# Topics regarding Revisions of ICH Q1/Q5C guidelines: focus on biological products DEC. 2022

Takashi Kameda, Ph. D.
Office of Vaccines and Blood Products
PMDA

Note: This presentation is not the official position of the PMDA or the EWG of Q1/Q5C, containing personal views of the speaker.



Current ICH Stability guidelines and Background of proposed revision



#### Stability related ICH guidelines

| Code               | Title  | Step 4                   |
|--------------------|--|--------------------------|
| Q1A(R2)<br>Q1A(R1) | Stability Testing of New Drug Substances and Products  | Feb-6-2003<br>(Dec-1993) |
| Q1B                | Photostability Testing of New Drug Substances and Products   | Nov-6-1996               |
| Q1C                | Stability Testing for New Dosage Forms   | Nov-6-1996               |
| Q1D                | Bracketing and Matrixing Designs for Stability Testing of New Drug<br>Substances and Products      | Feb-7-2002               |
| Q1E                | Evaluation for Stability Data  | Feb-6-2003               |
| Q1F                | Stability Data Package for Registration in Climatic Zones III and IV                               | Withdrawn on Jun-1-2006  |
| Q5C                | Quality of Biotechnological Products: Stability Testing of<br>Biotechnological/Biological Products | Nov-30-1995              |



#### ICH Quality Guidelines specific to Biologicals

| Code | Title   | Step 4                      |
|------|---|-----------------------------|
| Q5A  | Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin             | Sep-23-1999<br>Now Revising |
| Q5B  | Analysis of the Expression Construct in Cells Used for Production of r-DNA Derived Protein Products             | Nov-30-1995                 |
| Q5C  | Quality of Biotechnological Products: Stability Testing of Biotechnological/Biological Products                 | Nov-30-1995<br>Now Revising |
| Q5D  | Derivation and Characteristation of Cell Substrates Used for Production of Biotechnological/Biological products | 16-Jul-1997                 |
| Q5E  | Comparability of Biotechnological/Biological Products Subject to Changes in their Manufacturing Process         | 18-Nov-2004                 |
| Q6B  | Specifications: Test Procedures and Acceptance Criteria for Biotechnological/Biological Products                | 10-Mar-1999<br>Now Revising |



#### Activities on Q1/Q5C revision

| Jun 2021 | In ICH Incheon meeting, revisions of the stability guidelines was endorsed as a new topic.  |
|----------|---|
| May 2022 | In ICH Athens meeting, the Assembly approved PhRMA's nomination of Ms. Megan McMahon as the informal WG Leader/Rapporteur of the Q1/Q5C WG. |
| Aug 2022 | Informal WG was established.  |
| Nov 2022 | In ICH Incheon meeting, the Concept Paper was approved.   |

#### Considerations for Updates to ICH Q1 and Q5C Stability Guidelines: Embracing Current Technology and Risk Assessment Strategies

Megan E. McMahon Alexander Abbott, Yelizaveta Babayan, Jenny Carhart, Chi-wan Chen, Elke Debie, Mingkun Fu, Cherokee Hoaglund-Hyzer, Andrew Lennard, Hanlin Li, Tony Mazzeo, Lori McCaig, Sylvine Pischel, Fenghe Qiu, Dennis Stephens, Robert Timpano, Debra Webb, Chad Wolfe, Kayla Woodlief & Yan Wu

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In consideration of the recent ICH Quality Discussion Group (QDG) recommended revision to the ICH series of stability guidelines.

Conducted a comprehensive review of ICH Q1A, Q1B, Q1C, Q1D, Q1E, and Q5C to identify areas where the guidelines could be clarified, updated, and amended to reflect the potential knowledge gained from current risk-based predictive stability tools and to consider other science- and risk-based stability strategies in accordance with ICH Q8–12.

Propose a holistic approach to stability understanding, utilizing historical data, prior knowledge, modeling, and a risk assessment process to expand the concept of what could be included (or would be acceptable) in the core stability data package, including type and amount of stability evidence, assignment of retest period and shelf-life for a new product, and assessment of the impact of post-approval changes.



https://link.springer.com/article/10.1208/s12248-021-00641-6

#### **Excerpt from Concept Paper**

Signed by the ICH parties, publication pending



#### Issues to be Resolved:

#### Consistency of interpretation

- Through reorganisation into a core guideline with topic-specific annexes/appendices, the update will clarify which parts of the guideline apply to which product types.
- ➤ Improve harmonisation by clarifying perceived ambiguities within the current guideline.



# Issues to be Resolved: <u>Clarification of technical components of current guideline and stability-related concepts; may include</u>

- ➤ Combine common/overlapping principles and expand on items specific for Drug Substances (DS)/Intermediates/Drug Products (DP).
- Additional products not covered by the existing ICH stability guidelines to be considered can include
  - ✓ Cell and Gene Therapy Products / Advanced Therapy Medicinal Products (ATMPs)
  - ✓ Oligonucleotides, Peptides
  - ✓ Generics, Biosimilars
  - ✓ New products developed from approved active substances
  - ✓ Vaccines
  - ✓ Plasma-derived products.
  - ✓ regulated OTC products

As part of this consideration, certain stability concepts (e.g., retest date) may not be applicable to all product types.



#### Issues to be Resolved:

## Clarification of technical components of current guideline and stability-related concepts; may include

- Data and evaluation strategies for defining the retest period/shelf-life (DS) (align with ICH Q7) and shelf-life (DP).
- Baseline considerations in designing a stability protocol (e.g., storage temperatures/ %RH/study timepoints, stability-indicating methods, Climatic Zones III and IV (former ICH Q1F guideline).
- Container Closure System: packaging configurations on stability; related conditions for drug and drug-device combination products.
- Photostability: testing expectations, relevant testing conditions and applicability
- The practical use of bracketing and/or matrixing.

etc.



Issues to be Resolved:

Address new technologies and modern tools/strategies used as part of enhanced product understanding

Pharmaceutical Quality System (PQS) related stability topic

Clarify applicability of requirements across development and lifecycle

Training strategies and alignment with other guidelines



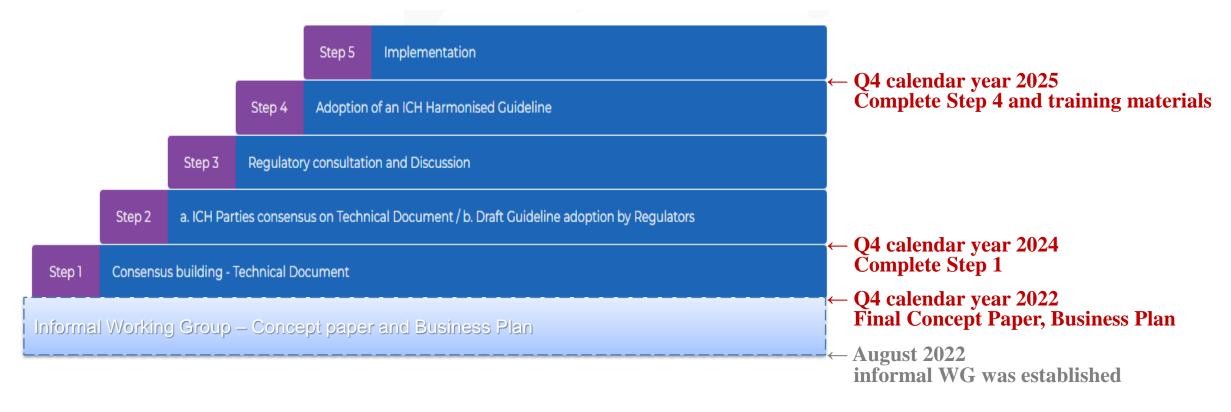
#### ICH Guidelines to be considered for reflection in revised Q1/Q5C guidelines

| Code       | Title  |            |
|------------|--|------------|
| Q2         | Validation of Analytical Procedures  |            |
| Q8         | Pharmaceutical Development   | ]          |
| <b>Q</b> 9 | Quality Risk Management  |            |
| Q10        | Pharmaceutical Quality System  | Risk-based |
| Q11        | Development and Manufacture of Drug Substances<br>(Chemical Entities and Biotechnological/Biological entities) | management |
| Q12        | Technical and Regulatory Considerations for Pharmaceutical Product<br>Lifecycle Management                     |            |
| Q14        | Analytical Procedure Development   |            |



#### The proposed Q1/Q5C milestones

#### ICH Procedure for harmonization





#### **ICH**

<u>International</u> <u>Council for</u> <u>Harmonisation of Technical Requirements for Pharmaceuticals for Human Use</u>

#### **Founding Regulatory Members**

- •EC, Europe
- •FDA, United States
- •MHLW/PMDA, Japan

#### **Founding Industry Members**

- •EFPIA
- •JPMA
- •PhRMA

#### **Standing Regulatory Members**

- •Health Canada, Canada
- •Swissmedic, Switzerland

#### **Regulatory Members**

- •ANVISA, Brazil
- •COFEPRIS, Mexico
- •HSA, Singapore
- •MFDS, Republic of Korea
- •MHRA, UK
- •NMPA, China
- •SFDA, Saudi Arabia
- •TFDA, Chinese Taipei
- •TITCK, Turkey

#### **Industry Members**

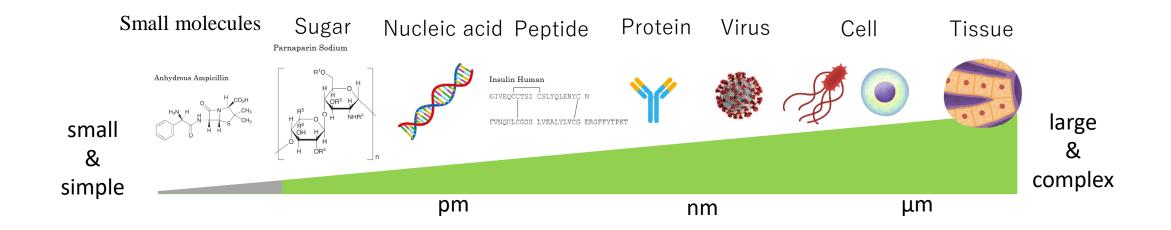
- •BIO
- •Global Self-Care Federation
- •<u>IGBA</u>



Specific considerations assumed for biological products in the revision of Q1/Q5C guidelines



#### Variety of biological products



#### Accumulation of knowledge

#### Classical modality

 Proteins or peptides, isolated from plasma or produced by recombinant technology etc.

#### New modality

- ATMPs
- mRNA vaccine
- recombinant viral vector vaccine etc.



#### Current Q5C

| Scope     | Product type  |
|-----------|---|
| Cover     | well-characterised proteins and polypeptides, their derivatives and products of which they are components, and which are isolated from tissues, body fluids, cell cultures, or produced using rDNA technology   |
|           | <ul> <li>e.g.</li> <li>cytokines, erythropoietins, plasminogen activators</li> <li>blood plasma factors</li> <li>growth hormones and growth factors, insulins</li> <li>monoclonal antibodies</li> <li>vaccines consisting of well-characterised proteins or polypeptides</li> </ul> |
| May cover | conventional vaccines, after consultation with the appropriate regulatory authorities   |
| Not cover | antibiotics, allergenic extracts, heparins, vitamins, whole blood, or cellular blood components   |

#### How to cover biological products in new guidelines



#### **Basic evaluation stance for biologics**

Q1 guideline applies in general to biotechnological/biological products.

However Biotechnological/biological products do have distinguishing characteristics.

- Active components are typically proteins and/or polypeptides
- Maintenance of molecular conformation and, hence of biological activity, is dependent on noncovalent as well as covalent forces.
- The products are particularly sensitive to environmental factors such as temperature changes, oxidation, light, ionic content, and shear.
- To ensure maintenance of biological activity and to avoid degradation, stringent conditions for their storage are usually necessary.

Primary data to support a requested storage period for either drug substance or drug product should be based on long-term, real-time, real-condition stability studies.

excerpts from Q5C PREAMBLE

#### Typical not applicable evaluation concepts for biologics

#### Re-test period

- The period of time during which the drug substance is expected to remain within its specification and, therefore, can be used in the manufacture of a given drug product, provided that the drug substance has been stored under the defined conditions.
- A batch of drug substance can be re-tested multiple times and a different portion of the batch used after each re-test, as long as it continues to comply with the specification.
- For most biotechnological/biological substances known to be labile, it is more appropriate to establish a shelf life than a re-test period. The same may be true for certain antibiotics.

excerpt from Q1A Glossary

#### Extrapolation

Extrapolation is the practice of using a known data set to infer information about future data. Extrapolation to extend the retest period or shelf life beyond the period covered by long-term data can be proposed in the application, particularly if no significant change is observed at the accelerated condition.

- Knowledge of change pattern
- Fit of mathematical model
- Relevant supporting data

Applicability of new technologies and modern tools/strategies

excerpt from Q1E 2.3

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Societal demand for urgent development such as pandemic response



### Thank you for your attention.



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