行政院所屬各機關因公出國人員出國報告書(出國類別:參加會議)

赴新加坡參加2012年「International Workshop on Cell and Tissue Therapy: Converging Science & Regulations 」會議

服務機關:行政院衛生署食品藥物管理局

姓名職稱:張連成副審查員

派赴國家:新加坡

出國期間: 101年3月22日到24日

報告日期:100年4月8日

摘要

衛生署食品藥物管理局藥品組張連成副審查員於本(101)年 3 月 22 日至 24 日,赴新加坡參加 2012 年「International Workshop on Cell and Tissue Therapy: Converging Science & Regulations 」會議。

本次會議是由新加坡衛生科學局(Health Sciences Authority;HSA)發起之workshop,會議主題爲分享各國藥政主管機關之幹細胞及細胞治療審查法規體系,會議主要分爲幾大專題進行:Cord Blood - Clinical Applications、 Tissue-engineered Products in Regenerative Medicine、 Mesenchymal Stem Cells - Science and Clinical Applications、 Animal Models in Cell and Tissue-based Therapies - Proof Of Concept、 Challenges in Regulation of Cell and Tissue-based Therapy - Clinical Trials、 Challenges in Regulation of Cell and Tissue-based Therapy - Non-clinical Animal Studies、 Challenges in Regulation of Cell and Tissue-based Therapy - Manufacturing and Quality、 Challenges in Regulation of Cell and Tissue-based Therapy - Clinical Practices and Hospital Exemption。

本次會議同時邀請英、美、日、澳等國家之醫學界與產業界,對 其研發與執行細胞治療產品之現況與發展進行報告,會議討論過程中 顯示,國際最新細胞治療研究與法規進展,已由最基本的倫理考量, 進一步建立要求產品品質的GMP制度,以及臨床試驗前動物實驗數據 之考量,同時各國也於會上充分溝通審查類似案件常見之疑慮,有助 於使我國審查標準與國際接軌,未來更希望能夠藉由各國審查體系之 相互交流分享,提供我國參與國際舞台並增進國際合作之契機。

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WORKSHOP PROGRAMME

WHO NOTIFY EXPLORING VIGILANCE NOTIFICATION FOR ORGANS, TISSUES AND CELLS

壹・目的

衛生署食品藥物管理局藥品組張連成副審查員於本(101)年 3 月 22 日至 24 日,赴新加坡參加 2012 年「International Workshop on Cell and Tissue Therapy: Converging Science & Regulations 」會議。

本次會議爲 100 年泰國曼谷參加 APEC 生命科學創新論壇(LSIF)項下「WORKSHOP ON STEM CELL PRODUCT QA/QC」會議之延續性會議,有鑒於細胞治療產品已成爲歐美先進國家新興生物科技產品之重要發展項目,全美迄今有超過 2000 種產品正在進行上市前臨床試驗評估,因此美國、歐盟、澳洲、加拿大、韓國與新加坡等國衛生主管機關,除建置對細胞產品之管理架構外,亦依最新科學進展,發展出對產品品質管控及動物試驗模式。同時,配合醫學儀器更新,醫院亦開始投資由醫師主持之組織工程技術。

參與國家單位包括:Australia TGA、South of Korea KFDA、UK Division of Cell Biology and Imaging National Institute for Biological Standards and Control、US FDA Gene Therapies Office of Cellular, Tissue, and Gene Therapies Center for Biologics。

學術界及醫院等非官方單位有:Duke Translational Medicine Institute, Duke University Medical Centre, USA、Singapore General Hospital、Paul O'Gorman Laboratory of Cellular Therapeutics, Royal Free Hospital, London、Department of Bioengineering, National University of Singapore、Department of Orthopaedic Surgery, National University Health System、Singapore Stem Cell Consortium、Division of Medical Biotechnology,

Paul-Ehrlich-Institute, Germany、Department of Paediatrics, Yong Loo Lin School of Medicine, NUHS、National Heart Centre, Singapore、Blood Services Group, HSA & St George's Hospital, London及WHO Coordinator (Project NOTIFY), USA等。



US FDA Dr Wilson Bryan

Korea KFDA Ms. Jin, Mi-Ryeong



左: Dr Mark Lowdell, Royal Free Hospital, London

中: Prof Michael Raghunath, NUof Singapore



右: Ms Susanne Douglas,

Therapeutic Goods Administration, Australia

圖:「International Workshop on Cell and Tissue Therapy: Converging Science & Regulations」會議各與會國代表合照

貳、行程與工作紀要

日期 工作紀要

101年3月22日 至新加坡會場

Grand Copthorne Waterfront hotel

101年3月23日 參加會議

101 年 3 月 24 日 参加會議

101年3月25日 返國(新加坡->台北)

參、會議重點

各國細胞治療體系分析整理如下:

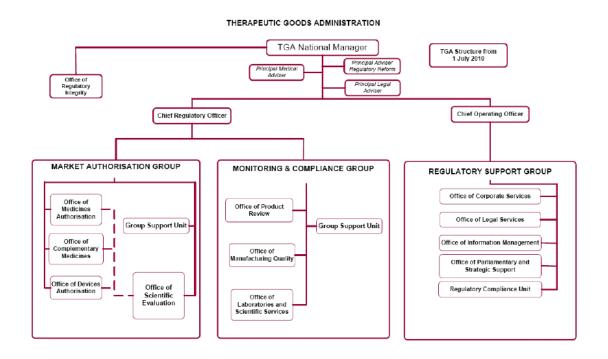
- · Australia:

(一) 主管機關: Therapeutic Goods Administration (TGA)

TGA 隸屬澳洲政府健康及老化部,主要負責藥品(prescription, OTC, complementary 等)、醫療器材、血液及生物製劑的管理, 確保該類產品之安全、品質及療效為其重點工作。

(二) 主管法規: *Therapeutic Goods Act 1989.* 共分三部份,包含第一部份產品標準(Part 3-1: Product Standards)、第二部份之醫療物品登記(Part 3-2: Registration of TG) 及第三部份之製造許可(Part 3-3: Licensing)

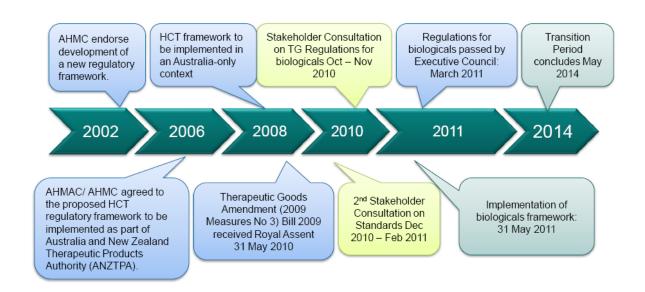
(三)管理架構:



Office of Scientific Evaluation 分為下列幾個部門:

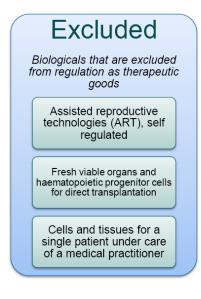
- 1. Pharmaceutical Chemistry Section: evaluates quality and bioavailability aspects of prescription and OTC medicines
- 2. **Toxicology Section**: evaluates safety aspects of prescription, OTC and complementary medicines
- 3. Biological Sciences Section: evaluates quality aspects of biologicals, biological medicines, cell and tissue therapies and blood and blood products
- 4. Experimental Products Section: administers access to unapproved therapeutic goods in Australia
- 5. **Management and Coordination Section**: includes Office Head and administrative and project management functions

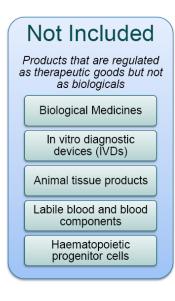
(四)歷史沿革及未來規劃進程

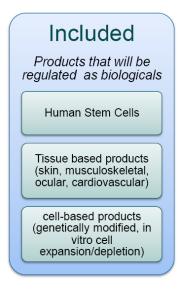


(五): 澳洲人體細胞組織生物製劑類產品新興管理架構

1. 為因應新興細胞治療與醫療技術應用的挑戰,TGA以現有生物製劑對產品管理的基礎,依據產品特性、使用者風險,建立特殊的管理架構,下圖可見TGA對產品管理的思維,Human Stem Cell、Tissue based products、cell based products將被歸類爲生物製劑產品,並加以管理。







- 2. Human tissue therapy products包括:
 - (1) skin
 - (2) musculoskeletal —bone, collagen
 - (3) cardiovascular —heart valves
 - (4) ocular whole eye, cornea
- 3. Human cellular therapy products包括:
 - (1) stem cells and progenitor cells e.g. mesenchymalstem cells `HPC for uses other than haematopoietic reconstitution `other stem cells (e.g. neural) and progenitor cells (e.g. nasal cells)

- (2) other human cell-based products, such as: fibroblasts, chondrocytes
- (3) immunotherapy products, such as cell-based tumour vaccines
- (4) genetically modified cells
- 4. 此一生物製劑類產品管理的新架構,具備以下幾點特性:
 - (1)符合全球化目標(Global Harmonization)
 - (2) 能辨別生物製劑類產品,特別是細胞與組織產品的特殊規格(Recognition of Unique Specifications of Biologicals, Particularly Cell & Tissue)
 - (3) 具備高度公眾與倫理議題
 - (4) 需將傳染性疾病控散機會降至最低

(六)產品依風險分級:

Class 1 biological.

A biological is Class 1 if it is: declared in the Regulations as a

Class 1 biologicals - requirements

- · Certify compliance with standards
- Should be fit for intended clinical purpose
- · 'Inclusion' on the ARTG
- The requirements are not 'lower' than other Classes – different governance

A biological is Class 2 if it is:

- a. both:
 - i. processed using only one or more of the actions of minimal manipulation; and
 - ii. for homologous use; or
- b. declared in the Regulations as a Class 2 biological.

Class 2 biologicals - requirements

- Dossier to demonstrate compliance with standards and guidelines
- GMP conformance (licence or clearance)
- Should be fit for intended clinical purpose
- 'Inclusion' on the ARTG

A biological is Class 3 if it is:

- a. processed:
 - using a method in addition to any of the actions of minimal manipulation; and
 - ii. in a way that does not change an inherent biochemical, physiological or immunological property; or
- b. declared in the Regulations as a Class 3 biological.

Class 3 biologicals - requirements

- · Dossier:
 - demonstrate safety, quality and efficacy
- GMP conformance (licence or clearance)
- Approved clinical indication
- · 'Inclusion' on the ARTG

A biological is Class 4 if it is:

- a. processed:
 - using a method in addition to any of the actions of minimal manipulation; and
 - ii. in a way that changes an inherent biochemical, physiological or immunological property;
- b. declared in the Regulations as a Class 4 biological.

Class 4 biologicals - requirements

- Dossier:
 - demonstrate safety, quality and efficacy including clinical data and analysis
- GMP conformance (licence or clearance)
- Approved clinical indication
- 'Inclusion' on the ARTG

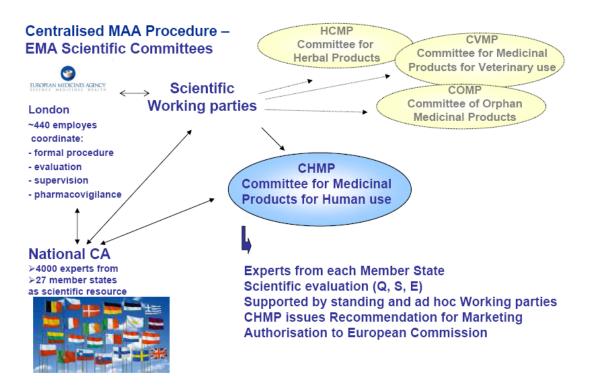
此部份需要注意的事所有產品均須符合相關標準(Standards), 尤其是 Class 2 以上須有 GMP conformance(licence or clearance)。各類產 品送審所需文件如下表:

Human blood	and blood co	omponents, hur	nan tissues a	and human ce	ellular therapy	oroducts
	Biologicals*			Blood and blood components*	HPC*	
	Class 1	Class 2	Class 3	Class 4		
Standards Standards for minimising infectious disease transmission				mission		
	Sector specific requirements	Product specific sta	ndards, e.g. cardio	vascular, musculo	skeletal, ocular, skin,	blood, HPC
General standards, e.g. default pharmacopoeial standards, labellin				labelling standards		
Manufacturing requirements		Manu	facturer quality sys	stem requirements,	e.g. Code of GMP	
Submission requirements	Certification		Dossier		Technical master	file (TMF)
Guidance documents					TMF guide	line
		Ad	loption of relevant	international guida	hce documents	

二、EMA與德國:

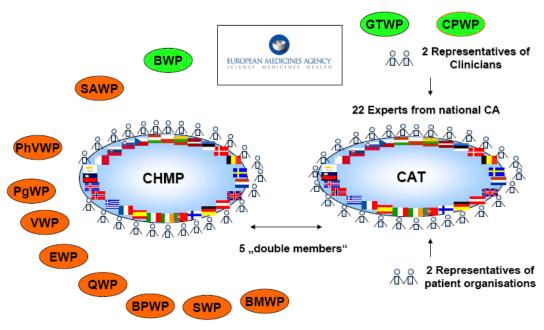
(一) 主管機關:

- 1. 歐盟執委會-歐盟行政部門爲歐盟管理實體:由歐洲共同體委員(及會員國代表)組成,並遴選主席。
- 2. 歐洲議會-歐盟立法部門: 為歐盟立法實體,由歐洲議會785位委員經選舉輪流出任,任期5年。
- 3. The European Medicines Agency (EMA)-EMA建立於1993年,自1995年開始運作,爲歐盟專責醫藥品評估與核發許可之機構,其經歐洲議會立法,並由歐盟執委會核准設立,主要任務如下:
 - (1) Scientific advice and protocol assistance to companies
 - (2) Orphan drugs designation
 - (3) Paediatric Investigation Plans
 - (4) Evaluation of new products, generics, OTCs
 - (5) Arbitration and referral procedures
 - (6) Regulatory & Scientific Guidance to companies
 - (7) Information to patients & transparency
 - (8) Coordination of pharmacovigilance activities
 - (9) Coordination of Member States' inspections (GMP, GCP, GLP)
- 4. 國家主管機關(National Competent Authorities, NCA):歐盟會員國國內專責醫藥品評估與核發許可之機構。該機構另設有HCMP、CVMP、COMP、CHMP委員會及成員如下圖所示。



生物藥品除技術審查單位外,另設有Committee for Advanced Therapies(CAT)供諮詢,其組成專家背景如下圖所示。

Committee for Advanced Therapies (CAT)



(二) 主管法規:Canada Health Act 、The Assisted Human Reproduction

Act 、Food and Drugs Act等。

(三)管理方式:

1. 歐洲議會與歐洲理事會(The European Parliament and of the Council)於2004年發佈用於人體醫療用途之人體組織與細胞標準指令(Directive 2004/23/EC of the European Parliament and of the Council of on setting standards of quality and safety for the donation, procurement, testing, processing, preservation, storage and distribution of human tissues and cells),規範機構的監督管理、人體細胞與組織之捐贈、摘取、檢驗、處理、保存與配送等相關品質與安全性,其主要內容爲建置人體組織細胞的捐贈、摘取、檢驗、保存、處理、儲存與運送之標準作業,包括來自週邊血液、臍帶血與骨髓之血液幹細胞、生殖細胞、胎兒組織與細胞,成體幹細胞以及胚胎幹細胞。至於同一次手術中用於自體移植的的組織細胞、血液與血液成分物、與在捐贈者體內功能相同之移植用器官或部分器官,以及除臨床試驗外用於研究之人體細胞組織等,皆不受該指令管轄。相關法令與基準規範如下圖:



2. 產品分類管理可為

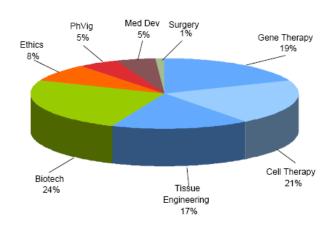
(1) For Substantially manipulated cells / heterologous use:

可再細分爲Medicinal Product、Advanced therapy Medicinal Products (ATMP)兩種類型,其中ATMP包括:Gene therapy MP、Somatic cell therapy MP、Tissue engineered products。

(2) For non-substantially manipulated cells: 非屬Medicinal Products。

Committee for Advanced Therapies (CAT)

Expertise as required by ATMP-Regulation:



3. 查核:

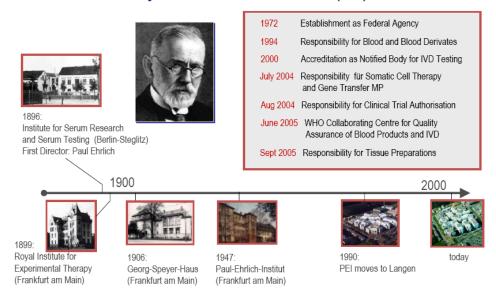
歐盟指令亦賦予會員國可對從事人體細胞組織產品相關機關進行查核之權力,但與美國CBER/FDA執行方式不同,歐盟國家多授權民間機構與認證組織執行相關認證評鑑事務,例如德國,仍以其聯邦血清疫苗管理局Paul-Ehrlich-Institut(PEI)等National and International Integration,做為人體器官保存庫登記、查核與驗證之機構。

4. Paul-Ehrlich-Institut (PEI)介紹:

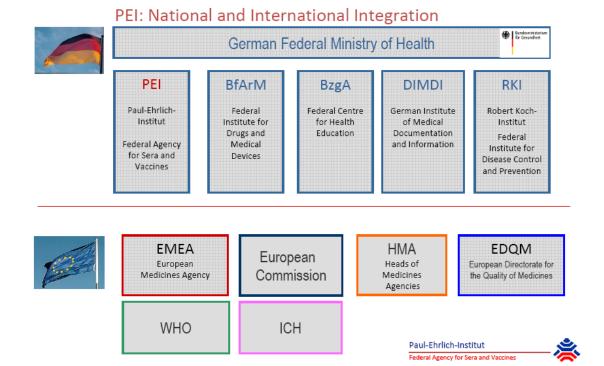
德國諾貝爾獎得主Paul Ehrlich於1896年在柏林(Berlin)成立血清研究與血清檢驗研究所,1899年又於德國法蘭克福成立實驗治療

皇家研究所,1906年又於法蘭克福成立Georg-Speyer-Haus,負責化學治療性研究(Chemotherapy),至1947年整合前三機構於法蘭克福 am Main正式成立Paul-Ehrlich-Institut,至1990年再遷移至法蘭克福 的Langen迄今。其歷史如下表所示。

History of the Paul-Ehrlich-Institut (PEI)

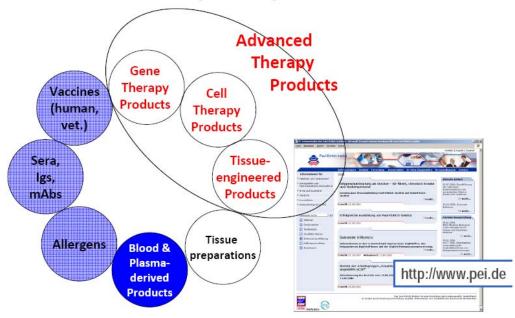


PEI自1972年起,成為德國聯邦政府衛生部的下屬機構-聯邦血清疫苗局(Paul-Ehrlich-Institut, Federal Agency for Sera and Vaccines),與聯邦醫藥品醫療器材研究所(BfArM, Federal Institute for Drugs and Medical Devices)、聯邦衛教中心(BzgA, Federal Centre for Health Education)、德國醫學文件與資訊研究所(DIMDI, German Institute of Medical Documentation and Information),及聯邦疾病管制與預防研究所等機構,共同負責的國醫療衛生醫療管理工作。



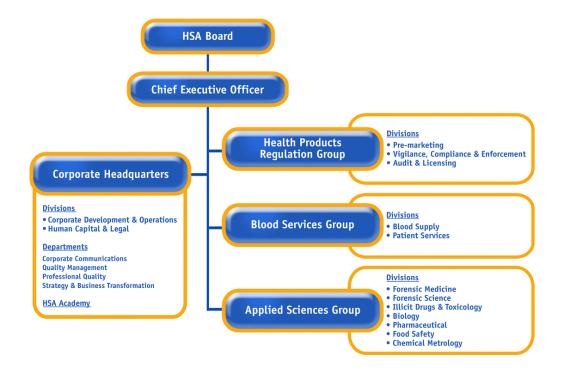
PEI自1994年起負責管理血液及其衍生物,200年接受認證成爲負責診斷試劑上市審查檢驗與批次放行檢驗等業務之驗證單位,至2004年7月,負責體細胞與基因治療等轉譯醫學產品的管理,同年8月負責臨床試驗的審查業務,2005年6月正式成爲世界衛生組織血液製劑與體外診斷試劑品質保證共同研究中心(WHO Collaborating Centre for Quality Assurance of Blood Products and IVD),依據歐盟2004/23/EC指令規定,德國聯邦政府衛生部必須針對低風險之移植用人體細胞組織,建置處理與保存機構之認證與查核工作,因此,自2005年9月起,PEI正式開始負責德國境內人體組織庫與其他相關機構之登記與查核驗證。

PEI: Medicinal Product Responsibility



四、Singapore

(一) 主管機關: Health Sciences Authority Health Products Regulation Group



Objectives:

- 1. Safeguard public health
- 2. Ensure the public has access to safer cell and tissue-based therapeutic products
- 3. Provide clear, transparent and internationally benchmarked regulatory infrastructure to support the rapid development in cell and tissue-based therapeutic products

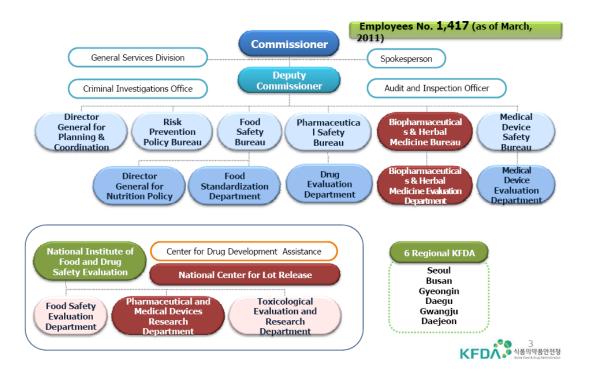
(二) 主管法規:Medicine Act

(三)管理方式:

- 1. regulate quality, safety and efficacy of high-risk CTT products like other medicinal products under Medicine Act
- 2. CTT products fall within the definition of Medicine Products (Pharmaceuticals & Biologics)

五、South of Korea

(一) 主管機關: KFDA



1. Vision:

Secure the highest level of public health by ensuring Food and Drug Safety

2. Mission:

- (1) Prevent and Manage Food and Drug related Risks in advance
- (2) Rapid Response to Food and Drug Safety Risks
- (3) Establish communication network and Support relevant parts

(二) 主管法規:

Pharmaceutical Affairs Act (cell therapy product) · Human Tissue Safety Control Act (Human Tissue)

(三)管理方式:

1.定義:

(1) Pharmaceutical Affairs Act, Annex 3:

A cell therapy product refers to a biopharmaceutical used as a therapeutic, diagnostic and preventive agent by proliferating, selecting and changing in vitro autologous, allogeneic or xenogenyeic cells, or engaging in other activities that will modify biological attributes of the said cells.

(2) KFDA notification 2010-50, Article 2

A medicinal product manufactured through physical, chemical, and/or biological manipulation, such as in vitro culture of autologous, allogeneic, or xenogeneic cells

2. Exemption: KFDA notification 2010-50, Article 2

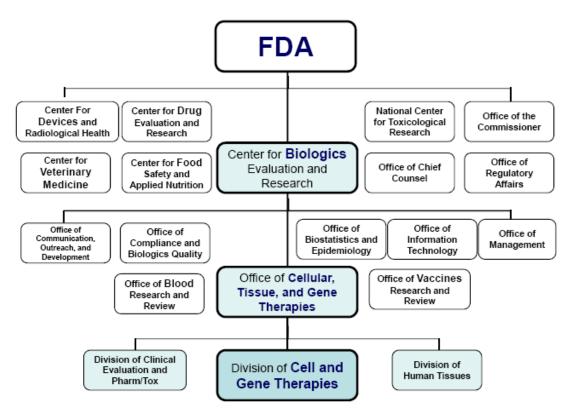
The case where a medical doctor performs minimal manipulation which does not cause safety problems of autologous or allogeneic cells in the course of surgical operation or treatment at a medical center (simple separation, washing, freezing, thawing, and other manipulations, while maintaining biological properties)

六、USA

(一)主管機關:US FDA

(二) 主管法規:

- 1. Statutes (Laws): Food, Drug & Cosmetic Act (FD&C Act)
- 2. Regulations (details of the law): 21 CFR (Code of Federal Regulations)
- 3. Human Cells, Tissues, and Cellular and Tissue Based Products (HCT/Ps) (21 CFR 1271.3 d))



(三)管理方式:

- 1. Most types of stem cell products of clinical interest today are subject to Biologics
- 2. Regulations and require premarket approval
- 3. Examples of OCTGT Products:
 - (1) Stem cell and stem cell-derived products: Hematopoietic, mesenchymal, embryonic, etc.
 - (2) Somatic cell therapies: Pancreatic islets, chondrocytes, myoblasts, keratinocytes, hepatocytes, etc.
 - (3) Cancer vaccines and immunotherapies: Dendritic cells, lymphocyte-based therapies, cancer cell-based therapies, peptides, proteins
 - (4) Cell lysates and extracts
 - (5) Gene therapies: Gene-modified cells · Plasmids, viral vectors,

bacterial vectors

- (6) Devices: Cell-based devices · Devices used for cells and tissues4. Examples of a few exceptions:
 - (1) Autologous or family-related peripheral blood stem cells for hematologic malignancies: Regulated as Tissue product under Section 361 PHSA
 - (2) Bone Marrow, autologous or allogeneic, for homologous use is not regulated by FDA: under authority of HRSA
- 4. Stem Cell Products in the US
- (1) No stem cell products have a Biologics License in the US
- (2) Multiple types of stem cells for multiple indications are in clinical trials

二、會議主題心得報告:

2009年3月9日,美國總統奧巴馬簽署行政命令,宣布解除對用聯邦政府資金支持胚胎幹細胞研究的限制,美國的細胞研究進入新階段。以下僅就會議期間與各國主管機關討論心得區分為:法規、動物實驗模式、臨床審查經驗等三部份分別敘明。

(一) 法規:

細胞治療產品已成爲歐美日等先進國家積極發展的新興生技產品,全美目前已有超過2000種產品正在進行上市前臨床試驗評估。因此,各國主管機關均對其主管機關進行人力規劃或法規更新的工作,本次「International Workshop on Cell and Tissue Therapy: Converging Science & Regulations」會議,重點在於各國對主管機關法規、產品品質及產品審查經驗進行討論,尤其各國均已公告細胞治療產品法規或草案,此類產品最重要之臨床前議題即爲產品品質管控(OA/OC),

先進製藥國家(例如:美國、英國、澳洲等)對此類產品,甚至要求 自臨床試驗階段至產品上市均須符合 GMP 規範。

美國 CBER/FDA 於 1993 年開始進行人體細胞組織的管理研究, 其管理大體依循產品風險高低採取分級分類管理模式,其中低風險的 產品包含移植用人體器官、組織、細胞等,採取源頭管制方式,透過 經註冊、認證之人體組織庫(Human Tissue Banks)供應安全無虞之人 體器官、組織、細胞;而高風險的產品包括經培養、活化之細胞治療 產品、含有修飾基因之細胞治療產品、基因治療產品、複合性產品、 組織工程產品等,世界各國衛生管理機構多嘗試在符合人體組織物管 理特殊要求的條件下,採取那入既有之藥物管理機制,其中細胞治療 及基因治療產品,多歸類爲生物藥品管理,組織工程產品多以含有人 體組織成份之醫療器材管理。

概觀人體細胞組織產品的全球管理發展近況,大約可分爲進展最快的美國,已於 2005 年正式實施風險分級管理制度;德國、英國等歐盟會員國,已實施人體器官保存庫登記查核作業與核准細胞治療的臨床研究;韓國、日本、澳洲、加拿大及台灣,也屬於後來居上,法規架構已形成,韓國甚至已於 2011 年核准相關產品上市。

我國基因治療之發展,早自90年初期即有以質體轉殖VEGF生長因子治療軀幹壞死組織再生的創新療法,惟當時國內尚未有任何關於基因治療技術與產品之管理規範。92年衛生署公告基因治療人體試驗申請與操作規範,成爲國內第一種基因治療的管理規範。97年,衛生署收到國內第二件基因治療人體試驗申請案,100年食品藥物管理局成立後,基因治療及細胞治療之臨床試驗申請案件漸增至每年10件左右,顯示我國醫療技術亦隨歐美先進國家,重新進入基因治療領

域,然近幾年歐美各國業已將基因治療產品之定義、管理架構與品質安全要求,逐一公佈供生技醫藥界參考,以進行有效管理。

我國的細胞治療研究管理制度與與亞洲各國相近,審查基準主要參照美國、歐盟及ICH相關基準規範,細胞治療產品的臨床試驗審查業務於2010年由衛生署醫事處移撥至食品藥物管理局,食品藥物管理局為確保基因治療、體細胞治療臨床試驗計畫之審查合乎科學性、安全性及社會倫理性,並確保受試者之權益,說明基因治療、體細胞治療產品申請臨床試驗時所需之相關技術性資料內容,作爲教學醫院及藥商準備相關案件申請資料之參考。於2011年2月預告「體細胞治療臨床試驗基準(草案)」、「基因治療臨床試驗基準(草案)」及「體細胞及基因治療臨床試驗計畫申請與審查作業規範(草案)」,並於2011年6月邀請各界專家學者進行第一次討論會議,未來將細部修定後再透過召開第二次專家會議進行意見交換。

(二)動物實驗模式

現今面對Advanced Therapy Medicinal Products的挑戰大致可分為下列幾點:

- Non-Clinical Aspects: Toxicology \(\cdot \) Relevant Animal Model(s) \(\cdot \) Proof of
 Concept \(\cdot \) Biodistribution \(\cdot \) Tumorigenicity \(\cdot \) Immunogenicity
- 2. Starting Material: Testing of Donors Microbiological Safety of Procurement Cell banking Origin of Cell lines
- 3. Clinical Aspects: Safe initial Dose \ Indications \ Reactions in Humans \ Follow-up
- 4. Transport to manufacturing site: Cold Chain Viability of Cells Chemicals for Cryopreservation Sterility

- 5. Quality Aspects: Identity、Purity、Sterility、Potency
 如何選擇合適的動物試驗模式?多數科學研究首先以relevant
 species爲主,幾個重要觀念爲:
- 1. A relevant species is one in which the test material is pharmacologically active due to the expression of the receptor or an epitope.
- 2. Use of smart *in-vitro* testing may in certain cases potentially complement or even substitute animal studies.
- 3. Choice of animal model depends on purpose:
 - (1) Proof-of-concept: usually homologous models
 - (2) Toxicology: may also be necessary to test final medicinal product (in addition, or alternatively).
 - (3) Could also be a disease model, if available
- 4. *In vitro M*odels may provide additional / alternative ways to address specific aspects e.g.Proof of concept for immune modulation (cytokine production, MLR inhibition, …)
- 5. Animal models reflecting the therapeutic indication (Disease Models) ideal but limited availability
- 6. Selection of animal models and species scientifically justified
- 7. Large animal models preferable:
 - (1) Size
 - (2) Surgically implanted cell products
 - (3) Functionality
 - (4) long-term evaluation of tissue regeneration
 - (5) Safety follow-up
 - (6) Physiology or Immune system of the animal

- 8. relevant for appropriately studying the clinical effect (e.g. regeneration of tissue)
- 9. Most relevant animal model determined by specific safety aspect to be evaluated
- 10. Intended cell-based product consisting of human cells for
- (1) proof-of-concept and
- (2) safety studies (where possible)
- 11. Necessity of
- (1) immunocompromised and/or
- (2) immunosuppressed animals
- (3) some aspects not optimally predictable of *in vivo* behavior of transplanted cells, e.g. persistence or functionality
- 12. Homologous animal models using corresponding Animal Stem Cells to study medicinal product
- (1) (+) often most relevant system for Proof-of-Concept
- (2) (-) uncertainty of similarity stem cells or factors involved in differentiation process
- (3) (-) Technology to generate IMP not always transferable (e.g. markers, antibodies)
- 13. Careful Interpretation of data from homologous models
- 14. If **only** homologous animal models are used:
- (1) Understand potential differences between human and animal stem cells
- (2) take into consideration when interpreting results

(三)臨床審查經驗:

US FDA 對此類產品重視 Safety issues,其中包括幾個重點,例如:
Immune response to the product、Duration of follow-up(含Concern regarding risk of malignancy)、Size of safety database (Number of subjects exposed 與 Duration of exposure)。

其中 Immune response to the product 要考量的點爲:Immune tolerance 、 Immune-privileged sites 、 Immunosuppression 。 而 Immunosuppression 又是臨床審查極重要的一環,要考慮的有:

1. Is immunosuppression needed for a specific cellular product?

2. Considerations:

- (1) Type of product: Immunosuppressants have been administered for allogeneic cells (both embryonic stem cell-derived products and differentiated cells). Immunosuppressants do not appear to be necessary for autologous cellular products or for mesenchymal stem cells.
- (2) Site of administration : Immunosuppressants may not be necessary for 'immune privileged' sites (e.g., the retina).
- (3) Clinical (and preclinical?) experience with related products
- 3. What immunosuppressants have been used? 下表爲 FDA 整理的免疫抑制劑種類:

Category	Medications Included
Polyclonal T-cell depleting	Rabbit-anti-human anti-thymocyte globulin (rATG)
antibodies	Horse-anti-human anti-thymocyte globulin (hATG)
	Anti-lymphocyte globulin (ALG)
Monoclonal T-cell depleting	Alemtuzumab (Campath)
antibodies	
Monoclonal Anti-IL2R	Daclizumab, Basiliximab
antibodies	
Monoclonal Anti-CD3	hOKT3g1 (Ala-Ala)
antibodies	
TNF-α antagonists	Infliximab, Etanercept
Anti-inflammatory	Deoxyspergualin
Calcineurin inhibitors	Tacrolimus, Cyclosporine
mTOR Inhibitors	Sirolimus, Everolimus
Inosine monophosphate	MMF, Mycophenolate Sodium
dehydrogenase inhibitors	
Corticosteroids	Prednisone, Methylprednisolone, others

from Collaborative Islet Transplant Registry (CITR)

- 4. When has immunosuppression been administered, relative to the time of administration of the cellular product?
- 5. Adverse reactions associated with immunosuppressants, from CITR

US FDA 近年來核准之細胞治療產品(BLA, Biological License Application)整理如下表:

年份	產品來源	產品名稱	備註
1997	Autologous cultured chondrocytes	Carticel	
2010	Sipuleucel-T	Provenge	
2011	Azficel-T	Laviv	
2011	Hematopoietic progenitor cells, cord blood	Hemacord	

2012	Allogeneic cultured keratinocytes	Gintuit	
	and fibroblasts in bovine collagen		

四、結語及建議:

藉由參與本次workshop,與美國、加拿大、歐盟、日本等先進製藥國家及亞洲各國相互學習分享細胞治療臨床試驗之審查與經驗,充分了解各國法規審查體系之架構,並透過會議中實際案例討論瞭解細胞治療臨床研究審查等多層面應考量的重點,由宏觀的角度衡量新興生技藥品研發階段臨床試驗前CMC、藥毒理、臨床試驗設計原理及倫理議題,相較於世界各國,台灣的審查品質呈現較優性與開放性,著重於法規科學與倫理的審查,重視受試者權益之保護與國際合作接軌。

未來我國應考量引進國際最新倫理規範與細胞治療科技新知,著 重於產品層面之研發輔導,對於屬個案治療或醫師個人之研究興趣等 低風險案件,研議法規鬆綁機制,並藉由相關專業審查團隊人才之培 訓,配合健全細胞治療法規體系及完善的查核機制,加速新興生技產 品研發時程,以期國民能獲得新穎、安全、有效的治療契機。