Unmet medical needs



Genetic disorders



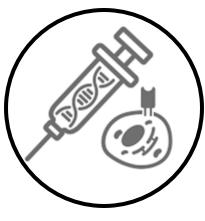
Tissue infarction

Critical size defects

In the era of...

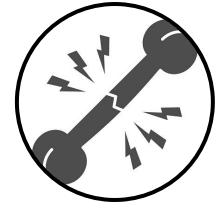
Advanced Therapy Medicinal Products (ATMPs)





Cell-based therapy

Gene-based therapy



Tissue-based therapy

Any cell or gene therapy product or tissue engineered product that has been <mark>substantially</mark> manipulated and/or performs a different function in the recipient than in the donor

WHO, Considerations in developing a regulatory framework for human cells and tissues and for advanced therapy medicinal products, 2023

What makes ATMPs different?

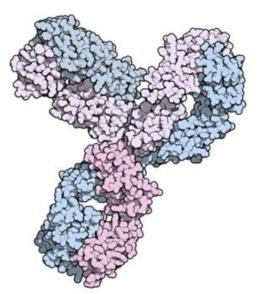
Biologics

Small molecule drugs

÷

Aspirin (21 atoms)

- Well-known structure and conformation
- Predictable pharmacokinetics (PK) and pharmacodynamics (PD)
- Long history in medical uses, well-recognized production processes



Pembrolizumab (~20,000 atom, size ~14 nm)

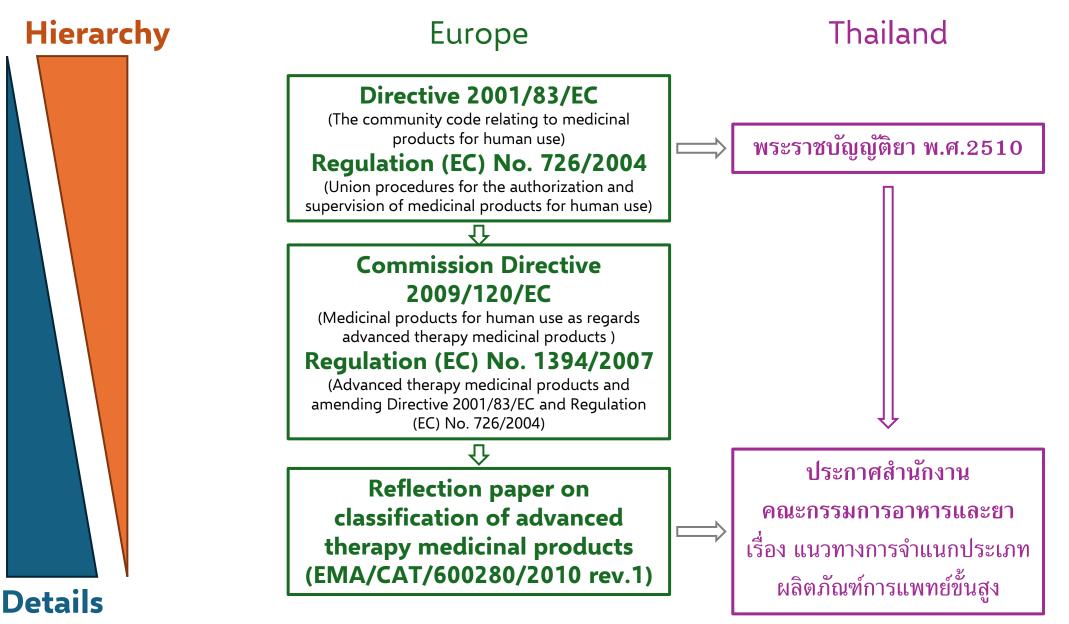
- Complicated structure and conformation, and susceptible to external conditions
- Recent but widely used in medicine, well documented in production process
- Predictable PK and PD

ATMPs

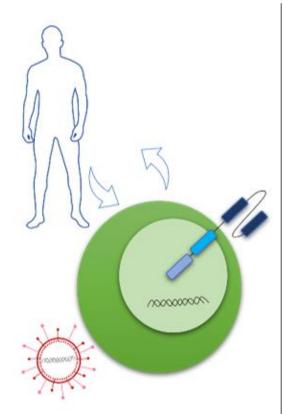
Circulating T cells (5-7 μm)

- Highly complicated structure and highly susceptible to many external stimuli
- Viable cells can be expanded and differentiated
- Never followed the conventional PK/PD concepts
- Recognized as Living drugs

That's why we need a NEW control

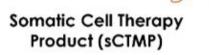


Classification of ATMPs

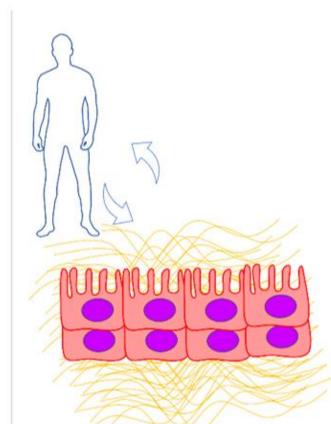


Gene Therapy Medicinal Product (GTMP)

E.g. genetically modified T cells

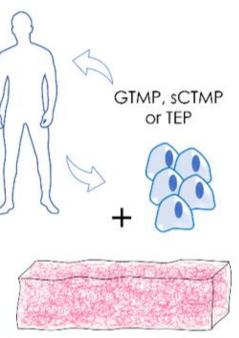


E.g. ex vivo expanded adipose stem cells



Tissue-Engineered Product (TEP)

E.g. ex vivo expanded corneal epithelial cells attached to a fibrin support



medical device

Combined ATMP

E.g. porcine collagen scaffold seeded with autologous chondrocytes

Image courtesy of https://www.propharmagroup.com/

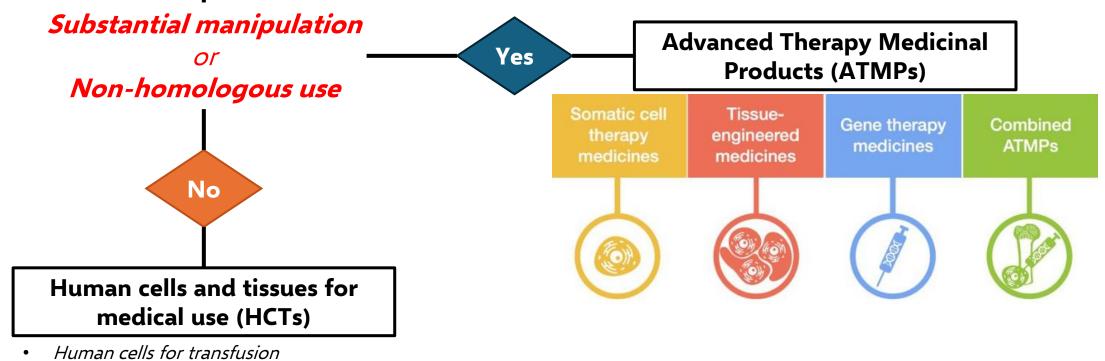


Is Blood Transfusion considered as an ATMP?

How EMA and WHO say?

Cell-based and gene therapy products (CGTPs)

Ref: Reflection paper on classification of advanced therapy medicinal products (EMA/CAT/600280/2010 rev.1) and WHO considerations on Regulatory convergence of Cell and Gene Therapy Products



• Human tissues for transplantation

Substantial manipulation

The cells or tissue(s) have been manipulated during the manufacturing process so that their biological characteristics, physiological functions or structural properties have been modified to be relevant for their intended function.

Reflection paper on classification of advanced therapy medicinal products (EMA/CAT/600280/2010 rev.1)

การดัดแปลงอย่างมีนัยสำคัญ/การดัดแปลงมากกว่าการดัดแปลงเพียง เล็กน้อย (Substantial manipulation/more than minimal manipulation) หมายความว่า การดัดแปลงซึ่งส่งผลให้<mark>เกิดการ</mark> เปลี่ยนแปลงลักษณะทางชีวภาพ (Biological) สรีรวิทยา (Physiological) หรือโครงสร้าง (Structure) ที่ส่งผลให้เซลล์หรือ เนื้อเยื่อนั้นมีคุณสมบัติหรือกลไกการออกฤทธิ์ในการรักษา<mark>เปลี่ยนแปลง</mark> ไปจากเซลล์หรือเนื้อเยื่อเดิม

ประกาศสำนักงานคณะกรรมการอาหารและยา เรื่อง แนวทางการจำแนกประเภทผลิตภัณฑ์การแพทย์ขั้นสูง

Cell and tissue manipulations considered minimal or non-substantial include:

- Cutting, grinding, and shaping
- Centrifugation
- Soaking in antibiotic or antimicrobial solutions
- Sterilization and low-level irradiation
- Cell separation, concentration, or purification
- Filtering
- Lyophilization (freeze-drying)
- Freezing, Cryopreservation, Vitrification

Let's think!!!

Considering the following cell/tissue manipulations, would they be classified as substantial or minimal manipulation?

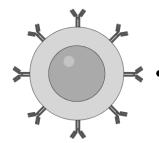


• Cell culture/expansion

• Isolation of keratinocytes from skin using enzymatic digestion



• Islet isolation from pancreas using enzymes



Radio-labelling of leukocytes for diagnostic purposes

Referenced case scenario from Reflection paper on classification of advanced therapy medicinal products (EMA/CAT/600280/2010 rev.1)

Let's think!!!

Considering the following cell/tissue manipulations, would they be classified as substantial or minimal manipulation?



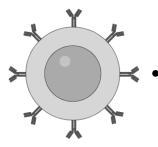
- Cell culture/expansion Substantial manipulation
- Biological characteristics and structural properties could be modified during the cell proliferation
- Repeated attachment and detachment cycles could lead to phenotypic changes especially on cell surface proteins
- Isolation of keratinocytes from skin using enzymatic digestion



Substantial manipulation

Minimal manipulation

- Enzymatic digestion destroys the tissue architecture and functional interaction of the cells, which cannot be regained
- Islet isolation from pancreas using enzymes Minimal manipulation
 - Scientific evidence proof that the original structural and functional characteristics are maintained



- Radio-labelling of leukocytes for diagnostic purposes
 - The manipulation does not alter the functional properties of the cells

Non-homologous use

The same essential function (or homologous use) for a cell population means that the cells when removed from their original environment in the human body are used to maintain the original function(s) in the same anatomical or histological environment.

Reflection paper on classification of advanced therapy medicinal products (EMA/CAT/600280/2010 rev.1)

Non-homologous use หมายความว่า ผลิตภัณฑ์การแพทย์ขั้นสูงที่มี <mark>หน้าที่ หรือกลไกการทำงาน</mark>ในตัวผู้รับ (recipient) <mark>แตกต่าง</mark>จากหน้าที่ หรือกลไกการทำงานของเซลล์หรือเนื้อเยื่อเดิมจากตัวผู้ให้ (Donor)

ประกาศสำนักงานคณะกรรมการอาหารและยา เรื่อง แนวทางการจำแนกประเภทผลิตภัณฑ์การแพทย์ขั้นสูง

Let's think!!!

Considering the following cell/tissue applications, would they be classified as homologous or non-homologous use?

• Bone marrow cell transplantation in hematologic cancer patients



Pancreatic Langerhans' islets transplantation



Skin transplantation from one part of the body to another part

Autologous bone marrow stem cell injection for myocardial infarction

Let's think!!!

Considering the following cell/tissue applications, would they be classified as homologous or non-homologous use?

• Bone marrow cell transplantation in hematologic cancer patients



- Homologous use
- Minimal manipulation
- The original functions (hematopoietic or immune reconstitution) are maintained
- Pancreatic Langerhans' islets transplantation

Homologous use

- Minimal manipulation: No alteration on their biological characteristics
- Use in the same essential functions in recipients



• Skin transplantation from one part of the body to another part

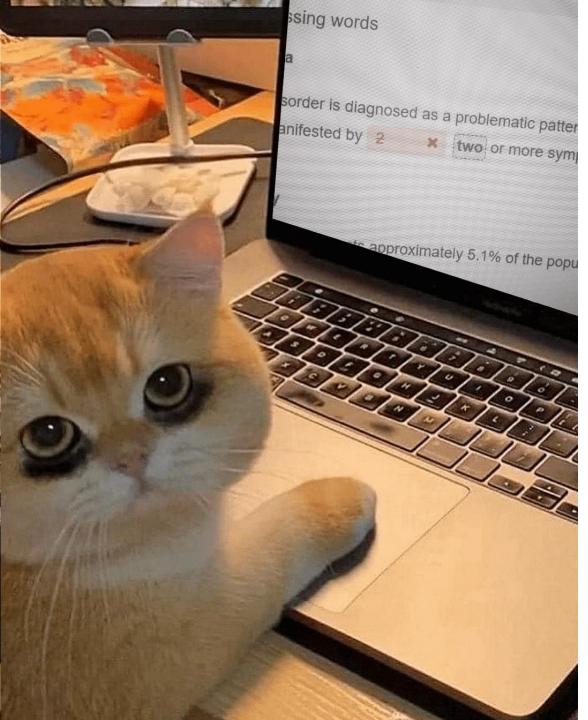
Homologous use

- Minimal manipulation
- Use in the same anatomical and histological environments in the recipients
- Autologous bone marrow stem cell injection for myocardial infarction

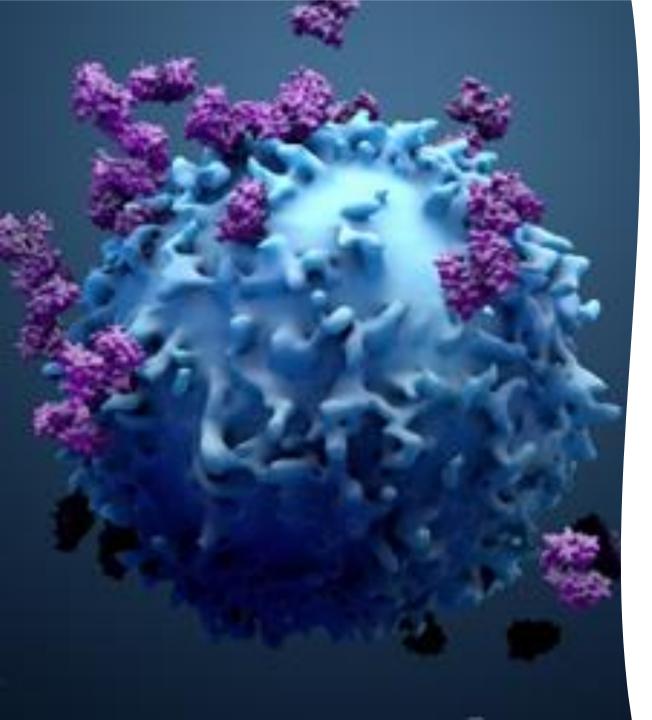
Non-homologous use

- Minimal manipulation, but
- Use in the different essential functions (regeneration of myocardial cells) in the different anatomical environment

Referenced case scenario from Reflection paper on classification of advanced therapy medicinal products (EMA/CAT/600280/2010 rev.1)



Types of ATMPs: Definitions and Classifications



Somatic cell therapy medicinal products (sCTMPs)

• (a) contains or consists of cells or tissues that have been subject to substantial manipulation so that biological characteristics, physiological functions or structural properties relevant for the intended clinical use have been altered, or of cells or tissues that are not intended to be used for the same essential function(s) in the recipient and the donor;

• (b) is presented as having properties for, or is used in or administered to human beings with a view to treating, preventing or diagnosing a disease through the pharmacological, immunological or metabolic action of its cells or tissues.

Example: FDA-approved sCTMPs

AMTAGVI (lifileucel), Iovance Biotherapeutics, Inc.

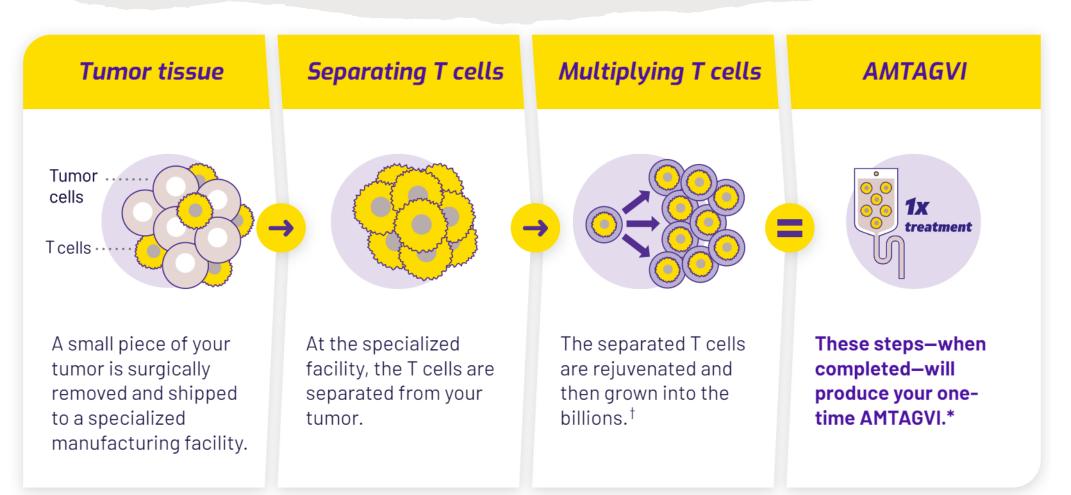


Image courtesy of IOVANCE Biotherapeutics, Inc.

Tissue engineering products (TEPs)

- contains or consists of engineered cells or tissues, and
- is presented as having properties for, or is used in or administered to human beings with a view to regenerating, repairing or replacing a human tissue.
 - A tissue engineered product may contain cells or tissues of human or animal origin, or both. The cells or tissues may be viable or non-viable. It may also contain additional substances, such as cellular products, bio-molecules, biomaterials, chemical substances, scaffolds or matrices.
 - Products containing or consisting exclusively of non-viable human or animal cells and/or tissues, which do not contain any viable cells or tissues and which do not act principally by pharmacological, immunological or metabolic action, are excluded from this definition.
 - Cells or tissues shall be considered 'engineered' if they fulfil at least one of the following conditions:
 - - the cells or tissues have been subject to substantial manipulation, so that biological characteristics, physiological functions or structural properties relevant for the intended regeneration, repair or replacement are achieved. The manipulations listed in Annex I, in particular, shall not be considered as substantial manipulations,
 - the cells or tissues are not intended to be used for the same essential function or functions in the recipient as in the donor.

Products containing or consisting of *animal cells or tissues* to be administered to humans will always be considered as ATMPs. Genetically altered pig heart transplanted into a human for the second time



By Megan Molteni 🎔 Sept. 22, 2023

Reprints



The University of Maryland team prepares the pig heart for transplant. COURTESY UNIVERSITY OF MARYLAND SCHOOL OF MEDICINE

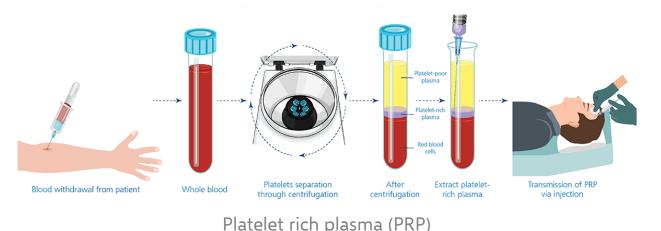
Let's think!!!

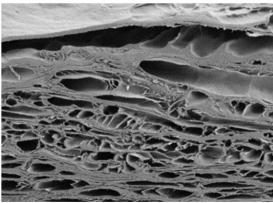
From the following hint:

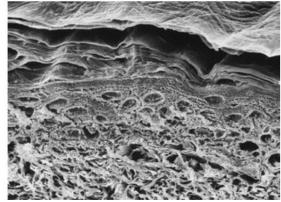
"Products containing or consisting <u>exclusively</u> of <u>non-</u> viable cells or tissues and which do NO act principally by pharmacological, immunological or metabolic action, will not be considered ATMPs."

Are the following products considered as ATMPs?:

- Decellularized scaffolds
- Cornea/Amniotic membrane for transplantation
- Demineralized bone matrix (DBMs)
- Platelet rich plasma (PRPs)







Fish skin

Human skin

Decellularized scaffolds from fish skin for the treatment of skin wounds (Image courtesy of Keresis, Iceland)



Demineralized bone matrix (Image courtesy of MTF, USA)

Example: FDAapproved TEPs

denovoSkin™, CUTISS AG, Switzerland



How to distinguish between sCTMPs and TEPs

Product intended for treatment, prevention or diagnosis of a disease through pharmacological, immunological or metabolic action of its cells / tissues

sCTMP

Product intended for regeneration, repair, replacement of human tissue

TEP pos

Information on the claimed mode of action (MoA) is particularly important to ascertain whether the product is for treatment, prevention or diagnosis of a disease, and exerts its activity via a pharmacological, immunological or metabolic action, or whether the product is intended for regeneration, repair or replacement of cells/tissues. The possible MoA should be considered in relation to the intended indication.

Combined ATMPs

- it must incorporate, as an integral part of the product, one or more medical devices within the meaning of Article 1(2)(a) of Directive 93/42/EEC or one or more active implantable medical devices within the meaning of Article 1(2)(c) of Directive 90/385/EEC, and

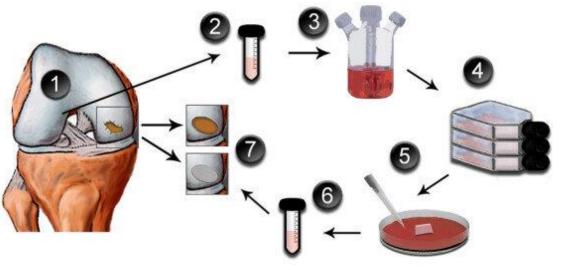
- its cellular or tissue part must contain viable cells or tissues, or

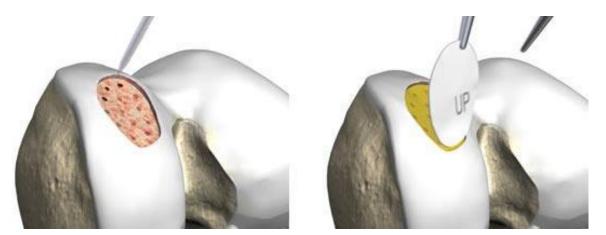
- its cellular or tissue part containing non-viable cells or tissues must be liable to act upon the human body with action that can be considered as primary to that of the devices referred to.

The medical device should retain its intended purpose / mode of action in the combination to be considered as being "integral part" of the final product

Examples: Combined ATMPs

MACI (Autologous Cultured Chondrocytes on a Porcine Collagen Membrane), Vericel Corporation





Jacobi, M., Villa, V., Magnussen, R.A. et al. MACI - a new era?. BMC Sports Sci Med Rehabil 3, 10 (2011).

The MACI procedure:

(1) Initial arthroscopy with evaluation of the injured cartilage and harvest of a full-thickness cartilage biopsy;

(2) the biopsy is sent in a sterile and cooled container to the cell culture laboratory;

(3) the cartilage is enzymatically digested;

(4) expansion of the chondrocytes in monolayer culture for about four weeks;

(5) the cells are seeded onto the scaffold a few days before implantation;

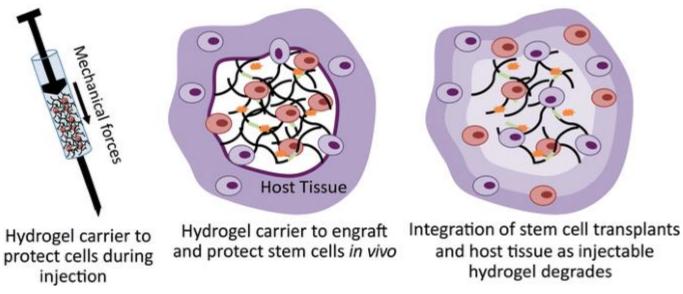
(6) the engineered implant is sent back to the surgeon in a sterile container;

(7) definitive surgery with debridement of the injured cartilage followed by implantation of the MACI-implant, which is trimmed to fit the defect size and glued with a thin layer of fibrin glue.

How can we determine if a medical device is considered an integral part?

If the combined component (although CE marked) is not or no longer used as a medical device but should be **considered as an "excipient"** in the final formulation of the drug (and therefore **not** combined).

Example: Injectable gel matrix for cell transplantation



- The gel matrix has the function to keep the cells around the administration site

 The manufacturing process uses the matrix in a different way than its intended use when considered as a medical device

The matrix was not considered to be a medical device any more

 The CAT therefore classified the product as a sCTMP, not combined ATMP

Marquardt, L.M., Heilshorn, S.C. Design of Injectable Materials to Improve Stem Cell Transplantation. Curr Stem Cell Rep **2**, 207–220 (2016).

Gene therapy medicinal products (GTMPs)

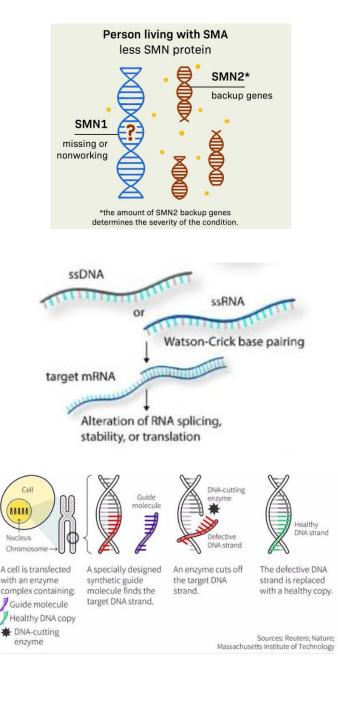
(a) it contains an active substance which contains or consists of <mark>a recombinant nucleic</mark> acid used in or administered to human beings with a view to regulating, repairing, replacing, adding or deleting a genetic sequence;

(b) its therapeutic, prophylactic or diagnostic effect relates directly to the recombinant nucleic acid sequence it contains, or to the product of genetic expression of this sequence.

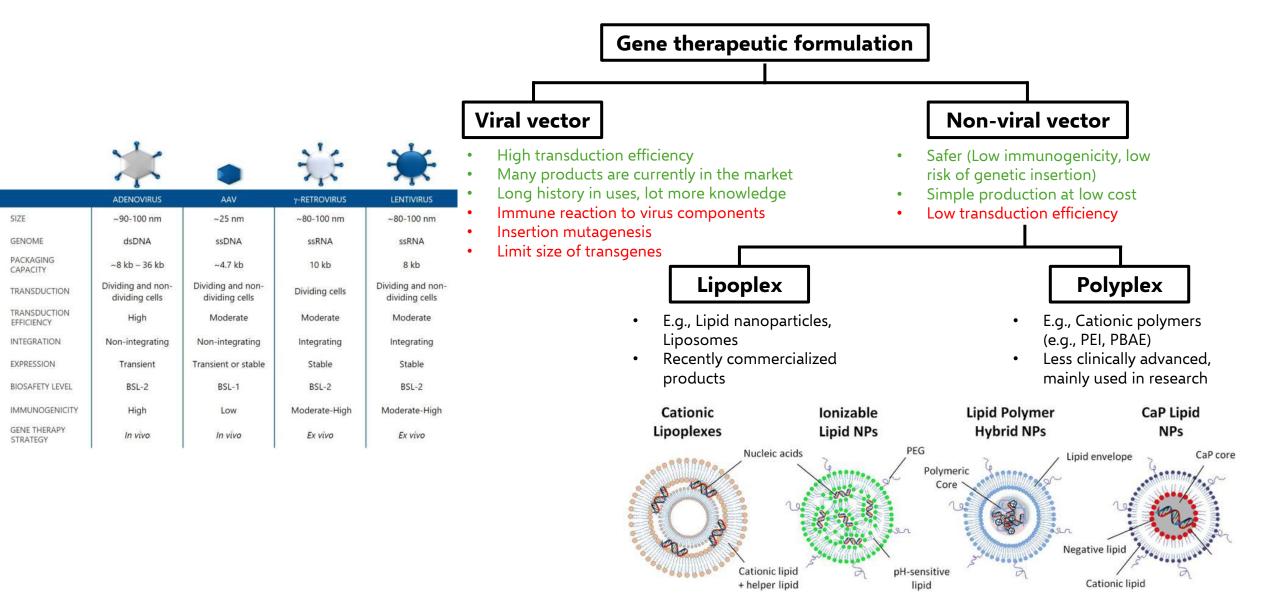
Gene therapy medicinal products shall not include vaccines against infectious diseases.

Roles of gene as therapeutics

- 1. Expression: Target proteins are translated based on the input DNA or RNA
- Silencing or Interference: Protein expression is suppressed, using short strand nucleotides (such as antisense oligonucleotides, or silencing RNA (siRNA)) to interfere the translation process.
- 3. Editing: Host genome is permanently edited, either by an addition, deleting, or replacing (mainly perform using CRISPR/Cas technology)



Gene delivery systems



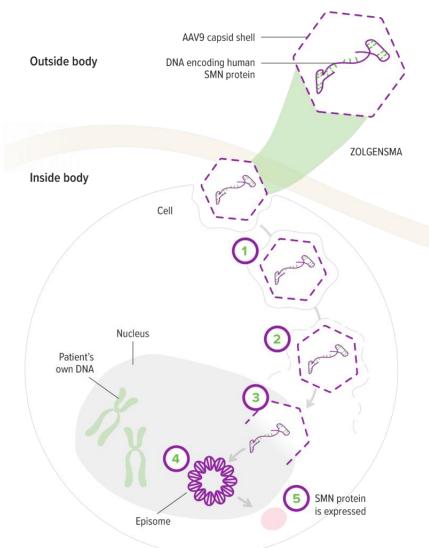
(a) it contains an active substance which contains or consists of <mark>a recombinant nucleic acid</mark> used in or administered to human beings with a view to regulating, repairing, replacing, adding or deleting a genetic sequence;

The recombinant nucleic acids should be of biological origin **independently from the origin of the** vector system used (e.g., viral/bacterial vectors or micellar and liposomal formulations, etc.)

Example: In vivo gene therapy



ZOLGENSMA (onasemnogene abeparvovecxioi), Novartis Gene Therapies, Inc.



Does not need to know that...

Prefix: Fantasy element to provide unique identification; to contribute to the distinct name.

Infix: Element to denote the type of viral vector such as:

-adeno- [adenovirus] -cana- [canarypox virus] -foli- [fowlpox virus] -herpa- [herpes virus] -lenti- [lentivirus] -morbilli- [paramyxoviridae morbillivirus] -parvo- [adeno-associated virus (parvovirdae dependovirus)] -retro- [other retro viruses] -vaci- [vaccinia virus]

ona semnogene (abebarvovec-xioi

Ref: American Medical Association (AMA)

Infix: Element to denote the gene's mechanism of action (pharmacologic class) such as:

-ald- [adrenoleukodystrophy (ALD) protein] -bermin- [vascular endothelial growth factor] -cima- [cytosine deaminase] -etid- [eczema-throbocytopenia-immunodeficiency syndrome] -far- [interferon] -kin- [interleukins] -lip- [human lipoprotein lipase] -naco- [coagulation factor IX] -nermin- [tumor necrosis factor (TNF)] -pap- [human papilloma virus] -permin- [hepatocyte growth factor] -reti- [retinal pigment] -stim- [colony stimulating factor] -tusu- [tumor suppression]

-beglo- [βA-t87Q-globin]

- -cabta- [cell expressed antibody and T cell activation] -ermin- [growth factor]
- -fermin- [fibroblast growth factor]
- -lim- [immunomodulator]
- -mul- [multiple gene]
- -nad- [NADH dehydrogenase]
- -octoco- [coagulation factor VIII]
- -papkino- [human papilloma virus and IL-2]
- -repi- [REP-1 gene]
- -semn- [SMN]
- -tima- [thymidine kinase]

Stem: Element to identify type of vector

-vec [non-replicating viral vector]

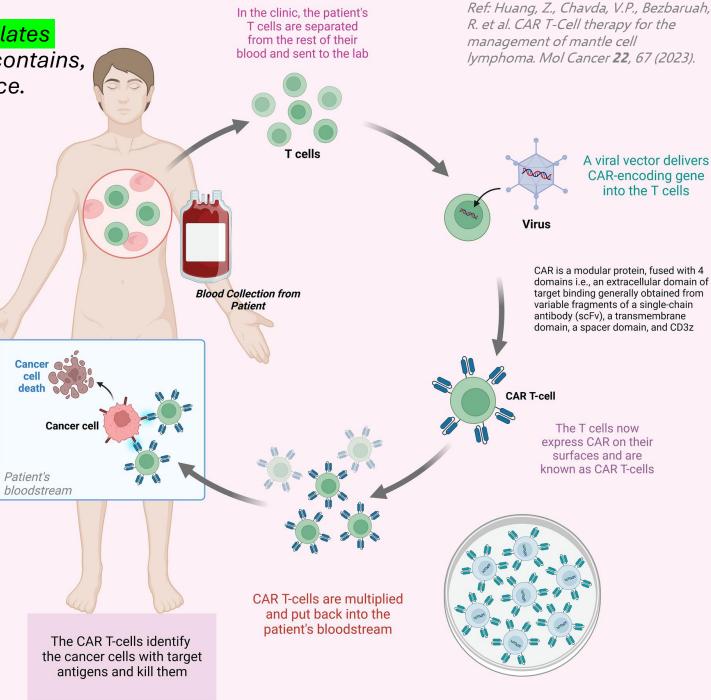
-repvec [replicating viral vector]

-plasmid [plasmid vector]

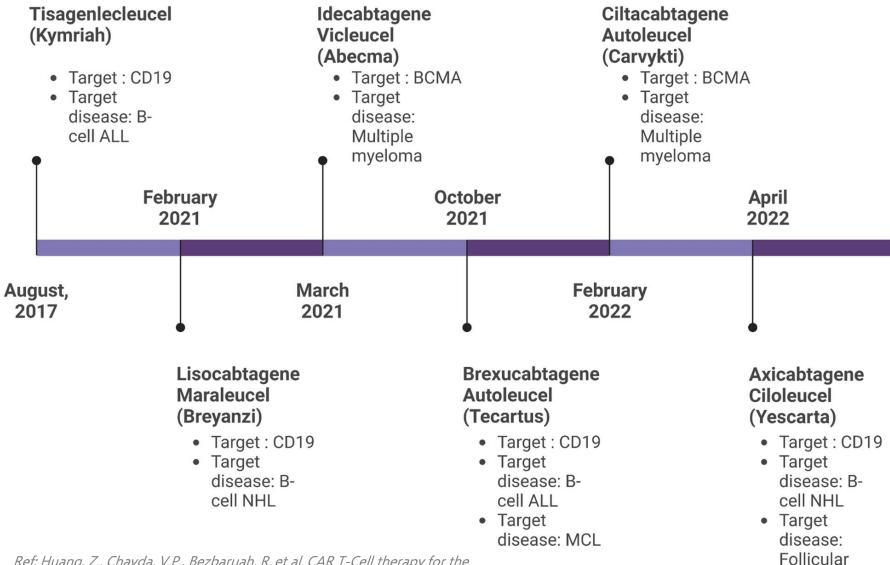
(b) its therapeutic, prophylactic or diagnostic effect relates directly to the recombinant nucleic acid sequence it contains, or to the product of genetic expression of this sequence.

Genetic manipulation does not necessarily have to take place in the human body, since for example products consisting of genetically modified cells generated *ex-vivo* have also been classified as a gene therapy medicinal product.

Example: *Ex vivo* CAR T cells



USFDA approved CAR T cell products

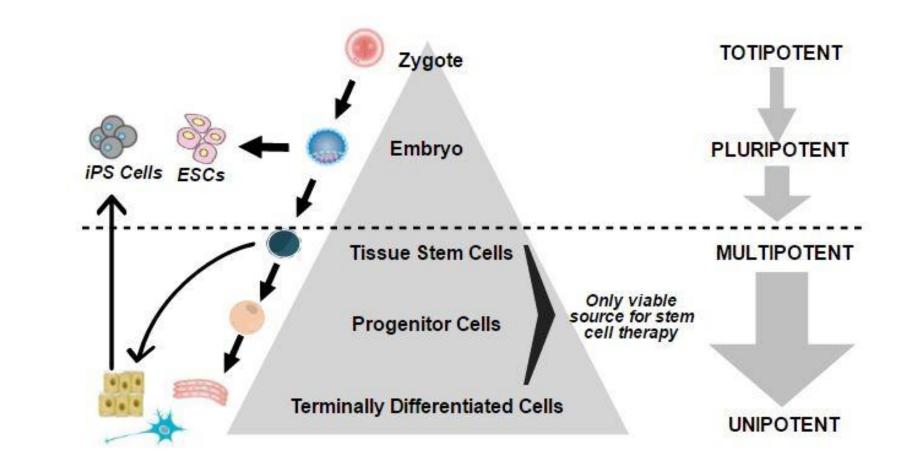


lymphoma

Ref: Huang, Z., Chavda, V.P., Bezbaruah, R. et al. CAR T-Cell therapy for the management of mantle cell lymphoma. Mol Cancer **22**, 67 (2023).

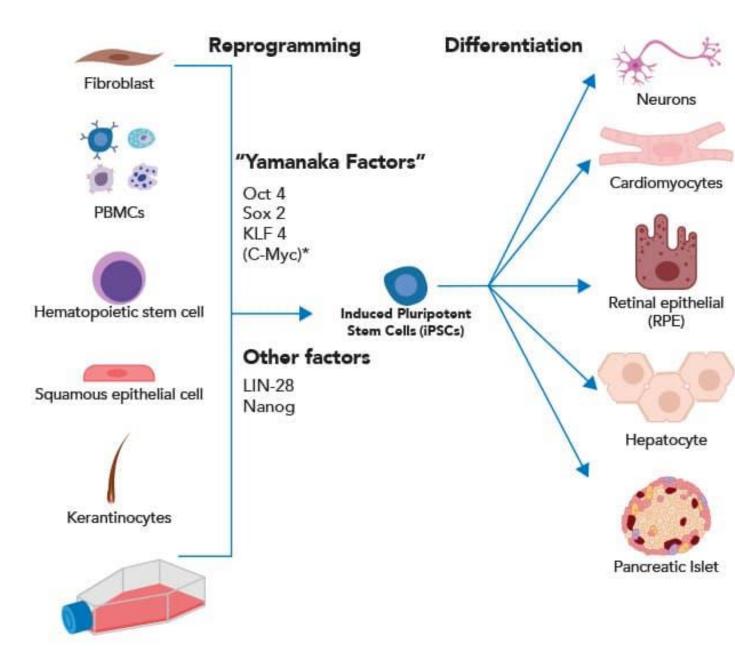
(b) its therapeutic, prophylactic or diagnostic effect <mark>relates directly</mark> to the recombinant nucleic acid sequence it contains, or to the product of genetic expression of this sequence.

The MoA and proposed indication, as claimed by the applicant are of essential to assess if there is a "direct" relationship between the therapeutic, prophylactic or diagnostic effect of the product and the delivered genetic sequence or the expressed product.



Do iPSCs qualify as GTMPs?

Stem cell reprogramming process



2012 Nobel Prize in Physiology or Medicine





Shinya Yamanaka University of Kyoto, Japan Photo Credit: Center for IPS cell Research and Application, Kyoto University

John B. Gurdon Gurdon Institute in Cambridge, UK

- The recommendation on the classification as tissue engineering products considered that the primary role of the cells was the "regenerate/repair/replace" of the patients' tissues, while the genetic modification was limited to a secondary role of cellular reprogramming.
- the classification does not necessarily exempt from the relevant and applicable scientific requirements of GTMP

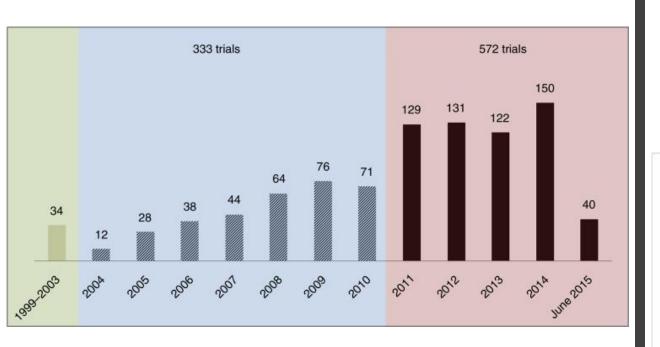
Before we go any further.

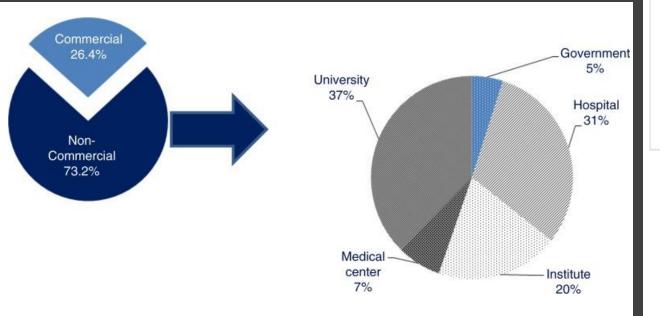
- The CAT classification examples in the reflection paper should not be understood as generic classifications for certain classes of ATMPs.
- Future applicants should apply caution when extrapolating the CAT classifications to their product and should consider applying for ATMP classification of their product.
- While the recommendation on classification provided by the Agency is not binding, the procedure can help developers to clarify the applicable regulatory framework.

- The disclaime

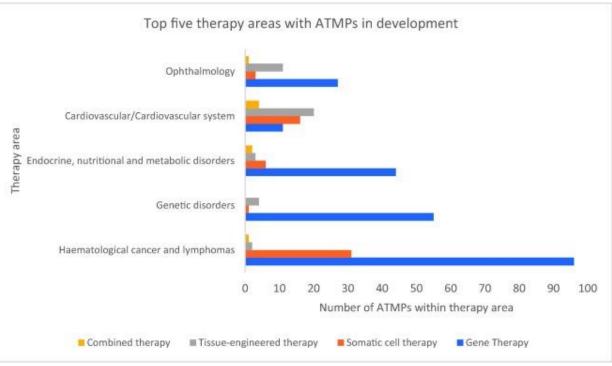
Medical Devices (93/42/EEC)

Type of treatment/product modality								
Medical Devices	Tissue Therapy	Cell Therapy	Cell/Gene Therapy	Gene	e Therapy	Vaccines	Biotech	Chemicals
Combined ATMP medical device plus a TEP, sCTMP or GTMP	Tissue Engineered Product (TEP) eg. Spherox, Holoclar, lab grown skin for burns treatment, P-TEV (VERIGRAFT) Advar	Somatic cell therapy medicinal product (sCTMP) eg. Alofisel, exp. CD34+, MSC for arthritis, hPSC derived	Produc Ex Vivo GTMP eg. Strimvelis (rec. CD34+), Yescarta (CAR T), emilimogene sigulactibac (rec. bacteria)	py Medicinal t (GTMP) In Vivo GTMP eg. Imlygic (onc. Virus), EV with rec. mRNA, rec. trans. mRNA, Zolgenzma (AAV), NTLA-2001 (CRISPR/Cas9) ATMP) (1394/2007)		eg. DNA vaccines or recombinant virus AGAINST infectious disease By EMA legal classification therapies are	leg all gene ح	eg. Aspirin, Spinraza Synthetic gonucleotide, gally speaking, are not gene therapies
eg. medical device only, deceullarised scaffold	eg. skin transplant for burns treatment		transplant, blood usions		ATMP	s	ATMP Sweden	
	Tissues and Cells (2004/23/EC), Blood (2002/98/EC)				NOT ATN		What are ATMPs? (atmpsweden.se)	





Wilkins GC, Lanyi K, Inskip A, Ogunbayo OJ, Brhlikova P, Craig D. A pipeline analysis of advanced therapy medicinal products. Drug Discov Today. 2023 May;28(5):103549.



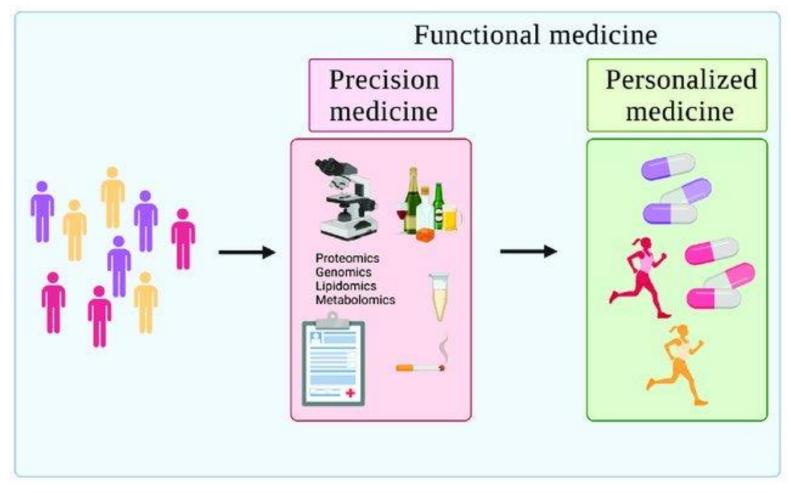
Current status of ATMP development

FAQs: **Are ATMPs** a subtype of personalized medicine?

YOU HAVE A QUESTION

memegenerator.ne

Personalized medicine vs Precision medicine



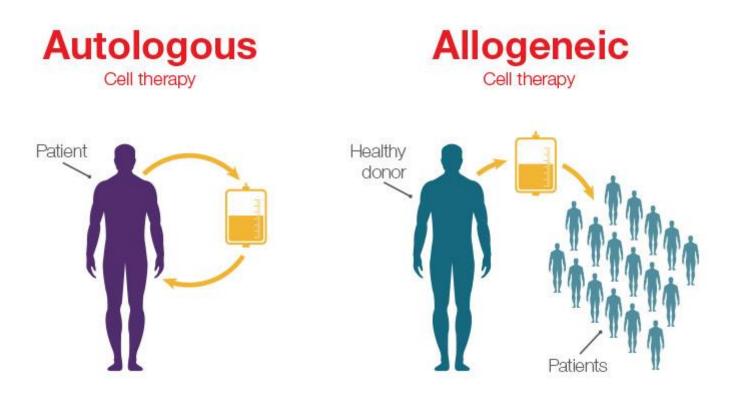
Precision medicine identifies differences in individuals, categorizing based on environmental, biological, and psychosocial factors.

Personalized medicine takes these differences and implements preventions/treatments tailored to the individual.

Carbonara, K.; MacNeil, A.J.; O'Leary, D.D.; Coorssen, J.R. Profit versus Quality: The Enigma of Scientific Wellness. J. Pers. Med. **2022**, *12, 34.*

Why we wonder about that?

Autologous vs Allogenic transplantation



ATMPs are based on genes, cells, or tissues delivered to patients to provide a therapeutic benefit based on a specific target of interest. This is often referred to as personalized medicine by many. ATMPs include cells, engineered tissues, or the manipulation of the patient's genome. This is in contrast with traditional manufacturing processes for compounds that are synthetically derived (i.e., small molecule) or proteins or peptides expressed by cellular systems (i.e., large molecule biopharmaceuticals). - ISPE

Image courtesy of The International Society for Pharmaceutical Engineering (ISPE)

THANK YOU YOUR ATTENTION

NOWITS TIME FOR QUESTIONS

Contact: Chavee Laomeephol

Department of Biochemistry and Microbiology, Faculty of Pharmaceutical Sciences, Chulalongkorn University *Email: Chavee.L@chula.ac.th*

Relevant documents

• สำนักงานคณะกรรมการอาหารและยา

ประกาศสำนักงานคณะกรรมการอาหารและยา เรื่อง แนวทางการจำแนกประเภทผลิตภัณฑ์การแพทย์ขั้นสูง

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• EMA

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