出國報告(出國類別:開會)

參加國際醫藥法規協和會

(ICH)Q5A(R2)工作組:人類或動物

來源細胞株所產製生物技術產品之病

毒安全性評估(Viral Safety

Evaluation of Biotechnology

Products Derived from Cell Lines of

Human or Animal Origin)

服務機關:衛生福利部食品藥物管理署

姓名職稱:張弘技士

派赴國家:新加坡

出國期間:108年11月16日至108年11月21日

報告日期:108年1月7日

國際醫藥法規協和會 (International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use, 簡稱 ICH)係由美國、歐盟及日本等三國藥政主管機關及製藥界,於 1990 年共同發起 成立之國際協和組織。ICH成立目的係藉由藥品品質、安全性及有效性等指引之 制定,以期協和各國法規標準,促進新藥發展及審查程序之效率、增進公共衛生、 避免重複性人體臨床試驗並合理的減少動物試驗之使用。隨著 ICH 制定之規範 逐漸影響全球,其他國家或地區,如瑞士、加拿大、韓國、巴西、中國、新加坡等 國也陸續加入該組織。2015年 10 月, ICH 改組並於瑞士登記為非營利性之法 律實體 (legal entity),名稱變更為「 International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use, 簡稱 ICH」,對國際 醫藥法規影響更深遠。為接軌國際藥品法規與管理,我國除積極參與ICH會議及各 工作組外,並與國際友人維持緊密互動並建立人脈、爭取國際能見度來獲得相關會 員的支持與肯定,經過多年的耕耘與努力,於107年6月7日經大會通過成為ICH第10 個法規單位會員,能隨時了解ICH最新發展重點及方向,即時提供資訊作為國內相 關法規政策制定參考依據,並讓台灣在新藥研發上更具備競爭力。

ICH每年召開兩次會議,輪流於歐洲、美洲、亞洲等地區舉行。108年6月 ICH大會通過「Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin Q5A(R2) Guideline _ 提案,隨即成立 Informal working group。職奉派於108年11月16日至21日參加 ICH Q5A(R2)工作 組第一次面對面會議,會議地點為新加坡。本次會議完成概念文件(concept paper)、 工作計畫 (business plan) 及指引草案重點與架構等議題討論,並製作工作成果簡 報提報大會,獲大會同意正式成立Expert working group,將持續進行草擬 Q5A(R2)文件。

因應新型態產品、新病毒檢驗技術、新確效方法及新製程之發展,來自各 國主管機關與製藥界代表們齊聚一堂進行面對面討論,專家們踴躍地分享實務經 驗、逐行逐字討論文件內容,雖過程中亦會有意見相左的時候,然而經由不斷地溝 通最終達成共識,令人印象深刻。期間與各國專家交流互動,除展現我國能見度, 也提升病毒安全性評估相關專業知能,收穫甚多。

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壹、目的

國際醫藥法規協和會(International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use, 簡稱ICH)係由美國、歐盟及日本等三國藥政主管機關及製藥界,於 1990 年共同發起成立之國際協和組織。ICH 成立目的係藉由藥品品質、安全性及有效性等指引之制定,以期協和各國法規標準,促進新藥發展及審查程序之效率、增進公共衛生、避免重複性人體臨床試驗並合理的減少動物試驗之使用。隨著 ICH 制定之規範逐漸影響全球,其他國家或地區,如瑞士、加拿大、韓國、巴西、中國、新加坡等國也陸續加入該組織。2015 年 10 月,ICH 改組並於瑞士登記為非營利性之法律實體 (legal entity),名稱變更為「International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use, 簡稱 ICH」,對國際醫藥法規影響更深遠。為接軌國際藥品法規與管理,我國除積極參與ICH會議及各工作組外,並與國際友人維持緊密互動並建立人脈、爭取國際能見度來獲得相關會員的支持與肯定,經過多年的耕耘與努力,於107年6月7日經大會通過成為ICH第10個法規單位會員,代表我國法規與國際同步。

因細胞製程生物技術產品常可預見病毒汙染風險,汙染來源可能源自於細胞株本身或製造過程中由外界導入,而受汙染之產品會造成使用者臨床上嚴重之後果。因此ICH於1999年公告Q5A(R1) guideline(人類或動物來源細胞株所產製生物技術產品之病毒安全性評估),其內容包含細胞庫及未加工原液(unprocessed bulk)中內源或外源性病毒檢測之建議方法與病毒清除(viral clearance)程序之評估,作為相關生物技術產品品質管制之參考依據。Q5A(R1) guideline實施至今已逾20年,為因應新型態產品、新病毒檢測技術、新確效方法及先進製程之發展突飛猛進,ICH大會於108年6月通過Q5A(R2) guideline之提案,隨即成立工作組,預計以3年的時間著手修訂相關內容。

職於108年11月16日至21日奉派參加ICH Q5A(R2)工作組第一次面對面會議。首次參與面對面會議與各國法規與技術專家共聚一堂,學習ICH Q5A(R2)指引草案修訂之流程,由各國專家分享實務經驗、深入討論概念文件(concept paper)及工作計畫(business plan)內容,可了解病毒安全性評估之最新發展及未來趨勢,而與各國專家交談互動,更可建立良好溝通管道以深化國際合作。

貳、過程紀要

日期	行程/工作紀要
108年11月16日(六)	啟程(台北-桃園機場-新加坡)
108年11月17日(日)~	參加ICH Q5A(R2)工作組會議:人類或動物來源細胞株所
108年11月20日(三)	產製生物技術產品之病毒安全性評估 (Viral Safety
	Evaluation of Biotechnology Products Derived from Cell
	Lines of Human or Animal Origin)
	會議地點:Grand Copthorne Waterfront Singapore
108年11月21日(四)	回程(新加坡-桃園機場-台北)

參、會議內容及重點摘錄

Q5A(R2)工作組會議共四天,工作重點摘錄如下:

一、參加 ICH Briefing Session,演講主題「 ICH: a global initiative」

由 ICH 秘 書 處 Ms. Coralie Angulo(Business Coordinator)、 Ms. NadiaMyers(Manager)及Dr. Anne Latrive(Manager)三人共同介紹,內容如下:

1. 組織介紹

ICH是由歐盟、美國及日本藥品主管機關及製業界等為協和國際藥品法規管理,共同發起正式成立於1990年之組織,ICH以提升新藥開發與查驗登記的效率及促進民眾健康為目標。藉由制定與實施有關藥品協和化之指引(guidelines)及標準(standards)達成組織目標。隨著會員增加、公布之指引為多國採納引用,進行組織改造,於2015年10月23日成為瑞士法律管理下非營利性之法律實體。ICH透過來自會員與觀察員推薦之專家工作組之努力,已制定超過60項技術文件指引(如圖一),包含Safety Guidelines文件14份、Quality Guidelines文件23份、Efficacy Guidelines文件21份、Multidisciplinary Guidelines文件6份、Electronic Standards for the Transfer of Regulatory Information、CTD/eCTD及 MedDRA (standardised medical terminology)等。

2. 組織架構(Governance Structure of ICH)

ICH大會(Assembly)由16個會員及32個觀察員組成。大會下設有秘書處、MedDRA管理委員會、ICH 管理委員會,並有32個專家工作組計723位專家協助制定與修訂指引,其中435位來自創始/常務會員(如圖二)。



圖一、ICH所產出技術指引(摘自簡報內容)



圖二、ICH工作組成員組成(摘自簡報內容)

- 3. 協和化流程 (ICH Process of Harmonisation)
- (1) 新提案篩選流程 (New Topic Selection Process)

ICH會員與觀察員均可提出欲協調新主題建議案,由管理委員會下之小組委員會收集提案後,訂定提案審查之優先順序。ICH大會一年進行一次之提案審查,新提案及其大綱獲通過審查後,成立非正式工作組(Informal

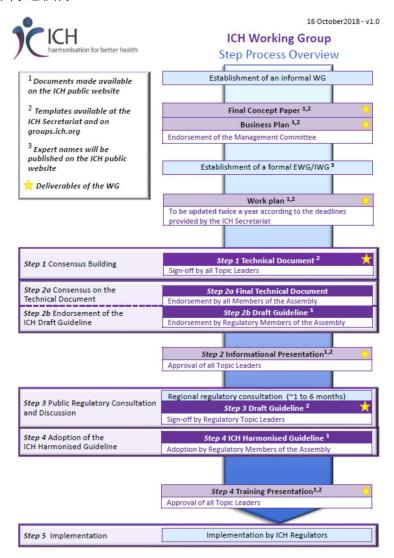
working group, Informal WG) •

(2) 啟動協和工作

Informal WG完成概念文件及工作計畫兩份草案。草案提交ICH管理委員會同意後,更名為專家工作組(Expert working group, EWG),正式進入Step 1協和階段。ICH指引的建立,原則上須經歷五個步驟(如圖三):

- Step 1: Consensus Building 技術文件經EWG成員充份討論並獲得共識 後作成草案,提交給大會進入step 2。
- Step 2 : a/b
 - a. Consensus on the Technical Document 大會根據EWG所提交達成充分科學共識的報告,經全體會員同意後進入下一階段 step 2b。
 - b. Endorsement of the ICH Draft Guideline 在技術文件的基礎上,經大會 法規主管機關會員簽署採納指引草案後完成 Step 2。
- Step 3: Public Regulatory Consultation and Discussion 第3步驟分為三個不同的階段:
 - Stage I 指引草案徵詢各界意見(Regional regulatory consultation):指引草案於ICH會員國間公告,徵求各界意見。其他非ICH會員的法規主管機關和業者公協會也可以透過向ICH秘書處對所公告徵求意見的指引草案發表評論或提供意見。
 - Stage II 討論所蒐集的意見(Discussion of regional consultation comments): 在蒐集各方所有意見後,EWG致力於處理所收到的意見並充分討論。
 - Stage III 完成第3步驟專家指引草案(Finalization of step 3 experts draft guideline):在EWG充分考量所蒐集之意見,就步驟2b指引草案的修訂版 達成共識,並經法規主管機關專家簽署後,將第3步驟之指引草案提交 給大會,請求進入ICH第4步驟程序。
- Step 4: Adoption of the ICH Harmonised Guideline 指引草案經大會法規主管機關會員正式通過以完成第4步驟,此時所完成的ICH協和化指引將由各ICH法規主管機關會員採用。

● Step 5: Implementation - 各地區依其規定,各自將指引落實為各國之法規或行政命令付之執行。



圖三、ICH指引建立流程(摘自簡報內容)

4. 工作組運作事項(Operational Matters of Working Groups)

工作組成員包含小組報告起草人(Rapporteur)、Regulatory Chair、Topic leader、Deputy Topic Leader、Rapporteur Supporter、Additional Support Staff、Editor、Content Manager。報告起草人係由ICH大會任命來自法規或業界會員所推薦之專家,負責協助與管理工作組之科學與技術性活動,以產出符合規定之ICH文件,另協調專家意見與秘書處聯繫等事務,進入Step 2b後,報告起草人需改由法規主管機關會員接任。Regulatory Chair則由ICH管理委員會任命來自法規主管機關會員所推薦之專家,遵循概念文件及工

作計畫所定之範圍與時間表,確保工作組依ICH流程及時程執行。
Topic Leader係由各會員推薦專家參與工作組事務,而創始法規主管機關會員則可另外推薦一名Deputy Topic Leader參與工作組事務。工作組專家依據作業手冊-Annex 2: Ground Rules for Good Practices of ICH Working Groups執行其任務,當專家連續兩次缺席,且無法繼續參加工作組會議,則會員應再指定另一名具資格專家代替其工作。Editor負責確保指引、問答及技術文件均依據ICH格式(style guide)而制定。Content Manager負責線上專用區架構之建立、上傳文件及維持文件於最新狀態等工作。

二、Q5A(R2)工作組會議

本次工作組會議參加者有來自美國FDA、歐盟EC、日本PMDA、加拿大Health Canada、瑞士Swissmedic、巴西ANVISA、新加坡HSA、韓國MFDS、臺灣TFDA、大陸NMPA等法規會員,來自製藥界會員有歐洲製藥工業協會聯合會(European Federal Pharmaceutical Industrial Association, EFPIA)、日本製藥工業協會(Japan Pharmaceutical Manufacturers Association, JPMA)、美國藥品研究及製造商協會(Pharmaceutical Research and Manufacturers of America, PhRMA)、國際藥品製造商和協會聯合會(International Federation of Pharmaceutical Manufacturers & Associations)及國際學名藥暨生物相似性藥品協會(International Generic and Biosimilar Medicines Association, IGBA)等代表計19人。來自美國FDA之Dr. Joel Welch擔任報告起草人並與歐盟EC之Dr. Johannes Blümel共同主持會議,四天之議程如下表:

108年11月17日	• Introduction
	• Finalize Concept Paper and Business Plan
108年11月18日	Discuss Process and Strategy for Outline Creation
	• Work on Outline
108年11月19日	Develop Work Plan
	Complete Management Committee presentation
108年11月20日	Develop Presentation for External Audience
	Present to Management Committee
	Develop Strategy for Continued Progress and Interactions

(一) 討論 ICH Q5A(R2)概念文件(Concept paper)草案

摘錄討論重點如下:

- 1. ICH Q5A(R1)指引於1999年公告,迄今實施已逾20年,期間生物技術產品及製程之發展突飛猛進,如新型態生物技術產品、新病毒清除(virus clearance)確效方法、新病毒檢測技術、先進製程等,已無法反應於原指引中,造成各主管機關間對此類產品管理之挑戰,因此ICH會員提出Q5A(R2)之修訂。
- 2. 需要解決的問題 (Issues to be Resolved)

(1) 新型態生物技術產品

過去20年,因新生產技術及製造平台之發展,使得許多新型態生物技術產品問世,特別是利用哺乳類及昆蟲載體/細胞之表現系統製造之virus-like particles(VLPs)、subunit proteins及viral-vectored products,已建立供疫苗或基因治療使用,病毒載體及外源性物質之清除可能需被證明,另外,在進行病毒清除研究,選擇合適病毒標的時,不同細胞類型來源之已知或可能病毒之物化特性應納入考量。

(2) 額外的病毒清除確效方法

應允許確效方法之彈性,並需討論使用病毒清除確效之替代方法的時機, 及採用相同病毒去除(removal)/不活化(inactivation)純化步驟之相似類型產品, 若將其純化步驟數據套用於產品之限制。

(3) 新病毒檢測方法

PCR及次世代定序法(Next Generation Sequencing, NGS)可提供對起始物質及病毒收集液中之外源及內源性病毒快速且敏感的偵測,定量PCR可考慮列入用於製程中病毒清除能力之評估,然而以病毒核酸偵測為基礎之檢驗方法並無法分辨感染性或非感染性病毒顆粒,所以若偵測到核酸訊號應需再加做病毒感染力之確認試驗以進行風險評估。

- (4) 先進製程之病毒清除確效及風險減緩(risk mitigation)策略 先進製程中與病毒安全性相關之挑戰包括:
 - a. 在連續製造(continuous manufacturing)過程中外源及內源性病毒之偵測

- b. 由傳統單位操作改進而來之病毒清除確效策略
- c. 以為傳統病毒清除spiking研究設計之小量模式來代表先進製造系統之適 用性
- d. 病毒安全性評估中設施設計及製程(開放式或密閉式系統)之原則
- (5) 近來發展之病毒清除確效相關面向
 - a. 以Protein A或其他種類樹脂填充之層析管柱,建議於其樹脂使用週期終 點時進行評估
 - b. 額外的相關模式病毒(relevant model virus)用於病毒清除研究
 - c. 選擇適當的模式病毒(model virus)用於nanofilter確效
 - d. 針對病毒清除安全性邊際(safety margin) 進行探討,包括計算清除係數

(二) 討論 ICH Q5A(R2)工作計畫(Business Plan)草案

- 1. 問題與所需花費的成本 (The issue and its costs)
- (1) 提案預計解決哪些問題/議題

自從ICH Q5A(R1)指引於1999年公告以來,先進的製程、進步的病毒值 測與定量技術及病毒清除策略已蓬勃發展,下列議題並未含括於指引,需於 新指引中增訂。

- a. 新型態牛物技術產品
- b. 額外的病毒清除確效方法
- c. 新病毒檢測方法
- d. 先進製程之病毒清除確效及風險減緩(risk mitigation)策略
- e. 近來發展之病毒清除確效相關面向

(2) 利害關係人

雖然現今全球法規主管機關鼓勵使用新技術,但缺乏更新版本的指引可以 依循,造成審核及管理上的挑戰。若ICH不著手修訂將帶來之損失/成本如下:

- a. 不同法規主管機關需花時間各自訂定地區性的指引
- b. 公司需準備多重文件以符合不同法規主管機關之規定
- c. 延遲產業界導入新技術
- d. 延遲病人可獲得新治療方式

- e. 將對導入ICH Q13指引(針對連續製造)產生潛在的負擔
- 2. 計畫 (Planning)
- (1) 主要完成事項為修訂ICH Q5A(R2)品質指引。
- (2) 資源

專家工作組將包含約25位專家,預計需要進行6次面對面會議及多次期 中電話會議以完成修訂。

(3) 計畫/里程碑之時間規劃

預計利用3年的時間 (2019年11月至2022年11月)來完成step 4。

- 概念文件及工作計畫經大會同意:2019年11月
- 完成技術文件(technical document)草稿: 2020年11月
- 完成Step 1、Step 2a及2b: 2021年6月
- 完成Step 3及Step 4:2022年11月
- (4) 推動方式
 - a. 於科技研討會中報告概念文件及指引草案。
 - b. 與無參與指引修訂之委託研究機構及其他技術專家交流,以徵求他們的 專業意見。
 - c. 準備有關ICH Q5A(R2)指引之正式訓練材料,並於機構間交流活動及 ICH所舉辦之技術工作坊中發送。
- 3. 計畫影響性 (The impacts of the project)

更新後的指引將允許下列事項:

- (1) 促進新型態生物技術產品之發展及評估
- (2) 增加病毒清除確效方法之彈性
- (3) 導入新病毒偵測技術及替代分析方法(如PCR及NGS)
- (4) 發展及評估病毒清除確效及先進製程之試驗方法
- (5) 導入近來發展之病毒清除確效相關面向

(三) 製作對外界報告之投影片

為與外部專家、製藥業者及相關利害關係人溝通、闡述未來ICH Q5A(R2)修訂之方向及重點,以利蒐集各界回饋意見,故專家們共同討論對外界報告之投影片內容,重點如下:

- 1. 簡介ICH進行指引協和化之程序
- 2. 預定之工作計畫期程
- 3. ICH Q5A(R2)專家工作組成員名單
- 4. ICH Q5A(R1)需著手修訂之緣由
- 5. 由EWG達成共識之概念文件及工作計畫內容,摘要出重點介紹未來將修訂之 主題並舉例說明

肆、心得

一、 感謝有機會參與並學習國際藥品法規與技術討論

本次ICH Q5A(R2)專家工作組會議,能與主管機關法規專家、技術專家及 製藥界代表共聚一堂,共同為修訂ICH Q5A(R2)指引而努力,備感榮幸。由於 近20年來細胞製程生物技術產品、病毒檢測技術及先進製程發展迅速,與會的 製藥界代表也充分表達其實務上的現況,因會議是採共識決,對於文件內容逐 字討論過程中,雖亦會有意見相左的時候,然而經由不斷地溝通最終意見趨於一致, 順利完成形成指引前之概念文件及工作計畫。

二、修訂「人類或動物來源細胞株所產製生物技術產品之病毒安全性評估」指引,健全細胞製程生物技術產品之品質管理

為健全細胞製程生物技術產品之品質管理,108年6月ICH大會通過修訂ICH Q5A(R2)提案。隨即由會員及觀察員推薦各代表參與Informal WG,於108年9月組成工作組,報告起草人草擬概念文件及工作計畫以電子郵件寄予各代表,並於本次新加坡面對面會議前,辦理2次電話會議溝通意見。本次ICH Q5A(R2)之修訂將可以更符合目前細胞製程生物技術產品之產業現況,透過協和化之指引可以促進先進製程之發展、新檢驗技術及確效方法之應用,並可作為各國法規主管機關審查及管理之準則。

伍、建議

一、積極參與重要國際會議,持續掌握國際藥品管理趨勢與發展

隨著科技的進步,新藥不斷地快速發展,先進製程及新檢驗技術也因應而生, 因此藥品品質檢驗規範與管理也須同步。我國自97年開始參與ICH活動,於105 年成為觀察員,其後於107年正式成為ICH法規會員,應積極參與相關會議或訓練課程,持續掌握國際藥品管理動態及提升技術專業知能,一方面制定與國際協和化之藥品審查基準,一方面精進食藥署檢驗方法開發制定之能力,期能與國際接軌並促進國內製藥業之國際競爭力。

二、參與國際組織活動,建立人脈以擴大國際合作

持續參與國際組織活動,藉由與各界專業人士互動,建立友誼並建立人脈與聯繫管道,拓展國際參與機會,進而擴大國際合作。

陸、附錄

一、ICH Q5A(R2) 專家合影



二、ICH Q5A(R2) EWG專家名單

Expert list

ANVISA, Brazil EC, Europe

Ms. Silmara Cristiane da Silveira Andreoli Johannes Blumel

EFPIA FDA, United States

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Dr. Fouad Atouf Dr. Ivana Knezevic



Final Concept Paper Q5A(R2): Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin Dated 17 November 2019

Endorsed by the Management Committee on 18 November 2019

Type of Harmonisation Action Proposed

It is proposed to revise the Q5A(R1) Guideline "Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin" to reflect new biotechnology product types, advances in manufacturing technology, analytical methods for virus testing, and scientific knowledge that have occurred since publication of the original document in 1999.

Statement of the Perceived Problem:

Since the publication of the Q5A(R1) Guideline in 1999, advances in biotechnology product development and manufacturing have occurred. The following advances are not reflected in the original guideline:

- New classes of biotechnology products have been developed, resulting in challenges for consistent regulation of these products across different health authorities.
- Only a limited number of validation approaches for virus clearance are described that
 can be currently applied. This has resulted in regulatory health authorities adopting
 different positions on the acceptability of these advances.
- New alternative analytical methods are available for use in virus testing but are not described. The techniques should be discussed, and additional detail included to support the inclusion of future analytical techniques.
- The development of advanced manufacturing (including, but not limited to continuous manufacturing processes) requires additional considerations for implementation of virus validation and risk mitigation strategies.

Issues to be Resolved

New classes of biotechnology products

In the past twenty years, there has been an emergence of advanced biotechnology products due to the development of new production technologies and biomanufacturing platforms. Specifically, virus-like particles (VLPs), subunit proteins, and viral-vectored products have been developed for vaccines and gene therapies using novel mammalian and insect-based vector/cell expression systems. For some of these products, clearance of virus vector and adventitious agents may need to be demonstrated. The physicochemical properties of known and potential viruses for the species of cell line origin need to be considered in selection of appropriate viruses for the clearance studies.

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三、ICH Q5A(R2) Final Concept Paper (續)

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Q5A(R2) Concept Paper

Endorsed: 18 November 2019

Additional validation approaches for virus clearance

Where appropriate, flexibility in validation approaches should be allowed in order to effectively leverage knowledge gained during development of manufacturing processes with extensive experience to support virus clearance. It is necessary to discuss expectations and limitations for the use of data of a purification step for related products or product classes that follow the same virus removal/inactivation unit operation purification step or conditions. Additionally, opportunities to use alternative approaches for virus clearance validation based on experience with well-characterized cell substrates and manufacturing processes should be discussed.

New virus assays and alternative analytical methods

Technological advances since the publication of the original ICH Q5A(R1) Guideline have occurred that require additional discussion. Specifically, nucleic acid-based assays such as Polymerase Chain Reaction (PCR) and Next Generation Sequencing (NGS) may provide rapid and sensitive detection of adventitious and endogenous viruses in the starting and harvest materials. Additionally, quantitative PCR assays may be considered for assessment of the virus clearance capability of the manufacturing process. However, these nucleic acid-based assays have limitations as they cannot distinguish between infectious and noninfectious particles and therefore detection of a signal may need a confirmatory test with an infectivity assay for risk-assessment. For this reason, additional justification describing their use should be provided. Moreover, general principles for the inclusion of new assays and potential replacement/supplement of existing assays should be presented in order to continue to support future development of new technology.

Virus clearance validation and risk mitigation strategies for advanced manufacturing

The principles of viral safety described in the ICH Q5A(R1) Guideline apply to emerging or advanced manufacturing approaches beyond traditional unit and batch process operations. However, specific challenges associated with viral safety in advanced manufacturing are not addressed in the original guideline, and would benefit from additional discussion and clarification. These challenges may include:

- Screening for and detection of adventitious and endogenous viruses during continuous manufacturing
- Validation of virus clearance strategies adapted from traditional unit operations
- Suitability of small scale models designed for traditional virus clearance spiking studies to represent advanced manufacturing systems
- Potential considerations for the role of facility design and manufacturing processes (open versus closed systems) in viral safety evaluation

Details for this topic will also support the ongoing development of ICH Q13.

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Q5A(R2) Concept Paper

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Aspects of virus clearance validation that have emerged or evolved

Some aspects of virus clearance validation have emerged or evolved since the publication of the ICH Q5A(R1) Guideline and will be discussed. For example:

- The recommended evaluation of chromatographic resin at the end of its lifetime for Protein A resin and potentially other resins
- Additional relevant model viruses for virus clearance studies
- Selection of appropriate model viruses for validation of nanofilters
- Additional discussion on the virus clearance safety margin, including calculation of clearance factors

Additionally, risk mitigation technologies for treatment of raw materials will be discussed.

Background to the Proposal

Consensus has emerged that ICH Q5A(R1), while still useful, requires revision to allow for a consistent global understanding of viral safety within the biopharmaceutical landscape. Moreover, to support both the development of new products and the use of state-of-the-art technologies, updating of viral safety approaches is essential. Implementation of updated assays and alternative validation approaches will benefit both industry and regulators by providing increased flexibility for viral safety assessment. Finally, the revised guideline will allow for a more harmonized approach for newer classes of biotechnology products and new developing technologies.

Type of Expert Working Group and Resources

It is proposed to establish an Expert Working Group with representatives with specialized knowledge on virus-detection technologies, virus clearance strategies, and manufacturing processes.

The Expert Working Group may also engage with external service providers who have experience with performing virus testing and virus clearance evaluations.

Timing

This working group had its first face-to-face meeting in November 2019. It is anticipated that this guideline may take 3 years to complete.



Final Business Plan Q5A(R2): Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin Dated 17 November 2019 Endorsed by the Management Committee on 18 November 2019

1. The issue and its costs

What problem/issue is the proposal expected to tackle?

Since the publication of the Q5A(R1) Guideline in 1999, advances in manufacturing and improved technologies for virus detection and quantification have emerged and strategies for virus clearance have evolved based on manufacturing experience and scientific consensus. The following issues are not covered and will be addressed:

- New classes of biotechnology products
- Additional validation approaches for virus clearance
- New virus assays and alternative analytical methods
- · Virus clearance validation and risk mitigation strategies for advanced manufacturing
- Aspects of virus clearance validation that have emerged or evolved
- What are the costs (social/health and financial) to our stakeholders associated with the current situation or associated with "non action"?

There is a general consensus that the current ICH Q5A(R1) Guideline, while useful, does not specifically address recent advances in biopharmaceutical development. Although the current global regulatory frameworks encourage the use of new technologies, the lack of an updated regulatory guideline can make implementation, regulatory approval, and lifecycle management more challenging. Specific costs from lack of action by ICH would include:

- Potential issuance of regional guidelines/guidances with differing regulatory expectations
- Multiple filing strategies required by companies to comply with different regulatory expectations
- Delayed or inconsistent implementation of new technologies by industry
- Delayed access of new therapies to patients
- Potential burden to implement the ongoing ICH Q13 Guideline for continuous manufacturing

2. Planning

What are the main deliverables?

The main deliverable is a revised quality guideline, ICH Q5A(R2).

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Q5A(R2) Business Plan

What resources (financial and human) would be required?

An Expert Working Group that would include approximately 25 experts. We anticipate the need for six face-to-face meetings and multiple interim teleconferences to complete the proposed revision.

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What is the time frame of the project?

The new guideline is anticipated to take three years to achieve Step 4, from November 2019 - November 2022.

What will be the key milestones?

The proposed timeline and milestones are below.

- Final concept paper and business plan endorsed: November 2019
- Completion of first technical document draft: November 2020
- Completion of Step 1, Step 2a and 2b: June 2021
- Completion of Step 3 and 4: November 2022
- What special actions to advance the topic through ICH, e.g. stakeholder engagement or training, can be anticipated either in the development of the guideline or for its implementation?

The following are potential special actions that may be taken to advance development of the guideline:

- Presentations of published concept paper and draft guideline at scientific conferences
- Engagement with contract research organizations and other technical experts not directly involved in guideline authorship to solicit their input and topic expertise

The following are potential special actions that may be taken to advance or promote implementation of the guideline:

 Preparation of formal training materials related to the Q5A(R2) guideline and their distribution at inter-agency engagement activities and ICH-supported technical workshops

3. The impacts of the project

 What are the likely benefits (social, health and financial) to our key stakeholders of the fulfilment of the objective?

The updated guideline will allow for the following:

- Facilitation of the development and assessment of new biotechnology product types
- Flexibility in virus clearance validation approaches
- Implemention of new virus assays and alternative analytical methods (e.g., PCR, next generation sequencing) for adventitious and endogenous virus detection
- Development and assessment of virus clearance validation and testing approaches for advanced manufacturing
- Implementation of emerging and evolving aspects of virus clearance validation

四、ICH Q5A(R2) Final Business Plan (續)

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Q5A(R2) Business Plan

- What are the regulatory implications of the proposed work is the topic feasible (implementable) from a regulatory standpoint?
 - The proposed work is a revision to an existing Guideline. Sufficient expertise is available within the working group to perform this task.

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Will the guideline have implications for the submission of content in the CTD/eCTD? If so, how
will the working group address submission of content in the dossier? Will a consult be requested
with the ICH M8 working group?

It is anticipated that any documentation related to this revision would be incorporated into existing CTD/eCTD quality modules. For this reason, the guideline would have no impact for the submission of content in the CTD/eCTD.

4. Post-hoc evaluation

How and when will the results of the work be evaluated?

At the conclusion of each step, we will determine whether deliverables and their timelines were met by comparison against our concept paper and business plan.