

Laureate Biopharmaceutical Services

Scientific Advisory Board meeting

19 April 2012

Biosimilars and Biobetters

Steven Chamow, Ph.D.

Principal Consultant

Chamow and Associates, Inc.

San Mateo, CA USA



CHAMOW
& Associates

Outline

- Biosimilars and biobetters
 - Opportunity
- Regulatory developments
 - US regulatory pathway
- Challenges for biosimilars
 - Alternative technologies vs. improved production efficiency
 - Analytical characterization
 - Sandoz' experience
- Conclusions

Biosimilars vs. biobetters

- Biosimilar
 - Recombinant therapeutic that resembles but is not identical to the original product. The biosimilar must closely resemble the reference product, e.g., *safety, purity and potency do not show clinically meaningful differences* from reference product.
 - Potential for improved *process*
- Biobetter
 - Enhanced version of the innovator product. For a biobetter, *safety, purity and potency will show clinically meaningful differences* from the reference product.
 - Potential for improved *product*

The opportunity for biosimilars

- US healthcare spending
 - Projected to be 20% (\$4,000B) of US domestic GDP (\$20,000B) by 2015
 - Of this, prescription pharmaceuticals will be 10% (proejcted \$446B)
- Biologics
 - For 2010, 14% (\$43B) of pharmaceutical spending (\$307B)
 - Certain to rise in the future
 - 33% of all drugs in development

The opportunity for biosimilars (cont'd.)

IMS Health 2011 report

- By 2015, spending on biosimilars will exceed \$2 billion annually, or about 1% of total global spending on biologicals.
- This growth in biosimilars will be driven mainly by patent expiries coming in the next 5 years, of which there are many. Between 2011 and 2015 a total of \$17 billion worth of sales in the US alone will lose patent protection, presenting a huge opportunity for biosimilar manufacturers to gain market share.

US regulatory paths

Historical perspective

- Four pathways to drug approval
 - NDA 505(b)(1) path is for new drugs
 - ANDA path is for generics
 - NDA 505(b)(2) path covers reformulations and combinations of existing drugs
 - BLA path is for new biologics
- To date, FDA approvals for "generic" biologics have been under 505(b)(2)
 - Novo Nordisk's recombinant human glucagon GlucaGen in 1998 was first
 - Six biologics approved by FDA to date

Currently available biosimilars worldwide 2010

Company	Drug class	Biosimilar	Approval/Launch (year)	Country
Biopartners	rhGH	Valtropin	2006/07	EU/US ¹
Baxter	rhHyaluronidase	Hylenex	2005	US ¹
CT Arzneimittel	rhG-CSF	Biograstim	2008	EU
Dr. Reddy's Laboratories	rhG-CSF	Grafeek	-	India
	ch anti-CD20 mAb	Reditux	2007	India
	rhEPO	Cresp	2010	India
Hexal	rhEPO	Epotin alfa Hexal	2007	EU
	rhG-CSF	Filgrastim Hexal	2009	EU
Hospira	rhEPO	Retacrit	2007	EU
	rhG-CSF	Nivestim	2010	EU
Medice	rhEPO	Abseamed	2007	EU

¹ FDA approval via 505(b)(2)

Currently available biosimilars (cont'd.)

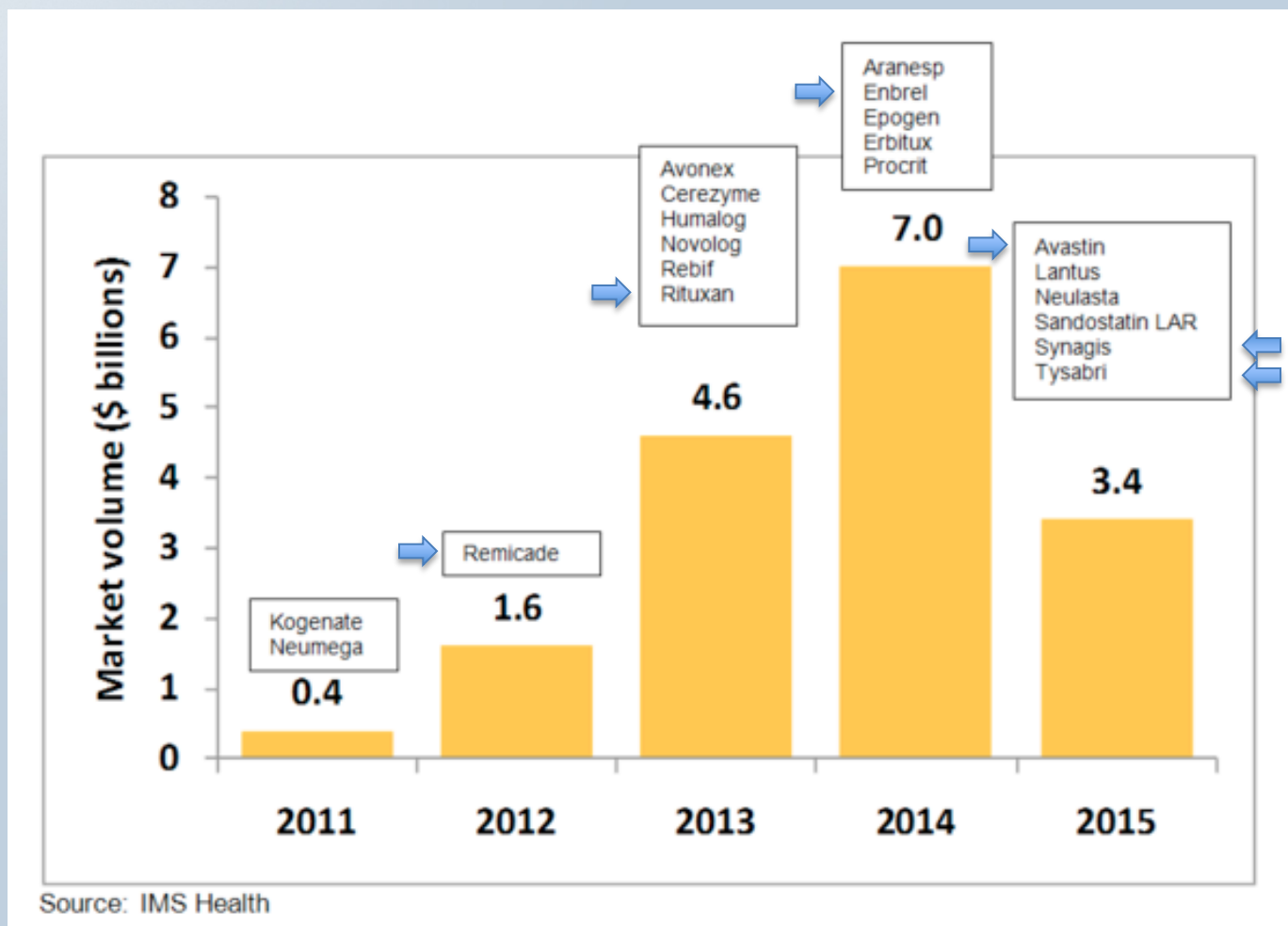
Company	Drug class	Biosimilar	Approval/Launch (year)	Country
Novo Nordisk	rGlucagon	GlucaGen	1998	US ¹
Ratiopharm	rhG-CSF	Ratiograstim	2008-09	EU
	rhG-CSF	Filgrastim ratiopharm	2008	EU
Sandoz	rhGH	Omnitrope	2004/06/09	Australia/Eu&US ¹ /Japan&Canada
	rhEPO	Binocrit	2007	EU
	rhG-CSF	Zarzio	2009	EU
Stada	rhEPO	Silapo	2007	EU
Teva/Ferring	rhGH	Teva-tropin	2005	US ¹
Teva	rhG-CSF	Tevagrastim	2008	EU
Upsher Smith	rSalmon calcitonin	Fortical	2005	US ¹

¹ FDA approval via 505(b)(2)

Source: Cheng Hou *et al.*, *J. Chem. Technol. Biotechnol.* **86**, 895-904 (2011)

US patent expiries 2011-15 by market volume

Based on 2007 US retail sales



mAbs and
Fc fusion
proteins

Enbrel: Nov 2011 US patent office action extends US patent protection to 2028

US regulatory pathway

The challenge

- Biologics are structurally much more complex and heterogeneous than small organic molecules
- How to provide sufficient analytics to completely define something that is essentially “acceptably heterogeneous”
 - Measurement of bioequivalence
 - Length of product exclusivity

US regulatory pathway

- Patient Protection and Affordable Care Act
 - Signed 23 Mar 2010
 - Within this legislation is the Biologics Price Competition and Innovation Act of 2009 (BIPCA) which creates abbreviated approval pathway [Section 351(k)] for biologics
 - Key provisions
 - 12 years exclusivity from the date reference material is first produced (irrespective of patent landscape) for innovator companies
 - No biosimilar submissions to FDA within first four years
 - Two avenues for approval
 - “Highly similar” if it closely resembles the reference product and if safety, purity and potency show no clinically meaningful difference
 - “Interchangeable” if it is expected to produce the same clinical outcome as reference product in a given patient
 - Unclear how these will be interpreted

FDA guidance

- Three guidances were issued by FDA on 9 Feb 2012
 - Scientific considerations
 - Quality considerations
 - Biosimilars: Questions and answers

Reference: Koslowski *et al.*, Developing the nation's biosimilars program. *NEJM* **365**, 385-388 (2011)

Draft guidance

Scientific considerations

- Biosimilar application for licensure will be submitted as “351k application”
- FDA will take a risk-based “totality-of-the-evidence” approach to assess data as evidence of biosimilarity to originator product

Draft guidance

Quality considerations

- Overview of analytical factors to be considered in submitting a 351k application
- Emphasizes importance of extensive analytical, physicochemical and biological characterization in demonstrating biosimilarity
 - Seems to allow for minor differences in clinically inactive components, e.g., new formulation and container/closure possible

Draft guidance

Questions and answers

- Addresses anticipated questions in biosimilar product development, e.g.
 - How to request meetings with FDA?
 - How to address differences in formulation from reference product?
 - How to request exclusivity?

Challenges for biosimilars

Strategies and Sandoz' experience

Strategy

Alternative technologies

- Opportunity to move away from traditional CHO-based cell culture
 - Transgenic plants and animals
 - Atryn® (rh antithrombin) from GTC Biotherapeutics, approved by FDA in 2009
 - GTC is focused on follow-on products with potentially improved ADCC
 - Glycoengineered yeast (*Pichia pastoris*)
 - Merck (GlycoFi acquired 2006)
 - Technology capable of eliminating microheterogeneity of glycoforms in glycoproteins
 - PER.C6
 - Capable of very high density growth (16E7 cells/mL)
 - Enables lower culture volume and single use bioreactor technology (e.g., ≤ 2 kL)
- Benefit: improved cost and product quality
- Challenge: product comparability may be more difficult to justify
 - Contaminant profile
 - Product variants

Strategy

Improved production efficiency

- Closely match innovator's expression system
- Cut costs through manufacturing efficiency gains and reduced licensing and patent encumbrances
 - Increased production titer
 - Single use bioreactors
 - Simplified downstream process = increased robustness, higher overall process yield
 - Shorter process = higher productivity/yr
- New stable cell line required
 - DHFR and GS as selectable markers in CHO, NS0
 - While original patents now expired, patents on improvements can make use of "state of the art" technology proprietary
 - PDL uses non-proprietary selection system
 - Xanthine-guanosine phosphoribosyl transferase (*gpt*) from *E. coli* and cholesterol-independent NS0
 - 20-60 pg/cell-day reported

Analytical characterization

Acceptable changes in quality attributes

Schiestl *et al. Nat. Biotechnol.* **29**, 310-312 (2011)

- Quality variation in innovator products
 - Aranesp[®] (engineered analog of hEPO)
 - Rituxan[®]/Mabthera[®] (ch anti CD-20 mAb)
 - Enbrel[®] (TNFR Fc fusion protein)
 - All glycoproteins in which glycan structure impacts function
- Market-sourced
 - EU 2007-2010 (Aranesp, Rituxan/Mabthera)
 - EU/US 2007-2010 (Enbrel)
- Causes of quality changes in marketed products
 - Batch-to-batch variability
 - Process drift
 - Manufacturing process changes

Analysis of Aranesp[®] commercial lots

Charge isoforms by CZE

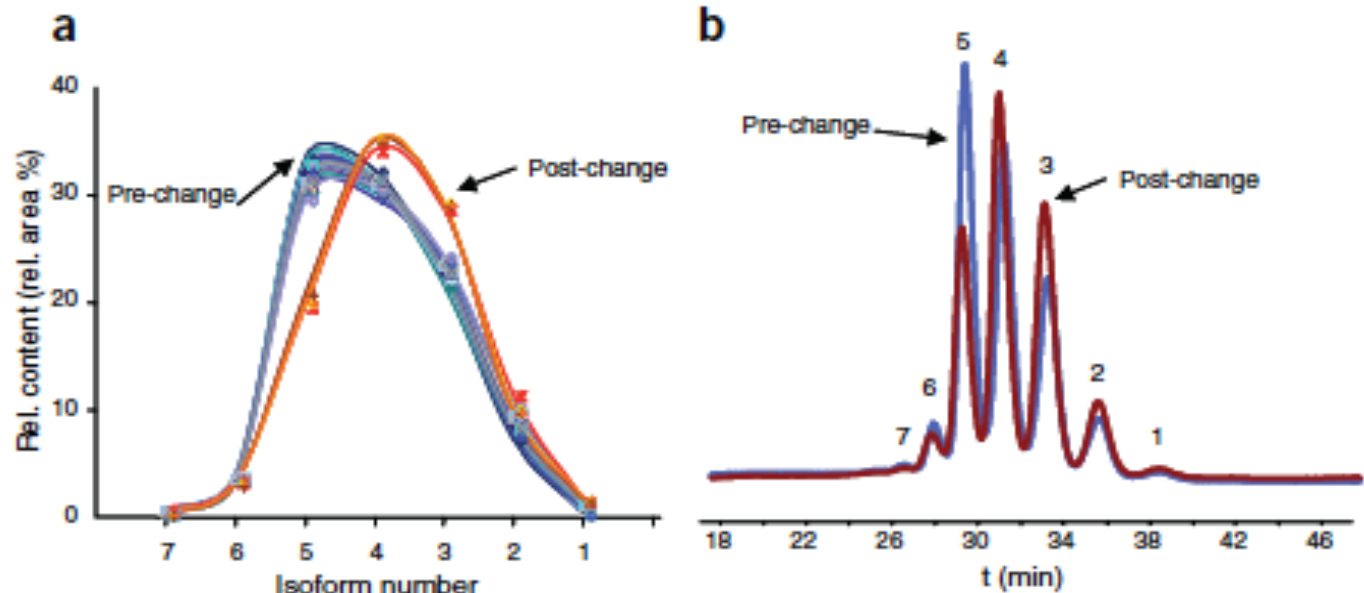


Figure 1 Comparison of the pre- and post-change Aranesp batches measured by capillary zone electrophoresis. (a) Relative content of the individual isoforms of the pre-change ($n = 18$) and the post-change ($n = 4$) batches. (b) Representative electropherograms; peaks are labeled with the isoform number.

(a-b) 22 batches tested

High batch-to-batch consistency

Abrupt shift suggests manufacturing process change (2008, EMA)

Analysis of Rituxan[®]/Mabthera[®] commercial lots

CEX, ADCC, glycoforms

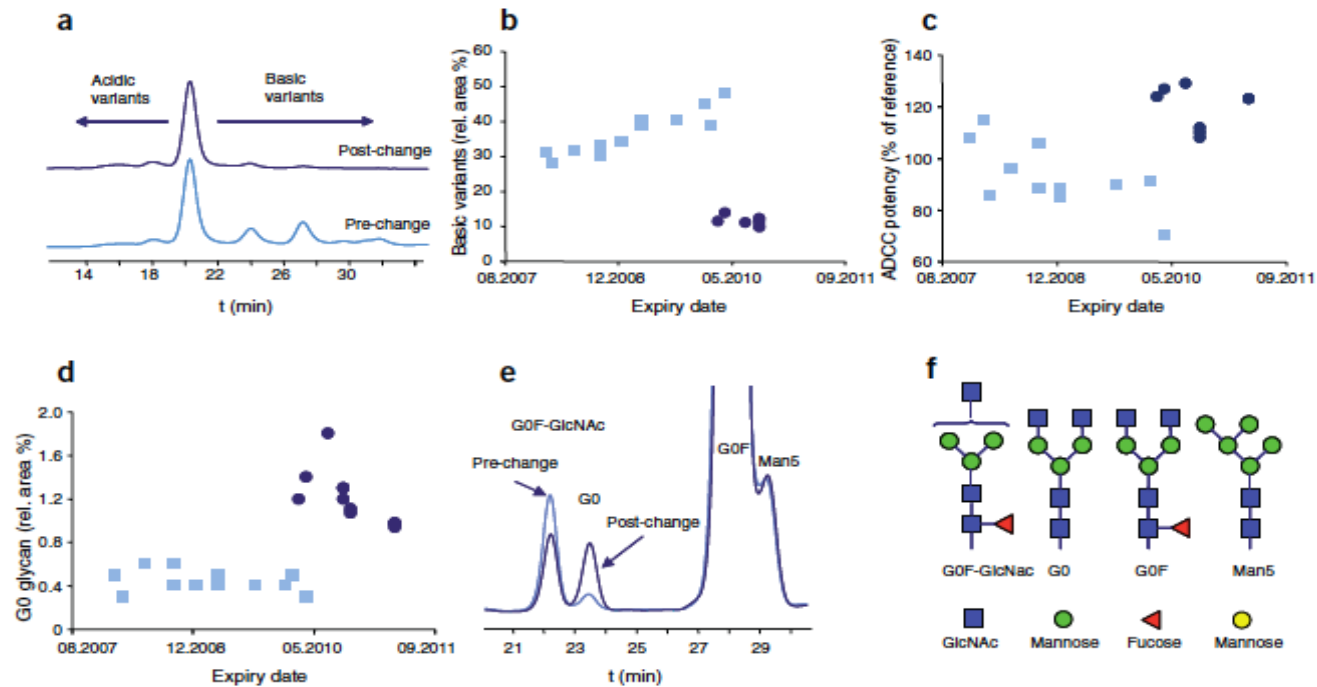


Figure 2 Comparison of the different pre- and post-change batches of Rituxan/Mabthera. (a) Exemplary CEX chromatograms. (b) Amount of basic variants of the pre-change ($n = 12$) and post-change ($n = 6$) batches as measured by CEX. (c) ADCC potency of the pre-change ($n = 11$) and post-change ($n = 8$) batches. (d) Relative amount of the G0 glycan of the pre-change ($n = 13$) and post-change ($n = 11$) batches. (e) Exemplary glycan mapping chromatograms. (f) Glycan legend.

(b) 18, (c) 19, (d) 24 batches tested

Abrupt shift suggests manufacturing process change

- Decrease in C-terminal lys and N-terminal gln (CEX)
- Increase in G0/G0F

Analysis of Enbrel[®] commercial lots

CEX, glycoforms

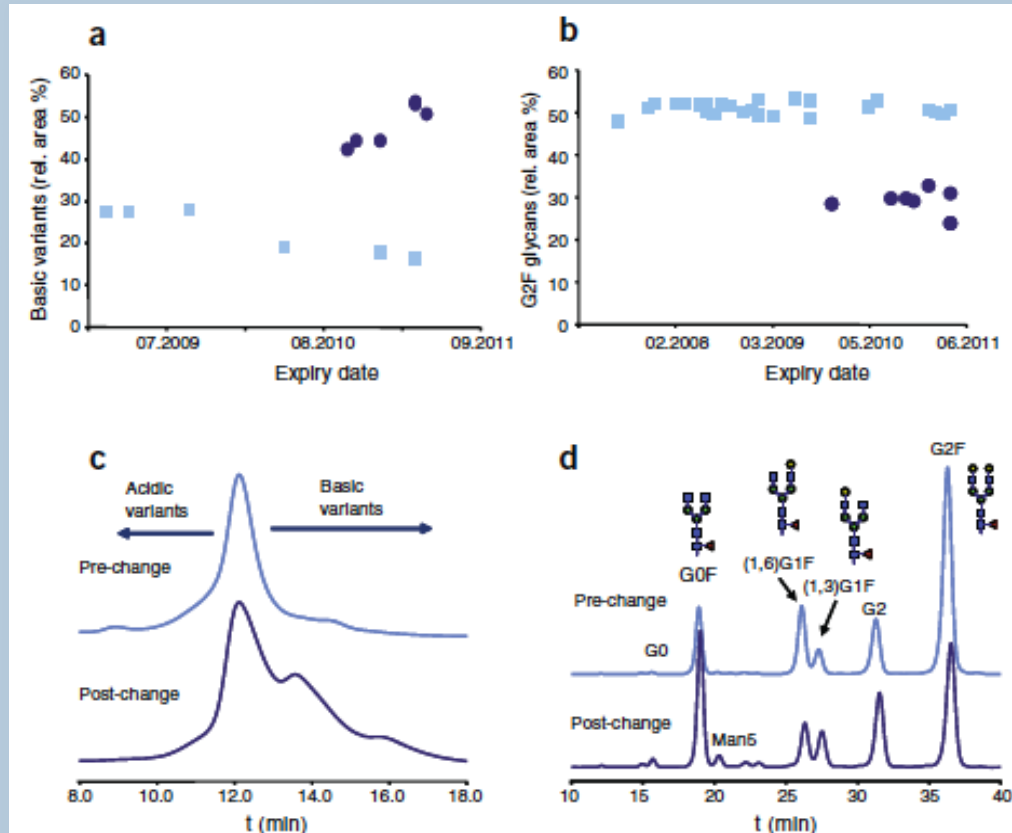


Figure 3 Comparison of the different pre- and post-change batches of Enbrel. (a) Relative amounts of basic variants of the pre-change ($n = 6$) and the post-change ($n = 6$) batches as measured by CEX. (b) Relative amount of the G2F glycan of the pre-change ($n = 25$) and the post-change ($n = 9$) batches. (c) Exemplary CEX chromatograms. (d) Exemplary glycan mapping chromatograms.

(a) 12, (b) 34
batches tested

Abrupt shift in 2010
suggests
manufacturing
process change

- Increase in basic variants
- Decrease in G2F

Summary

Sandoz' experience

- Substantial alterations in glycan profiles for all tested products
- For **Aranesp**, changes in charge isoforms (sialylation?)
- For **Rituxan/Mabthera**, variation in ADCC among batches (G0 vs. G0F)
- For **Rituxan/Mabthera** and **Enbrel**, changes in basic variants (C- term lys; N-term gln)
- Abrupt shifts suggest manufacturing process changes
- Magnitude of quality differences observed represents acceptable variation for innovator product under licensed product label

Conclusions

- A biosimilar shows no clinically meaningful difference in safety, purity and potency compared to the innovator product
 - Potential to improve the *process* for better production efficiency and lower cost
- With US regulatory pathway proposed, biosimilars going forward will be considered for approval by FDA under 351(k)
- Biobetters—enhanced versions of the innovator product—will remain under BLA
- To guide biosimilar development, Sandoz' experience indicates that innovator product variability should be considered to establish acceptable ranges for critical product quality attributes

























































































