+ cells
  - Viable CD34+ cells



## **Split Apheresis comparability**



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# Analytics and manufacturing improvements

- Develop analytics and bioanalytics
- Optimize manufacturing process in lab
  - -Improved product quality
  - -Pre-change post-change\*
- Technology transfer to CMO
- Update CMC section IND
- Clinical studies

**\*ICHQ5E** - When pre- and post-change products are not comparable, please consult the appropriate regional regulatory authority







 Not possible to assess functional activity in final drug product (CD34+ cells) if transgene is not expressed







 Not possible to functional activity in final drug product (CD34+ cells) if transgene is not expressed







- Gene modification corrects arrest at enucleation step in  $\beta$ -thalassemia
- Potency can be measured as a relative increase in % enucleated cells

Image adapted from: hubpages.com/education/General-Considerations-In-Hematology-Blood-Formation-In-Erythropoiesis









# Analytics and manufacturing improvements in clinical studies



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Zynteglo EPAR - public assessment report 14-Feb-20

## Summary

- Technology transfer
- Invest in analytics
  - Potency and stability indicating assays
  - Bioanalytics and data science too
  - Less variability is better
- Minimize manufacturing variability (split aph)
- Get clinical experience (introduce changes early)
- Learn from mistakes
  - Small scale models to de-risk



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