

行政院及所屬各機關出國報告  
(出國類別：開會考察)

赴法參加  
「細胞治療產品與基因治療產品之品質管理與標準化」  
會議並參訪製造廠

服務機關：行政院衛生署藥物食品檢驗局  
出國人職稱：科長  
姓名：陳惠芳  
出國地區：法國  
出國期間：92.02.22-92.03.01  
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細胞治療與基因治療產品之品質管理與標準

主辦機關:

行政院衛生署藥物食品檢驗局

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出國類別: 其他

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關鍵詞: 基因治療產品,細胞治療產品,品質管理,標準化

內容摘要: 本次出國係參加由負責歐洲藥典制定工作之歐洲醫藥品管理局 (The European Agency for the Evaluation of Medicinal products, EMEA) 歐洲醫藥品品質審查委員會 (European Directorate for the Quality of Medicines, EDQM) 所舉辦「細胞治療產品與基因治療產品之品質管理與標準化」研討會, 開會地點位於法國斯特拉斯堡 (Strasbourg), 開會時間為 2003 年 2 月 24 至 25 日, 邀請包括有製造廠、公私立研究機構、學校、許可證核發單位、國家檢驗單位等代表參與, 討論細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關內容, 計有 153 位來自歐洲各國、台灣、南韓、美國、加拿大與中國大陸等 22 個國家代表參與該會。國內目前雖尚未有細胞治療產品與基因治療產品申請許可證, 然而全球目前已有多項該類產品進行臨床試驗中, 政府亦已投注大量資金於生技產業, 國內目前已有基因治療之臨床研究正進行中, 預料不久之將來, 即有相關細胞治療產品與基因治療產品申請上市許可; 藉由參加此次會議, 蒐集細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關資料, 以供我國訂定細胞治療產品與基因治療產品之管理規範參考。赴法期間順道參訪位於法國里昂之輸入我國非人血來源血液製劑之製造廠 IMTIX-SANGSTAT, 實際了解其原料之來源管制、製造作業、製程管制、成品之品質管制與批次放行作業情形, 並藉機蒐集該類產品之最新管理規範等相關資料, 有助於我國對於非人血來源血液製劑之檢驗管理。

本文電子檔已上傳至出國報告資訊網

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## 摘 要

本次出國係參加由負責歐洲藥典制定工作之歐洲醫藥品管理局（The European Agency for the Evaluation of Medicinal products, EMEA）歐洲醫藥品品質審查委員會（European Directorate for the Quality of Medicines, EDQM）所舉辦「細胞治療產品與基因治療產品之品質管理與標準化」研討會，開會地點位於法國斯特拉斯堡（Strasbourg），開會時間為 2003 年 2 月 24 至 25 日，邀請包括有製造廠、公私立研究機構、學校、許可證核發單位、國家檢驗單位等代表參與，討論細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關內容，計有 153 位來自歐洲各國、台灣、南韓、美國、加拿大與中國大陸等 22 個國家代表參與該會。

國內目前雖尚未有細胞治療產品與基因治療產品申請許可證，然而全球目前已有許多項該類產品進行臨床試驗中，政府亦已投注大量資金於生技產業，國內目前已有基因治療之臨床研究正進行中，預料不久之將來，即有相關細胞治療產品與基因治療產品申請上市許可；藉由參加此次會議，蒐集細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關資料，以供我國訂定細胞治療產品與基因治療產品之管理規範參考。

赴法期間順道參訪位於法國里昂之輸入我國非人血來源血液製劑之製造廠 IMTIX-SANGSTAT，實際了解其原料之來源管制、製造作業、製程管制、成品之品質管制與批次放行作業情形，並藉機蒐集該類產品之最新管理規範等相關資料，有助於我國對於非人血來源血液製劑之檢驗管理。

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## 一、前言與目的

自人類基因解碼及組織工程研究有成，生技產業頓時成為國際間進展最神速之炙熱產業，我國產官學各界亦已紛紛加強生技產業相關領域之各項知識技能，期能為國家創造另一契機。隨著生物技術之發展，涉及體細胞與遺傳物質之生物治療學得以不斷發展，美國 FDA 業已頒佈『人類體細胞治療產品與基因治療產品之管理規範』，且美國藥典業已於 2002 年納入細胞治療與基因治療產品之相關規範；歐洲醫藥品管理局 (The European Agency for the Evaluation of Medicinal products, EMEA) 及 ICH 亦已針對基因治療議題召開多次會議，負責歐洲藥典訂定工作之歐洲醫藥品品質審查委員會 (European Directorate for the Quality of Medicines, EDQM) 亦於法國舉辦「細胞治療產品與基因治療產品之標準化與品質管理」研討會，討論細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關內容，預期相關產品規範亦將於近年內公布。

依據美國藥典所規範，細胞治療產品含有活的哺乳類動物細胞為其活性成份，基因治療產品含有核酸 (通常為 DNA) 為其活性成份，某些產品則結合這兩類，含有表現新基因之活細胞，該類結合性產品之規範則參照體外基因治療產品。

目前細胞治療產業的範圍相當廣泛，舉凡用在缺陷細胞的治療，或用在特殊病變之細胞治療，包括應用於各種不同癌症、心血管疾病、肝病、糖尿病、感染性疾病、神經退化性疾病、皮膚潰瘍及骨質修復等之治療。數以百萬之費用已被花費於細胞治療相關產品的商品化上，目前僅有少數該類產品得以上市，然而許多產品已在臨床試驗階段。目前全球共有超過兩百家細胞治療公司，預估細胞治療之市場潛力至二〇〇五年將

超過 300 億美元，二〇一〇年更高達 800 億美元。其中，包括骨髓移植、幹細胞移植以及活細胞治療（淋巴細胞治療）產品，市場規模將達 145.7 億美元。此外，亦有若干公司正研發可以使細胞對抗 HIV 病毒的細胞治療產品，這些前瞻研發與突破，均將驅動未來 10 年細胞治療產品市場規模的成長。

依據二〇〇二年美國藥典所載，細胞治療產品之細胞來源有三：病患自己的細胞（自體細胞產品）、他人細胞（異體細胞產品）以及源自動物如豬、猴、牛等之細胞（異種細胞產品）。目前該藥典所列舉之細胞治療產品計有：1) 用於骨髓移植之器材或試劑；2) 用於治療癌症：表現癌特異性 peptides 之 T 淋巴細胞、樹狀細胞或巨嗜細胞，及與細胞激素同時注射之自體或異體癌細胞；3) 用於治療疼痛：分泌腦內啡（Endorphins）或兒茶酚胺（Catecholamine）；4) 用於治療糖尿病：分泌胰島素之 $\beta$ 型胰島細胞；5) 用於治療創傷癒合：於生物相容性基質（matrix）上之自體角質層細胞或異體真皮層纖維母細胞；6) 用於組織修復：自體或異體軟骨細胞、間質幹細胞（Mesenchymal stem cell）；7) 用於神經退化性疾病：異體或異種神經細胞；8) 用於暫時性輔助肝臟：含異體或異種肝細胞之體外中空纖維系統（extracorporeal hollow fiber system）；9) 用於感染性疾病：活化之 T 淋巴細胞等產品。

細胞治療產品必須面臨多項挑戰：1) 該類產品為活細胞，無法進行任何滅菌或過濾程序，亦無法進行病毒去除/不活化步驟；2) 使用於製程之所有原料仍具有潛藏傳染性物質而無法以現今之技術與方法檢測或移除之可能性，因此原料之資格檢定（Qualification）與來源是製造安全且有效之產品的關鍵重點；3) 細胞治療產品之貯存亦是一大挑戰，目前為止，冷凍是長期貯存之主要模式，但某些細胞可能會因冷凍而改變其特性，因此該類產品可能須於製造完成數小時內投予病患；

4) 臨床上經常有緊急狀況需要儘速投予該類產品；5) 某些產品之批次量即相當於一投予劑量。針對最後三項挑戰，傳統之分析方法如無菌試驗、黴漿菌檢測及效價試驗可能無法適用，亦或於試驗完成前即被投予病患。因此必須對於原料進行篩檢，其製造過程必須符合 cGMP 且全程無菌操作；身為國家衛生主管機關，實應儘速訂定該類產品之規範以維護國人之用藥安全。

基因治療的定義，廣義而言，是應用基因或基因產物治療疾病的一種方法；狹義而言，是把外界的正常基因或治療基因轉移到人體進行基因修飾和表現，改善疾病的一種治療方法。基因轉移可在體外或體內進行，體外基因轉移是從病人體內選擇適合的標的細胞，在體外進行培養和修飾，然後將被修飾的細胞送回病人體內。體內基因轉移是透過媒介物，將正常基因輸送給病人，該媒介物對病人體內之特定組織細胞有高親和性而可將正常基因送入標的細胞。基因之轉移可透過生物載體或非生物載體方法，生物載體通常是利用病毒作為載體，一般經常使用之載體病毒包括：反轉錄病毒 (Retrovirus, RV)、腺病毒 (Adenovirus, AV)、腺相關病毒 (Adeno-Associated Virus, AAV)、疱疹病毒 (Herpes Simplex Virus, HSV) 等。非生物載體方法包括各種物理方法如：裸 DNA 注射法、電穿孔法等，化學方法 (如：磷酸鈣沉澱法等) 及脂質體 (Liposome)。

基因治療於 1990 年首次臨床試驗應用於對一位 Adenosine Deaminase (ADA) deficiency 引起嚴重免疫功能低下的患者治療成功後，又有三種疾病獲得良好的結果：家族性高膽固醇血症、囊性纖維化 (Cystic fibrosis) 和高雪氏症 (Gaucher disease)，目前認為基因治療是治療基因突變性疾病的一項根本措施，同時也為非基因突變性疾病提供一種新治療方法。目前臨床試驗之基因治療遺傳疾病如 Adenosine deaminase deficiency、



囊性纖維化、家族性高膽固醇血症、高雪氏症等，治療後天性疾病如愛滋病、周邊動脈血管疾病、自體免疫疾病及腫瘤等。

基因治療發展至今已十年以上的歷史，全球目前已有三千餘人接受基因治療的試驗，隨著載體與基因傳遞相關技術的不斷改進，各基因治療公司也積極地開發新產品或新療法，依據生物技術開發中心所著「製藥產品 2001 年鑑」內所提：針對進入臨床前試驗的新藥按療效分類共分成 199 類，各類用藥已進行臨床試驗新藥數排名，以抗癌 827 個產品、抗癌免疫製劑 381 個產品、基因治療 325 個產品為首。目前全球的基因治療產品已進入 Phase II 及 III 階段者約有 40 件，應用在治療癌症者即有 25 件，佔總產品的 62.5%，其次為治療心血管疾病產品（12.5%）；其中又以治療黑色素瘤與頭頸癌之基因治療產品名列一、二；癌症之基因治療技術為目前較成熟且各界投入研發最多之領域，美國基因治療公司進行臨床試驗之主要癌症產品中，有數件產品已在 phase III 階段，距離成功上市已近，各界更預估全球第一個基因治療產品將會使用於癌症治療，並在二〇〇三年左右進入市場，此外，各界並預估基因治療產品之全球市場於二〇〇八年將高達 55.5 億美元。

然而基因治療技術卻仍有安全性、穩定性、免疫性等問題，二〇〇一年四月份之科學（Science）期刊亦報導了一項基因治療之風險：德國研究人員發現將基因送入老鼠的骨髓細胞可能會導致類似血癌的症狀，這項發現意味送入之基因隨機插入細胞的基因中，於少數情況下可能會引發基因的不表現、過度表現或轉譯出不正常蛋白質而引發癌症等疾病。身為國家衛生主管機關，實應儘速訂定該類產品之規範以維護國人之用藥安全。

國內目前雖尚未有細胞治療產品與基因治療產品申請許可證，然而全球目前已有多項該類產品進行臨床試驗中，政府亦

已投注大量資金於生技產業，國內目前已有基因治療之臨床研究正進行中，預料不久之將來，即有相關細胞治療產品與基因治療產品申請上市許可；本局有感於此類議題之重要性與迫切性，擬著手訂定細胞治療產品與基因治療產品之品質管理規範，適逢負責歐洲藥典訂定工作之歐洲醫藥品品質審查委員會（European Directorate for the Quality of Medicines, EDQM）首次於法國舉辦「細胞治療產品與基因治療產品之標準化與品質管理」研討會，參與該會議可與國際接軌，同步了解最新之細胞治療產品與基因治療產品研發、製造與品質管制等相關資訊，作為我國訂定相關規範之參考。所制定之規範除供相關產品之品質檢驗管理之需，亦供業界研發製造時參考遵循，以維護國人就醫用藥之安全，並共同促進我國生技產業之發展。

順道參訪位於法國里昂之輸入我國非人血來源血液製劑之製造廠 IMTIX-SANGSTAT，實際了解其原料之來源管制、製造作業、製程管制、成品之品質管制與批次放行作業情形，並藉機蒐集該類產品之最新管理規範等相關資料，有助於我國對於非人血來源血液製劑之檢驗管理。

## 二、會議過程與內容

負責歐洲藥典制定工作之歐洲醫藥品品質審查委員會（European Directorate for the Quality of Medicines, EDQM）有感於細胞治療與基因治療產品規範訂定之迫切性，在歐洲醫藥品管理局（The European Agency for the Evaluation of Medicinal products, EMEA）協助下，於法國舉辦「細胞治療產品與基因治療產品之標準化與品質管理」研討會，邀請製造廠、公私立研究機構、學校、許可證核發單位、國家檢驗單位等代表參與，討論細胞治療產品與基因治療產品最新研發資訊、製造品質管制以及國家檢驗機構之品質管理規範等相關內容，計有 153 位來自歐洲各國、台灣、南韓、美國、加拿大與中國大陸等 22 個國家代表參與該會。

研討會內容包含（一）細胞治療產品與基因治療產品之最新發展，（二）細胞治療產品之新品質挑戰，（三）基因治療產品之新品質挑戰，（四）細胞治療產品與基因治療產品之法規議題，（五）未來展望等議題，其內容重點如後所述。

### （一）細胞治療產品與基因治療產品之最新發展

#### 1. 基因治療與細胞治療：前景與問題

首先由法國 Genethon 公司 Dr. O. Danos 將基因治療與細胞治療作一簡介，並提出基因治療與細胞治療之展望與問題。他提及基因治療主要區分為兩類，第一類為針對特定細胞形態作修正（modification of a specific cell type），如以基因治療矯正鎌刀型紅血球；第二類為全身

性傳送治療性蛋白質 (systemic delivery of therapeutic proteins)，如基因殖入使產生人類凝血因子。

目前基因轉移系統大致分為非病毒性基因轉移方法 (non-viral gene transfer methods) 與病毒性載體 (viral vector) 兩大類，由於基因治療成功的關鍵在於發展有效且能專一性地傳送基因到目標細胞，同時避免產生任何毒性或副作用，非病毒性基因轉移方法具有使用簡單、易大量製備且不引起宿主免疫反應之特點，故儘管其基因轉殖效果較差，基於安全考量，該類方法仍頗具發展潛力。常見之非病毒性基因轉移方法如陽離子脂質 (cationic lipid)、脂質體 (liposome) 及裸露 DNA (naked DNA) 等。病毒性載體由於其基因傳送效率佳，某些載體更能於目標細胞中持續表現，一直是基因治療載體之研究重點，但其製備及純化過程複雜，並會誘發宿主免疫反應，且嵌入 DNA 也有細胞突變之疑慮，為使用該類載體必須考慮之重點。常見之病毒載體使用腺相關病毒 (AAV)、腺病毒 (adenovirus)、反轉錄病毒 (retrovirus) 及慢病毒 (lentivirus) 等病毒製備。各種病毒載體均有其特性，如嵌入基因容許大小、免疫性及安定性等，端視治療目的選擇適當之載體。此外，製備完成之基因傳送載體必須經過許多研究、測試與確效，如傳送效率分析法之設計與確效 (須標準品)、毒性、遺傳毒性、生殖細胞傳遞率 (germline transmission) 及環境散播之評估 (environmental dissemination)。

曾被報導過發生副作用之基因治療臨床試驗有：1) 投予高劑量腺病毒載體造成一病患死亡。2) 一位 A 型血友病患精液中存在反轉錄病毒載體 DNA。3) 一位直接經由肝臟施予基因治療之 B 型血友病患精液中存在腺相關

病毒載體 DNA。4) 兩位泡泡兒 (X-linked SCID) 因反轉錄病毒載體治療造成淋巴球增殖現象。另外，對於反轉錄病毒 DNA 之插入亦有相關之危險性，如致癌基因 (Oncogene) 的活化及腫瘤抑制基因 (tumor suppressor) 的不活化。

故選擇基因轉移系統通常須考量：病毒性或非病毒性、局部或全身性、體外或體內、長期或過渡性以及針對成人或胎兒組織等因素。此外，採體內直接基因轉移須考量血清蛋白、血管壁、細胞外基質及免疫性等困難。

最後，他提出細胞治療與基因治療之關鍵點為：(1) 有效地轉移入目標細胞群，可藉由修改載體、改善局部區域性轉移之方法、改善目標細胞或幹細胞之純化方法等來增進效率。(2) 使基因表現之適時適地，可藉由建立適當之元素控制 mRNA 的產生、成熟與轉譯以及發展同源基因重組 (homologous recombination) 應用於原位基因修復 (in situ gene repair) 等來改善。(3) 減少毒性，可藉由控制先天性免疫反應、對轉殖產物 (transgene product) 的耐受性以及控制染色體整合 (chromosomal integration) 等來改善。

## 2. 基因治療最新趨勢與發展

首先由德國 PEI Dr. K. Cichutek 介紹基因轉移藥品 (gene transfer medicinal products, GT-MPs) 之發展。他先介紹基因轉移藥品之定義，依據 WHO 臨床基因轉移監測小組 (clinical gene transfer monitoring group) 草擬的定義，基因轉移藥品主要為 (i) 供活體修飾體細胞基因用之病毒、非病毒載體或核酸，(ii) 經體外基因修飾之自體、異體或異種細胞。接著介紹基因治療之發展狀態，目前尚

未有基因治療產品獲得上市許可，而至今發展之主力在歐洲與北美，有 97% 臨床試驗在北美或歐洲進行中，其中美國佔 81.1%，歐洲則佔 16.2%；約 4,000 人接受過基因轉移藥品治療，使用反轉錄病毒載體者佔 50.2%，其次為腺病毒載體佔 18.4%，再者為脂質體佔 17.7%，其他尚有 naked / plasmid DNA 佔 3.5%，痘病毒 (pox virus) 載體佔 2.5%，腺相關病毒載體佔 1.0%，以及其他方式約佔 6.6%；基因轉移藥品治療疾病中：癌症佔 63.4%，單基因疾病佔 12.3%，感染性疾病佔 6.4%，心血管疾病佔 8.0%；目前大部分臨床試驗均尚在 Phase I 或 Phase II，Phase III 僅佔 0.6%。Dr. K. Cichutek 接著介紹一些可能有效之臨床試驗案例，如貧血、頭頸癌、血友病及單基因疾病，由這些案例顯示各種疾病可能需要發展特定之治療方式，使用特定之載體、表現系統或修飾細胞；此外，隨著基因轉移效果之改善，嚴重副作用也會隨之出現，這是改善載體和治療對策時將會面臨之問題。

基因轉移藥品在歐盟之上市許可將可經由歐洲醫藥品管理局之集中程序獲得，各國主管機關如 PEI 之專家會審核開發藥廠之申請案並提出科學性建議；目前已有基因轉移藥品臨床前與臨床試驗指引可供參考。有關評估與審核臨床試驗計畫書，將會建立一套涵蓋主管機關核准與當地倫理委員會正面評價之併行程序。

其次由法國 Gencell, Aventis Pharma Dr. D. Faucher 介紹供周邊動脈疾病 (Peripheral Arterial Disease, PAD) 基因治療用之 NV1FGF 質體 DNA 的品質管制。Gencell, Aventis Pharma 已研發出以基因治療方式—使用 NV1FGF (攜帶 FGF-1 基因之 pCOR DNA 質體) 治療周邊動脈疾病患者，目前正進行第二期臨床試驗。NV1FGF 是由含有

pXL3179 質體之 XAC-1 pir116 大腸桿菌經醱酵及多道層析步驟純化而得。該公司對於製程各階段如種細胞庫 (MCB)、工作細胞庫 (WCB)、中間產物、原料藥及最終藥品均有完整測試程序以符合歐洲、美國及 ICH 指引，方能開發全球化市場。除了使用藥典所記載之分析方法，許多 1990 年早期只能在研究單位使用之分析技術已經被改善並確效，成為符合 cGMP 之分析工具，以評估將供第一期及第二期臨床試驗使用之藥品的鑑別、純度、效價、安全及安定性等特性。為評估質體 DNA 的完整性而發展出一種能定量 open circular form 之層析法，以了解其摻雜於 supercoiled form 之情形，該分析法可採用洋菜膠或毛細管電泳來進行。Gencell 最近已對 DNA 脫嘌呤作用之分析方法進行確效，並發展出高靈敏度之定量 RT-PCR 方法來評估 host cell RNA 之污染，及定量 RT-PCR 方法來評估 host cell RNA 之污染，ELISA 或 Western-blotting 也被發展來評估 host cell protein。

### 3. 細胞治療最新趨勢與發展

首先由英國 ReNeuron 公司 Dr. J. Sinden 介紹以神經幹細胞株治療神經疾病之應用。由於幹細胞具有分裂增殖成與本身完全相同的細胞，以及分化成為多種特定功能的體細胞兩種特性，因此近年來幹細胞於治療疾病之應用上亦越來越廣，如中風、阿茲罕默症及帕金森氏症等。人類腦幹細胞的來源有胚胎、胎兒、成人腦組織及骨髓或其他組織，其中胚胎幹細胞因能分化成所有細胞形態，如心肌細胞、肝細胞及神經細胞等，屬於萬能性幹細胞。幹細胞之治療原則為 3R：置換 (replace)、修復 (repair) 與再生 (regenerate)，因此預期可利用幹細胞移植治療之疾病有：帕金森氏症、亨丁頓舞蹈症、脊髓損傷、中風、阿茲

罕默症早期及腦性麻痺等，建立幹細胞株使幹細胞於控管之條件下批次生產且商品化成為可能，Dr. J. Sinden 說明移植用神經幹細胞株需具備之重要特性，如細胞鑑別、高繼代之遺傳穩定性、活體存活率長、受損部位之移行與植入、活體內分化為神經細胞與神經膠細胞、以動物行為模式評估功能性有效及能評估功能特性之預測分析等。同時該類治療用產品必需每批次進行鑑別分析、幹細胞分離與製造過程須測試其純度、臨床使用全程之基因型與表型穩定性需穩定、活體使用安全（尤其不得過度生長）、長期於受損區內特定部位植入、必須以適當之動物模式證明其分化能力及生物活性效果。該公司在類似 GLP 的環境下自人腦分離神經幹細胞並利用調節 *c-myc* 進行有條件的永生化 (conditional immortalize) 開發細胞株並研究其特性，篩選並建立具上述特性之細胞株。此外，Dr. J. Sinden 並提出幹細胞產品之品質需由三階段之資格條件來控管—捐贈者資格、細胞庫資格及成品資格；捐贈者資格方面需通過 HIV、HBV、HCV、EBV 及 TSE 危險因子等篩檢項目；細胞庫資格方面需通過表型鑑別、無菌試驗、黴漿菌檢測、染色體核型分析、同功酵素圖譜分析、活體病毒污染試驗及 HIV、HBV、HCV、B19 等病毒核酸檢測項目。成品資格方面需通過無菌試驗、黴漿菌檢測、內毒素、表型鑑別、效價、細胞存活率及細胞濃度等項目。

其次由法國與美國 IDM (Immuno-Designed Molecules) 公司 Dr. E. Balbirnie 介紹該公司為改善患者免疫反應而研發出一組名為 Cell Drug<sup>TM</sup> 之免疫治療藥物及其品質挑戰。該組藥物分為兩大類，一為 Antibody-based Products，目前已有治療卵巢癌之 OSIDEM (第三期臨床試驗)、治療膀胱癌之 BEXIDEM (第二期臨床試驗) 及



治療慢性淋巴細胞白血病之 IDM-4 (第二期臨床試驗)，另一類為 Therapeutic Vaccines，目前已有治療前列腺癌之 ELADEM(第二期臨床試驗)及治療黑色素瘤之 UVIDEM (第二期臨床試驗)。

該類新產品與製程需歷經原料、發展製程與成品相關事務、品管放行檢驗及有限資源等品質挑戰，由於該類產品無法最終滅菌，因此原料之控管相當重要，該公司建立一套原料全程監控與管制系統，參考 ICH Q6B 指引，各類原料均制定規範以確保供給之一致性及安全性、鑑別、純度與效價，如細胞培養基之放行使用前須有 pH 值、外觀、滲透壓、無菌試驗、內毒素及黴漿菌檢測等規格，放行使用後則須先進行七天之細胞培養以評估細胞數、細胞存活率、細胞表型分析、外來病毒試驗等；細胞庫包含主細胞庫及工作細胞庫，參考 ICH Q5A 指引，細胞庫主要考慮微生物安全問題，必須進行無菌試驗、黴漿菌、抑菌性及抑黴菌性、外來病毒污染試驗、穿透式電顯、豬、牛病毒檢測、HIV, HBV, HCV 等病毒 PCR 檢測。另外，研發過程所有的活動均須有 SOP，實驗紀錄方式亦須有 SOP，研發過程之重要儀器校正須有 SOP，而臨床試驗製造過程所有儀器均須經檢定，研發作業須有計畫書並經法規部門及品保部門審核通過，自研發階段到製造階段之技術轉移應使用預先經審核且具有特定接受標準的計畫書，變更管制步驟也可能於轉移到製造階段後進行，必須進行相似性研究 (comparability studies) 及確效研究 (validation studies)，必要時必須進行 SOP 再檢閱與改版，必須有文件控管 SOPs，對於所有組別人員進行 GMP 與 GLP 訓練。在品管放行檢驗方面，現行最主要之檢驗為細胞數、存活率、表型鑑定、無菌試驗、內毒素及黴漿

菌檢測。最難處是大部分細胞產品可能需在得到無菌試驗及黴漿菌檢測結果前施予患者，因此可能必須“conditionally released（有條件地放行）”，放行時如發現有任何潛在之安全危險性，則最終產品需被銷毀。

## （二）細胞治療產品之新挑戰

### 1. 製造部份：

首先由英國 Bioreliance 公司 Dr. M. Wisher 介紹細胞治療產品細胞庫、原料及成品之品管與最新分析方法。他首先說明該類產品潛在的污染途徑：原料部份需注意細胞捐贈者及建立細胞庫前操作之潛在污染性，培養基與試劑部份之胎牛血清需注意牛的病毒與 TSE、胰蛋白酵素需注意豬的病毒、生長因子需注意各種來源可能造成之污染，細胞操作與處理過程部份需注意操作者可能造成之污染及不同批次間之交叉污染。生物製劑安全性最重要的三大議題為：原料（細胞庫、載體庫、培養基與試劑）是否受外來或內源病毒污染之篩檢、製程中間物（收取之原液、純化之載體）之篩檢及純化過程下游經確效之病毒去除/不活化步驟。而細胞治療產品通常並無純化步驟可以去除或不活化微生物之污染，故確保該類產品無微生物/病毒污染需藉由更嚴格之篩檢組織捐贈者、捐贈細胞及生產過程使用之原料試劑，以及確效之細胞處理過程及批次間之清潔確效來達成。

接著他深入介紹自體細胞治療產品所建議進行之品管項目：

捐贈者篩檢－HIV-1/2, HTLV1/2, HBV, HCV。

製程管制項目—無菌試驗、黴漿菌檢測、外來病毒試驗（體外與體內試驗）、測試培養基成份是否具牛、豬或人病毒、以細胞標記或同功酵素圖譜作細胞鑑別、細胞數、存活率與細胞形態、細胞效能。

逐批放行試驗項目—無菌試驗、內毒素、黴漿菌檢測、外來病毒試驗（體外試驗）、以細胞標記或同功酵素圖譜作細胞鑑別、細胞數、存活率與細胞形態、細胞效能。

製程確效—以微生物管制、細胞存活率、細胞生長及/或分化、細胞鑑別與純度、細胞活性或效能等項目來確效細胞操作過程；以細菌、黴菌與病毒之不活化來作清潔確效。

異體細胞治療產品所需進行之品管項目：

捐贈者篩檢—HIV-1/2, HTLV1/2, HBV, HCV, HAV, CMV, EBV, CJD 與 nvCJD 危險因子。

製程管制項目—對種細胞庫、工作細胞庫及製程中間物分別進行無菌試驗、黴漿菌檢測、外來病毒試驗（體外與體內試驗）、電子顯微鏡、反轉錄病毒感染力、人病毒、牛/豬病毒、致腫瘤性、染色體核型分析及細胞鑑別。

逐批放行試驗項目—無微生物或病毒污染試驗：  
無菌試驗（14 天）  
外來病毒體外試驗（14 天）  
黴漿菌檢測（28-35 天）

## 內毒素

- 細胞數、細胞存活率與形態
- 效價試驗

牛來源相關試劑所需進行之品管項目：依據歐盟專利藥品委員會 (CPMP) 2002 年提出製造人用生物製劑使用牛血清之指引，建議牛來源試劑應進行牛相關病毒檢測，如牛病毒性下痢病毒 (BVDV) 與牛多發性腫瘤病毒 (bovine polyoma virus, BPyV) 等。由於牛病毒性下痢病毒經常出現於胎牛血清 (fetal calf serum, FCS)，被 $\gamma$ 射線照射而不活化；而牛多發性腫瘤病毒屬於穩定的非套膜 DNA 病毒，與人類致病原 SV40 相關，但目前尚無證據顯示與疾病相關；因此人類細胞治療產品遭受牛病毒性下痢病毒與牛多發性腫瘤病毒污染之危險性如何？亟待見一步研究了解。

最後，他除說明歐洲藥典制定之黴漿菌檢測方法與要求外，並介紹以 Q-PCR 檢測黴漿菌之方法，該方法是利用 TaqMan 技術進行單管 PCR，採用 9 條引子與 2 個探針，針對 60 種黴漿菌一致之 16S-23S rRNA 區間；該方法快速而靈敏，尤適用於細胞治療產品等生命期短者，相較於藥典之黴漿菌檢測法須時 28-35 天，Q-PCR 檢測法僅需 2 小時；目前該法與藥典方法正式之比較研究已經完成。

其次是由法國 Genethon 公司 Prof. O.Merten 介紹基因治療使用之細胞庫及原料的品質管制以及黴漿菌、外來物質等最新檢測方法。基因治療使用之細胞必須建立種細胞庫及工作細胞庫，兩者均需儘可能準確地分析其生物結構與功能性，並證明無內源性或外來污染物質。細胞株特性之管理要求：(1) 細胞株之歷史背景與血統應有文件證明

(2) 種細胞庫與工作細胞庫生產與儲存步驟之詳細敘述  
(3) 建立細胞株鑑定資料，如細胞形態、染色體標記(染色體核型分析)、同功酵素分析、DNA 指紋分析及免疫標記分析等  
(4) 插入基因之特性分析，如該段基因之完整核苷酸序列、詳細之限制酶切割圖譜(包含可編碼序列)及拷貝數目(copy number)  
(5) 建立細胞於使用條件下之穩定性資料  
(6) 細胞之生長特性，須詳細敘述使用之培養系統  
(7) 病毒檢測：傳統病毒學方法(體外或體內)，以反轉錄酶進行檢測、以電子顯微鏡分析、嚙齒類動物抗體產生測試法(MAP, RAP, HAP)  
(8) 無細菌、黴菌與黴漿菌證明  
(9) 考量使用之細胞須進行的特定試驗，如有具繁殖能力之重組病毒(replication competent virus, RCV)，必要時須進行  
(10) 致腫瘤性試驗及  
(11) 致癌基因表現試驗。

載體的病毒基因與細胞基因重組或互補即有可能造成具繁殖能力之重組病毒(RCV)的產生，因此必須檢測製程各階段以確定無 RCV 存在。檢測 RCV 之方法依病毒種類使用不同細胞株，如 RCA 之檢測使用 A549 細胞、Hela 細胞或 S3 細胞，以細胞 CPE 之產生來判定，靈敏度可達 1-2 RCA 或 0.33 PFU/mL。

臨床使用之載體，各批次均應進行無菌試驗、黴漿菌檢測、外來物質檢測、內毒素、病毒力價、鑑別(RFLP, PCR)、功能(轉殖基因之表現)、細胞 DNA 之降解、細胞蛋白質、pH、充填量及安定性等試驗項目。此外，某些病毒載體須進行特定之品管項目，如 MLV(鼠類血癌病毒)須檢測 RCR、LV(慢病毒)須檢測 LV-RCR、AAV(腺相關病毒)須檢測腺病毒及 rcAAV、腺病毒須檢測 RCA 及腺相關病毒、顆粒與感染單位及空蛋白質外殼。

## 2. 研發部份：

首先由英國 Q-One Biotech 公司 Dr. D. Galbraith 介紹新興細胞治療與組織工程產品之病毒與微生物安全層面。他首先提及組織工程產品在美國被視為醫療器材，在歐洲則被視為需要更嚴格之安全評估標準的高科技藥品；此外，歐洲與美國指引最大之不同點在於—歐洲不建議使用直接取自對物之異種初代培養細胞，除非異種移植已獲國際間一致同意，並具備有效之國際監督系統及公佈特定之國際指引。他並介紹歐洲指引所載之批次放行試驗項目，包含鑑別、效價、存活率、外來物質試驗、純度及一般安全性試驗，歐洲要求除非某些經注射後須立即再注射之個人專屬之細胞治療產品，以及細胞數目或來源相當有限之細胞產品等可免除逐批放行試驗，但該類產品之細胞操作過程須確效 6 個月。接著他說明細胞治療產品之病毒污染來源：源自捐贈組織之人類病毒，來自分類細胞使用之動物抗體試劑、來自支持幹細胞生長之滋養細胞 (feeder cell) 以及來自細胞培養基或細胞培養添加物，因此必須藉由各階段之篩檢來確保產品之病毒安全性。在捐贈者篩檢部份，歐洲與美國除分別依據其捐血者標準外，尚須測定 HLA I/II 型抗原及其他相關抗原，病毒血清學篩檢部份至少須檢測 HIV 1/2, HTLV 1/2, HBV, HCV 及其他因特定組織須加作之病毒項目如造血細胞須加作 B19 與 TTV，上皮細胞須加作 HPV；對於血清學陰性之病毒檢測項目則另建議加作 PCR 檢測病毒核酸。分類細胞使用之抗體若得自綿羊，必須取得適用性證明以免除 TSE 疑慮，除對於抗體原液須進行檢測，抗體製造過程須有經確效之病毒去除/不活化步驟。滋養細胞部份須注

意：即使經過放射線照射仍可能釋放病毒，且某些反轉錄病毒會被放射線所誘導，circovirus 病毒對放射線具高度抵抗性。細胞培養基或細胞培養添加物部份須注意：胎牛血清之牛多發性腫瘤病毒 (BpyV)、胰泌素 (porcine trypsin) 之豬微小病毒 (porcine parvovirus)、氨基酸之鼠微小病毒 (minute virus of mice)。

此外他提及一些新發現的/緊急的病毒如 E 型肝炎病毒 (HEV)、環狀病毒 (circoviruses)、玻納病病毒 (borna disease virus)、布尼亞病毒 (bunyaviruses) /節肢動物病毒 (arboviruses) 及未知病毒。在 TSE 議題方面，反芻類動物來源之產品必須有適用證明書、使用高危險群材料可能還需要額外的資料如 TSE 之清除研究。

其次由德國 MediGene AG 公司之 Dr. Ch. Bogedain 介紹個人專用細胞治療產品之品管與放行策略。考量到病患與無菌室設備之防護，個人專用細胞治療產品之品管策略仍應包含病患本身之評估，雖然病患受病毒感染之狀態可能不會影響治療效果，但此評估對於避免生產設備與工作人員受病原污染極為重要。在原料部份，小心地篩選與原料測試是相當重要的，尤其是源自於人或動物者。若是進行基因治療，尤應特別注意載體，因其需要複雜的製造過程，故詳盡的安全性試驗是必需的，試驗項目應包含病原微生物或載體野生株測試、或可能導致病患體細胞複製載體之病毒。在製程管制部份，須包含依藥典進行之一般安全性試驗，如無菌試驗、黴漿菌檢測或自體細胞之存活率，此外亦包含特定試驗/效價試驗以提供治療成功可能性之證明，如純度之等級或細胞群之完整性，及治療基因表現率。在放行試驗部份則著重於一般安全性之考量，同時亦應進行產品特定效價試驗，若已排除病原微生物經由

原料導入產品，則詳盡之安全性試驗如病毒檢測（體內/體外試驗）可能非必要進行。考量病患時間及產品效期有限，完善之製程確效有助於使某些產品放行試驗改列為較非必要性，然而此部份卻常受限於缺乏可信之臨床材料供確效用。

接著由美國 Genzyme Biosurgery 之 Dr. G. C. Du Moulin 介紹該公司將自體移植用軟骨商品化之經驗。Carticel®治療方式是由外科醫師自病人關節軟骨取出一片約葡萄乾大小之健康軟骨組織送到該公司，經訓練之工作人員將軟骨細胞分離出，經過三週之培養使細胞數目增加約 10-20 倍後再送回醫院，由醫師植入原病患。該公司於八年前開始訂定其自體移植用軟骨 Carticel®之參數、規格及品質保證/品質管制計畫相關條件，美國 FDA 亦要求該產品須有穩健之品質計畫以確保其安全性與有效性。

該公司製造細胞治療產品之品質考量包含：

- (1) 病患細胞/批次之區隔
- (2) 原料之接受與放行
- (3) 儀器裝置之校正與確效
- (4) 記錄與文件管理
- (5) 環境監控
- (6) 設備之發展
- (7) 人員訓練與檢定
- (8) 製程確效

而該類產品進行確效之考量包括：

- (1) 切片之品質與差異性
- (2) 製程中細胞繁殖之管制：維持、擴增與純化
- (3) 自切片到植入間運送過程之保存機制
- (4) 移植後之保存機制



- (5) 製造活動受制於有限之產品效期
- (6) 品質管制分析方法之研發與確效
- (7) 每一位病患均制定為獨立之批次
- (8) 每一批次均需進行測試
- (9) 減低細胞產品之潛在差異性
- (10) 滿足緊急管理之構想

該類產品本身則著重於效價、安全性與安定性，效價之試驗包含總細胞數、活細胞數及生物活性分析；安全性則以無菌操作維持無菌性、未存在或擴增 HIV, HBV 及 HCV、未導入黴漿菌、內毒素與毒性污染物於製程來確保；在安定性方面，自體移植用軟骨之初代培養細胞貯存於液態氮至少可維持 2 年，Carticel®於 2-10°C 保存效期為 72 小時。此外，該類產品於研發期即須進行評估以決定產品之貯存、運送及操作條件，同時對於效期短之該類個人產品亦需特別考量某些狀況，如 24 小時快遞系統、空運環境、暴露於 X 光下、堅固隔熱之包裝材質。

許多該類產品可能無法藉由成品試驗來放行，必須藉由適當之確效來控管每一操作步驟及嚴格執行 GMP 來反應產品之安全性與有效性，而品質系統可以有效地監控制造關鍵點並指導對策來持續改善。

### (三) 基因治療產品之新挑戰

#### 1. 製造部份：

首先由法國 Necker 醫院 Prof. M. Cavazzana Calvo 說明基因治療嚴重複合性免疫不全症之實務經驗。嚴重複合性免疫不全症 (severe combined immunodeficiency,

SCID-X1) 是 X 染色體基因缺陷之遺傳性疾病，由於淋巴球前驅細胞膜上  $\gamma_c$  細胞激素 IL2, 4, 7, 9, 15 接受器之基因突變致膜上蛋白質表現不正常，使 T 細胞與 NK 細胞之分化受阻，導致免疫力嚴重缺乏而無法對抗任何感染，常於一歲以內死亡；傳統治療方法為骨髓移植，若未治療，終身都得待在無菌塑膠帳篷內，故俗稱泡泡兒。

SCID-X1 是基因治療的良好模式，因該病為單一遺傳性疾病，患者致死率高，而致病機轉與基因均已知悉，且成熟 T 細胞生命期長達數年。同時該基因治療方法是將  $\gamma_c$  基因轉移至造血前驅細胞，符合選擇基因治療之三利基：轉移基因帶給被轉移細胞存活或生長的好處、被轉移的細胞在最終分化前經過數次分裂以及確保分化細胞生命期夠長；以往之實驗結果： $\gamma_c$  基因轉移之體外實驗顯示  $\gamma_c$  的表現可以回復， $\gamma_c^-$  小鼠之免疫缺乏可以藉由體外將  $\gamma_c$  基因轉移至造血前驅細胞來矯正。

$\gamma_c$  基因轉移物 MFGB2- $\gamma_c$  是採用反轉錄病毒載體 Mo-MuLV (由 Murine Moloney leukemia virus 製造)， $\gamma_c$  基因在病毒 LTR promotor 之控制下，包裝細胞株為  $\Psi$  CRIP，病毒力價為  $5 \times 10^5$  particles/mL，經檢測無 RCRs 存在。在臨床前試驗部份， $\gamma_c$  基因轉移體外試驗是分別採用  $\gamma_c^-$  B 淋巴細胞及  $\gamma_c^-$  CD34<sup>+</sup> 細胞，以了解其於 B 淋巴細胞之可行性、蛋白質表現及功能，於前驅細胞之表現及長期表現，以及 NK 細胞及 T 細胞之分化。活體試驗是採用  $\gamma_c^-$  小鼠以了解其毒性及可行性。

在安全與法規議題方面：載體在 GMP 設施下製造，載體生產細胞及上清液無微生物存在，臨床使用批次無 RCV 存在，體外治療設施已取得核准，此外，臨床試驗

是經由巴黎醫院管理單位、遺傳工程委員會、生物分子及遺傳委員會、安全與臨床試驗委員會及倫理委員會等單位核准。

其次是由英國 Cobra Therapeutics Ltd 之 Dr. G. Sharpe 介紹臨床試驗用基因治療腺病毒載體之製造與特定分析。他認為臨床試驗用基因治療腺病毒載體之製造必須儘可能簡單易行，具有再現性但又有調整之彈性，他以一個用於“基因導向酵素前驅藥物治療 (gene-directed enzyme Prodrug therapy, GDEPT)”之重組腺病毒之製造為例來說明。該重組腺病毒因剔除 E1 和 E3 基因，由於 E1 蛋白主要是提供病毒表現早期基因所需之轉錄因子，因此該重組腺病毒為複製缺陷病毒，使用之包裝細胞株為 PER C6<sup>TM</sup> 細胞，採用旋轉培養瓶 (roller culture) 以無血清、動物蛋白質和抗生素之培養基培養。在安全性試驗方面，於製造流程之各階段，種細胞庫 (MCB) 必須進行全套試驗，種病毒庫 (master virus seed stock, MVSS) 必須以體外試驗測試外來物質並檢測 RCA，具載體之細胞株 (CVL) 必須以活體及體外試驗測試外來物質並檢測 RCA 及黴漿菌，最後純化後之重組病毒載體必須檢測無菌性、內毒素及黴漿菌。此外，腺病毒載體之品質管制試驗尚須進行：以 ELISA 鑑別試驗、顆粒數、以溶菌斑試驗 (plaque assay) 進行感染力試驗、純度試驗 (P:I)、特定效價試驗、不純物試驗 (RCA) 及 Cs 與宿主細胞殘留分析等。

## 2. 研發部份：

首先由法國 Transgene 公司 Dr. D. Malarme 介紹基因治療用病毒載體之穩定性議題。病毒載體之穩定性可分為

兩部份，其一為熱穩定性，另一為基因穩定性；在熱穩定性方面，影響之因素包含載體種類、生產過程、病毒濃度、處方緩衝液之組成、酸鹼度與滲透壓，以及液劑或凍乾型式，現有對於生物製劑指引及多年來對於減毒活疫苗所累積之經驗均為進行評估研究時相當有用之參考，如 ICH Q5C 及 Q1A。Dr. D. Malarne 以利用腺病毒載體表現 IL-2 細胞激素之案例來說明熱穩定性研究，初步研究已獲得 4°C 貯存一年之結果，而該結果顯示將來有希望將貯存溫度由現行之 -70°C 改為 4°C。

至於基因穩定性方面，影響之因素包含載體種類、轉移基因之自然狀態、基因插入之建構、基因表現程度、繼代次數等，然其評估研究可能較具特異性，目前亦尚無專用指引可參考。Dr. D. Malarne 以利用牛痘病毒載體表現黏液蛋白和 IL-2 細胞激素之案例來說明基因穩定性研究，該研究除將載體製造過程間各階段如種病毒代前 (Pre-MVS)、種病毒代 (MVS)、臨床用代數進行 IL-2 基因序列與蛋白質表現、IL-2 功能性、MUC-1 基因序列與蛋白質表現及插入基因與片段重複序列之 PCR 試驗等分析外，尚將臨床用代數之病毒載體進一步繼代 3 代，使該繼代亦進行上述之分析，各代之分析結果均必須在所訂定之規格範圍內。基因穩定性對於基因治療用病毒載體之特性分析而言為關鍵參數，故他建議基因穩定性研究除包含生產代數本身與前後進行上述分析外，應涵蓋許多分離的 sub-clones 之分析。

其次由英國 Cobra Therapeutics Ltd 之 Dr. D. Thatcher 介紹基因治療用質體 DNA 載體之穩定性議題。質體 DNA 由於 DNA 結構之特性，使其對於物理變性、清潔劑變性及化學降解比許多蛋白質類生物藥品較具抵抗力，DNA

結構之受損通常經由脫鹼氮作用與脫嘌呤作用改變鹼基而造成，可能會導致影響製藥的生物活性與安全性。常態的質體 DNA 為環狀超螺旋捲曲之三級結構存在，稱為 supercoiled form，若其中一股因物理化學或酵素性破壞而斷裂，則形成 open circular form，若兩股均斷裂則形成 linearised form，open circular form 經長期存放亦可能形成 linearised form。而這三種型式可以利用掃描原子顯微鏡（atomic force microscopy, AFM）觀察或以毛細管電泳或膠片電泳分析。

質體 DNA 貯存時影響其三級結構之因素有溫度、酸鹼度及重金屬離子，故質體 DNA 載體之穩定性必須探討這三因素，進行相關之加速試驗（stressed stability）如低 pH 值與高溫條件等。此外，脫嘌呤作用之主要催化劑已被確認為酸和二價鐵，動力學研究結果顯示 DNA 降解的原因通常是化學性而非酵素性，故研究長期與短期之貯存溫度對於質體 DNA 影響時，必須調配於添加 EDTA 之適當緩衝液中，以捕捉金屬離子及維持酸鹼中性。另外並以螢光酵素（luciferase）活性分析之模式進行活體及體外試驗來作質體 DNA 穩定性研究之生理活性評估。

加速試驗結果顯示 open circular form 的形成是質體 DNA 降解之主要原因，螢光酵素活性分析之活體與體外試驗亦顯示 open circular form 使生物活性降低。

接著由德國 PlasmidFactory 公司 Dr. M. Schleaf 介紹質體 DNA GMP 生產之改善。質體 DNA 的拓樸（topological）構造可以利用毛細管電泳來分析，其為評估質體 DNA 儲存或應用之品管與穩定性的重要工具，因此製程之研發必須考量到能將不想要的 open circular (oc)

或 linear plasmid 與想要的 supercoiled closed circular (ccc) 載體區分開來；同時，任何質體 DNA 製程之研發必須具備完整之製程管制系統以獲得質體之特性分析數據。

有關質體 DNA 的製造，自載體設計到臨床試驗須考量之重點：整體構想、載體構造（含大小、拷貝數、DNA 序列及拓樸分析等）、DNA 之生產（含安全性、質體拓樸分析及品質保證）、DNA 藥物處方（含質體拓樸分析、儲存與穩定性）以及臨床應用。在安全性方面採用無動物來源與植物來源複合物之培養基成份、製程全程無抗生素、酵素（如 RNase）、無有機溶劑且無乙醇或異丙醇、製程下游階段不採用離心程序等。

在質體 DNA 特性分析方面，包含以 UV 260nm 測 DNA 濃度、以 UV 220-320nm 測純度、外觀純度檢查、以膠片電泳或 Q-PCR 檢測細菌 DNA 潛在污染、以膠片電泳或螢光分析檢測 RNA 潛在污染、以 LAL 試驗檢測脂多糖（LPS）、以 BCA 法檢測潛在污染蛋白質、以負荷菌試驗或無菌試驗檢測潛在污染微生物、來自製程之其他污染或噬菌體、以 proof reading 進行質體 DNA 序列分析、以限制酶片段長度分析了解質體 DNA 構造、以毛細管電泳作質體拓樸分析。此外，DNA 生產與質體拓樸分析的關係：以層析法分離不想要的 open circular DNA 可以改善載體的效率。最後 Dr. M. Schleef 並說明應用毛細管電泳技術分析質體 DNA 載體之穩定性，如不同溫度下長期儲存之分析等。

接著由美國 Canji 公司 Dr. B. Hutchins 說明腺病毒對照標準品之特性分析與使用。隨著應用於基因治療臨床試驗之腺病毒載體的研發，其安全性議題亦日益重要。在腺

病毒對照標準品工作小組 (adenovirus reference material working group) 指導，以及美國 FDA 藉由美國、加拿大、法國、荷蘭、德國及英國的許多實驗室與組織捐贈的服務和供給下，已研發了腺病毒對照標準品，該標準品是由純化的野生型第五型腺病毒所組成。建立該標準品的目的是為了用以決定腺病毒載體的 particle unit 及 infectious unit，以及比較參考點，相關資訊可上網頁 (<http://www.wilbio.com>) 了解。

腺病毒對照標準品工作小組依據該標準品於特性分析研究期間蒐集的數據所作之統計分析決定顆粒濃度及感染力價，其顆粒濃度為  $5.8 \times 10^{11}$  particles/mL，對於 HEK 293 細胞之感染力價為  $7 \times 10^{10}$  NAS Infectious Units (NIU) / mL。該標準品完整的 DNA 序列已決定並將存放於 Genbank，並經多種不純物分析，如 HEK 293 宿主細胞 DNA 殘留量低於 3pg HCDNA/ per  $\mu\text{g}$  total DNA，殘留之片段大小，殘留片段大小為 120 bp, 411 bp, 757 bp，HEK 293 宿主細胞蛋白質殘留量為 18 ng/mL，殘留 BSA 低於 0.5 ng/mL，游離 hexon 為 1.16  $\mu\text{g}/\text{mL}$  或每  $10^{12}$  個腺病毒顆粒約 2.0  $\mu\text{g}$ ，以 RP-HPLC 分析並未檢測到分子量 31K 之前驅蛋白質，內毒素含量低於 0.15 EU/mL，於 0.1% (w/v) SDS 之 A260nm/A280nm 比值為 1.37，該標準品並經檢測確認無外來物質，且以光度校正光譜分析 (photon correlation spectroscopy) 評估顆粒大小分布證明其相當均質，並以場發射掃描式電子顯微鏡 (field-emission scanning electron microscope) 確認並評估其單一顆粒平均直徑為  $86.2 \pm 5.4$  nm。最後，該標準品目前已可自美國菌種保存中心購得。

本單元最後是由英國 Oxford BioMedica 之 Dr. K. Mitrophanous 說明對反轉錄病毒與慢病毒(Lentivirus, LV) 對照標準品的需求。反轉錄病毒與慢病毒為目前基因治療載體系統中相當有前途的工具，尤其是慢病毒載體結合了可感染非分裂細胞、能嵌入染色體、能長期表現以及毒性低之特性，使大量相關研究投入該領域。目前慢病毒載體有 HIV, SIV (Simian immunodeficiency virus), FIV (Feline immunodeficiency virus) 以及 EIAV (Equine infectious anemia virus)，而新構成的反轉錄病毒載體則因使用新的 pseudotypes。

然而目前該二類載體系統均尚無對照標準品供用，建立對照標準品來評估臨床使用之載體系統的安全性與效價如使用量（顆粒數）、RNA 量、嵌入效率等特性是有必要的。

在安全性方面，RCR 或 RCL 的產生可能來自於基因同源性重組或非同源性重組，同源性重組可以經由載體系統之設計避免之，非同源性重組則難以預測；為確定臨床用載體於生產過程是否產生 RCR 或 RCL，必須進行 RCR 與 RCL 分析，而對照標準品對於該分析亦是有必要的，因該分析必須經確效證明能檢測出 RCR 與 RCL 之存在，故陽性對照組是必需的，其於分析條件下能以類似 RCR/RCL 之情形複製。此部份仍有其困難處，因為不同載體的使用，如 MLV (Murine leukemia virus), HIV, FIV, EIAV，以及不同套膜 (Ampho, RD114, VSV-G) 之使用，目前對於 RCL 構造以及其如何/是否於人類細胞內複製均尚不清楚。



現行對於 MLV 載體之 RCR 檢測方法是採用 product enhanced reverse transcriptase assay (PERT assay)，該方法為極靈敏之反轉錄酶試驗方法，靈敏度可達 10-100 個顆粒，該法可使用具複製能力之 MLV (4070A) 或 FeLV B/C 為陽性對照組，本法並可應用於使用任何套膜之任何 MLV 載體系統。對於其他新載體則可能需要廣用型的陽性對照，建議以 MLV (4070A) 當作一般陽性對照。

在效價方面，以 RT 活性及/或 RNA 量來評估顆粒數、以及單位載體之嵌入數等效價分析均需要對照標準品，他提出以 PERT assay 評估顆粒數時可採用 MLV (4070A) 當標準品，其可自美國菌種保存中心購得；另外，在以及時 RT-PCR 測量 RNA 量時可採用  $\beta$ -actin, neo,  $\beta$ -gal 等為 RNA 決定標準品。

#### (四) 法規議題

##### 1. 目前與未來之法規挑戰：

首先由英國 Arnold & Porter 之 Dr. L. Tsang 介紹基因治療產品和細胞治療產品目前與未來之法規挑戰。隨著科學家對於生化學、細胞與分子生物學、遺傳學、材料科學及生醫組織工程學的了解，亦更新了以基因、細胞或組織為基礎的個人用治療性藥品之臨床研發範疇，其與傳統藥品之臨床研發及使用亦大為不同，為確保該類產品之品質、安全與效用，所有這些改變對於藥廠與衛生主管機關而言一直持續存在著技術與法規之挑戰。

設定規格以充分了解組織與細胞產品最大潛力時需要強而有力的科學證據，並在合理的法規要求支撐下，以確保其安全性與有效性。由於該類新技術產品之科學研發已跨越生物、物理、化學、材料科學與臨床操作等領域，因此需要一套可適合多方面之方式以著力於與該類產品之設計及功能評估相關之關鍵議題，形成一套合理的根據供將來產品臨床研發用。同時，一套清楚透明的法規系統亦是必需的。目前亟需考量的是：該類產品究竟該如何被適當地管理，方能在不會造成不必要的障礙下使病患接受新治療以保護大眾健康。

##### 2. 製藥業之需要：

首先由 EuropaBio 之 Dr. E. Tambuyzer 介紹藥廠對管理該類產品標準化與品質管制的歐洲法規架構須求。現行歐洲和全球對於細胞與基因治療產品之法規由於應用創新和以生物技術製造產品而顯著改變，而這些產品的標準化和品質管制之於社會之確保安全性、之於藥廠的計畫與

保持水準之研發而言均相當重要，因此 Dr. E. Tambuyzer 說明現行歐洲對於細胞治療產品與基因治療產品之法規並闡述藥廠的觀點。

歐盟將基因治療產品視為藥品管理 (98/C 229/03)，其認為基因治療是一套基因轉移到人體組織且於活體內表現的程序，而載體可視為“用於基因治療之產品”的一部份，而該產品則被視為醫藥品。至於細胞與組織相關產品，許多產品無法符合醫療器材或醫藥品法規所述的定義，且各會員國管理不一，導致對未來產品與投資狀況不明確、對產品安全性與有效性之管理不足、對藥廠造成貿易障礙、無法確定歐洲病患之接受標準是否相同以及歐盟各會員國各自立法。在臨床試驗方面，基因治療與細胞治療產品其臨床前試驗可能有所不同，採用非傳統之臨床試驗可能較適當，強調重點在細胞增殖、感染危險性、對免疫系統之衝擊等，此外可能還需要特殊之試驗設備。目前臨床試驗仍由各國各自管理，如德國自 2002 年 6 月法國報告副作用案例後，由 PEI 決定中止所有反轉錄病毒的基因轉移試驗。歐盟的臨床試驗指令 2001/21 預計將自 2004 年 5 月起施用，各會員國必須於 2003 年 5 月 1 日前適用並公告，使臨床試驗之管理簡單化並協同化。除經將實施臨床試驗該國之主管機關審核並報告 EMEA，並經獨立的倫理委員會審核，對於基因治療與細胞治療產品之一般審核時間為九十天，得展延九十天，異種治療者則無時間限制。該指令要求被核准的基因治療或細胞治療案件必須明確地書面化，並明令會造成生殖細胞基因特性改變之臨床試驗將不會被准許，此外尚要求必須作安全性之評估，有副作用必須通報，用於臨床試驗的產品其製造必須符合 GMP。此外，DG Sanco 提出對於人類組織與細胞有關捐

贈、採集、篩檢、操作、儲存與配送所設定之安全與品質標準之建議指令，現正於歐洲藥典審核程序中。

至於組織工程產品，歐洲各官方與民間單位目前對產品定義、範圍與放行程序之意見尚未一致，大部份傾向於採用新法規架構管理，預計於 2003 年 6 月將提出建議指令草案。而 EuropaBio 期待歐盟管理單位能：(1) 針對細胞/組織工程產品建立一套新的法規，有別於醫療器材與藥品，並根據細胞/組織工程操作等級、主要作用模式、藥理、代謝或免疫作用等進行分類；(2) 所有製造廠採用相同法規；(3) 特定且協同之高品質、安全與有效之歐洲標準品；(4) 基於智慧財產之保護，需要有資料保護系統；(5) 中央核准系統，而非相互認證；(6) 基於特殊專業技術之需求，高度建議設立組織工程產品之中央專家諮詢體系。

接著由位於法國之歐洲製藥產業協會 (European Federation Pharmaceutical Industries Association, EFPIA) Dr. C. L. Julou 講述同樣的主題。他說明基因治療與細胞治療產品製藥業需要一個清楚合法之法規架構，特別是需知道主要負責該類治療產品監督管理責任的管理單位為哪一處；另外則需要一個逐步發展技術、方法與模式以取得新資訊，以及支持臨床研究與高品質藥物研發之管理環境；此外，該領域的管理者必須有很強的科學背景以及評估醫藥品 (尤其是生物性/生技產品) 的經驗，並有隨時更新科學知識的機會。

適當的品質評估標準對於產品研發是必需的，不恰當的標準與法規可能對於試圖研發細胞與基因治療產品的公司而言是致命的負擔。因此促進國際標準品之研發及訂

定產品不純物之可接受標準等支持品質研發，以及修訂優良操作規範如 GMP, GLP, GCP 以適用於基因治療與細胞治療等均為製藥業所需求之管理環境。

### 3. 主管機關之需要：

首先是由歐盟企業總署 (DG Enterprise) 製藥單位之 Mr. M. Robert 說明治療產品在歐洲團體之管理發展。基因治療產品與細胞治療產品在歐洲指令被視為醫藥品 (2001/83/EC)，同時亦在臨床試驗指令 (2001/20/EC) 中確認為人用醫藥品；歐洲法規對於基因治療產品之特殊要求包含基因在目標細胞之表現、治療基因之序列等特性分析、物化及生物/免疫等載體特性分析及生物性之基因轉移特性分析、建立細胞庫種批系統、宿主細胞來源控管、病毒安全性及產品自捐贈者至成品之可追溯性；對於細胞治療產品之特殊要求包含改變細胞免疫、代謝或其他定性或定量方面之操作、細胞之篩選、操作與製造過程、細胞操作及與非細胞物質結合、修改基因或其他操作來表現之前未表現之同源性或非同源性功能性。歐盟目前已提出“以人類細胞與組織為原料”之建議指令(OJ 2002/C 227 E/28)，提供將應用於人體之人體組織與細胞的捐贈、採集與篩檢之品質與安全標準，同時亦提供將用於移植之人體組織與細胞的處理、儲存、保存與配送，但該建議指令並不包含用於製造藥品之自體細胞。此外要注意的是：供移植用之人體細胞並不視為產品，供體細胞治療用者才視為產品，其區別在於細胞處理的範圍與目的不同，及細胞是否被改變生物特性等差異。

接著是由法國醫療保健產品安全署 (AFSSAPS) 之 Mrs. S. Lucas-Samuel 說明法國主管機關對於治療產品之

管理經驗。AFSSAPS 被授權管理細胞治療與基因治療產品、該類之附屬產品、組織器官、生物性警戒 (biovigilance)，而法國自 1993 年起開始評估基因治療臨床試驗案例，自 1996 年起開始評估細胞治療臨床試驗案例。

法國對於細胞治療的定義為：給予病患細胞製備物（自體、異體或異種）後能表現出明定的特性，而治療或防止疾病。對於基因治療的定義為：為治療或診斷之目的而藉由體內或體外載體轉移遺傳物質進入人體組織，使能於活體表現該特定基因。對於該類產品之管理著重於生產與製備過程之三關鍵：

- (1) 原料：基因治療產品部份是指細胞庫、病毒種批系統（含特定基因、表現載體）；細胞治療產品部份是指來自器官或組織的自體、異體或異種細胞，或細胞庫系統（細胞株）。
- (2) 活性成份原液：基因治療產品部份是指重組病毒載體、質體、生產病毒細胞、供體外基因轉移細胞（異體或異種）；細胞治療產品部份是指操縱細胞混合液（無論操縱程度）、細胞溶解物（cell lysates）及用於連接內層基質與醫療器材之細胞。
- (3) 成品：指供醫療用之最終產品。

此外其生產與製備過程又可區分為簡單程序與複雜程序，簡單製程如自體造血幹細胞於再注射前之冷凍、貯存與運送；複雜程序在細胞治療部份如細胞的篩選、增殖

及分化等；在基因治療部份如病毒載體庫系統、培養、純化與凍乾等。除生產與製備過程之三關鍵步驟外，製程須經確效且具再現性。

對於該類產品/製程須要求技術性資料以證明產品之品質、安全與有效性，要求之資料須包含：(A) 品質相關資料部份含(1)原料及其他材料、(2)生產/製備過程、(3)成品品質管制及(4)病毒安全性等資料；(B) 非臨床資料部份含安全與作用機轉方面之資訊(實驗數據或參考數據)；(C) 臨床資料部份含支持治療用途的臨床資料(實驗數據或參考數據)、劑量、注意事項與副作用等資料。

品質相關資料部份之(1)原料及其他材料包含主要原料、附屬產品(ancillary products)及其他材料。附屬產品之定義為：(1)與器官、組織、細胞或胚胎接觸之產品、(2)使用於人用治療產品之製備、儲存或運送期間之產品、(3)為化學或生物(人體或動物)來源。AFSSAPS對該類產品之管理要求為：需要生產過程、原料品質及品質管制等品質資料，以及安全/體外活性等參考資料/實驗資料。

主要原料所需之資料：

(i) 基因治療方面

1. 目標基因及表現載體之來源、構造、特性分析及包含完整性與穩定性驗證之管制。
2. 重組載體之宿主細胞來源與特性分析。
3. 細胞庫/病毒種批系統之製備、管制與儲存。

(ii) 細胞治療方面：自體、異體或異種細胞

1. 捐贈者之臨床與生物性篩選、收集條件。
2. 細胞庫（異種）。
3. 管制項目如細胞存活率、鑑別及純度。

有關品質相關資料部份之（2）生產/製備過程，不論其製程為簡單型或複雜型，均需檢附（i）製造廠名稱、（ii）自原料到治療投予前之製程敘述與流程圖、（iii）製程中管制資料、（iv）關鍵步驟和中間產物之鑑定、（v）製程確效等資料。

有關品質相關資料部份之（3）成品品質管制部份所需之資料如下表

	Cell Therapy	Viral/plasmid vectors
Identity	-phenot. g enotyp markers -isoenzyme analysis -cell morphology	-restriction enzyme mapping -sequencing -molecular form of the plasmid
Impurities/ process	-residual media,	-residual media -host cell proteins, DNA
Impurities / product	-differentiate cells	-defective particles -agregates
Microbial safety	-Sterility, mycop. endotox -viral contaminant	-Sterility, mycop. endotox - RCV
Quantity	-Viable number of cells	-particle concentration -vector titer, DNA mass
Potency	-functionnal assay	-functionnal assay

\*Examples of tests

最後，有關品質相關資料部份之（4）病毒安全性，須檢附捐贈者之篩選資料、附屬產品須有來源證明、製程須有相關之病毒不活化資料。



#### 4. OMCL (官方檢驗機構) 之需要：

由法國醫療保健產品安全署(AFSSAPS)之 Mr. M. H. Tissier 說明法國 OMCL 對於官方檢驗機構之需求所提之建議。官方檢驗機構以獨立的專業技術提供主管機關有關批次產品是否符合預先設定之重要品質參數等相關資料，歐盟各國之官方檢驗機構並形成一個聯網 (OMCL network)，從事批次放行與市售調查兩大工作；官方檢驗機構同時亦參與相關參考文獻與對照標準品之規劃，以及共同合作研究等。另外，官方檢驗機構目前已有生物製劑如疫苗、血液製劑及生技藥品之管理經驗，足以開始管理細胞與基因治療產品範疇，然而，在開始管理前必須先考慮到各種層面，而非只侷限於技術層面。

在管理層面而言，基因治療產品被視為「未來的中央授權產品」，將會被納入由 OMCL network 執行管制之協調方案中。細胞治療產品並不隸屬於上市批准部份，是否納入協調方案管制尚有疑問，法國官方檢驗機構則開始進行「儲存與製備中心之外部品質管制」。

在技術層面而言，OMCL 必定較容易找到敘述重要品質參數與確效技術之參考文獻，供各官方檢驗機構許多委員一般使用，對照標準品與試劑亦同前述。法國 OMCL 已開始作細胞與基因治療產品之相關考量並已具備計畫方案及實驗室之初步操作經驗。該機構並認為此刻是開始進行歐洲共同合作 (在歐洲藥典之監督管理下) 之時刻。

總而言之，目前需要進行的工作有：須具備官方檢驗機構各項設備清單，須具備生產業者/製造業者之清單，優先順序之定義，開始進行歐洲共同合作研究如黴漿菌檢測、病毒載體力價標定、RCV 檢測等，制定藥典相關品

目如造血幹細胞之細菌管制、修訂已公佈之一般檢驗項目如黴漿菌檢測、基因治療載體特定品目等。

## (五) 未來

### 一、美國藥典在細胞治療與基因治療產品標準化之行動：

首先由美國藥典之 Dr. I. F. Deveau 介紹美國藥典對於細胞治療與基因治療產品標準化之行動。美國藥典開始訂定細胞治療與基因治療產品之標準是起始於 1997 年 12 月，當時是由生技與基因治療專家委員會組成一個諮詢小組；2000 年時，USP 大會將該諮詢小組提升為基因治療、細胞治療及組織工程專家委員會，該委員會是由來自醫學研究中心、生技製藥業、包含 NIH, FDA 等政府機構之科學家及臨床醫師組成。由 1997 年原來的諮詢小組開始訂定之『<1046>細胞治療與基因治療產品』一般通則終於在 2002 年 4 月 1 日正式定稿公告，該篇通則綜合了細胞治療與基因治療產品之製造、試驗及投予等相關議題及現行最佳之操作。委員們在訂定期間亦查閱參考了許多相關品質管理指引文件，包含 CBER 的考慮要點文件 (point to consider) 與指導文件 (Guidance)、ICH 指導文件、美國聯邦法規 21CFR210, 211, 600 及 820、品質系統管理條例及 ISO 指導文件。

該篇一般通則內容涵括：

#### (1) 引言

包括一般定義、細胞治療產品 (定義與介紹)、基因治療產品 (定義與介紹) 及本篇之目的與組織架構等部份。

## (2) 製造概論

包括引言、原料、細胞庫與病毒庫特性、製程中管制、規格及確效之考量等部份；其中原料部份又細分原料種類、資格檢定（含鑑別與選擇、合適性、特性分析、胎牛血清及品質保證等議題），細胞庫與病毒庫特性部份又細分細胞庫、病毒庫、資格檢定、種細胞庫之檢定、種病毒庫之檢定及工作細胞或病毒庫之檢定。

## (3) 細胞治療產品之製造

包括引言、材料來源之採集、細胞分離與篩選、細胞增殖與分化、遺傳物質導入細胞、細胞治療產品處方化等部份；其中材料來源之採集又細分人體組織、人體血液及骨髓及動物組織三議題。

## (4) 基因治療產品之製造

包括引言、基因載體設計考量與製造與純化等部份；其中基因載體設計考量部份又細分載體種類、載體設計標準、標的基因轉移、對體液免疫系統之衝擊、對細胞免疫系統之衝擊、基因產品抗原性、補體去活化、組織特異性啟動子、載體複製狀態之衝擊、載體之嵌合等議題；製造與純化部份又細分載體建構、輔助功能系統、病毒性基因治療載體、質體載體、寡核苷酸載體、基因治療產品之處方化等議題。

## (5) 現場製備並施打

包括一般性考量、現場製備及施打等部份；其中現場製備部份細分產品之操控、設備要求及成品

放行等議題；施打部份又細分施打前之要求、病患之治療與治療後之監控等議題。

(6) 分析方法

包括一般性考量、新方法及公定化之前景、抽樣、安全性、劑量訂定分析、效價、純度及鑑別等部份；其中安全性與鑑別部份細分一般考量、細胞治療產品、病毒載體基因治療產品與非病毒載體基因治療產品等四部份；劑量訂定分析與效價部份亦分別細分為一般考量、細胞治療產品及病毒載體與非病毒載體基因治療產品等三部份；純度部份又細分一般考量、細胞治療產品、病毒載體基因治療產品、非病毒載體基因治療產品與凍乾之病毒載體與非病毒載體基因治療產品等五部份。

(7) 安定性

包括一般性考量、安定性評估計畫發展、加速性與最適當之挑戰條件等部份。

(8) 儲存與運送

包括一般考量、細胞治療產品與基因治療產品等部份；其中細胞治療產品細分超低溫冷凍保存、解凍、冷凍產品與非冷凍產品等部份。

(9) 標示

產品標示由 FDA 管理，且須符合現行相關法規；對於生物製劑和器材，瓶籤與盒籤均需分別標示效期；若細胞處理過程添加抗生素，因此有存在於成品之可能性，則標示必須註明之。此外，產品放行前雖經病原或微生物篩檢，適當之

生物危害標示可能仍有必要。另外對於特定病患使用之產品，病患姓名將需要註明於標示上，再加上批號之設計，以確保產品施打正確。

#### (10) 法規、標準與新方法

包括法規與標準之總結與對新方法之需求兩部份。內容說明該類產品依製造與使用不同而可能以藥品、生物製劑或醫材管理，因此 FDA 建議業者於研發早期即請求界定說明，以方便其決定管理單位。該類產品法規與生技藥品相似，一般要求主要敘述於 21CFR，美國聯邦政府已公佈許多指導文件，ICH 亦公佈許多與藥品品質相關之指導文件，許多文件內容已被引用於本篇內。

目前該專家委員會已與許多細胞類創傷敷料製造業者合作草擬了該類產品品目，並已分別公佈於 PF27 與 PF28。此外，附屬產品為產品製造過程間使用而不會存在於最終產品之材料，但其可能會影響產品的安全性、純度與有效性。目前該委員會正草擬一篇一般通則—〈1043〉附屬產品 (Ancillary products)，以明訂用於細胞治療與基因治療產品製造之附屬產品之來源與檢定資格，確保細胞治療與基因治療產品之品質與安全。

## 二、圓桌討論與行動計畫之訂定

最後由所有演講者主持圓桌討論並訂定行動計畫。討論內容共分為品質、安全性試驗、標準化、方法、各項藥典品目、指導文件、對照標準品、定義與命名等主題，除就各主題重點說明外，亦拋出許多問題供大家省思。首

先，與會者一致同意“安全”為最優先之考量，檢測無菌性、黴漿菌、內毒素、外來物質等以及現有之 NAT 要求，除歐洲藥典現有之試驗方法外是否尚有其他？Q-PCR 尚需特定 SOP 與指導文件方能使用；安全性之試驗是否須注意詳列病毒清單、病毒不活化確效模式及生產方式（使用無血清培養基培養）；對照標準品部份，目前已有腺病毒對照標準品，尚須建立其他病毒載體與非病毒載體之對照標準品及共同使用之方法 SOP，並考量地區性工作標準品之建立；在檢驗方法方面須儘速建立指導文件與詳細 SOP，並考量特異性、確效標準/適用性、信賴區間/精密度、試劑及專利性等相關重點；在效價試驗方面，尚須發展有效性與安全性之評估模式、量身訂作的品質管制與製程管制系統、評估各種載體的標準 SOP 等；在品質方面，製造上游和最終產品檢驗、品質保證系統之存在、GMP 查核、官方檢驗機構的角色等議題均為重點；在藥典品目方面，提及訂定範圍、一般指導文件與詳細方法、產品特異性、有彈性的標準化、原料如胎牛血清之要求等重點；在定義/命名方面，包含品質管制、許可證與查核等所有與該類產品相關之規則與法規，經由持續進行交談、建議及公開諮詢、與生物技術工作小組（BWP）及國際夥伴密切合作努力於此部份。

### 三、參訪 IMTIX-SANGSTAT 製造廠

於 2 月 27 日參訪位於法國里昂之 IMTIX- SANGSTAT 製造廠，該廠位於 Aventis 公司廠區內，原為法國 Pasteur Merieux (前 Aventis ) 公司之血液製劑工廠，於 2000 年該製造廠被單獨出售且重新命名，而其公司總部位於美國加州。該製造廠輸入我國之動物抗人類胸腺細胞免疫球蛋白血液製劑有“瑪里斯”兔抗胸腺細胞免疫球蛋白(Thymoglobuline) 與“桑斯達”馬抗人類胸腺細胞免疫球蛋白(Lymphoglobuline) 二種產品。

此次參訪工廠由其法規事務主任 To-Nhu Truong-Tran 女士負責安排相關事宜。考察重點為了解上述二產品之 GMP 製造情形，包括人胸腺細胞來源之管控、動物飼養、免疫與動物血清之收集與品質管控、製造流程、製程管制、成品之品質管制與批次放行作業情形等。該二產品皆為臨床上進行人類器官移植時所使用，製造過程中用作免疫原之人 thymus fragment (胸腺) 來自歐洲合約醫院，捐贈者均經各種試驗 (Anti-HIV1/2、HBsAg、anti-HCV 等) 篩檢合格者，其 thymus fragment (胸腺) 方可用來製備細胞作為免疫原；所使用之免疫動物，Thymoglobuline 為 SPF 兔子，Lymphoglobuline 為馬，均委由合約動物飼養中心 (一家馬場與六家養兔中心) 進行動物之免疫與抽血。該些動物中心均通過該國衛生主管單位之查核與該廠派員進行內部稽核。對所使用之 SPF 兔子進行各種檢查與試驗，包括臨床觀察、屍體解剖及血清學試驗，定期 (每半年) 進行對五種病毒、六種細菌及七種寄生蟲之檢測。馬則使用以 Elisa 方法測試 West Nile、AVE 與 AIE 等病毒。

生產 Lymphoglobulin 與 Thymoglobuline 之廠區為各自獨立之設備與空調系統的製造廠房，Lymphoglobulin 為生產歷史較久之舊產品，當初規畫製造 Thymoglobuline 時應美國 FDA 之要求另建一個

製造場所，目前 Thymoglobulin 於 1999 年已獲得美國 FDA 之上市生產許可。Lymphoglobulin 與 Thymoglobuline 均以胸腺細胞各自免疫馬與 SPF 兔子，所獲得含抗人胸腺細胞血清作為原料，其製造過程須進行嚴格管控，但該二產品之製程不同，Thymoglobulin 以 pasteurization 進行製程中病毒不活化步驟，製程中所使用之 RBC 應美國 FDA 之要求使用美國來源，而 Lymphoglobulin 因產品特性無法以 pasteurization 進行製程中病毒不活化，目前正被法國衛生單位要求製程加入 20 nm 微過濾（nanofiltration）方法以作為病毒之移除步驟，製程中所使用之 RBC 為美國來源，而胎盤組織來自法國。

該二產品之原液則委託隔壁 Aventis 廠分裝，對 Thymoglobulin 另進行冷凍乾燥，同時委由 Aventis 進行稀釋液之製備。之後將充填好之產品送至巴黎進行包裝。至於成品之檢驗有幾個項目，包括 Rosette formation inhibition test、safety and potency in Monkey（Lymphoglobulin 每批測試、Thymoglobulin 每五批測試一次）、Anti-platelet activity *in vivo*、Anti-glomerular basement membrane antibodies 等均委由 Aventis 進行檢驗，而 Mannitol 與 protein nitrogen 之檢驗目前雖委 Aventis 進行，但該廠將自己建立檢驗方法。該廠去年產量 Thymoglobulin 約 20 批次（22,000 瓶/lot），而 Lymphoglobulin 約 8 批次（22,000 瓶/lot）。每批產品均需經法國國家檢定機關（AGENCE FRANCAISE DE SECURITE SANITAIRE DES PRODUITS DE SANTE, AFSSAPS）檢驗合格後核發 Batch Release Certificate（附件一）方可放行使用。

同時並藉機蒐集歐洲藥點與 CPMP 對該類產品之最新管理規範等相關資料（附件二與附件三），以供我國訂定相關規範之參考。



#### 四、心得

- (1) 了解細胞治療產品與基因治療產品之定義與範疇、基因轉移系統種類及特性、該類產品之前景與問題。選擇基因轉移系統通常須考量：病毒性或非病毒性、局部或全身性、體外或體內、長期或過渡性以及針對成人或胎兒組織等因素。此外，採體內直接基因轉移須考量血清蛋白、血管壁、細胞外基質及免疫性等困難。細胞治療與基因治療之關鍵點為：(1) 有效地轉移入目標細胞群，可藉由修改載體、改善局部區域性轉移之方法、改善目標細胞或幹細胞之純化方法等來增進效率。(2) 使基因表現之適時適地，可藉由建立適當之元素控制 mRNA 的產生、成熟與轉譯以及發展同源基因重組應用於原位基因修復等來改善。(3) 減少毒性，可藉由控制先天性免疫反應、對轉殖產物的耐受性以及控制染色嵌合 (chromosomal integration) 等來改善。
- (2) 獲取基因治療產品與細胞治療產品之最新趨勢與發展，至今發展之主力在北美與歐洲，使用反轉錄病毒載體者佔半數，其次為腺病毒載體，基因轉移藥品治療疾病中：癌症佔 63.4%，單基因疾病佔 12.3%，感染性疾病佔 6.4%，心血管疾病佔 8.0%；目前大部分臨床試驗均尚在 Phase I 或 Phase II。會中並介紹一些可能有效之臨床試驗案例，如貧血、頭頸癌、血友病及單基因疾病，由這些案例顯示各種疾病可能需要發展特定之治療方式，並使用特定的載體、表現系統或修飾細胞。
- (3) 細胞治療產品在製造方面需歷經原料、製程與成品品管放行檢驗等品質挑戰，由於該類產品無法最終滅菌，通

常亦無純化步驟可以去除或不活化微生物之污染，故確保該類產品無微生物/病毒污染需藉由更嚴格之篩檢組織捐贈者、捐贈細胞及生產過程使用之原料試劑，以及確效之細胞處理過程及批次間之清潔確效來達成。此外，許多該類產品可能無法藉由成品試驗來放行，必須藉由適當之確效來控管每一操作步驟及嚴格執行 GMP 來反應產品之安全性與有效性，而品質系統可以有效地監控製造關鍵點並指導對策來持續改善。

- (4) 基因治療產品則有載體安全性、穩定性（熱溫定性及基因穩定性）、產生具繁殖能力之重組病毒及傳送效率等品質挑戰。反轉錄病毒載體有 DNA 嵌入之相關危險性，如致癌基因的活化及腫瘤抑制基因的不活化，今年 1 月中法國傳出第二起嚴重複合性免疫缺乏症幼童接受基因治療後出現白血病死亡之案例，目前該國嚴重複合性免疫缺乏症基因療法已暫停，美國與德國亦已暫停用反轉錄病毒載體進行基因轉移的試驗；另外腺病毒載體在美國亦曾有劑量過高致死之案例發生，因此載體之安全性評估不可不慎。另外，由於生技發展進步神速，許多 1990 年早期只能在研究單位使用之分析技術須經改善並確效成為符合 cGMP 之分析工具，方能用以評估臨床試驗用之藥品鑑別、純度、效價、安全及穩定性等特性。
- (5) 隨著科學家對於生化學、細胞與分子生物學、遺傳學、材料科學及生醫組織工程學的了解，亦更新了以基因、細胞或組織為基礎的個人用治療性藥品之臨床研發範疇，其與傳統藥品之臨床研發及使用亦大為不同，為確保該類產品之品質、安全與效用，所有這些改變對於藥廠與衛生主管機關而言亦持續存在著技術與法規之挑戰。設定規格需要強而有力的科學證據，在合理的法規

廠與衛生主管機關而言亦持續存在著技術與法規之挑戰。設定規格需要強而有力的科學證據，在合理的法規要求支撐下，才能確保產品的安全性與有效性。同時，一套清楚透明的法規系統是必需的，促進國際標準品之研發及訂定產品不純物之可接受標準等支持品質研發，以及修訂優良操作規範如 GMP, GLP, GCP 以適用於基因治療與細胞治療等均為製藥業所需求之管理環境。目前亟需考量的是：該類產品究竟該如何被適當地管理，方能在不會造成不必要的障礙下使病患接受新治療並保護大眾健康。

- (6) 美國藥典訂定之『<1046>細胞治療與基因治療產品』一般通則綜合了細胞治療與基因治療產品之製造、試驗及投予等相關議題及現行最佳之操作。制定委員會是由來自醫學研究中心、生技製藥業、包含 NIH, FDA 等政府機構之科學家及臨床醫師組成。訂定期間亦查閱參考了許多相關品質管理指引文件，包含 CBER 的考慮要點文件 (point to consider) 與指導文件 (Guidance)、ICH 指導文件、美國聯邦法規 21CFR210, 211, 600 及 820、品質系統管理條例及 ISO 指導文件。
- (7) 參訪輸入我國非人血來源血液製劑之製造廠 IMTIX-SANGSTAT，實際了解其原料之來源管制、製造作業、製程管制、成品之品質管制與批次放行作業情形，並藉機蒐集該類產品之最新管理規範等相關資料，有助於我國對於非人血來源血液製劑之檢驗管理。

## 五、建議

- (1) 儘速明訂我國對於細胞治療產品與基因治療產品之管理架構，涵蓋許可證申請、製造查核、上市品質管理與上市後監督制度，以因應該類產品之上市，提升國人用藥醫療品質，保障用藥安全。
- (2) 儘速訂定我國對於細胞治療產品與基因治療產品之相關規範，涵蓋產品研發設計指導文件、臨床試驗指導規範、藥典之一般產品規範及各項產品品目等。
- (3) 儘速進行人員專業訓練、對照標準品之建立與檢驗方法研發，以加強我國對細胞治療產品與基因治療產品之品質管理。
- (4) 規劃完整之查核體系，涵蓋人體組織細胞優良操作規範（GTP）、非臨床試驗優良操作規範（GLP）、臨床試驗優良操作規範（GCP）及藥品優良製造規範（GMP）等。
- (5) 本局目前正積極制訂細胞治療產品規範與基因治療產品規範，並將邀集相關專家學者及臨床醫師共同參與討論，以制訂出切合實際並能確保產品品質安全有效之規範，供生技業者研發製造與主管機關管理之參考。
- (6) 建議能多提供同仁參加國際性會議之機會，不僅能即時汲取新知，瞭解國際間該類產品發展情形，亦可增加與國際專家之交流，獲取非正式之研習機會。



AGENCE  
FRANÇAISE DE SECURITE SANITAIRE DES  
PRODUITS DE SANTE

Direction des Laboratoires et des Contrôles  
Tel : 01.55.87.41.15 / Fax : 01.55.87.42.02  
Produits Dérivés du Sang et Thérapie Cellulaire

RÉPUBLIQUE FRANÇAISE

附  
件  
—

EU OFFICIAL CONTROL AUTHORITY BATCH RELEASE  
CERTIFICATE FOR MEDICINAL PRODUCT

EU/OFFICIAL CONTROL AUTHORITY BATCH RELEASE CERTIFICATE - Finished Product

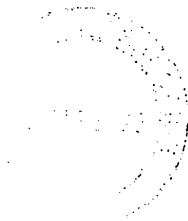
Examined under Directives 89/381/EEC (Medicinal Products derived from Human Blood or Plasma) and in accordance with the Administrative Procedure for Official Control Authority Batch Release within EU.

Trade name	<b>LYMPHOGLOBULINE</b>
Common name	Immunoglobuline de cheval anti-thymocytes humains
Batch number	LY020
Type of container	Vial : 5ml
Total number of containers in this batch	24419
Nominal dose per container	115 mg
Expiry date	AUGUST 2004
Marketing authorisation number (France) issued by : AFSSAPS	NL 6272
Name and address of manufacturer	IMTIX SANGSTAT 58, avenue Debourg BP 7055 69348 LYON cedex 07

This batch has been examined using documented procedures which form part of a quality system which is in accordance with the EN 45001 standard. This examination is based on the review of the manufacturer's protocol and the appropriate control laboratory tests as indicated in the marketing authorisation application.

Signed :	
Name and function of signatory :	L. MOUILLOT Responsable de l'unité Produits Sanguins et Thérapie Cellulaire
Date of issue :	Saint-Denis, le 10-04-2002

Certificate Number : 02/S/EP/4187/P



Pour le Directeur Général  
et par délégation  
La Directrice des Laboratoires  
et des Contrôles

M-H TISSIER

# Draft monographs for comment

## IMPORTANT NOTICE

This section contains proposals for new and revised monographs and other texts, intended for inclusion in the European Pharmacopoeia and submitted for public comment. You can comment through the appropriate national authority at the address listed on the back cover page of the present issue. Only comments sent before 31 July 2002 will be considered before the final version is prepared. Readers from countries not members of the European Pharmacopoeia Commission should send their comments directly to the European Directorate for the Quality of Medicines. In order to facilitate the work of the Secretariats of the National Authorities which collect the comments, please mention in any correspondence the reference number indicated at the beginning of each monograph.

It is stressed that these proposals have not been adopted by the European Pharmacopoeia Commission and must not be regarded as official standards. Comments which propose modifications of limits should be supported by analytical data obtained on a significant number of batches. Proposed changes of methodology should be supported by experimental results of a comparative trial of the method published in *Pharmeuropa* for comment and the proposed alternative.

In the case of proposals for revision, text to be deleted is crossed out and replacements or additions are underlined.

In certain cases, draft monographs require, for appropriate checking, the use of a reference material which is not yet commercially available; in exceptional circumstances, we will try to make the necessary substance available; please enquire to the European Directorate for the Quality of Medicines.

Reference: PA/PH/Exp/INC/T (02) 01 ANE

### NOTE ON THE MONOGRAPH

Following a recent policy decision by the European Pharmacopoeia Commission, tests for functionality related characteristics will now be introduced into many monographs (about 90), mainly on excipients. These tests will be included in a distinct section of the monograph since they are not a mandatory standard, but rather an indication of important aspects for the reliable characterisation of substances for use in the manufacture of medicinal products of consistent quality.

The first monograph to be published for comment in pursuit of this new policy is that on magnesium stearate shown below.

XXXX:0229

## MAGNESIUM STEARATE

### Magnesii stearas

#### DEFINITION

Magnesium stearate is a mixture of magnesium salts of different fatty acids consisting mainly of stearic acid [(C<sub>17</sub>H<sub>35</sub>COO)<sub>2</sub>Mg; *M*, 591.3] and palmitic acid [(C<sub>15</sub>H<sub>31</sub>COO)<sub>2</sub>Mg; *M*, 535.1] with minor proportions of other fatty acids. It contains not less than 4.0 per cent and not more than 5.0 per cent of Mg (A, 24.30), calculated with reference to the dried substance. The fatty acid fraction contains not less than 40.0 per cent of stearic acid and the sum of stearic acid and palmitic acid is not less than 90.0 per cent.

#### CHARACTERS

A white, very fine, light powder, greasy to the touch, practically insoluble in water and in ethanol.

#### IDENTIFICATION

First identification: C, D.

Second identification: A, B, D.

A. The residue obtained in the preparation of solution S (see Tests) has a freezing point (2.2.18) not lower than 53 °C.

- B. The acid value of the fatty acids (2.5.1) is 195 to 210, determined on 0.200 g of the residue obtained in the preparation of solution S dissolved in 25 ml of the prescribed mixture of solvents.
- C. Examine the chromatograms obtained in the test for fatty acid composition. The retention times of the principal peaks in the chromatogram obtained with the test solution are approximately the same as those of the principal peaks in the chromatogram obtained with the reference solution.
- D. 1 ml of solution S (see Tests) gives the reaction of magnesium (2.3.1).

#### TESTS

**Solution S.** To 5.0 g add 50 ml of *peroxide-free ether R*, 20 ml of *dilute nitric acid R* and 20 ml of *distilled water R* and heat under a reflux condenser until dissolution is complete. Allow to cool. In a separating funnel, separate the aqueous layer and shake the ether layer with 2 quantities, each of 4 ml, of *distilled water R*. Combine the aqueous layers, wash with 15 ml of *peroxide-free ether R* and dilute to 50 ml with *distilled water R* (solution S). Evaporate the organic layer to dryness and dry the residue at 100-105 °C. Keep the residue for identification tests A and B.

**Acidity or alkalinity.** To 1.0 g add 20 ml of *carbon dioxide-free water R* and boil for 1 min with continuous shaking. Cool and filter. To 10 ml of the filtrate add 0.05 ml of *bromothymol blue solution R1*. Not more than 0.5 ml of 0.01 *M hydrochloric acid* or 0.01 *M sodium hydroxide* is required to change the colour of the indicator.

**Chlorides (2.4.4).** 0.5 ml of solution S diluted to 15 ml with *water R* complies with the limit test for chlorides (0.1 per cent).

**Sulphates (2.4.13).** 0.3 ml of solution S diluted to 15 ml with *distilled water R* complies with the limit test for sulphates (0.5 per cent).

**Cadmium.** Not more than 3 ppm of Cd, determined by atomic absorption spectrometry (2.2.23, *Method II*).

**Test solution.** Place 50.0 mg of the substance to be examined in a polytetrafluoroethylene digestion bomb and add 0.5 ml of a mixture of 1 volume of *hydrochloric acid R* and

The following chromatogram is published for information.

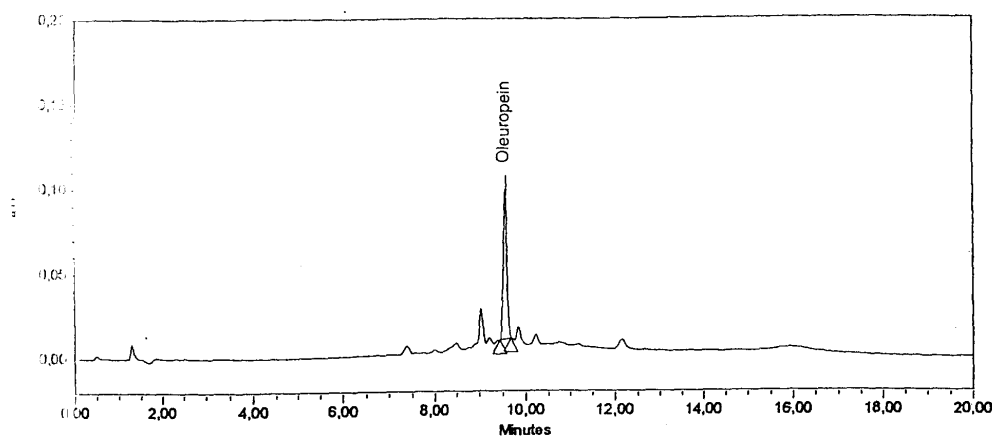


Figure 1878-1.- Chromatogram of olive leaf for the assay of oleuropein

- Stationary phase: octadecylsilyl silica gel for chromatography R (5 µm),
- Temperature: 25 °C.
- Mobile phase:
- Mobile phase A: dilute 1.0 ml of glacial acetic acid R to 100 ml with water R,
- Mobile phase B: methanol R.

Time (min)	Mobile phase A (per cent V/V)	Mobile phase B (per cent V/V)
0-5	85 → 40	15 → 60
5-12	40 → 20	60 → 80
12-15	20 → 85	80 → 15

Flow rate: 1 ml/min.

Detection: spectrophotometer at 254 nm.

Injection: 20 µl.

Retention time: oleuropein = about 9 min.

Calculate the percentage content of oleuropein from the expression

$$\frac{A_1 \times m_2 \times p \times 8}{A_2 \times m_1}$$

- $A_1$  = area of the peak due to oleuropein in the chromatogram obtained with the test solution,
- $A_2$  = area of the peak due to oleuropein in the chromatogram obtained with the reference solution,
- $m_1$  = mass of the drug to be examined, in grams,
- $m_2$  = mass of oleuropein R in the reference solution, in grams,
- $p$  = percentage content of oleuropein in the reagent.

Reagents

Oleuropein.  $C_{25}H_{32}O_{13}$ . (M, 540.5). XXXXXXX. [32619-42-4]. Powder, soluble in methanol.

Oleuropein used in Olive leaf (1878) complies with the following requirement:

Assay. Examine by liquid chromatography (2.2.29) as prescribed in the monograph on Olive leaf (1878). The content of oleuropein is not less than 80 per cent, calculated by the normalisation procedure.

Draft Monograph (EP)

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ANTI-T LYMPHOCYTE  
IMMUNOGLOBULIN FOR HUMAN  
USE, ANIMAL

Immunoglobulinum anti-T lymphocytorum  
ex animale ad usum humanum

DEFINITION

Anti-T lymphocyte immunoglobulin for human use is a liquid or freeze-dried preparation containing immunoglobulins, obtained from serum or plasma of animals, mainly rabbits or horses, immunised with human lymphocytic antigens.

The immunoglobulin has the property of diminishing the number and function of immunocompetent cells, in particular T-lymphocytes. The preparation mainly contains immunoglobulin G. It may contain antibodies against other lymphocyte subpopulations and against other cells. The preparation is intended for intravenous or intramuscular administration, after dilution where applicable.

Unless otherwise prescribed, it complies with the monograph on Immunoserum for human use, animal (0084). → voir IPI

## PRODUCTION

### GENERAL PROVISIONS

During development studies, it shall be demonstrated that the production method yields a product that:

- does not transmit infection,
- is characterised by a defined pattern of immunological activity, notably: antigen binding, complement-independent cytotoxicity, cytokine release, induction of T-cell activation, cell death,
- has a defined distribution of immunoglobulin classes,
- has a defined immunoglobulin G concentration,
- does not produce antibodies that cross-react with human tissues to a degree that would impair clinical safety,
- contains a defined level of anti-thrombocyte antibody activity,
- contains a defined level of haemoglobin.

The product shall have been shown, by suitable tests in animals and evaluation during clinical trials, to be well tolerated when administered by the intended route.

**Reference preparation.** A batch shown to be suitable in clinical trials, or a batch representative thereof, is used as the reference preparation for the tests.

### ANIMALS

The animals are kept isolated from contact with other animals at all times during transport, immunisation and bleeding. The strain, origin and identification number of the animals must be specified.

### IMMUNISATION

Human antigens such as continuously growing lymphocyte cell lines or thymocytes are used to immunise the animals. Thymocytes may be subjected to a sorting procedure. The immunising antigens are submitted to a validated procedure for inactivation of infectious agents or are shown to be free from infectious agents. The donors of the antigens comply with the requirements for donors of blood and plasma of the monograph on *Human plasma for fractionation (0853)*. The cells used comply with defined requirements for purity of the cell population and freedom from adventitious agents.

### COLLECTION OF BLOOD OR PLASMA

No antimicrobial preservative is added to the plasma and serum samples.

### PURIFICATION AND VIRAL INACTIVATION

The method of preparation may include a step for absorption of cross-reacting anti-human antibodies using material from human tissues and/or red blood cells. The donors for such materials comply with the requirements for donors of blood and plasma of the monograph on *Human plasma for fractionation (0853)*. The human materials are submitted to a validated procedure for inactivation of infectious agents or are shown to be free from infectious agents. If substances are used for inactivation of viruses, it shall have been shown that any residues present in the final product have no adverse effects on the patients treated with the anti-lymphocyte immunoglobulin.

Only an intermediate product that complies with the following requirements may be used in the preparation of the final bulk.

**Contaminating viruses.** Each serum pool is tested for contaminating viruses by suitable *in vitro* tests, including inoculation to cell cultures capable of detecting a wide range of viruses relevant for the particular product.

For a suitable limited number of batches, each serum pool is tested by suitable *in vivo* tests for infectious agents. These tests include the inoculation by the intramuscular route of each of the following groups of animals with the test preparation:

- 2 litters of suckling mice, comprising at least 10 animals less than 24 hours old,
- 10 adult mice,
- 5 guinea pigs.

The animals are observed for at least 4 weeks. Any animals that are sick or show any abnormality are examined to establish the cause of illness. A test in embryonated eggs is also carried out. Samples of the serum pool are injected into eggs by suitable routes, for example the chorioallantoic membrane, the amniotic cavity and the yolk sac of each of 10 embryonated eggs, 9-11 days old. The embryonated eggs are examined after incubation for not less than 5 days.

### FINAL BULK

The final bulk is prepared from a single intermediate product or from a pool of intermediate products obtained from animals of the same species. A stabiliser may be added. No antimicrobial preservative is added either during the manufacturing procedure or for preparation of the final bulk solution. During manufacturing, the solution is passed through a bacteria-retentive filter.

Only a final bulk that complies with the following requirement may be used in the preparation of the final lot.

**Thrombocyte antibodies.** Examined by a suitable method, the level of thrombocyte antibodies is shown to be below that approved for the specific product.

### FINAL LOT

The final bulk of anti-T-lymphocyte immunoglobulin is distributed aseptically into sterile, tamper-proof containers. The containers are closed as to prevent contamination. Only a final lot that complies with the requirements prescribed below under Identification, Tests and Assay may be released for use.

### CHARACTERS

The liquid preparation is clear or slightly opalescent and colourless or pale yellow. The freeze-dried preparation is a white or slightly yellow powder or solid friable mass, which after reconstitution gives a liquid preparation corresponding to the description above.

### IDENTIFICATION

- Using a suitable range of species-specific antisera, carry out precipitation tests on the preparation to be examined. It is recommended that the test be carried out using antisera specific to the plasma proteins of each species of domestic animal commonly used in the preparation of materials of biological origin in the country concerned and antisera specific to human plasma proteins. The preparation is shown to contain proteins originating from the animal used for the anti-T lymphocyte immunoglobulin production.
- Examine by a suitable immunoelectrophoresis technique. Using antiserum to normal serum of the animal used for production, compare this serum and the preparation to be examined, both diluted to contain 10 g/l of protein. The main component of the preparation to be examined corresponds to the IgG component of normal serum of the animal used for production.
- The preparation complies with the assay.

### TESTS

**Distribution of molecular size.** Size exclusion chromatography (2.2.30).

**Test solution.** Dilute the preparation to be examined with a 9 g/l solution of sodium chloride R to a concentration suitable for the chromatographic system used. A concentration in the range 2-20 g/l is usually suitable.



**Reference solution.** Dilute human immunoglobulin BRP with a 9 g/l solution of sodium chloride R to the same protein concentration as the test solution.

**Column:**

- size:  $l = 0.6$  m,  $\emptyset = 7.5$  mm,
- stationary phase: silica gel for size-exclusion chromatography R, a grade suitable for fractionation of globular proteins in the molecular mass range of 20 000 to 200 000.

**Mobile phase:** dissolve 4.873 g of disodium hydrogen phosphate dihydrate R, 1.741 g of sodium dihydrogen phosphate monohydrate R and 11.688 g of sodium chloride R in 1 litre of water R.

**Flow rate:** 0.5 ml/min.

**Detection:** spectrophotometer at 280 nm.

**Injection:** 50-600 µg of protein.

**Retention times:** identify the peaks in the chromatogram obtained with the test solution by comparison with the chromatogram obtained with the reference solution; any peak with a retention time shorter than that of dimer corresponds to polymers and aggregates.

**System suitability:**

- reference solution: the principal peak corresponds to IgG monomer and there is a peak corresponding to dimer with a retention time relative to monomer of about 0.85,
- test solution: the relative retentions of monomer and dimer are  $1 \pm 0.02$  with reference to the corresponding peaks in the chromatogram obtained with the reference solution.

**Limits:**

- total monomer and dimer: maximum 95 per cent of the total area of the peaks,
- total polymers and aggregates: maximum 5 per cent of the total area of the peaks.

**Purity.** Polyacrylamide gel electrophoresis (2.2.31), under non-reducing and reducing conditions.

**Resolving gel:** non-reducing conditions 8 per cent acrylamide, reducing conditions 12 per cent acrylamide.

**Test solution.** Dilute the preparation to be examined to a protein concentration of 0.5 - 2 mg/ml.

**Reference solution.** Dilute the reference preparation to the same protein concentration as the test solution.

**Application:** 10 µl.

**Detection:** Coomassie staining.

**Results:** compared with the reference solution, no additional bands are found in the electropherogram of the test solution.

**Haemoglobin:** 0.15 for absorbance (2.2.25) at 403 nm.

Dilute the preparation to be examined using a 9 g/l solution of sodium chloride R to obtain a solution containing 10 g/l of protein. Use water R as compensation liquid.

**Anti-A and anti-B haemagglutinins (2.6.20).** The 1:64 dilution does not show agglutination.

Carry out the test for anti-A and anti-B haemagglutinins. If the preparation to be examined contains more than 30 g/l of immunoglobulin, dilute to this concentration before preparing the dilutions to be used in the test.

**Haemolysins (2.6.23).** The 1:64 dilution does not show haemolysis.

If the preparation to be examined contains more than 30 g/l of immunoglobulin, dilute to this concentration before preparing the dilutions to be used in the test.

**ASSAY**

The potency is determined by measuring the complement-dependent cytotoxicity on target cells. Flow cytometry is performed as read-out of dead cells stained using propidium iodide. The potency is expressed as the concentration of anti-T lymphocyte immunoglobulin in milligrams per millilitre which mediates 50 per cent cytotoxicity.

**Lymphocyte separation medium.** Commercial ficoll-based separation media with low viscosity and a density of 1.077 g/ml<sup>(10)</sup>.

**Complement.** Commercial complement is suitable<sup>(11)</sup>.

**Buffered salt solution pH 7.2.** Dissolve 8.0 g of sodium chloride R, 0.2 g of potassium chloride R, 3.18 g of disodium hydrogen phosphate R and 0.2 g of potassium dihydrogen phosphate R in water R and dilute to 1000.0 ml with the same solvent.

**Buffer solution for flow cytometry.** Add 40 ml of 0.1 per cent V/V sodium azide R and 10 ml of foetal calf serum to 440 ml buffered salt solution pH 7.2. The foetal calf serum is inactivated at 56 °C for 30 min prior to use. Store at 4 °C.

**Propidium iodide solution.** Dissolve propidium iodide R in buffered salt solution pH 7.2, to a concentration of 1 mg/ml. Store this stock solution at 2-8 °C and use within 1 month. For the assay, dilute this solution with buffer solution for flow cytometry, to obtain a concentration of 5 µg/ml. Store at 2 °C to 8 °C and use within 3 h.

**Microtitre plates.** Plates used to prepare immunoglobulin dilutions are U- or V-bottomed polystyrene or poly(vinyl chloride) plates without surface treatment.

**Micronic tubes.** Suitable for flow cytometry measurement<sup>(12)</sup>.

**Cell suspension.** Collect blood in anticoagulant from at least one healthy donor and immediately isolate the peripheral blood mononuclear cells (PBMC) by gradient centrifugation in lymphocyte separation medium. Mononuclear cells should form a visible clean interface between the plasma and the separation medium. Collect the layer containing the cells and dispense into centrifuge tubes containing buffered salt solution pH 7.2. Centrifuge at 400 g at 2-8 °C for 10 min. Discard the supernatant. Suspend the cell pellet in buffer solution for flow cytometry. Repeat twice the centrifugation and resuspension of the cells. After the third centrifugation, resuspend the cell pellet in 1 ml of buffer solution for flow cytometry. Determine the number and vitality of the cells using a haemocytometer. The cell viability should be at least 90 per cent. Adjust the cell number to  $7 \times 10^6$ /ml by adding buffer solution for flow cytometry. Store the cell suspension at 4 °C and use within 12 h.

If necessary, the first PBMC pellet can be resuspended in buffered salt solution pH 7.2 containing 20 per cent fetal calf serum and stored overnight at 2°C. Centrifuge at 400 g at 2 °C to 8 °C for 10 min. Discard the supernatant. Suspend the cell pellet in buffer solution for flow cytometry. Determine the number and vitality of the cells using a haemocytometer. The cell viability should be at least 90 per cent. Adjust the cell number to  $7 \times 10^6$ /ml by adding buffer solution for flow cytometry.

(10) Lymphocyte separation medium 1X (CN Biomedicals Inc., Cat. No. 16-922-49) has been found suitable.

(11) Complement from Behring cat. No. ORAN 60/07 obtained from rabbits has been found suitable for immunoglobulin raised in rabbits and horses.

(12) Greiner tubes, Cat. No. 102201 have been found suitable.

**Test solutions.** For freeze-dried preparations, reconstitute as stated on the label. Prepare 3 independent series of not fewer than 7 dilutions using buffer solution for flow cytometry as diluent.

**Reference solutions.** For freeze-dried preparations, reconstitute according to instructions. Prepare 3 independent dilution series of not fewer than 7 dilutions using buffer solution for flow cytometry as diluent.

Distribute 75 µl of each of the dilutions of the test solution or reference solution to each of a series of wells of a microtiter plate. Add 25 µl of the cell suspension of PBMC into each well. Add 25 µl of rabbit complement to each of the wells. Incubate at 37 °C for 30 min.

Centrifuge the plates at 200 g at 4 °C for 8 min, discard the supernatant and keep the plate on ice. Preparation for flow cytometry measurement should be done step-wise by using a certain number of wells in order to allow labelling with propidium iodide solution and measurement within a defined time period. Resuspend carefully the cell pellet of a certain number of wells with 200 µl of propidium iodide solution. Transfer the suspension into micronic tubes. Incubate at 25 °C for 10 min then transfer immediately on ice.

Proceed with fluorescence measurement in a flow cytometer. Define a region including all propidium iodide (PI) positive cells on the basis of FSC and FL 2 or 3 (for PI). Measure the percentage of propidium iodide-positive cells without gating but excluding debris. Analyse a total of 10 000 cells for each of the test and reference solutions.

Use the percentages of dead cells to estimate the potency as the concentration in mg/ml of the preparation to be examined necessary to induce 50 per cent of cytotoxicity by fitting a sigmoidal dose response curve to the data obtained with the test and the reference preparations and by using a 4-parameter logistic model and a suitable software. The test is not valid unless the percentage of propidium iodide-positive cells at the lower asymptote of the curve is less than 15 per cent and the percentage of propidium-iodide positive cells at the upper asymptote of the curve is at least 80 per cent.

The estimated potency is not less than 80 per cent and not more than 120 per cent of the stated potency.

The confidence interval ( $P = 0.95$ ) of the estimated potency is not greater than 80 per cent to 125 per cent.

#### STORAGE

Protected from light at the temperature stated on the label.

#### LABELLING

The label states:

- the number of International Units per milliliter, where applicable,
- for liquid preparations, the volume of the preparation in the container and the protein content expressed in grams per litre,
- for freeze-dried preparations,
  - the name and the volume of the reconstitution liquid to be added,
  - the quantity of protein in the container,
  - that the immunosera should be used immediately after reconstitution,
  - the time required for complete dissolution,
- the route of administration,
- the animal species of origin,
- the name and amount of any stabiliser, where applicable,
- the dilution to be made before use of the product, where applicable.

#### Reagents

**Propidium iodide.**  $C_{27}H_{34}I_2N_6$  ( $M_r$  668.4). XXXXXXX. [25535-16-4]. 3,8-Diamino-5-[3(diethylmethylammonio)propyl]-6-phenyl-phenanthridium di-iodide.  
Dark red solid.

Reference: FAO/WHO Expert Committee on Biological Standardization, 1994, 19th Session, Geneva, 1994, p. 1944

XXXX:1944

## MANNHEIMIA VACCINE (INACTIVATED) FOR CATTLE

### Vaccinum mannheimiae inactivatum ad bovidas

#### DEFINITION

Mannheimia vaccine (inactivated) for cattle is a preparation from cultures of one or more suitable strains of *Mannheimia haemolytica* (formerly *Pasteurella haemolytica*). This monograph applies to vaccines intended for administration to cattle of different ages for the protection against respiratory diseases caused by *M. haemolytica*.

#### PRODUCTION

Production of the vaccine is based on a seed-lot system. The seed material is cultured in a suitable medium; each strain is cultivated separately and identity is verified using a suitable method. During production, various parameters such as growth rate are monitored by suitable methods; the values are within the limits approved for the particular product. Purity and identity are verified on the harvest using suitable methods. After cultivation, the bacterial suspensions are collected separately and inactivated by a suitable method. The vaccine may contain an adjuvant and may be freeze-dried.

#### CHOICE OF VACCINE COMPOSITION

The choice of composition and the strains to be included in the vaccine is based on epidemiological data on the prevalence of the different serovars of *M. haemolytica* and on the claims being made. The vaccine is shown to be satisfactory with respect to safety (5.2.6) and immunogenicity (5.2.7) in cattle. As part of the studies to demonstrate the suitability of the vaccine with respect to these characteristics the following tests may be carried out.

#### Safety

A. The test is carried out for each route of administration to be stated on the label and in animals of each category for which the vaccine is intended.

For each test in young animals, use not fewer than 10 calves that do not have antibodies against the serovars of *M. haemolytica* or against the leucotoxin present in the vaccine. For tests in older animals, such as pregnant cows, animals with a known history of no previous mannheimia vaccination and with low antibody titres (measured in a sensitive test system such as an ELISA) may be used.

Administer to each animal a double dose of vaccine containing not less than the maximum potency that may be expected in a batch of vaccine. Administer a single dose to each animal, if appropriate, after the interval to be recommended in the instructions for use. Observe the animals for at least 14 days after the (last) administration. Record rectal temperatures the day before each vaccination, at vaccination, 6-8 hours later and daily for 4 days. No animal shows a temperature rise exceeding 1.5 °C for 2 days



The European Agency for the Evaluation of Medicinal Products  
Evaluation of Medicines for Human Use

London, 24 July 2002  
CPMP/BWP/3354/99

附件三

**COMMITTEE FOR PROPRIETARY MEDICINAL PRODUCTS  
(CPMP)**

**NOTE FOR GUIDANCE ON PRODUCTION AND QUALITY CONTROL  
OF ANIMAL IMMUNOGLOBULINS AND IMMUNOSERA FOR HUMAN  
USE**

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**NOTE FOR GUIDANCE ON PRODUCTION AND QUALITY CONTROL OF  
ANIMAL IMMUNOGLOBULINS AND IMMUNOSERA FOR HUMAN USE**

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## 1. Scope

Animal immunoglobulin or immunoserum for human use is prepared from serum or plasma of immunised animals. Purified products consist mainly of immunoglobulin G. Immunoserum are at least partially purified products and could thus contain serum components other than immunoglobulins. These medicinal products contain a mixture of different antibodies but are enriched in specific antibodies against a particular target antigen.

The clinical targets of these products are diverse. The preparations in use include anti-lymphocyte/T-cell immunoglobulins/sera, anti-toxins against microbial and other toxins (e.g. *C. botulinum*, digitalis), anti-sera against bacterial and viral agents and anti-sera against the venoms of snakes, scorpions and spiders. In general, the development of immunoserum dates back to the beginning of the 20<sup>th</sup> century when they were the only available treatments for certain life-threatening conditions. In fact, this is still the case for most of these products.

In general, animal immunoglobulins and immunoserum are used infrequently and in very few patients. However, the anti-lymphocyte immunoglobulins/sera product group is still important and routinely used in the prophylaxis and treatment of acute rejection episodes in organ transplantations, for the treatment of GvHD in bone marrow transplantations and in the therapy of aplastic anaemia. New developments include immunoserum produced from the yolk of immunised hens, for example for the treatment of diarrhoea caused by parasites in AIDS patients. Animal immunoglobulins/immunoserum are administered intramuscularly, subcutaneously or intravenously. Some products are diluted in large volumes of physiological solutions before infusion.

The first products consisted of crude sera, which were replaced by purified immunoserum as required by the relevant Ph. Eur. monograph. These early products were purified by precipitation, often consisted of complete antibodies and may contain serum components other than immunoglobulins. The manufacturing processes of more recently developed products include more effective purification steps. Products are available with active substances consisting of purified F(ab')<sub>2</sub> or Fab immunoglobulin fragments produced by pepsin or papain digestion of complete immunoglobulin molecules.

In this document, the requirements for animal immunoglobulins/immunoserum for therapeutic use in humans are outlined. Animal immunoglobulins/immunoserum to be used for diagnostic purposes *in vitro* are not the concern of this note for guidance. Those products intended for use in the purification of other products, e.g. by immunoaffinity columns should be shown to be pure and free from adventitious agents by the methods described.

Important considerations for the clinical use of animal immunoglobulins/immunoserum include the risk of sensitisation of the recipient, the need of preparations with sufficient purity, the viral and TSE safety aspects, adverse effects caused by additives, pyrogens, cell or complement-active aggregates or immune complexes and variability in the specific potency. Therefore, there is a need to use improved manufacturing processes to reduce the amount of heterologous protein, to remove aggregates, to ensure viral safety and to develop appropriate control methods.

The quality of animal immunoglobulins/immunoserum should be considered on a case-by-case basis taking into account the individual character of each product, the clinical indication and the availability of alternative products.

Reference is made to the general Ph.Eur monograph Immunoserum ad Usum Humanum, 0084, and to the monographs available for a number of specific immunoserum (Immunoserum botulinum, 0085; Immunoserum diphthericum, 0086; Immunoserum gangraenicum, Cl. novyi, 0087; Cl. perfringens, 0088, Cl. septicum, 0089; Immunoserum gangraenicum, mixtum, 0090; Immunoserum contra venena viperarum europaeorum, 0145, Anti-T-lymphocyte CPMP/BWP/3354/99

immunoglobulin for human use, animal, 1928).

## **2. Species used for the Production of Animal Immunoglobulins for Human Use**

Animal immunoglobulins/immunoserum are obtained from sera of different species. Currently, these sera are collected from rabbit, horse, goat and sheep. Other species, like hens, could additionally be used. In general, it is desirable to have alternative products available from sera of different species for use in patients in the event of intolerance against heterologous protein.

Specific and general requirements for the animals used in the manufacturing process are set out under 3.1. General reference is made to the relevant Commission Directives. For those species where a TSE risk is known, the requirements specified in the EU Note for Guidance on Minimising the Risk of Transmitting Animal Spongiform Encephalopathy via Human and Veterinary Medicinal Products (CPMP/BWP/410/01, rev. 1) should be considered.

## **3. Characterisation of the Animal Immunoglobulin/Immunoserum during Development**

The active ingredient of any new immunoglobulin/immunoserum should be characterised by chemical and biological methods. Particular attention should be paid to use a wide range of analytical techniques for exploring different physico-chemical properties of the immunoglobulin. A clear difference should be made between the analytical tests performed during development in order to fully characterise the immunoglobulin, and tests performed routinely on each batch of the finished product.

It should be demonstrated that the product has a characteristic pattern of antigen-binding. Desired or undesired secondary processes known to be induced after the binding with the target antigen should be investigated. It should be shown that the product consists of a defined immunoglobulin G concentration. The content of other immunoglobulin classes should be investigated.

The product should not contain antibodies that cross-react with human tissues to a degree that would impair clinical safety. In the event that erythrocytes were used for absorption, the level of content of haemoglobin should be demonstrated to be low. The protein content, the composition of protein, the degree of aggregation and molecular fragmentation of the immunoglobulin should be determined. When human blood cells have been used for absorption, the content of haemagglutinins and haemolysins should be demonstrated to be low.

The immunoreactivity of the immunoglobulin should be assessed. The specific activity of the purified immunoglobulin should be determined.

## **4. Points to Consider in Manufacture**

Most of the techniques used to manufacture anti-venoms or anti-toxin immunoserum are based on the data published on tetanus and diphtheria antitoxins, i.e. ammonium sulfate precipitation, peptic digestion, thermocoagulation and aluminium gel absorption. Other products like anti-lymphocyte immunoglobulins/immunoserum are produced by combinations of chromatographic and precipitation steps. Because of the large variety of methods used for manufacturing, the quality of the products varies widely.

The main manufacturing steps consist of the preparation of the immunisation antigen, the immunisation of animals, collection of serum, absorption of undesired antibodies, purification including steps for removal or inactivation of viruses, formulation and filling. The absorption of unwanted antibodies may involve human tissue or cells.

Several of the requirements relating to establishments in which biological products are manufactured apply to the manufacture of animal immunoglobulins/immunoserum (e.g. WHO, CPMP/BWP/3354/99

Technical Report Series 822, 1992: Annex 1 Good Manufacturing Practices for Biological Products; EU Guide for Good Manufacturing Practice for Medicinal Products and Annex I to the EU Guide to GMP: Manufacture of sterile medicinal products). Specific information can be found in WHO Technical Report Series, 413, 1969: Annex 2: Requirements for Immunosera of Animal Origin.

#### **4.1 Animals used in the Manufacturing Process**

The marketing authorisation holder of the immunoglobulin/immunoserum has the responsibility for ensuring that the starting material comes from documented and recorded sources, and should perform regular audits of the farms supplying animals. The animals used should be a species approved by the competent authority, healthy and exclusively reserved for production of immunoserum. The supplier of animals should be subject to routine legal supervision by the competent veterinary authority.

The donor animals should be held in a closed breeding and production colony, whenever possible. The strain, origin and number of the animals should be specified. Transport and introduction of the animals into production should follow specified procedures, including definition of quarantine measures. If different requirements apply to breeding and production animals this should be specified in the Marketing Authorisation Dossier. For large animals, the differentiation between breeding and production animals may not be applicable. Source, identity and control of animals taken to complete the herd should be recorded. The feed should originate from a controlled source and no animal proteins should be added.

If the animals are treated with antibiotics there should be a suitable withdrawal period before collection of blood or plasma. The animals must not be treated with Penicillin antibiotics. If a live vaccine is administered to the animals, a suitable waiting period is imposed between the vaccination and collection of plasma for Immunosera/immunoglobulin production.

A regular health monitoring system should be in place which ensures that the animals are subject to continuous and systematic veterinary and laboratory monitoring for freedom from specified infectious agents. This should include constant monitoring of the animal colonies by the veterinarian, routine pathological examination of randomly selected animals, serological analysis for a range of viruses, bacteria and parasites and the examination of the health status of all animals by the responsible veterinarian, or a person under the responsibility of this veterinarian, prior to bleeding.

The Annex to this guideline provides examples of viruses which the company should consider when establishing a system of health control of the animals used as plasma/serum donors for their specific product. The number of animals which should be tested for and the frequency of testing depend on various factors and should be specified for each product depending on the epidemiology of the agent, the size of the herds and the incidence of infections. Testing for viruses should be performed in laboratories with experience in routine virus testing.

The results of the health monitoring of the animal colonies should be well documented and newly emerging serious veterinary diseases should immediately be reported to the competent authorities.

#### **4.2 Starting Materials**

##### *Biological materials used in the production*

Any reagents of biological origin used in the production of the immunoglobulin/immunoserum should be monitored for microbial contaminants such as mycoplasma, fungi and bacteria. Special consideration should be given to possible viral contaminants and tests for relevant viruses should be performed. Bovine sera used as supplement, e.g. in culture media used for culture of the cell line providing the immunisation

antigen should be checked and found negative for potential virus contaminants (at least bovine viral diarrhoea, infectious bovine rhino-tracheitis and para-influenza 3 virus). Preferentially, inactivated bovine serum should be used<sup>1</sup>. In addition, bovine sera and other bovine-derived biologicals used as supplements during the manufacturing procedure should comply with the requirements in the Note for Guidance on Minimising the Risk of Transmitting Animal Spongiform Encephalopathy via Human and Veterinary Medicinal Products

#### *Antigens for immunisation*

A number of different antigens is used, e.g.

- human antigens like thymocytes or permanent lymphocyte cell lines to produce anti-lymphocyte-cell sera,
- venoms from snakes, scorpions and spiders to produce anti-venoms
- toxins to produce anti-toxins
- viral and bacterial antigens

The antigens should be appropriately characterised. Information on the source and method of preparation should be provided. If appropriate, identification and sanitary status, age of the animal from which the antigen originates should be known. If the antigen is derived from a human donor, information concerning the health of the donor should be provided. Antigens derived from human tissues should be shown to be free of infectious agents. When a cell line is used, this cell line should be characterised according to the relevant requirements, e.g. CPMP/ICH/294/95 Note for Guidance "Derivation and characterisation of cell substrates used for production of biotechnological/biological products" and should be shown to be free of adventitious agents according to the CPMP/ICH/295/95 Note for Guidance.

#### *Material used for absorption of undesired antibodies*

There are products whose manufacture includes steps for absorption of cross-reacting or unwanted anti-human antibodies. For this purpose, material from human tissues and/or blood is mainly used. The human materials should be shown to be free of infectious agents. The donors of the human material for absorption should comply with the requirements for donors of blood and plasma according to the Ph. Eur. monograph „Human plasma for fractionation“. The origin, time of collection and testing should be specified. Any deviation from these requirements should be justified. It is preferred to subject these materials to viral inactivation.

### **4.3 Production Process**

#### *Immunisation of the animals*

The animals are immunised with antigens according to a defined scheme with booster injections at regular intervals. The use of adjuvant agents is permitted. The serum collection and the immunoglobulin/immunoserum production should be performed in separate rooms. The animals from which the serum is collected may be anaesthetised. They should be thoroughly examined, particularly for evidence of infections. If an animal shows any pathological lesions, relevant to the use of the serum in the preparation, it should not be used, nor any remaining animals of the group concerned, unless it is evident that their use will not impair the safety of the product.

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<sup>1</sup> If adopted by the CPM, the Note for guidance on the use of bovine serum in the manufacture of human biological medicinal products (CPMP/BWP/1793/01) should be considered.  
CPMP/BWP/3354/99



#### *Blood or plasma collection*

Collection of blood or plasma from animals should be made by venepuncture or intracardiac puncture. The area surrounding the point at which insertion is made into the vein should be cleaned and disinfected. The blood should be collected in such a manner as to maintain sterility of the product. If the blood/plasma is held for any period before further processing, it should be treated and stored in such a way as to exclude microbial contamination. Further storage before processing should be validated to ensure that the quality of the product is not influenced.

#### *Pool-Testing*

The freedom of contaminating viruses should be supported by testing either the serum pool or in the event that the manufacturing procedure contains a step of absorption, the first defined manufacturing step after absorption. The earliest step at which the serum obtained from all animals is assembled should be defined as serum pool. The pool should be tested for the absence of specific and adventitious viruses using appropriate *in vitro* and, if appropriate, *in vivo* tests. The program to be established to test for absence of specific viruses depends on the individual manufacturing process. Thus, when human blood is used for absorption of unwanted antibodies and/or for immunisation the absence of human viruses, at least HCV, HIV 1 /2 and HBV, should be demonstrated.

In the event of viral contamination detection in the pooled serum, evidence should be presented that this viral contamination has been eliminated or inactivated during the manufacturing process.

#### *Purification*

The batch of a product intended for further processing should be clearly defined. Methods used to purify the product and their in-process controls including their specification limits should be described in detail, justified and validated. It is important to ensure that purification procedures do not impair relevant immunobiological features of the immunoglobulin/immunoserum.

The flow-charts and descriptions of the manufacturing procedure should be detailed. Any optional variations of the manufacturing procedure should be validated. Criteria for reprocessing of any intermediate or of the final bulk should be carefully defined, and the procedure of reprocessing should be validated and justified.

The parallel purification of several intermediate serum pools is possible. The maximum number of these intermediate pools and their volume should be defined.

All possible steps should be taken to prevent aggregation. The residues deriving from the purification procedure should be tested for. It is important that the techniques used to demonstrate purity be assessed using as wide a range of methods as possible, including physico-chemical and immunological techniques. These should include tests for protein contaminants of the host and - if relevant - of human origin, as well as tests on materials derived from the purification process. The level of contamination with host proteins considered as acceptable should be justified and criteria of acceptance or rejection of a production batch should be given. Assays for endotoxin levels should be carried out.

The effectiveness of the manufacturing process to inactivate or remove potential viral contaminants is important for product safety. Unless otherwise justified, effective step(s) which inactivates or eliminates potential viral contaminants should be incorporated. Examples are solvent-detergent treatment, pasteurisation or appropriate filtration methods. Any inactivation process should not compromise the biological activity of the product.

Procedures, which make use of chromatography, should be accompanied by appropriate measures to ensure that column substances or any additional potential contaminants arising from their use do not compromise the quality and safety of the final product. Data on the characterisation of column material or material used for the precipitation of the protein including data on the purification, cleaning, storage and repeated use of these materials should be provided.

The composition and source of any cell-culture media, buffers, other products and substances used for production should be recorded.

Residues remaining from the purification process should be tested for and relevant specifications should be defined. The stability of intermediates should be demonstrated.

#### *Validation of the purification procedure*

The capacity of the purification procedure to remove unwanted host derived proteins, additives used as part of the purification, viruses and other impurities should be investigated thoroughly. The reproducibility of the purification process with respect to its ability to remove specific contaminants should be demonstrated.

Specific studies should be performed to investigate the capacity of the purification process to inactivate or remove viruses. The principles of the Note for Guidance CPMP/268/95 "Virus validation studies: the design, contribution and interpretation of studies validating the inactivation and removal of viruses" have to be applied. If human material are used for immunisation and absorption, human viruses should be considered in addition to species-specific viruses in selecting appropriate viruses for spiking studies. The validation of the purification process should also include justification of the working conditions such as column loading capacity, column regeneration and sanitisation and length of use of the columns as well as the use of any other substances such as precipitation substances.

#### *Antimicrobial agents*

Although antimicrobial agents are allowed to be added according to the Ph. Eur. monograph „Immunosera“, they should not be included in the manufacture unless their use is justified by quality and/or safety considerations. They must never be used as a substitute for any aspect of GMP. In particular, this should be taken into account for products to be administered intravenously and in large doses.

In selecting a preservative system the applicant should consider its effectiveness against potential microbial contaminants, possible interaction with the formulation or container and possible effects on testing in biological systems.

If replacement of preservatives is considered on the basis of side effects or for other reasons, a risk/benefit evaluation should be made, taking into consideration that such a change implies a new formulation with the need for additional studies for sterility, potency, stability and their clinical implications on a case by case basis.

### **5. The Final Bulk Product**

The quality of all components of the final preparation forming the final bulk product should comply with the specifications of the relevant monographs of the Ph. Eur., when available. The amount of active substance should be adjusted according to the protein concentration or activity. The bulk product should be shown to be free from bacterial, fungal and other microbial contamination.

## 6. The Finished Product/Release Testing

Quality control tests should be carried out routinely on each batch of finished product according to the GMP guidelines. The aim of the release testing of a given batch is to show that this batch is consistent with and equivalent to the successive batches produced and to batches that have been shown to be safe and efficacious in clinical trials in man. The tests should be performed as laid down in the Marketing Authorisation. Among all tests included in the specifications for release testing, most have to be carried out on the product in its final container

### *Identity*

A selection of tests used to characterise the immunoglobulin should be used to confirm product identity for each batch. The methods employed should include tests for biological activity as well as physicochemical and immunological methods. Using antisera specific to plasma proteins of each species of domestic animal commonly used in the preparation of materials of biological origin in the country concerned, it should be demonstrated that the product is shown to contain only proteins originating from the species used for the immunoglobulin production. The typical protein composition should be specified and tested for.

### *Purity*

The degree of purity will depend on several factors; these include the method of its production and purification and the degree of consistency of the production process. The purity of each batch should be established and be within specified limits. The product should be shown to be free from microbial contamination. Pyrogenicity should be tested for. Particular attention should be given to assessing the degree of aggregation or molecular fragmentation of the immunoglobulin. The protein content of the product must be as low as possible relating to its specific activity. The content of characteristic protein impurities or stabilisers e. g. albumin should be specified.

### *Potency*

The biological activity of the animal immunoglobulin/immunoserum should be established by a biological assay. The test for potency should give information on the functional property of the immunoglobulin. Currently, most of the tests are based on protective or therapeutic effects of the animal immunoglobulin/immunoserum determined in animals. For example, the dose necessary to protect 50% of a group of mice challenged with a specified, normally lethal, dose of venom or toxin may be determined. It is highly desirable to avoid the use of animals by substituting *in vitro* methods. Thus, the potential use of *in vitro* methods should be investigated. However, correlation to the protective or therapeutic effect should be established.

Other parameters which should be tested for include sterility, pH and content of antimicrobial preservatives.

### *Stability*

Stability studies should be performed to provide data to support the requested storage period for either drug substance (bulk material) or drug product (final container product). The data should be based on real-time and real-condition investigations. Depending on the product, it may be feasible to obtain data on the stability of the product during transport and storage at higher temperatures. If loss of activity during storage is revealed by stability studies, a shelf life specification should be established.

### *Specifications and reference material*

The studies described in Section 4 will contribute to a definitive specification list for the product, when justified by the information obtained from the examination of successive batches and results of batch analyses as indicated in Section 6.

When an international reference preparation is not available, an in-house reference preparation should be produced. This should originate from a suitable batch of the product which has been clinically evaluated and fully characterised in terms of chemical composition, purity, potency and biological activity. Criteria for establishing the reference preparation and criteria for re-testing and prolongation of the shelf-life should be stated.

### **7. Consistency of the Manufacturing Process**

Evidence should be provided on the consistency of production on at least three consecutive full-scale production batches. This should include information on the final bulk, finished product as well as on in-process controls. The studies should include biological, chemical and immunological methods to characterise the animal immunoglobulin/immunoserum as well as methods to detect and identify impurities.

#### **Annex: Potential Viral Contaminants**

Tables 1 to 3 give examples of viruses that a marketing authorisation applicant should consider when establishing a system of health control of the animals used as plasma donors. This system should be established individually for each product taking the following into account for the concerned species:

- the epidemiology of infectious disease in the country or geographical region where the production animals are maintained
- the use of a strict barrier system which effectively protects the animals from contact with wild animals, including rodents,
- the provision of a reliable system of veterinary control,
- the testing of donor animals or randomly selected animals before entering the colony and at regular intervals thereafter.

The occurrence/absence of infectious diseases in the country of origin should be substantiated by an official certificate of a legal veterinary authority. In this certificate the legal authority should also confirm that a compulsory notification of suspected cases of infectious diseases including clinical and laboratory verification, is in place.

In general, the company should routinely monitor the epidemiological situation in the country of origin of its plasma and in particular take note of any new emerging veterinary diseases and amend its list of considered viruses accordingly, if necessary.

**Table 1: Rabbit**

Rabbit rotavirus	
Reovirus type 3*	
Poxviruses:	
Rabbitpox (RPXV)*	
Myxomatosis virus (MYXV)	
Shope fibroma virus	
Rabbit haemorrhagic disease virus (RHDV)	
Rabbit papillomaviruses (e.g., Shope papillomavirus)	✓
Lapine parvovirus (LPV)	✓
Rabbit kidney vacuolating virus	✓
Herpes cuniculi	✓
Adenovirus	✓
Encephalomyocarditis virus	
Borna disease virus*	
Sendai virus*	
Simian Parainfluenza (SV-5)*	
Pneumonia virus of mouse (PVM)	

\* Virus classified as pathogenic for humans

**Table 2: HORSE**

Eastern, Western & Venezuelan Equine encephalitis viruses\*

St Louis encephalitis virus (SLEV)\*

Japanese B encephalitis virus\*

Vesicular stomatitis virus (VSV)\*

Equine herpesvirus, type 1-4\*

West Nile fever virus (WNV)\*

Equine morbilli virus (Hendra)\*

Borna disease virus\*

Reovirus type 1-3\*

Equine influenza virus\*

Equine rotavirus

Equine and bovine papillomaviruses (EqPV 1-2 and BPV 1-2)

Equine infectious anaemia virus (EIAV)

Equine arteritis virus

African Horse Sickness(Orbi)

Equine parvovirus

\* Virus classified as pathogenic for humans

**Table 3: SHEEP & GOAT**

Foot and mouth disease virus (FMDV)\*

Wesselbron virus\*

Louping ill virus (LIV)\*

Rift valley fever complex\*

Tick-borne encephalitis virus (TBEV)\*

Bluetongue virus (BTV)\*

Vesicular stomatitis virus (VSV)\*

Poxviruses:

Parapoxvirus (Orf)\*

Capripox virus\*

Cowpox virus\*

Parainfluenza virus type 3 (PIV-3)\*

Borna disease virus\*

Reovirus 1-3

Respiratory syncytial virus

Rotavirus

Akabane virus

Ovine herpes virus 2

Bovine herpes virus types 1,2,4

Border disease virus (BDV)

Ovine/bovine papillomavirus (OPV)

Bovine viral diarrhoea virus (BVDV)

Retroviruses:

Caprine arthritis encephalitis virus (CAEV)

Maedi-Visna virus (MVV)

Jaagsiekte virus (OPAV)

Bovine leukemia virus (BLV)

Epizootic haemorrhagic disease virus

Peste des petits ruminants (Morbillivirus)

Adenoviruses

Nairobi sheep disease

Ross river virus

\* Virus classified as pathogenic for humans