



MiniCase study:

Implementation of Novel Strategies and Novel Technologies for Acceleration of IND and BLA Submissions

CASSS WCBP – 2023

Stephane Avella

Regulatory CMC Biologics

Merck & Co., Inc., Rahway, NJ, USA

Thursday January 26, 2023 – 11am-12pm



Innovative 2-Stage Approach to Comparability Assessment for Acceleration of IND/CTA Submissions

Process and Analytical Comparability Assessment and Testing Strategy

DS Manufacturing Process/Site	Analytical Comparability				Process Comparability
	Release	Stability	Extended Characterization	Forced Degradation	
Clinical site Pre-change	X	X	X	---	X
	X	X	X	X ¹	X
	X	X	X	X ¹	X
	X	---	X	---	X
Commercial site Post-change	Initial stage Assessment-Post Change Lots				
	X	X	X	X ¹	X
	Final Stage Comparability Assessment -Post Change Lots				
	X	X	X	---	X
	X	X	X	---	X
	X	X	X	---	X

¹Forced degradation performed for Initial Stage Assessment only

Initial Stage Assessment

- **Amendment 1:** After Health Authority review & approval of data from 1 post-change DS batch meeting the comparability acceptance criteria
→ Drug product from that single post-change DS batch will be released for clinical use

Final Stage Assessment

- **Amendment 2:** After Health Authority review & approval of data from 3 post-change DS batches meeting the comparability acceptance criteria
→ All subsequent drug products from post-change DS batches can be released for clinical use

- 2-stage approach to comparability assessment enables rapid introduction/resupply of a single post-change material meeting product quality into late-stage Phase 3 clinical studies
- Approach was endorsed by FDA Type C Written Responses and EU Scientific Advice

Mini Case Study



New Strategies for Acceleration of IND and BLA Submissions

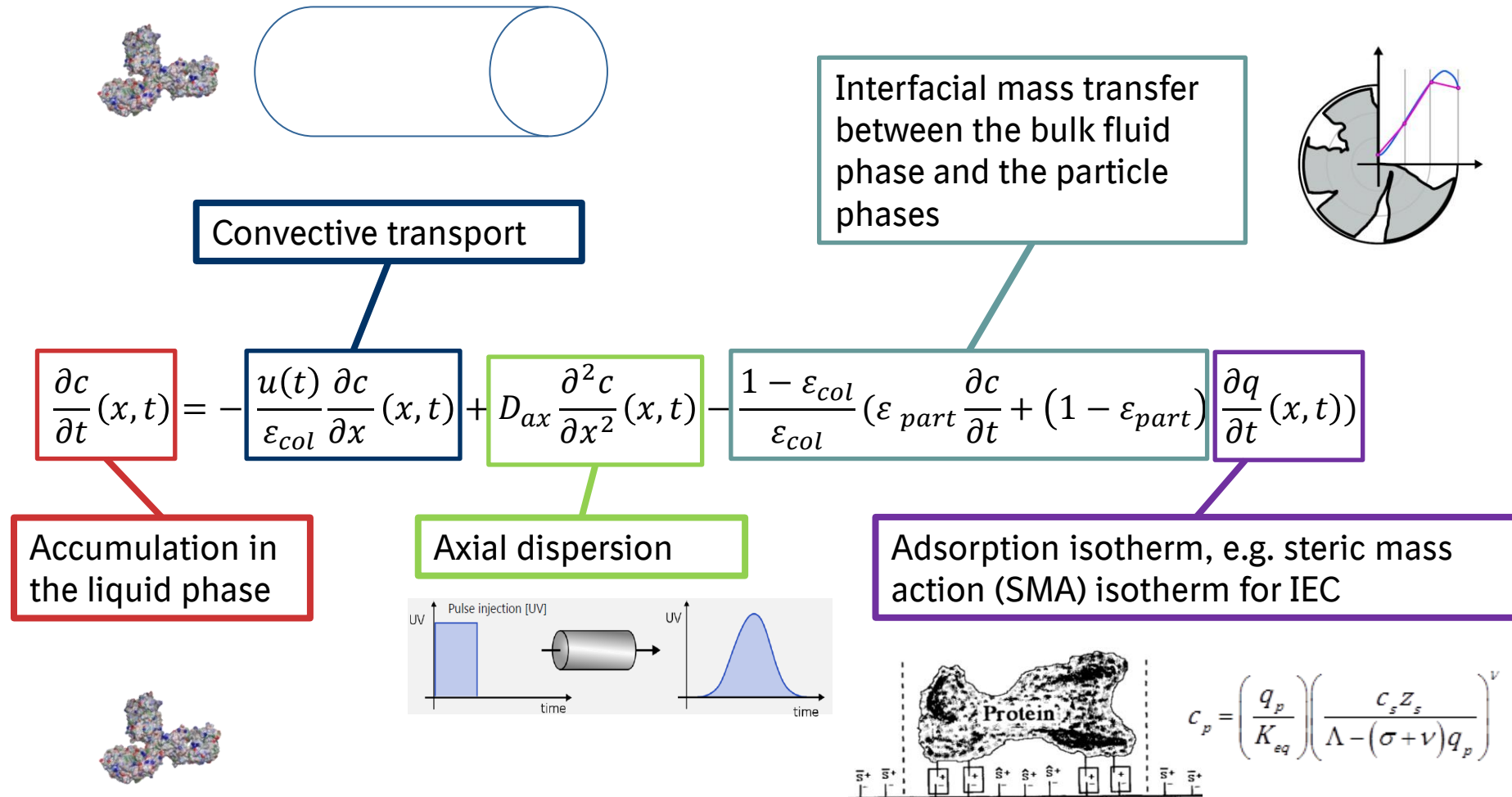
Mechanistic Modeling

BDB

Bioprocess Development Biologicals



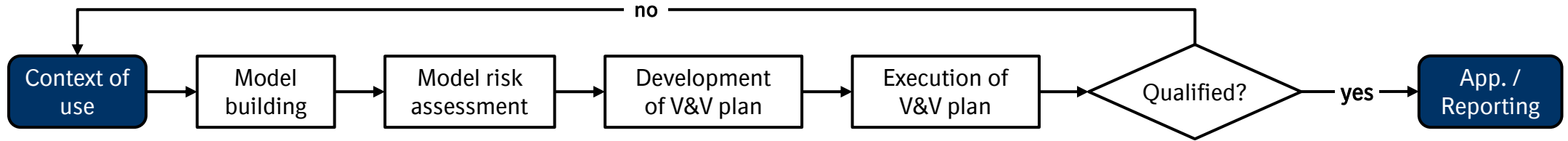
Mechanistic model for preparative chromatography



For modeling, we need to have a plan...

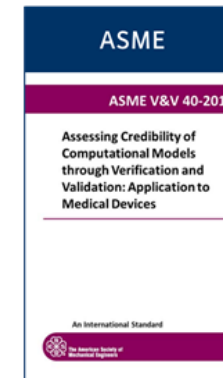
- What do you want to do with your models?
- What do you want to predict?
- What problems you want to solve?
- Where and how will your models be implemented to make what type of decisions...

Risk-Based Model Verification & Validation Workflow



Established framework is influenced by:

- ASME Verification and Validation (V&V) 40 standard
- FDA draft guidance: FDA-2021-D-0980
- ICH points to consider document



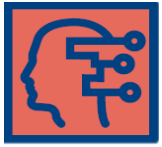
Risk of Model Based Data

- Mechanistic Model calibrated and validated
- Execute PCS for single unit operation with no wet lab data.
- Model risk: medium
 - Model Influence: high because process control for this CEX was entirely based on model data.
 - Decision Consequence: medium because final batch release testing carried out to ensures product quality.

High	3	4	5
Medium	2	3	4
Low	1	2	3
	Low	Medium	High

Model Influence

Decision Consequence



Strategy to Implementation

CEX model calibration, validation, and application – setting the industrial standard

- Publications on model calibration/validation strategy
- First *in silico* PCS executed in addition to wet lab PCS
- **Interaction with FDA's ETT in March 2021**
- Model included in BLA (S.2.6)

Model based decisions in development

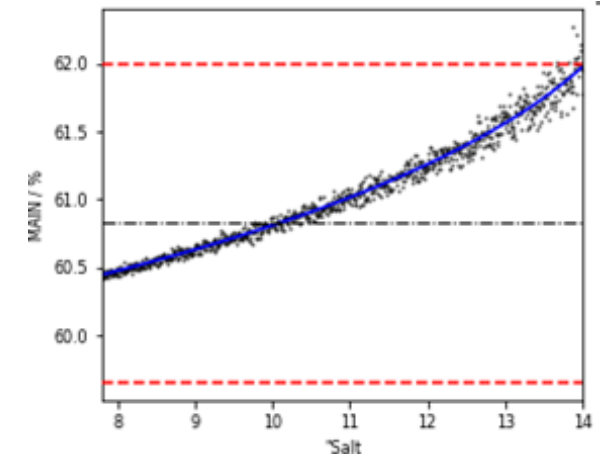
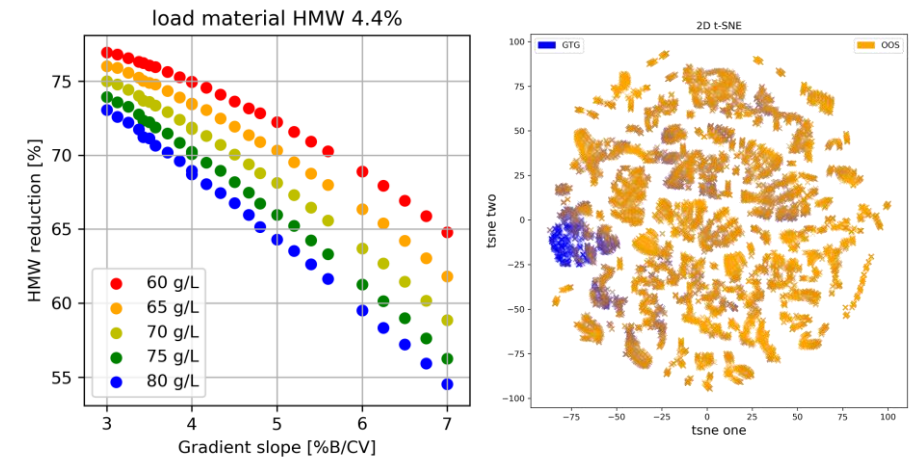
- CEX root cause investigation of 12k Tech Runs
- Design space determination method based on machine learning

CEX model benefit gained in the field application

- Optimization of linear gradient elution entirely performed *in silico*
- Process successfully consolidated with model predictions confirmed

PCS for CEX step entirely based on mechanistic model

- PARs defined by *in silico* PCS will be part of control strategy
- **Second interaction with FDA's ETT in May 2022**



Mechanistic model for preparative chromatography

Once a mechanistic model is validated as a digital twin of the manufacturing process, it can be used for in silico process characterization.

Example: CEX polishing of a complex mAb

