

New Frontiers in Immunogenicity Research for Biosimilars in CDER

Susan Kirshner

Director, Division of Biotechnology Review and Research III
Office of Biotechnology Products
CDER | US FDA

BSUFA III Regulatory Science Pilot Program Meeting— January 16, 2023

Overview



- Immunogenicity overview
- Components of an immune response
- Immunogenicity risk assessment of biosimilars
- BSUFA III research related to immunogenicity

Immunogenicity



- The ability of a substance to provoke an immune response
- Immunogenicity of biologic products can result in:
 - Adverse events such as hypersensitivity reactions
 - Changes to pharmacokinetics, pharmacodynamics, efficacy
- Impact from immunogenicity frequently caused by anti-drug antibodies

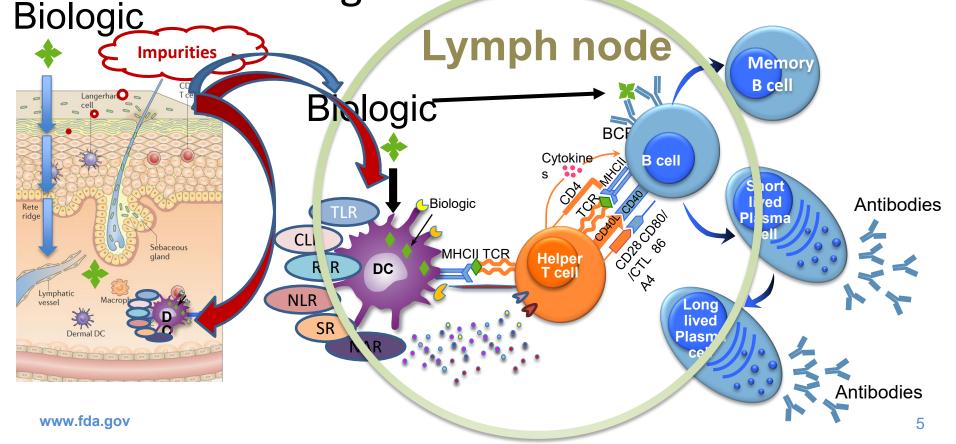
Immunogenicity



- Immunogenicity is unwanted for therapeutic biologics
- Examples of the negative impact of anti-drug antibodies:
 - Pure Red Cell Aplasia in patients treated with epoetin
 - Anti-drug antibodies cross-reacted with patients' own EPO
 - Loss of efficacy in patients treated with adalimumab

APCs and Thelper Cells are Critical in Provoking Immune Responses





Immunogenicity Risk Assessment



- Factors that impact the risk of developing antidrug antibodies (ADA)
 - Process related
 - Product related
 - Patient related
 - Disease related
 - Treatment related

Immunogenicity Risk for Biosimilars



- Biosimilars are not required to match impurities
- Impurities can impact immunogenicity
- Uncertainty around immunogenicity risk from:
 - Process related impurities e.g., host cell proteins
 - Product related impurities and variants e.g., aggregates

Biosimilar Immunogenicity Studies



- Biosimilar development programs include clinical studies
- Clinical studies assess that the biosimilar is not more immunogenic than the innovator product
- Clinical studies compare anti-drug antibody responses



- Reduce uncertainty about the impact of product and process related impurities
- Develop alternatives to clinical comparative immunogenicity studies
- Enhance risk frameworks for comparative immunogenicity study needs

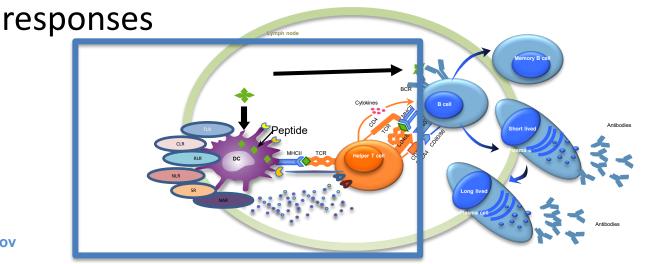
Pathway Forward

BSUFA Related Immunogenicity Research Goals



 Develop analytical methods for comparative studies

Evaluate for differences in initiating immune

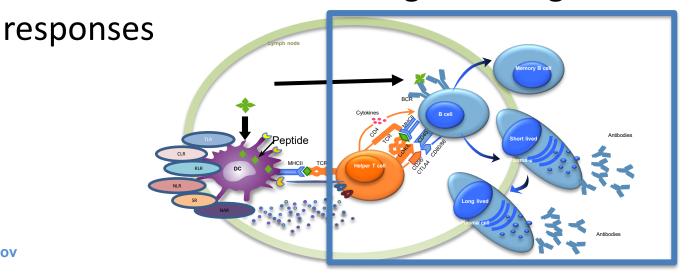


BSUFA Related Immunogenicity Research Goals



Develop non-clinical models for comparative studies

Evaluate for differences in generating immune



CDER Research Projects



- Validation of non-clinical immunogenicity models
- Production and optimization of humanized mice
- Develop acceptance parameters and standards for Innate Immune Response Modulating Impurities assays for biosimilars
- Address fundamental issues for in vitro immunogenicity testing

Summary



- CDER is developing and evaluating alternative approaches to clinical comparative immunogenicity studies
- Such alternative approaches will be important enhancements of risk-based approaches for comparative immunogenicity study needs

Summary



 Research is aimed at developing analytical methods and non-clinical models to be used as alternatives to clinical comparative immunogenicity studies



Next up:

Cate Lockhart, PharmD, Ph.D.

Executive Director

Biologics and Biosimilars Collective Intelligence Consortium