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A New Paradigm



Process Changes as a Source of Variability

- Situation
 - Process changes are inevitable in this space as technology is quickly evolving
 - Analytical method improvements are typically necessary throughout development
 - Change creates variability
 - Variability creates complexity in an already complex medicinal product
- Target
 - Implement process and analytical improvements that will provide greater process robustness and enhanced product quality while minimizing the impact of changes
- Proposal
 - Use <u>elements</u> of Quality by Design to take a science- and risk-based approach

Quality by Design: a systematic <u>approach to development</u> that begins with predefined objectives and emphasizes product and process understanding and process control, based on sound science and quality risk management.

Proposed Science- and Risk-Based Approach to Managing Changes

• Define the Critical Quality Attributes of the Product

CQAs are:

-Product attributes with potential to impact safety or efficacy

- The foundation for managing product quality through all stages of the product lifecycle

CQAs are <u>NOT</u>:

- Analytical methods
 - -Specifications

Proposed Science- and Risk-Based Approach to Managing Changes



Ensure Consistency of Assay Performance

 Systematic approach based on science and risk management to define sources of variability and implement controls in analytical methods as early as possible in development



Potential Process Changes

Manufacturing Process Component		Process v 1.0	Proposed Process v 2.0	Rationale for Change
Vector Process	Cell expansion	Adherent	Suspension	Enable treatment of larger population of patients including some older
Cell Process	Cell manipulation	Manual production	Implementation of automation	
	Final product formulation	Fresh product with 4 hour shelf life	Cryopreserved product.	 Improve supply chain robustness

Systematically Assess the Risks Associated with the Process Changes

Vector CQAs	Potential Impact		
Infectious viral titer	н		
Infectivity	н		
Transgene sequence	L		
Vector Integrity	L		
НСР	н		
HC DNA	н		
Benzonase	L		
Microbiological Control	L		
mycoplasma	L		
endotoxin	L		
Adventitious virus	L		
Plasmid DNA	М		
RCL	L		

Cell Product CQAs	Potential Impact of Vector Change	Potential Impact of automation	Potential Impact of cryopreservation
Percent CD34+	L	Н	н
Vector copy number	н	Н	М
CD34+ Stem Cell Potential	L	Н	н
Enzyme Activity	н	Н	М
Cell Viability (%)	L	М	н
Transduction efficiency	н	Н	L
Endotoxin	L	L	L
Mycoplasma	L	L	L
Microbiological control	L	L	L
RCL	L	L	L
Adventitious virus	L	L	L
HCP	н	L	L
Plasmid DNA	М	L	L
Host Cell DNA	н	L	L
Residual cytokines	L	L	L

Proposed Science- and Risk-Based Approach

- Use the risk assessment to
 - Drive development and generate data
 - Define the comparability strategy
 - Determine the required product characterization
 - Document rationale

