

The logo for PhAMA, featuring the word "PhAMA" in white, bold, sans-serif font. The "Ph" is on a dark blue background, and "AMA" is on a red background.

**PhAMA**

Innovative Medicines for Malaysia

# 1ST NATIONAL BIO-THERAPEUTICS CONGRESS – PUTTING PATIENT FIRST

**22 NOVEMBER 2014**

# Biosimilars - Interchangeability and Substitution

Dr. Paul Cornes

# **Dr Paul Cornes**

## **Conflict of interest**

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- **Salary received:**
  - **United Kingdom National Health Service**
- **Honoraria received:**
  - **Roche**
  - **Janssen**
  - **Sandoz**
  - **Lilly**
  - **European Generics Association**
  - **Teva**
  - **Hospira**

# ***Biosimilars - Interchangeability and substitution***



**Dr Paul Cornes,  
Consultant Oncologist,  
Bristol Haematology & Oncology Centre**



**Comparative Outcomes Group**



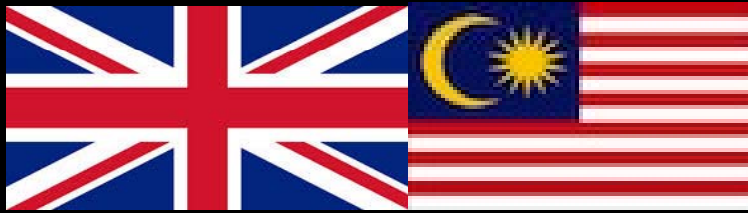
**ESO Task Force Advisory Board on  
Access to Innovative Treatment in  
Europe**

**European School of Oncology  
Piazza Indipendenza, 2  
6500 Bellinzona - Switzerland**

**paul.cornes@yahoo.co.uk**



# ***Biosimilars - Interchangeability and substitution***



# Question 1

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- You are part way through a course of treatment with infliximab for rheumatoid disease - The patient is responding without serious toxicity
- Your pharmacy colleagues tell you that the next treatment is likely to come from a new purchase of biosimilar infliximab (approved for use by the EMEA)
  
- Do you? – please chose your best response:
  1. Refuse – as the patient is part way through treatment and switching is not advised by Malaysian Guidelines
  2. Agree – but worry there is no data to support this change
  3. Agree to the switch – as no excess adverse events are expected



## Question 2

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- You are part way through a course of dose dense chemotherapy for breast cancer – supported by Filgrastim GCSF to prevent neutropaenia. The patient is responding without serious toxicity
- The patient will transfer mid-way through treatment to stay with her family in another area. Your colleague tells you that in their hospital, they use only biosimilar Filgrastim (approved for use by the EMEA and Malaysian Regulators)
  
- Do you? – please chose your best response:
  1. Refuse – the patient is part way through treatment and switching is not advised by Malaysian Guidelines
  2. Agree – but worry there is no data to support this change
  3. Agree to the switch – as no excess adverse events are expected

# Biosimilars - Interchangeability and substitution

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- Questions
- **Why have we been worried?**
- Terminology
- Rules
- Evidence for safety
  - Regulatory
- Observational studies of substitution & switching
  - Originator to Originator
  - Originator to Biosimilar
- RCTs of switching
- Questions Revisited





# Biosimilars may share primary DNA and amino acid sequence with originators

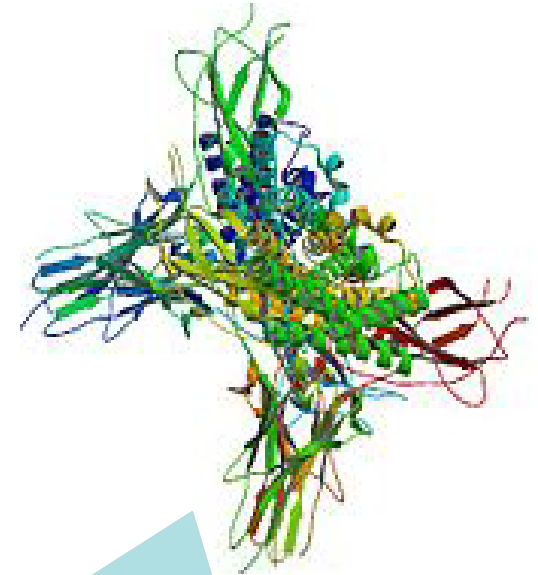
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- **But with**
  - **Different vectors to transform host cells**
  - **Different Cell Banks**
  - **Different cell culture medium**
  - **Different culture vessels - “Bioreactors”**
  - **.....**
  
- **Different tertiary structure could result**
  - **Which could alter the functionality or safety of the drug**

# What might make physicians hesitate?

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- Immunogenicity
- A protein can be modified in many ways:
  - side chains can be added,
  - protein misfolding makes different tertiary structure
  - degradation by oxidation or deamidation



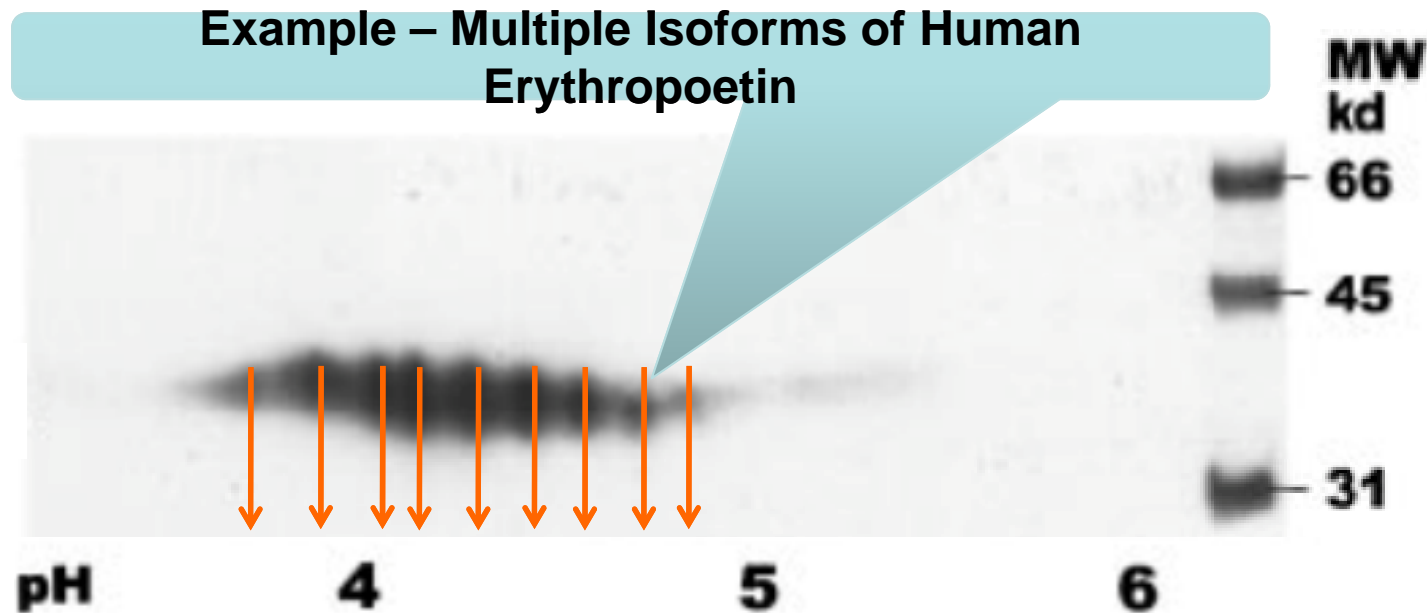
Different patented manufacturing processes may invariably lead to structural differences in the final product

Unlike classical generics, biosimilars are not identical to their originator products

- Committee for medicinal products for human use. Annex guideline on similar biotechnological medicinal products containing biotechnology-Derived proteins as active substances. Clinical and clinical issues: Guidance on biosimilar medicinal products containing recombinant erythropoietins. European Medicines Agency. EMEA/CHMP/94526/2005

# “Highly similar but not identical”

- Is not new to biotechnology
- Natural proteins come in a spectrum of isoforms

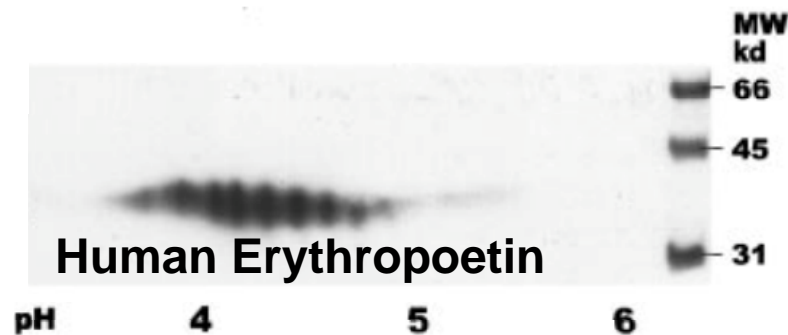


Human serum EPO (65 ng). Two-dimensional gel electrophoresis of human serum EPO. IEF was carried out by using IPG strips with a pH gradient of 3 to 6. SDS-PAGE was performed in 12% gels followed by immunoblotting

# “Highly similar but not identical”

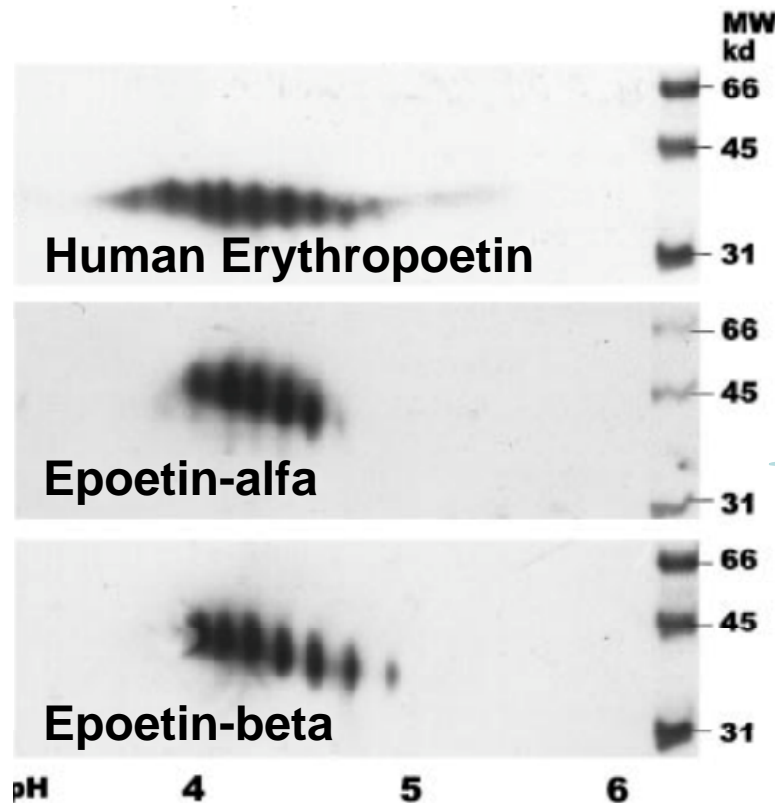
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# “Highly similar but not identical”

- Is not new to biotechnology
- Natural proteins come in a spectrum of isoforms

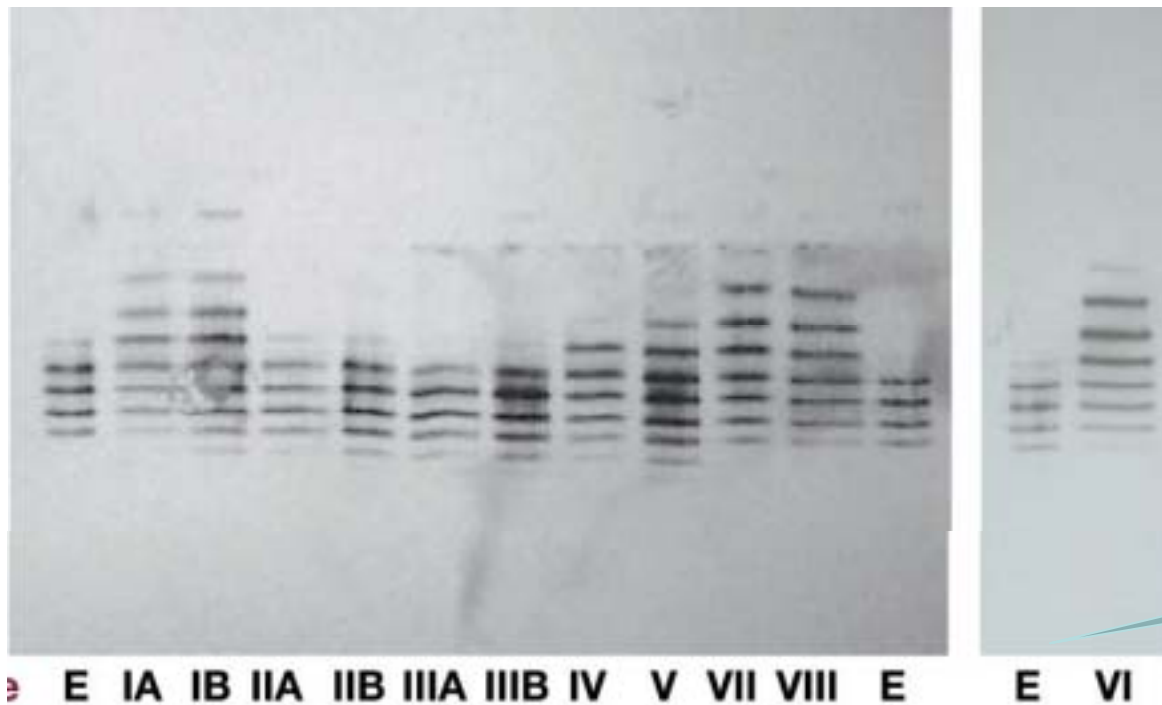


Recombinant drugs try to copy the spectrum of structure of natural proteins

There is no single “unique” structure of the drug

Human serum EPO (65 ng). Two-dimensional gel electrophoresis of human serum EPO. Analysis was carried out by using IPG strips with a pH gradient of 3 to 6. SDS-PAGE was performed in 12% gels followed by immunoblotting

# Protein variation in products marketed internationally as epoetin alpha



Multiple different isoforms of proteins naturally occur

E is the original reference product

Unregulated copy drugs bought in Asia and South America

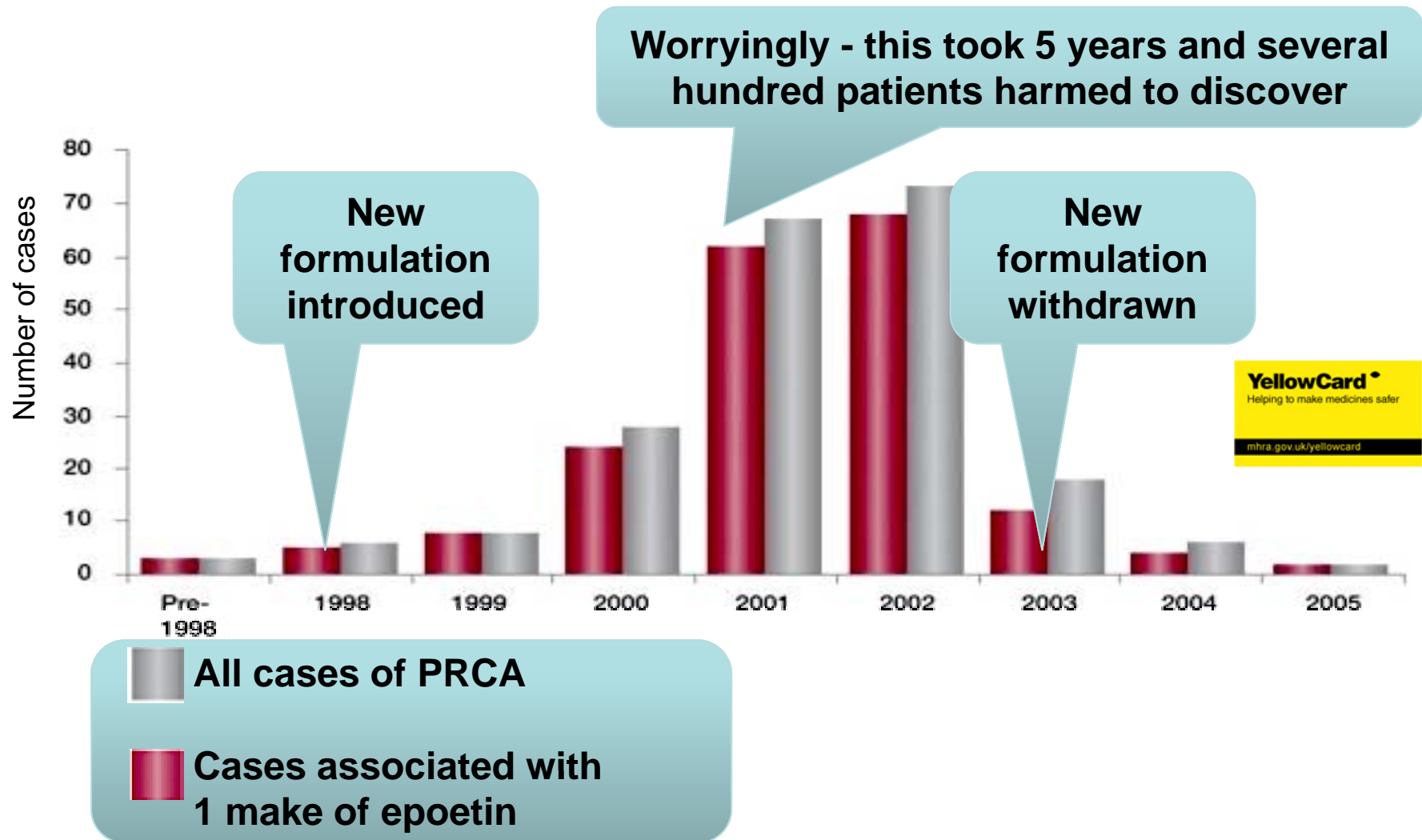
# Immunogenicity from small manufacturing changes

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- **Eprex® (epoetin alfa)**
  
- **Two production changes made....**
  1. **uncoated rubber stoppers used in the syringe**
  2. **a new stabiliser added**
    - K. Boven. The increased incidence of pure red cell aplasia with an Eprex formulation in uncoated rubber stopper syringes. *Kidney Int*, 67:2346-2353, 2005.
  
- **Several hundred patients developed anti-epoetin antibodies**
  - **these neutralised both endogenous erythropoietin and injected epoetin,**
  - **and stopped the bone marrow making red cells with development of profound anaemia**
  - **leading to some fatalities**
    - A. Kromminga. Antibodies against erythropoietin and other protein-based therapeutics: an overview. *Ann N Y AcadSci*, 1050:257-265, 2005.



# Time-course of PRCA

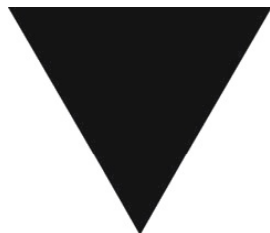


# Safety of biosimilar medicines: “EU DRA Vigilance”

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- **New EU pharmacovigilance legislation came into force in July 2012**
  - **legal obligation for the systematic tracking of medicines from manufacturer to patient**
    - Sträter B. New pharmacovigilance rules in the EU and their impact on biosimilars and automatic substitution. *Scrip Regulatory Affairs*. 10 Nov 2011.
  - **puts biosimilars in the same class as new substances**
  - **this means that manufacturers must include a ‘black symbol’ in the product information**

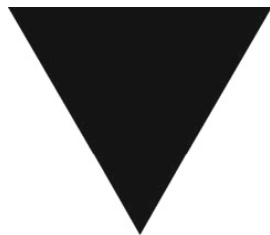
**EMA: 2 weekly reports on any new drug or indication or if safety worries**



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**IF YOU SEE  
SOMETHING,  
SAY  
SOMETHING.**

**BE SUSPICIOUS OF ANYTHING UNATTENDED.**  
Tell a cop, an MTA employee or call 1-888-NYC-SAFE.



**YellowCard**<sup>®</sup>  
Helping to make medicines safer

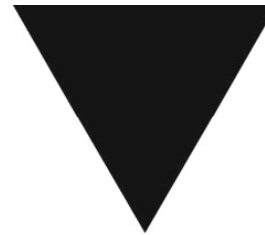
[mhra.gov.uk/yellowcard](http://mhra.gov.uk/yellowcard)

# How good is the new vigilance system?

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- EUDRA – Vigilance

- 2,108,742 unique ADR reports
- 439,971 biologic ADRs



- A total of 13,790 biopharmaceuticals (9,759 suspected) for which a biosimilar has been approved in the EU were identified in EV.
- For 90.4 % of these biopharmaceuticals and 96.2 % of the suspected biopharmaceuticals the product was clearly identifiable.

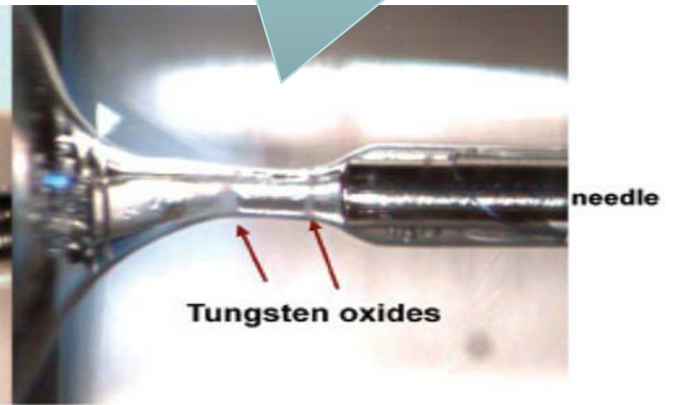
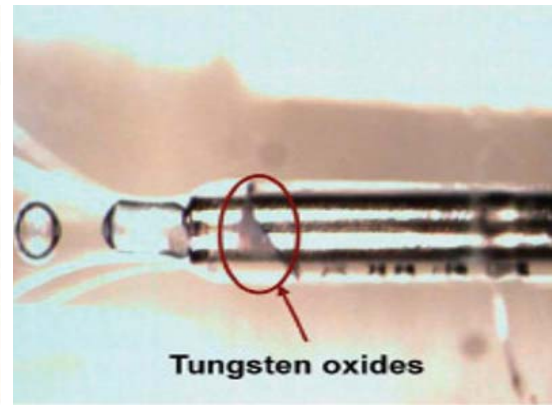
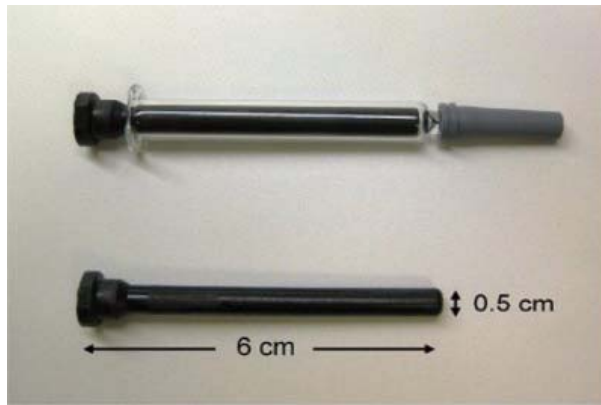


# Neutralizing antibodies to epoetin alfa triggered by soluble tungsten

The screenshot shows the website header with the logo 'American Pharmaceutical Review' and the tagline 'The Review of American Pharmaceutical Business & Technology'. A search bar is present. The navigation menu includes 'Home', 'Bio processing', 'Chromatography', 'Excipients', and 'Drug Delivery'. Below the menu, there are links for 'Articles', 'News', 'Events', 'Videos', 'White Papers / Application Notes', 'Featured Products', and 'Posters'. The article title is 'Extractable and Leachable Implications on Biological Products in Prefilled Syringes', posted on January 01, 2011. The authors listed are Yasser Nashed- Samuel, Dengfeng Liu, Kiyoshi Fujimori, Lourdes Perez, and Hans Lee, Ph.D. The article is attributed to Amgen Inc. There are social media icons for Twitter and Facebook, and options for Email, Print, and Comments.

- Amgen Study:
- Tungsten pins are used to form the needle cavity in glass pre-filled drug syringes

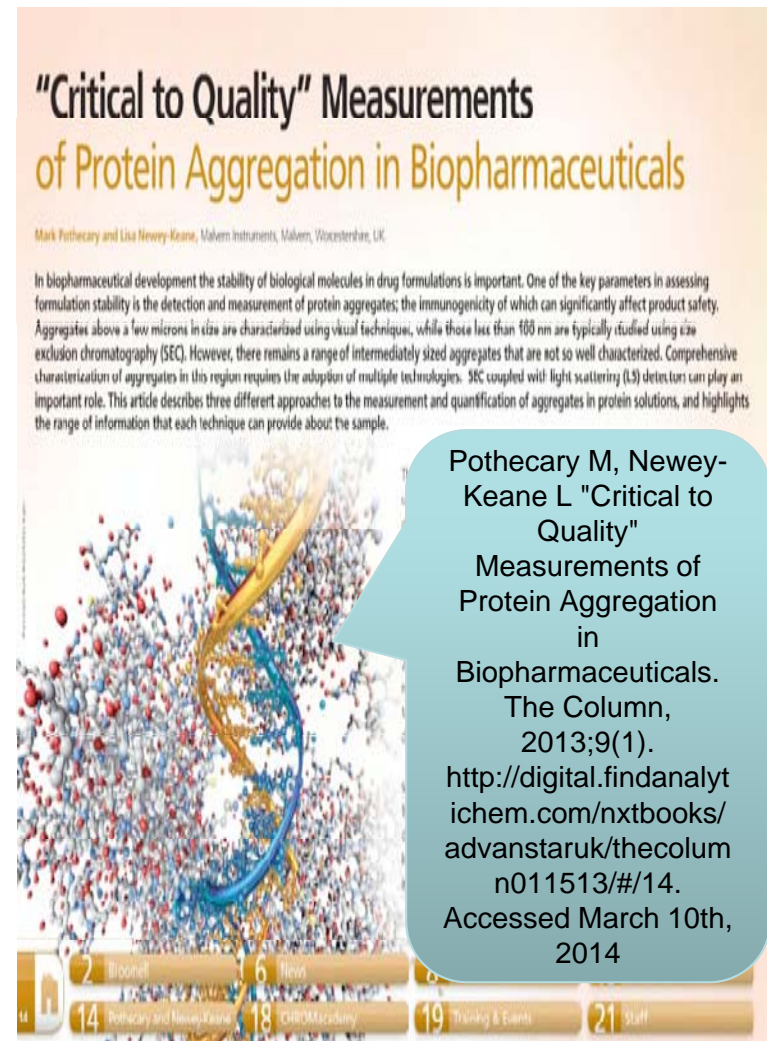
1,200 °C used to melt glass is sufficient to release some tungsten from the metal moulding pin



Yasser Nashed- Samuel et al. Extractable and Leachable Implications on Biological Products in Prefilled Syringes. American pharmaceutical review. January 01, 2011. <http://www.americanpharmaceuticalreview.com/Featured-Articles/37011-Extractable-and-Leachable-Implications-on-Biological-Products-in-Prefilled-Syringes/>. Accessed March 10th, 2014

# Neutralizing antibodies to epoetin alfa triggered by soluble tungsten

- Protein aggregates in biologic drugs stimulate immune responses.
- 2 cases from 337 in a trial of subcutaneous epoetin developed neutralizing antibodies
- a small number of individual syringes in 2 product batches were found to contain unusually high levels of aggregation & soluble tungsten
  - Tungsten induced denaturation and aggregation of the epoetin
  - Increasing the potential for immunogenicity



**"Critical to Quality" Measurements of Protein Aggregation in Biopharmaceuticals**

Mark Potheary and Lisa Newey-Keane, Malvern Instruments, Malvern, Worcestershire, UK

In biopharmaceutical development the stability of biological molecules in drug formulations is important. One of the key parameters in assessing formulation stability is the detection and measurement of protein aggregates; the immunogenicity of which can significantly affect product safety. Aggregates above a few microns in size are characterized using visual techniques, while those less than 100 nm are typically studied using size exclusion chromatography (SEC). However, there remains a range of intermediately sized aggregates that are not so well characterized. Comprehensive characterization of aggregates in this region requires the adoption of multiple technologies. SEC coupled with light scattering (LS) detectors can play an important role. This article describes three different approaches to the measurement and quantification of aggregates in protein solutions, and highlights the range of information that each technique can provide about the sample.

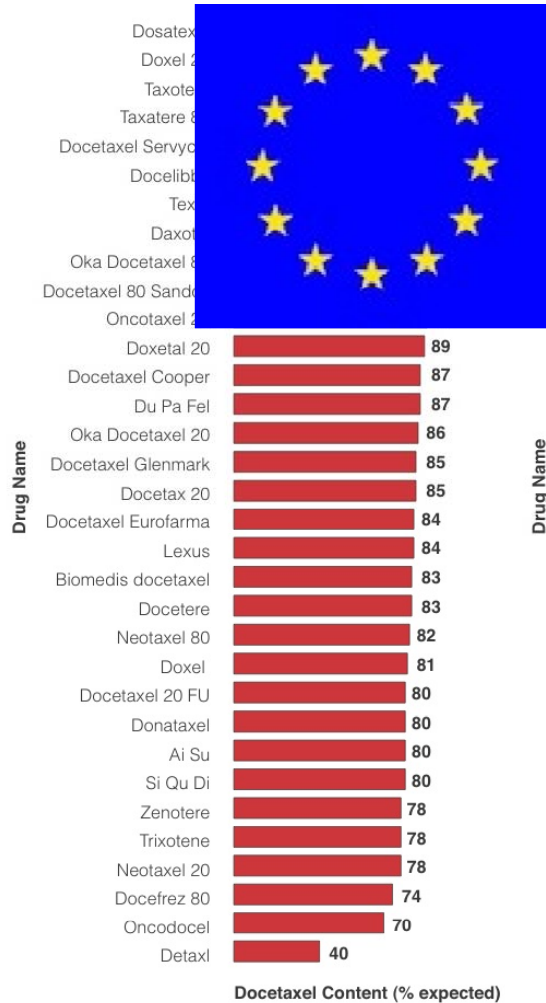
Pothecary M, Newey-Keane L "Critical to Quality" Measurements of Protein Aggregation in Biopharmaceuticals. The Column, 2013;9(1). <http://digital.findanalytichem.com/nxtbooks/advanstaruk/thecolumn011513/#/14>. Accessed March 10th, 2014

Seidl A et al. Tungsten-induced denaturation and aggregation of epoetin alfa during primary packaging as a cause of immunogenicity. Pharm Res. 2012 Jun;29(6):1454-67. doi: 10.1007/s11095-011-0621-4. Epub 2011 Nov 18.

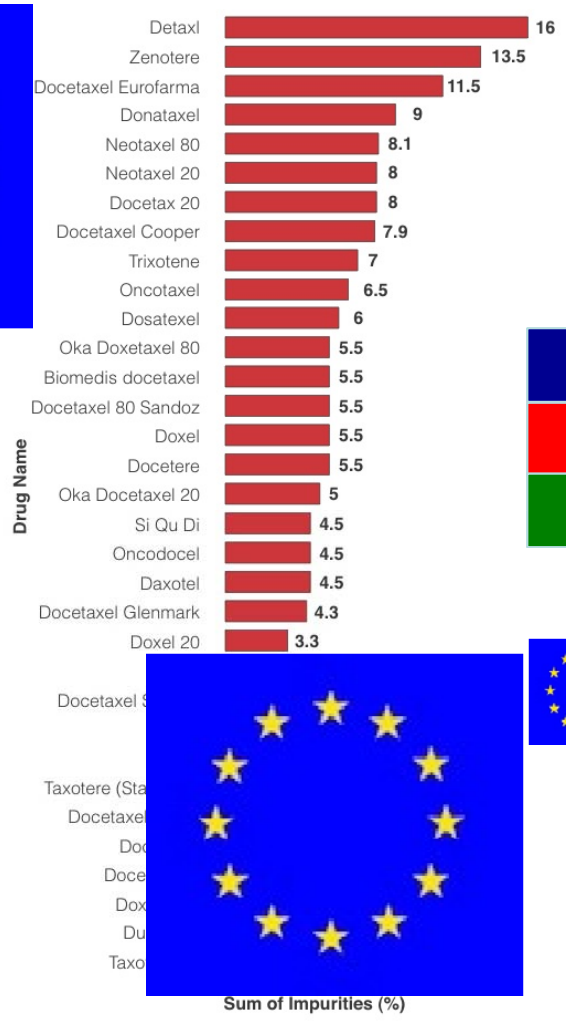


# Not all drugs are equal – your drug regulatory authority is crucial

VIAL CONTENT OF DOCETAXEL






IMPURITIES CONTENT



International copies of docetaxel compared for

- Activity
- Impurities

Key

-  Acceptable
-  Unacceptable
-  Original reference drug

 All EMEA approved generics were safe and active





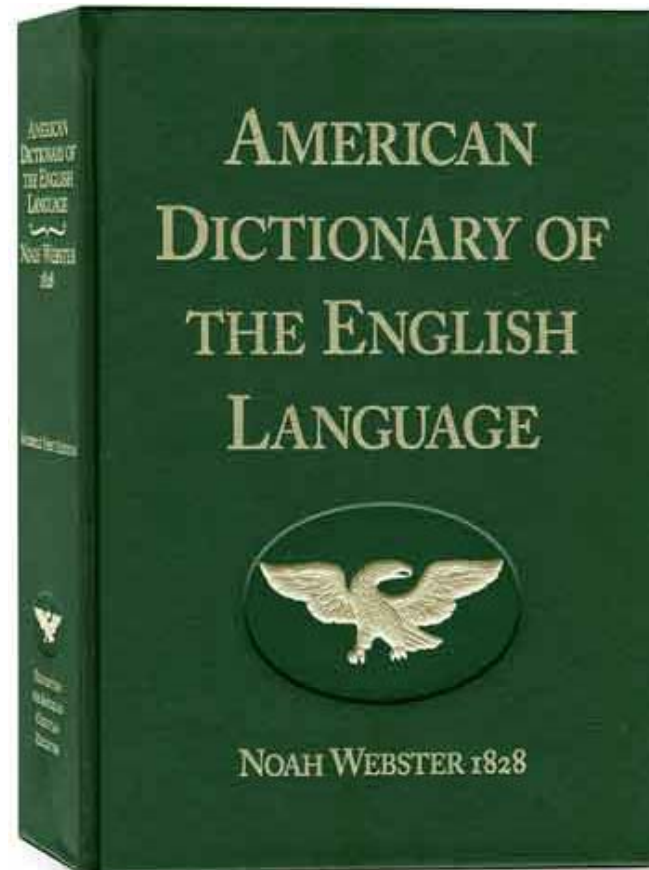
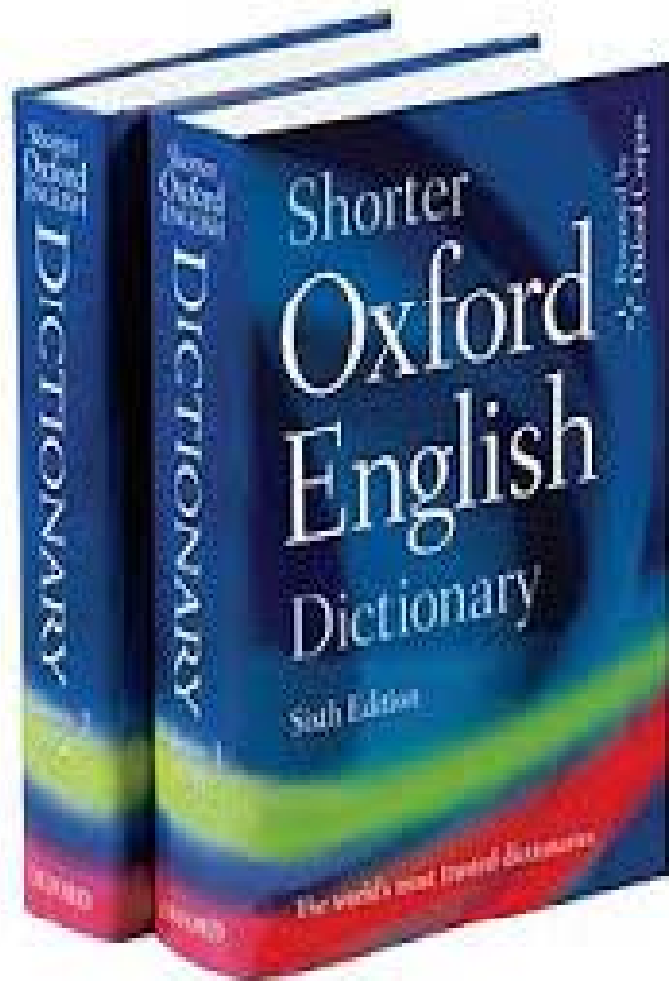


# Biosimilars - Interchangeability and substitution

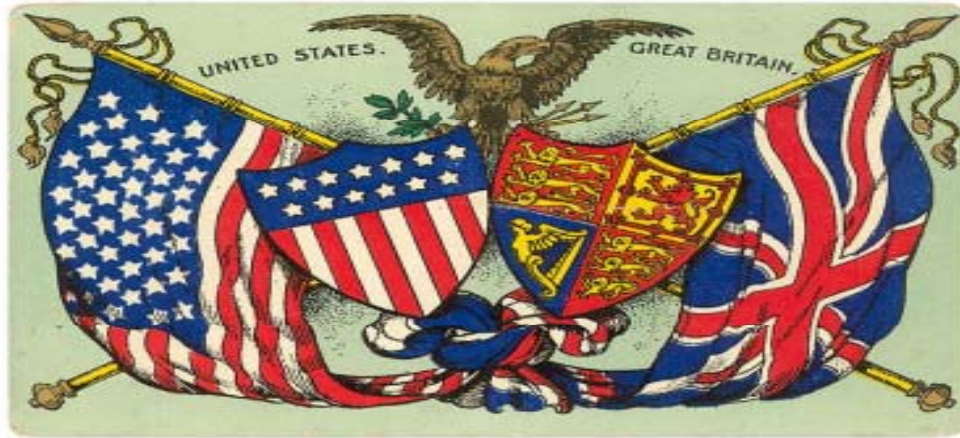
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- Questions
- Why have we been worried?
- **Terminology**
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  - Originator to Biosimilar
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- Questions Revisited

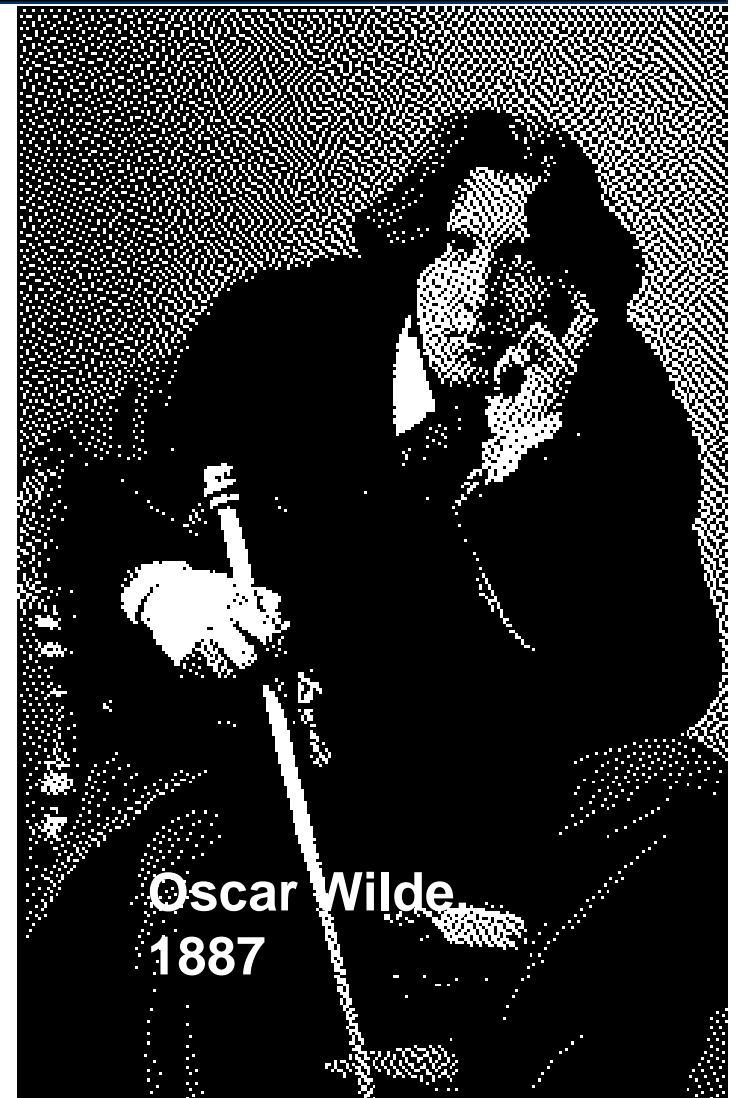




# Definitions



**‘We have really everything in common with America nowadays except, of course, language’.**



**Oscar Wilde  
1887**

# Definitions: interchangeable & substitutable

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- **interchangeable**
  - A product is interchangeable with another if both products are used and approved for the same indication.
- **substitutable**
  - Two products can be substitutable with each other if they can both be used in lieu of each other during the same treatment period.

And so – in theory, be substituted by a pharmacist.



# Definitions: interchangeable & substitutable

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**USA: US Food and Drug Administration (FDA) does have the authority to designate two sorts of follow-on biologic drugs after patent expiry**

- 1. “ biosimilar ”**
- 2. “ Interchangeable biosimilar ”**

# Definitions: interchangeable & substitutable

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## FDA Definition of Interchangeability



Interchangeability means that the biologic product is biosimilar to the U.S.-licensed reference biological product and can be expected to produce the same clinical result as the reference product in any given patient.



- For a biological product that is administered more than once to an individual, the risk in terms of safety or diminished efficacy of alternating or switching between use of the biological product and the reference product will not be greater than the risk of using the reference product without such alternation or switch.
- Interchangeable biological products may be substituted at the pharmacy level without the intervention of a healthcare provider.



# Definitions: interchangeable & substitutable



## FDA Definition of Interchangeability



Interchangeability means that the biological product is biosimilar to the reference biological product and that the clinical data demonstrate that the risk to the patient.

This power is not an EMEA or European Union issue. The decision is delegated to member countries of the E.U.



- For a biological product that is administered more than once to an individual, the risk in terms of safety or diminished efficacy of alternating or switching between use of the biological product and the reference product will not be greater than the risk of using the reference product without such alternation or switch.
- Interchangeable biological products may be substituted at the pharmacy level without the intervention of a healthcare provider.

# Definitions: interchangeable & substitutable



## FDA Definition of Interchangeability



Interchangeable biological products are those that are clinically equivalent to the reference product. This also explains why there can be so much confusion between the terms “interchangeable” “substitution” and “switchable”

- For a biological product that is administered more than once to an individual, the risk in terms of safety or diminished efficacy of alternating or **switching** between use of the biological product and the reference product will not be greater than the risk of using the reference product without such alternation or switch.
- **Interchangeable** biological products may be **substituted** at the pharmacy level without the intervention of a healthcare provider.

# Definitions: interchangeable & substitutable

---

- interchangeable
  - A product is interchangeable with another if both products are used and approved for the same indication.

You could substitute the biosimilar drug in your protocols and expect no clinically meaningful difference in outcomes

- Substitutable / USA “Interchangeable”
  - Two products can be substitutable with each other if they can both be used in lieu of each other during the same treatment period.

Implies – that the batch to batch variation of the original product is similar to its differences with the biosimilar drug.

Switching does not then increase risks. Either could be used during the same course of treatment for an individual patient

# Interchangability

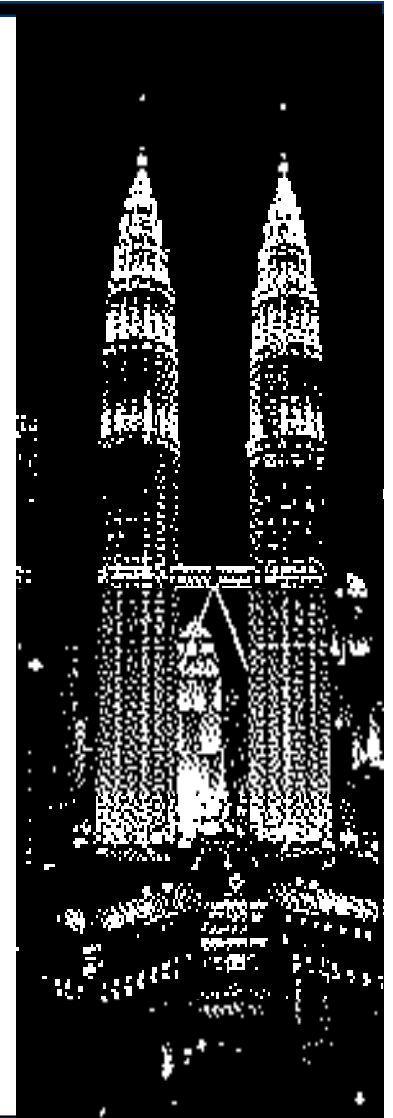
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- **US FDA is very keen to develop “interchangeable biosimilars”**
  - **interchangeable approval requires extensive additional clinical testing beyond that required for biosimilars.**
  - **In return for this additional expense, the first approved interchangeable version of any reference biologic is rewarded with one year of exclusivity, during which the FDA cannot approve any additional interchangeables for that biologic.**

# Biosimilars - Interchangeability and substitution

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# Interchangeability

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- **By definition, when a Biosimilar has been approved for an indication by your regulatory authority**
  - **It is interchangeable with the reference product**
  - **Which means you could use either drug and expect no clinically meaningful differences to occur**

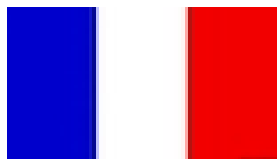


# Substitution

- The EMEA can approve biosimilars for the EU
- But the issue of substitution is in the hands of member states of the EU

- Law against automatic substitution
- Guidelines prohibit automatic substitution
- Automatic substitution No regulation/law

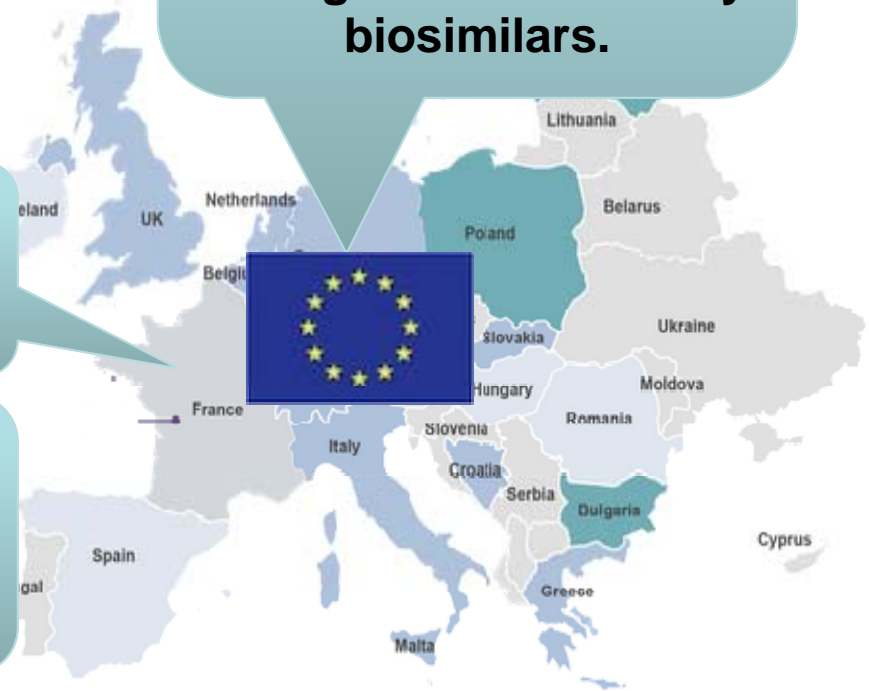
more than 12 countries across Europe have introduced rules to prevent automatic substitution of biological medicines by biosimilars.



2014: France has passed a law to permit automatic substitution




2014: USA has passed a law to permit interchangeability & switching mid-treatment



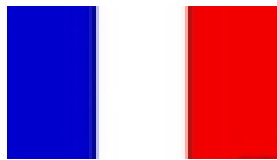


# Substitution

- The WHO issue guidelines for biosimilar regulation
- But the issue of substitution is in the hands of member states of the WHO



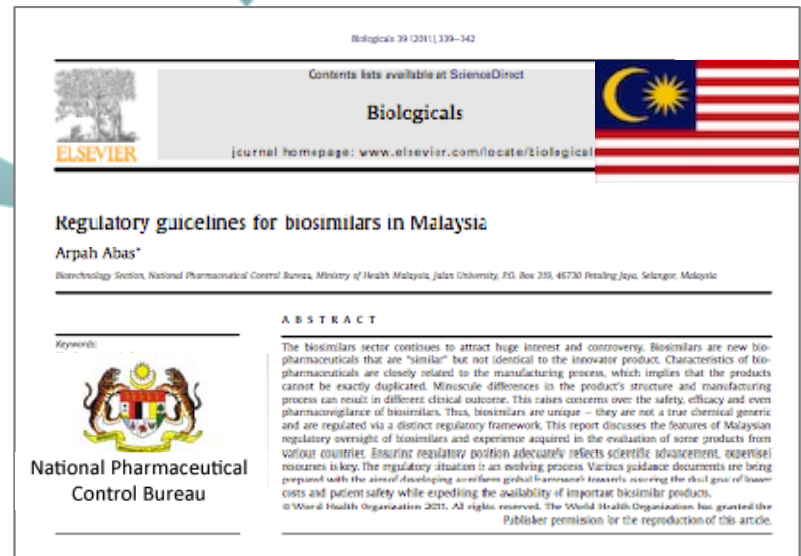
Malaysian guidelines of 2011 prevent automatic substitution of biological medicines by biosimilars at pharmacy level.



2014: France has passed a law to permit automatic substitution



2014: USA has passed a law to permit interchangeability & switching mid-treatment



Biologicals 39 (2011) 339–342

Contents lists available at ScienceDirect

**Biologicals**

journal homepage: [www.elsevier.com/locate/biologicals](http://www.elsevier.com/locate/biologicals)

**Regulatory guidelines for biosimilars in Malaysia**

Arpah Abas\*

Biochemistry Section, National Pharmaceutical Control Bureau, Ministry of Health Malaysia, Jalan University, P.O. Box 335, 46730 Petaling Jaya, Selangor, Malaysia

**ABSTRACT**

The Biosimilars sector continues to attract huge interest and controversy. Biosimilars are new bio-pharmaceuticals that are “similar” but not identical to the innovator product. Characteristics of bio-pharmaceuticals are closely related to the manufacturing process, which implies that the products cannot be exactly duplicated. Minuscule differences in the product’s structure and manufacturing process can result in different clinical outcome. This raises concerns over the safety, efficacy and even pharmacovigilance of biosimilars. Thus, biosimilars are unique – they are not a true chemical generic and are regulated via a distinct regulatory framework. This report discusses the features of Malaysian regulatory oversight of biosimilars and experience acquired in the evaluation of some products from various countries. Ensuring regulatory position adequately reflects scientific advancement, oversight remains a key. The regulatory situation is an evolving process. Various guidance documents are being prepared with the aim of developing uniform global framework towards ensuring the fulfilment of biosimilars and patient safety while expediting the availability of important biosimilar products.

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# Automatic substitution

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- **EMA and WHO**
  - automatic substitution by pharmacist is not an EMA or WHO power
  - France has proposed it
  
- **US - FDA**
  - Will permit for “interchangeable biosimilars”
  - But not for “biosimilars”
  
- **Malaysia**
  - Advises against automatic substitution

# Biosimilars - Interchangeability and substitution

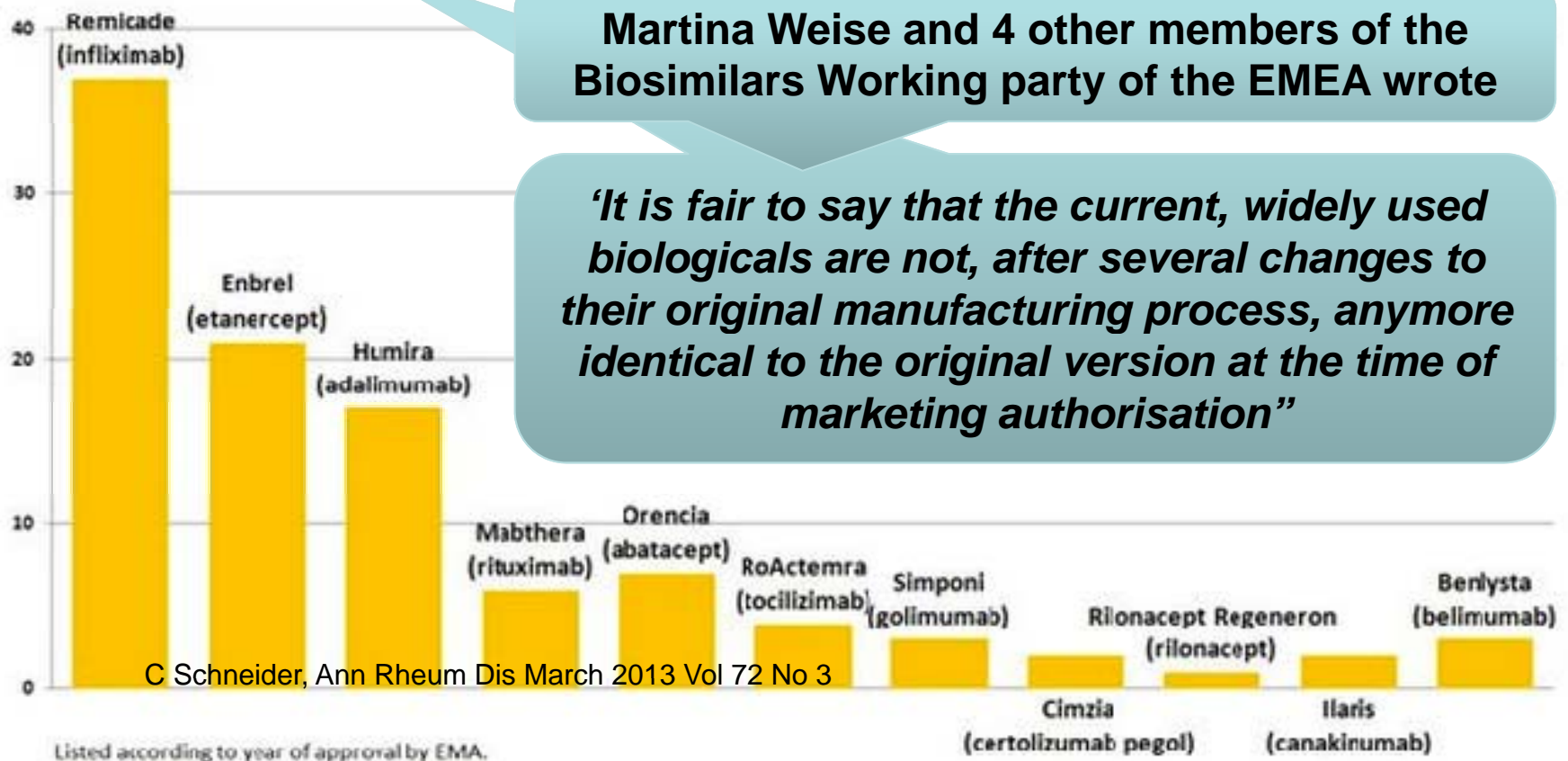
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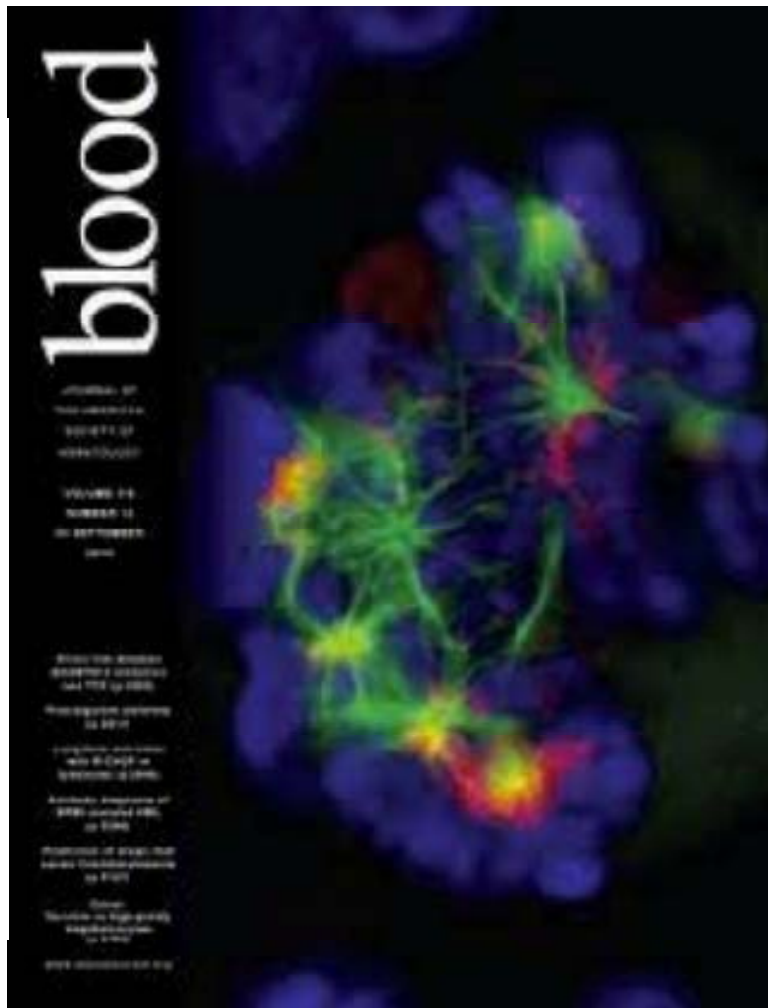
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# Manufacturing changes are frequent in biologic drugs over time

- Example: every single biologic agent used in rheumatology has had a manufacturing change – some had >35 changes



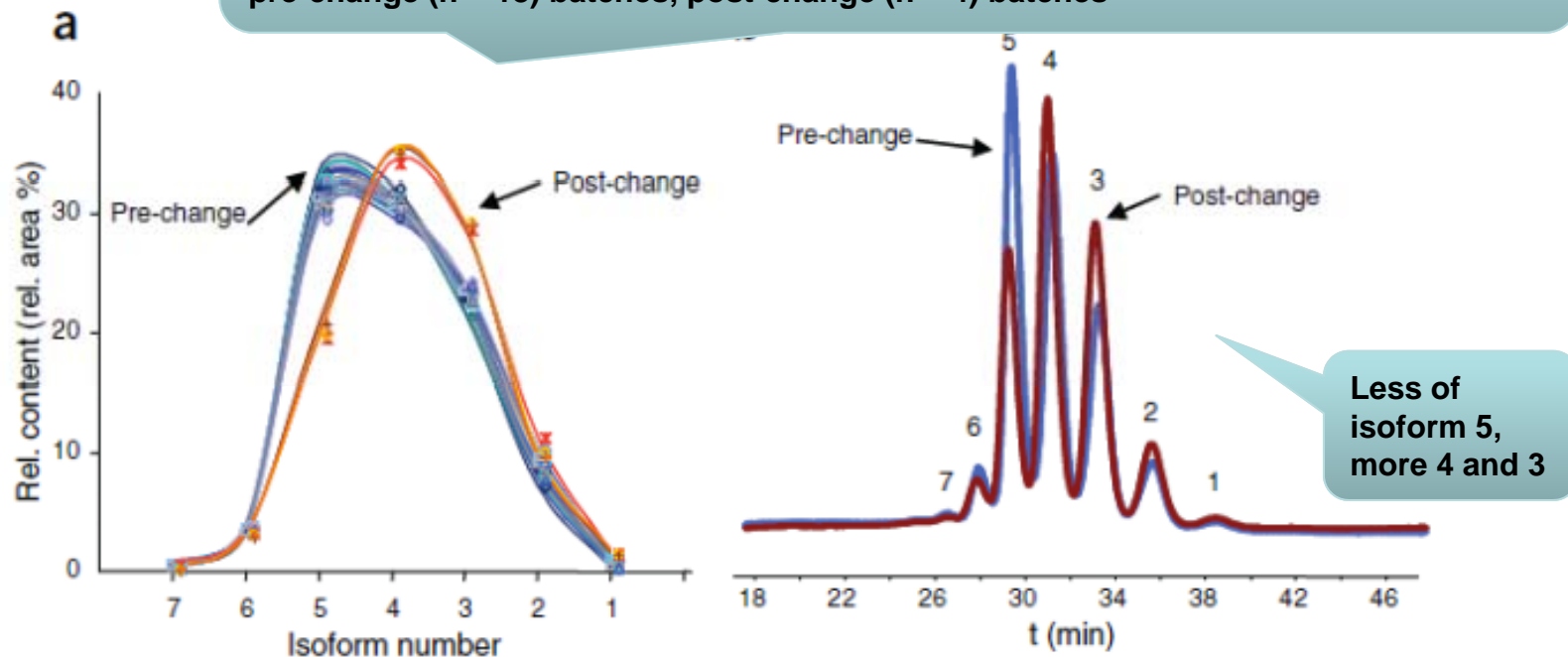


- “..the “similar but not identical” paradigm of biosimilars appears to fuel uncertainties about [biosimilars]. However, this principle is not new to biotechnology; even consecutive batches of originator products are never identical to each other...this is normal and is why adequate controls on batch consistency have to be imposed.”

- **Weise et al. Blood 2012; 120: 5111-5117**

# Manufacturing changes are frequent in biologic drugs over time

Relative content of the individual isoforms of originator Darbepoetin before and after a manufacturing change  
pre-change ( $n = 18$ ) batches, post-change ( $n = 4$ ) batches

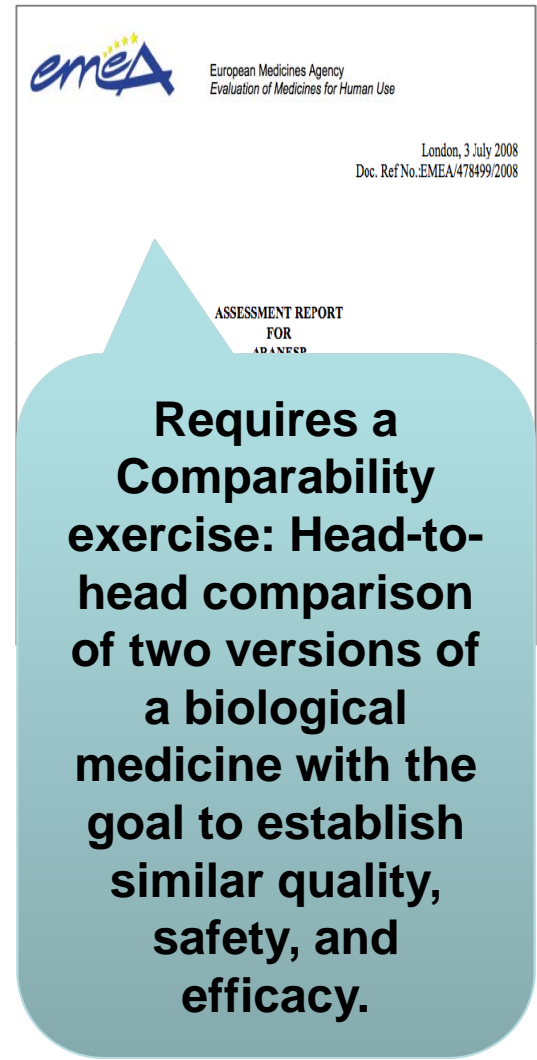


**Figure 1** Comparison of the pre- and post-change Aranesp batches measured by capillary zone electrophoresis. (a) Relative content of the individual isoforms of the pre-change ( $n = 18$ ) and the post-change ( $n = 4$ ) batches. (b) Representative electropherograms; peaks are labeled with the isoform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

# Manufacturing changes are frequent in biologic drugs over time

- **Example of darbepoetin changes**
  1. **Re-establishment of master cell bank**
  2. **Modification of the vector used to produce the antigen/source material, incl. new master cell bank**
  3. **Change from roller bottle (RB) manufacturing process to a more scaleable high throughput (HT) process using cells in suspension**
  4. **Change of cell culture medium**

Change was rated as “Replacement of a biological substance or product of biotechnology with one of a slightly different molecular structure.







# Biosimilars

---

- **From a scientific and regulatory point of view, the active substance of the biosimilar is just another version of the active substance of the originator product.**
  - Weise M et al. Biosimilars: the science of extrapolation. *Blood*. Pre-published online October 8, 2014; doi:10.1182/blood-2014-06-583617
- **This is important to state since the same scientific principles that underlie the comparability exercise for the purpose of demonstrating similarity of a product before and after a change in manufacturing process also apply to the comparability exercise for the purpose of demonstrating biosimilarity.**
  - European Medicines Agency, Committee for Medicinal Products for Human Use: Guideline on similar biological medicinal products (CHMP/437/04/Rev1). [http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/genera\\_l\\_content\\_000408.jsp&mid=WC0b01ac058002958c](http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/genera_l_content_000408.jsp&mid=WC0b01ac058002958c)



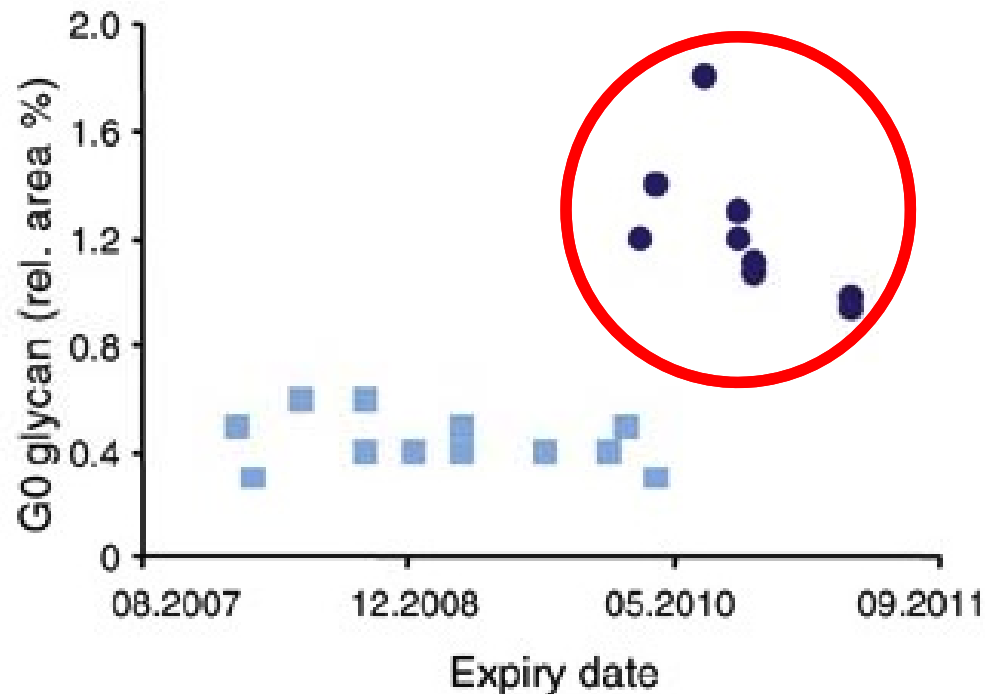
# Example of darbepoetin changes

- In addition to in-vitro binding studies – the manufacturer provided
  1. Single dose PK study in male beagle dogs
  2. 4 week repeated (3x/week) tox study in beagles- For toxicity, PK, PD, Immunological measurements
  3. Phase I comparative PK study (randomized, 2-way, open-label, crossover, SC) with 2 single doses in 48 healthy volunteers
  4. Phase III comparative efficacy study (controlled, randomized, in 446 CKD haemodialysis patients, SC or IV, maintenance)
  5. Single arm safety study with HT (open label, in 1172 CKD patients)



# Example of rituximab changes

- Schiestl, M. et al., Nature Biotechnology 29, 310-312, 2011
- Found a structural change in rituximab in batches sampled over time

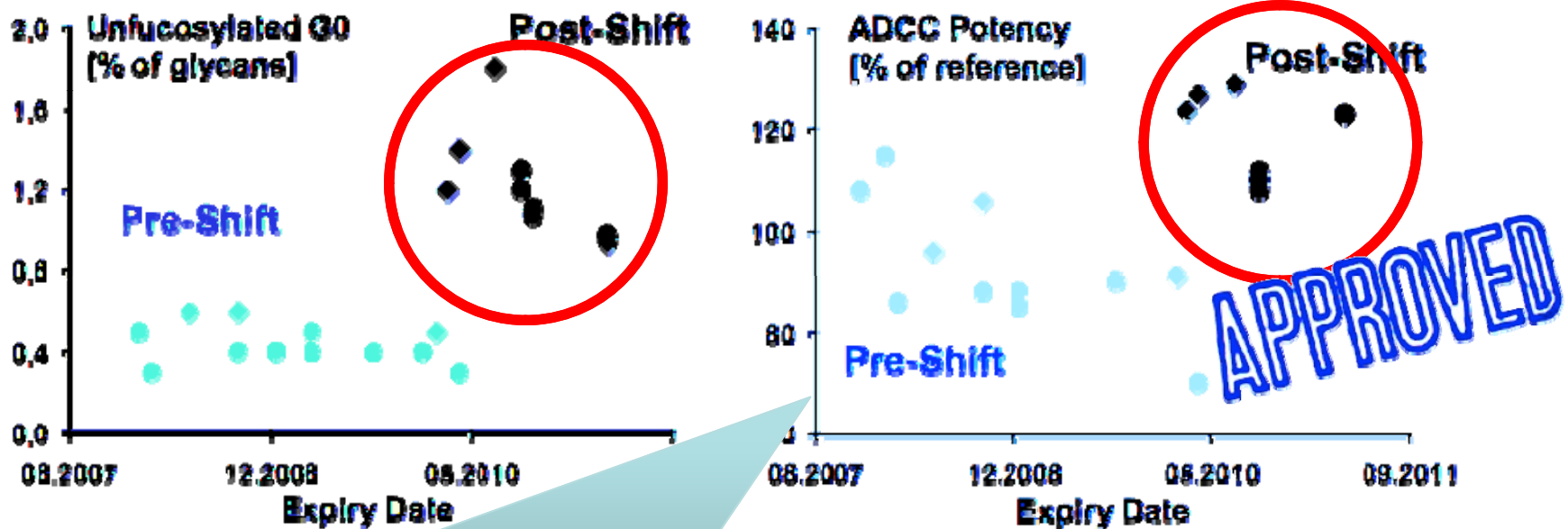


Comparison of the different pre- and post-change batches of Rituxan/Mabthera

Relative amount of the G0 glycan of the pre-change (n = 13) and post-change (n = 11) batches

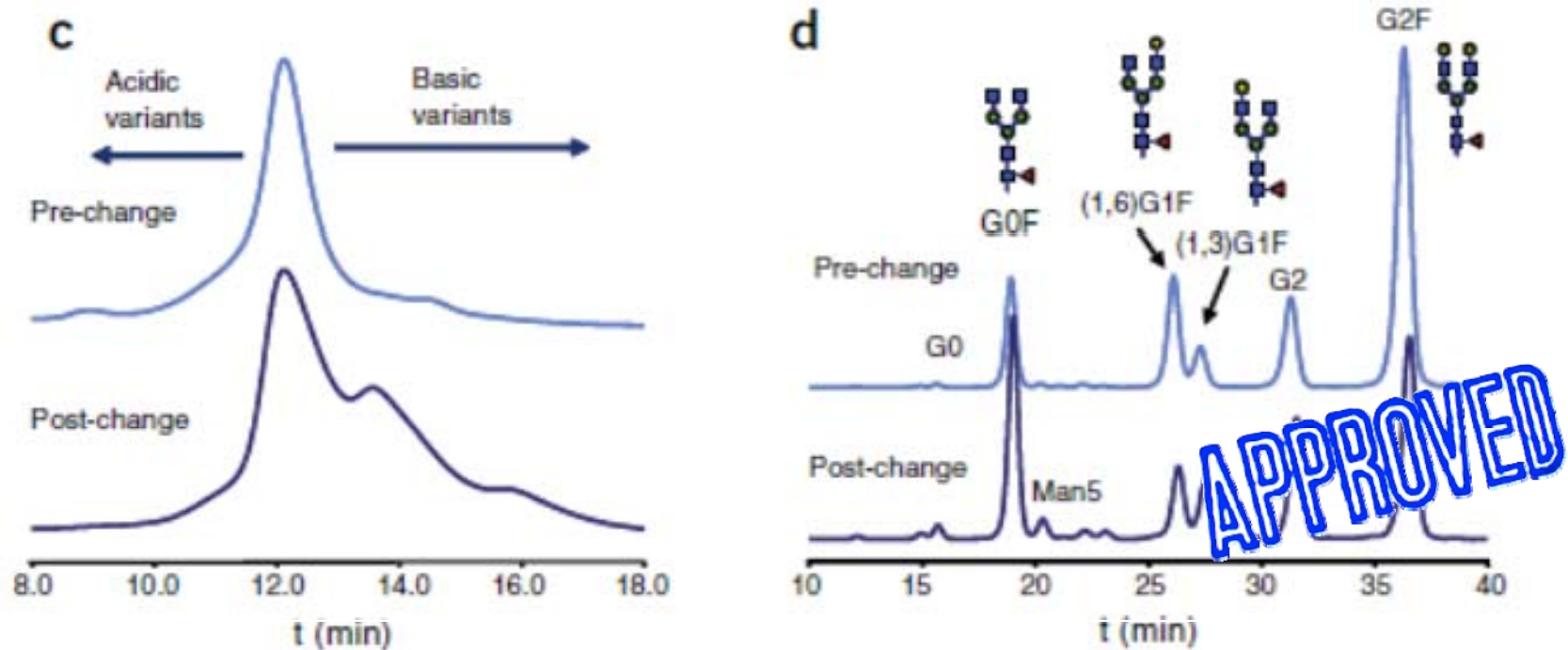
# Example of rituximab changes

- Schiestl, M. et al., Nature Biotechnology 29, 310-312, 2011
- Which was associated with a functional change in rituximab



The change led to a difference in potency of the drug measured by ADCC assay

# Example of etanercept-Enbrel changes



**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.

# Variation in the production process is a normal occurrence in biologic drugs

- Christian K. Schneider, MD, is Senior Medical Officer at the Danish Medicines Authority.
- He is Chairman of the EMA's Committee for Advanced Therapies

“...The scientific principles of a change in manufacturing process of an originator mAb/cept molecule and the generation of a biosimilar are the same”

- Further references:
- Schneider CK, Kalinke U. Toward biosimilar monoclonal antibodies. *Nat Biotechnol* 2008;26:985–90.
- Weise M, Bielsky MC, De Smet K, et al. Biosimilars—why terminology matters. *Nat Biotechnol* 2011;29:690–3.



# Quality of biosimilar medicines

- Brinks V, et al. Quality of original and biosimilar epoetin products. *Pharm Res*. Published online: 01 October 2010. Doi: 10.1007/s11095-010-0288-2

Pharm Res (2011) 28:386–393  
DOI 10.1007/s11095-010-0288-2

RESEARCH PAPER

## Quality of Original and Biosimilar Epoetin Products

Vera Brinks · Andrea Hawe · Abdul H. H. Basmeleh · Liliana Jozchin-Rodriguez · Rob Haselberg · Govert W. Somsen · Wim Jiskoot · Huub Schellekens

Received: 5 July 2010 / Accepted: 17 September 2010 / Published online: 1 October 2010  
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### ABSTRACT

**Purpose** To compare the quality of therapeutic erythropoietin (EPO) products, including two biosimilars, with respect to content, aggregation, isoform profile and potency.

**Methods** Two original products, Eprex (epoetin alfa) and Dynepo (epoetin delta), and two biosimilar products, Binocrit (epoetin alfa) and Retacrit (epoetin zeta), were compared using (1) high performance size exclusion chromatography, (2) ELISA, (3) SDS-PAGE, (4) capillary zone electrophoresis and (5) *in vivo* potency.

**Results** Tested EPO products differed in content, isoform composition, and potency.

**Conclusion** Of the tested products, the biosimilars have the same or even better quality as the originals. Especially, the potency of originals may significantly differ from the value on the label.

**KEY WORDS** biosimilar · immunogenicity · protein characterization · recombinant human erythropoietin

### ABBREVIATIONS

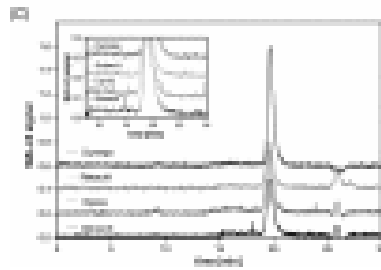
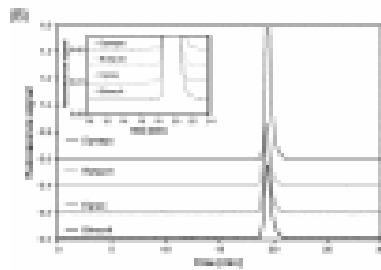
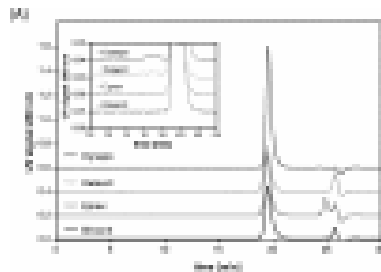
CHO	Chinese hamster ovary
CZE	capillary zone electrophoresis
ELISA	enzyme linked immunosorbent assay
EPAR	European public assessment report
EPO	Erythropoietin
HP-SEC	high performance size exclusion chromatography
IU	international units
PRCA	pure red cell aplasia
SDS-PAGE	sodium dodecyl sulfate polyacrylamide gel electrophoresis

### INTRODUCTION



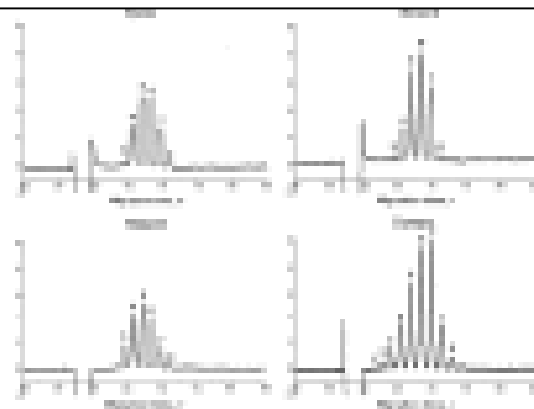
# Quality of biosimilar medicines

- Brinks V, et al. Quality of original and biosimilar epoetin products. Pharm Res. Published online: 01 October 2010. Doi: 10.1007/s11095-010-0288-2



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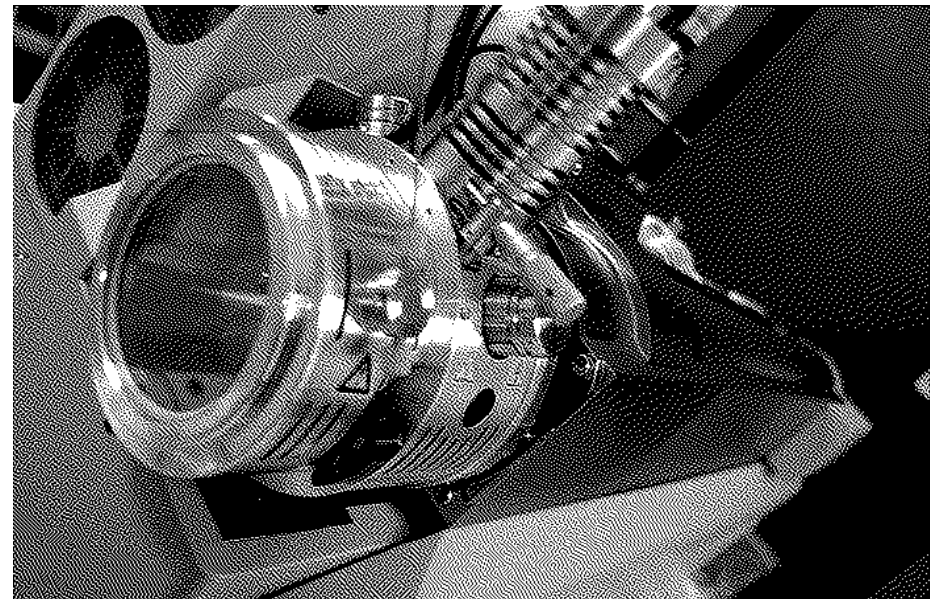




# Biosimilar drugs rely on analytics to ensure similarity

- That technology has increased sensitivity enormously
- Example: Mass Spectrometry

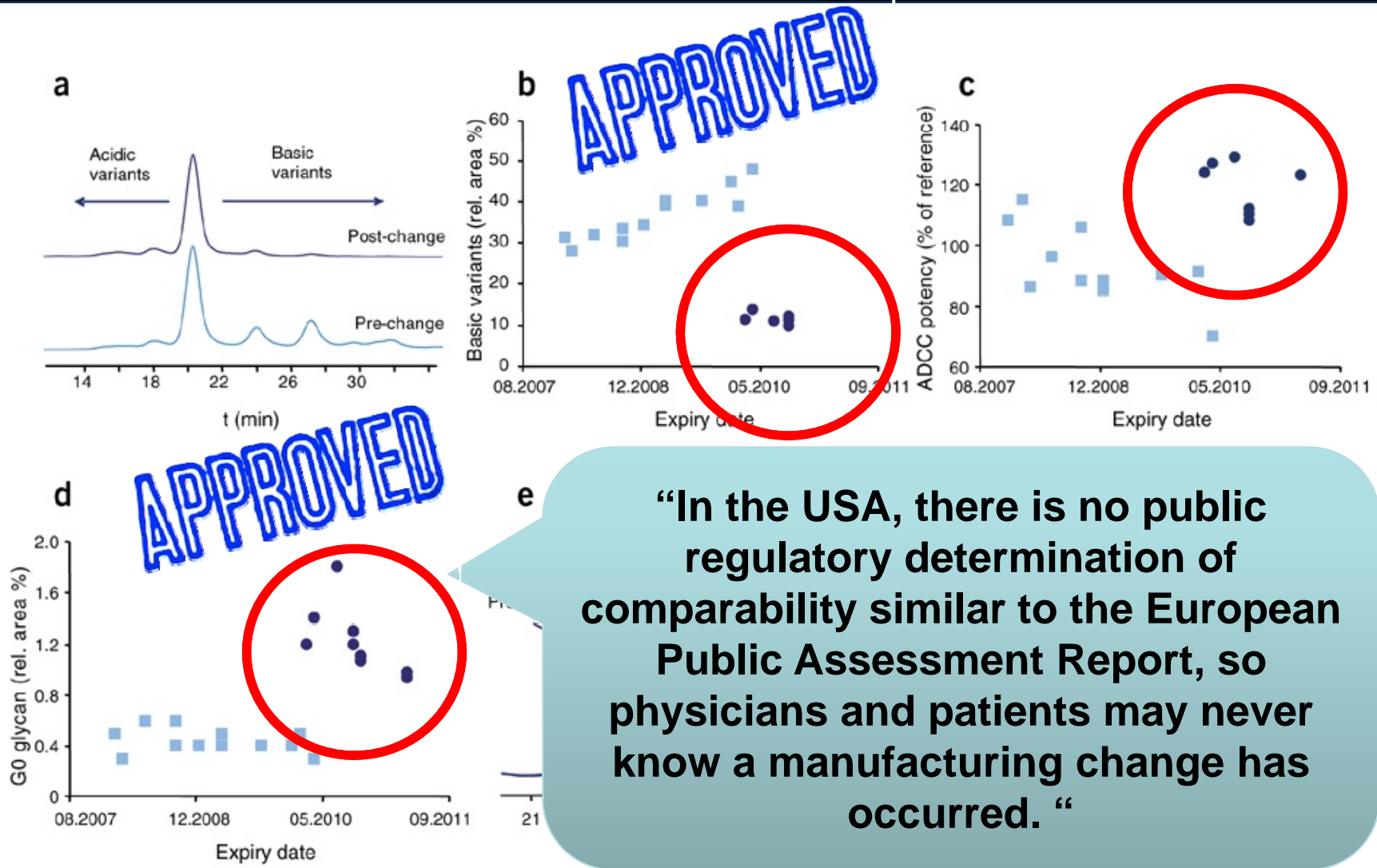
Year	Detection limit for peptides (pmol)
1990	100
1993	10
1997	1
2000	0.1
2003	0.01
2005	0.001
2008	0.0001
2011	0.00001



**10 Million-fold increase**



# Schiestl M. Nat Biotechnol. 2011;29(4):310–2.



# Biosimilars - Interchangeability and substitution

---

- Questions
- Why have we been worried?
- Terminology
- Rules
- Evidence for safety
  - Regulatory
- **Observational studies of substitution & switching**
  - **Originator to Originator**
  - **Originator to Biosimilar**
- RCTs of switching
- Questions Revisited



# Switching is frequent: Often between originator drugs!

---

- **22% of Italian patients switched epoetins in 18 months**
  - **Only 2% were to biosimilars**
    - Loiacono C et al. BioDrugs 2010;26(2):113-120
- **14.4% of US patients switched epoetins in 5 years**
  - Nurko S et al. ClinTher 2007;29(9):2010-21
- **90% of paediatricians surveyed have switched a patient's biologic drug to another brand**
  - Grimburg A et al. EndocrPract 2012;18(3):307-16A.
- **1 in 5 patients in the Prospective Immunogenicity Surveillance Registry (PRIMS) switches epoetin brands in without reported complications**
  - Iain C. Macdougall, et al. Incidence of erythropoietin antibody-mediated pure red cell aplasia: the Prospective Immunogenicity Surveillance Registry (PRIMS. Nephrol. Dial. Transplant. first published online September 19, 2014 doi:10.1093/ndt/gfu297

# Switching is frequent: Often between originator drugs!

---

- **Cancer and haematology patients may have different brands of filgrastim (white cell growth factor) to prevent neutropeanic fever during different courses of chemotherapy**
- **EORTC guidelines endorse biosimilar use**
  - Aapro MS, et al. 2010 update of EORTC guidelines for the use of granulocyte-colony stimulating factor to reduce the incidence of chemotherapy-induced febrile neutropenia in adult patients with lymphoproliferative disorders and solid tumours. *Eur J Cancer*. 2011 Jan;47(1):8-32. doi: 10.1016/j.ejca.2010.10.013.



# Review of all published data on switching between originator and biosimilar

---

12,039 patients in  
58 clinical trials

193 Post Authorisation Adverse event  
reports from EU DRA Vigilance

Review

---

## The safety of switching between therapeutic proteins

Hans C Ebbers, Michael Muenzberg & Huub Schellekens<sup>†</sup>

<sup>†</sup> *Utrecht University, Utrecht Institute for Pharmaceutical Sciences (UIPS), Department of Pharmaceutics, TB Utrecht, The Netherlands*

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193 Post Authorisation Adverse event reports from EU DRA Vigilance

Table 1. Biosimilars marketed in the EU.

Biosimilar	Reference product
<i>Epoetins</i>	
HX575 (Abseamed®, Binocrit®, & Epoetin-α Hexal®)	Epoetin-alfa (Eprex®/Erypo®)
SB-309 (Retacrit® & Silapo®)	Epoetin-alfa (Eprex®/Erypo®)
<i>G-CSFs</i>	
XM02 (Biograstim®, Filgrastim Ratiopharm®, & Tevagrastim®)	Filgrastim (Neupogen®)
EP2006 (Zarzio® & Filgrastim Hexal®)	Filgrastim (Neupogen®)
PLD108 (Nivestim®)	Filgrastim (Neupogen®)
<i>Human Growth Hormones</i>	
EP 2000 (Omnitrope®)	Somatropin (Genotropin®)
Valtropin®	Somatropin (Humatrope®)

# Review of all published data on switching between originator and biosimilar

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Human Growth Hormone – no safety signals

Epoetin – no safety signals

G-CSF – no safety signals

Study	Year	Type	Study	Year	Study design	Number patients/volunteers	Products	Outcome
Laursen <i>et al.</i>	1993	Randomized	Cheung <i>et al.</i>	2000	Double blind cross over	24 Volunteers	Two formulations epoetin- $\alpha$	Comparable safety, no AEs related to switching reported
Vahl <i>et al.</i>	1996	Randomized over	Bren <i>et al.</i>	2002	Controlled cross over	38 HD patients	Epoetin $\epsilon$ and $\alpha$ sc.	Comparable safety, no AEs related to switching reported
Jacobsen <i>et al.</i>	2000	Randomized	Nissenso <i>et al.</i>	2002	Randomized controlled trial with 4-week run-in period	507 HD patients	Epoetin and darbepoetin	Comparable safety, no AEs related to switching reported
Bidlingmaier <i>et al.</i>	2006	Open	Vanrentheg <i>et al.</i>	2002	Randomized open label with 4 week run in and switch	522 HD/PD patients	Epoetin- $\alpha$ or $\beta$ to darbepoetin	Comparable safety, no AEs related to switching reported
EMA	2007	Cross	Locatelli	2003	Open label, single-arm study with 3-week run-in period	343 HD and PD patients	Epoetin- $\alpha$ or $\beta$ to darbepoetin	No safety events related to switching reported
FDA	2007	Cross (exte cont)	Togawa <i>et al.</i>	2004				
*Romer	2009	Randomized	Brunkhorst	2004				
Stanhope <i>et al.</i>	2010	Randomized over	Mikutinovic <i>et al.</i>	2006				
Fuhr <i>et al.</i>	2010	Randomized over	Akizawa	2007				
Fuhr <i>et al.</i> (II)	2010	Randomized over	Besarab	2007				
Farias <i>et al.</i>	2010	Randomized	Klinger	2007				
Liedert <i>et al.</i>	2010	Cross	Levin <i>et al.</i>	2007				
Ullah <i>et al.</i>	2012	Open	Smith <i>et al.</i>	2007				
Total			Sulowicz <i>et al.</i>	2007				
			Hymes <i>et al.</i>	2007				
			Roger <i>et al.</i>	2008				
			Bock <i>et al.</i>	2008				
			Li <i>et al.</i>	2008	Prospective randomized open label	37 PD patients	darbepoetin Epoetin and darbepoetin	switching-reported Comparable safety, no AEs related to switching reported [60]
			Wizeman <i>et al.</i>	2008	Double blind cross over	313 HD patients	Epoetin $\alpha$ and Biosimilar Epoetin- $\zeta$	Comparable safety, no AEs related to switching reported [61]

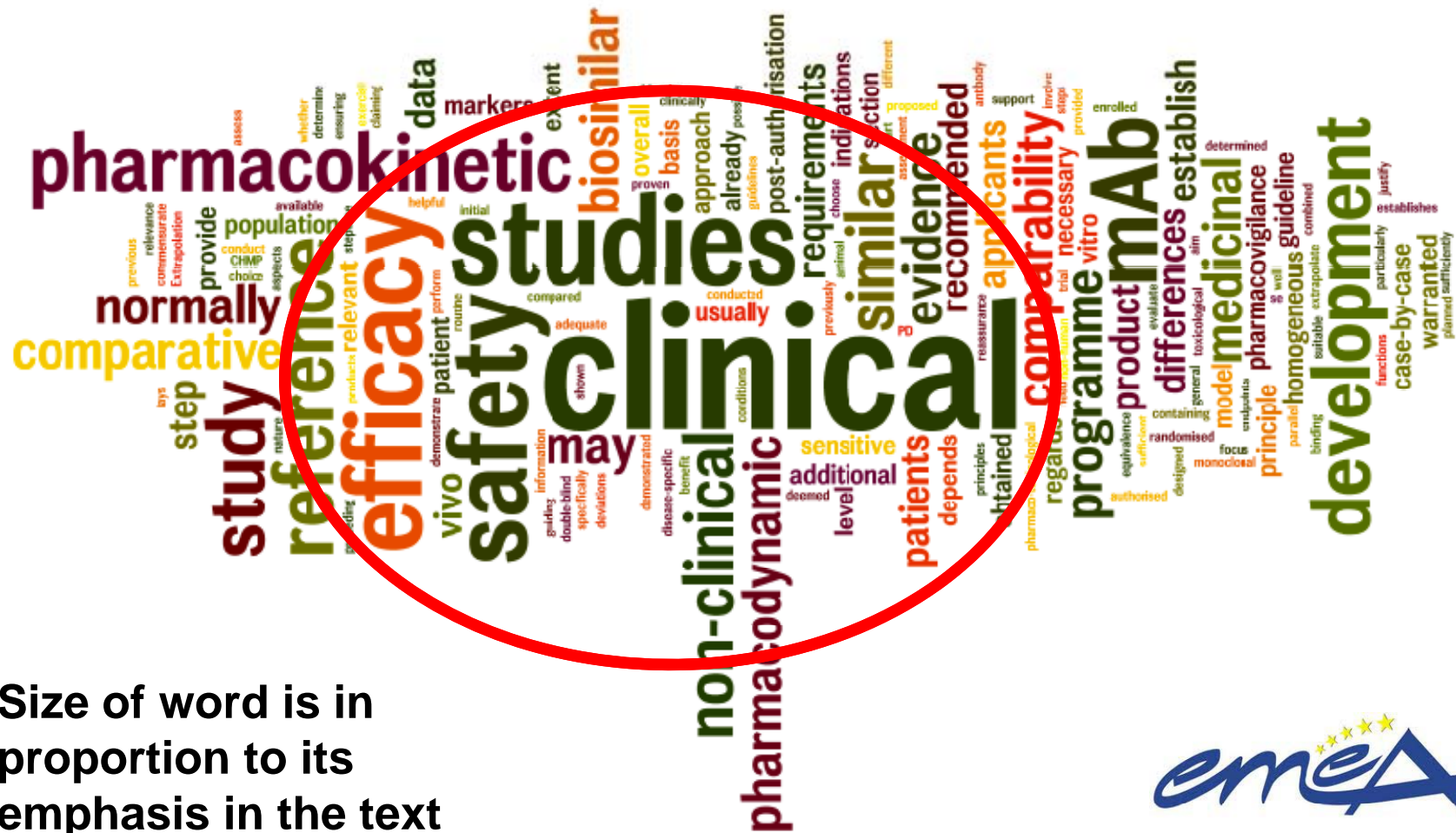
**Table 4. Crossover studies including Granulocyte Colony stimulating factors**

Study	Year	Type of study	nr patients/volunteers	Products	Study	Ref.
Hoglund <i>et al.</i>	1997	Prospective cross over	32 Volunteers	filgrastim and lenograstim	Lenograstim more CD34+ cells	[78]
Bong <i>et al.</i>	2001	Prospective randomized	11 Children treated with chemo	filgrastim and lenograstim	No safety events related to switching reported	[79]
Carlsson <i>et al.</i>	2004	Open randomized	7 SCN patients	filgrastim and lenograstim	No safety events related to switching reported	[80]
Lubenu <i>et al.</i>	2009	Cross over randomized	72 Volunteers	reference filgrastim and biosimilar	No safety events related to switching reported	[81]
Luberiau <i>et al.</i>	2009	Randomized cross over	56 Volunteers	reference filgrastim and biosimilar	No safety events related to switching reported	[82]
Waller <i>et al.</i>	2010	Randomized double blind	50 Volunteers	reference filgrastim and biosimilar	No safety events related to switching reported	[83]
Gascon <i>et al.</i>	2010	Randomised cross over	40 Volunteers	filgrastim and biosimilar	No safety events related to switching reported	[84]
Gascon <i>et al.</i>	2010	Randomised cross over	26 Volunteers	filgrastim and biosimilar	No safety events related to switching reported	[84]
Gascon <i>et al.</i>	2010	Randomised cross over	56 Volunteers	filgrastim and biosimilar	No safety events related to switching reported	[84]
Gascon <i>et al.</i>	2010	Randomised cross over	24 Volunteers	filgrastim and biosimilar	No safety events related to switching reported	[84]
Total			374			





# EMA. Guideline on similar biological medicinal products containing monoclonal antibodies



Size of word is in proportion to its emphasis in the text



# PRCA

---

- **Natural incidence with epoetin-alfa was 1/100,000**
  - **3 cases in first decade of Eprex Use**
- **After Eprex formulation change rose to 50/100,000**
  - Mikhail A, Farouk M. EpoetinBiosimilars in Europe: Five Years On. *Adv Ther* (2013) 30(1):28–40
- **Exposure to epoetin-alfa Binocrit reached 300,000 patient-years by February 2014**
  - **Approved 2007**
    - Garzotto AR et al. Erythropoiesis-stimulating agents for the treatment of chemotherapy-induced anemia: comparisons from real-world clinical experience. *J Blood Med*. 2014; 5: 43–48.

**Strongly suggests that a similar association between PRCA and biosimilar epoetin-alfa is now very unlikely**

# Biosimilars - Interchangeability and substitution

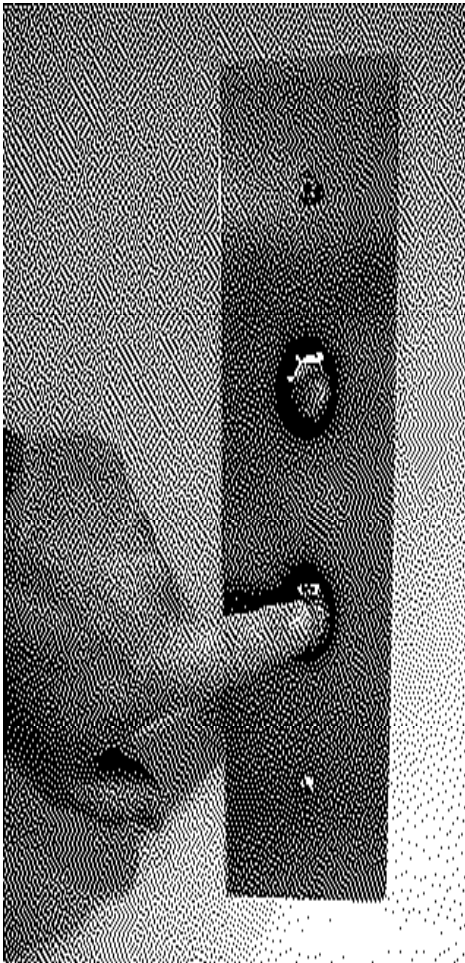
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- Questions
- Why have we been worried?
- Terminology
- Rules
- Evidence for safety
  - Regulatory
- Observational studies of substitution & switching
  - Originator to Originator
  - Originator to Biosimilar
- **RCTs of switching**
- Questions Revisited



# Substitution & Switching

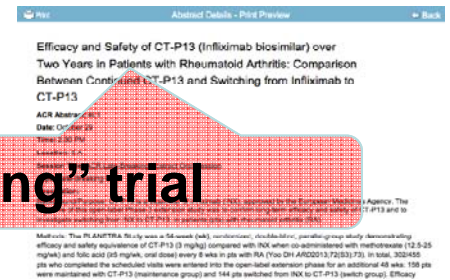
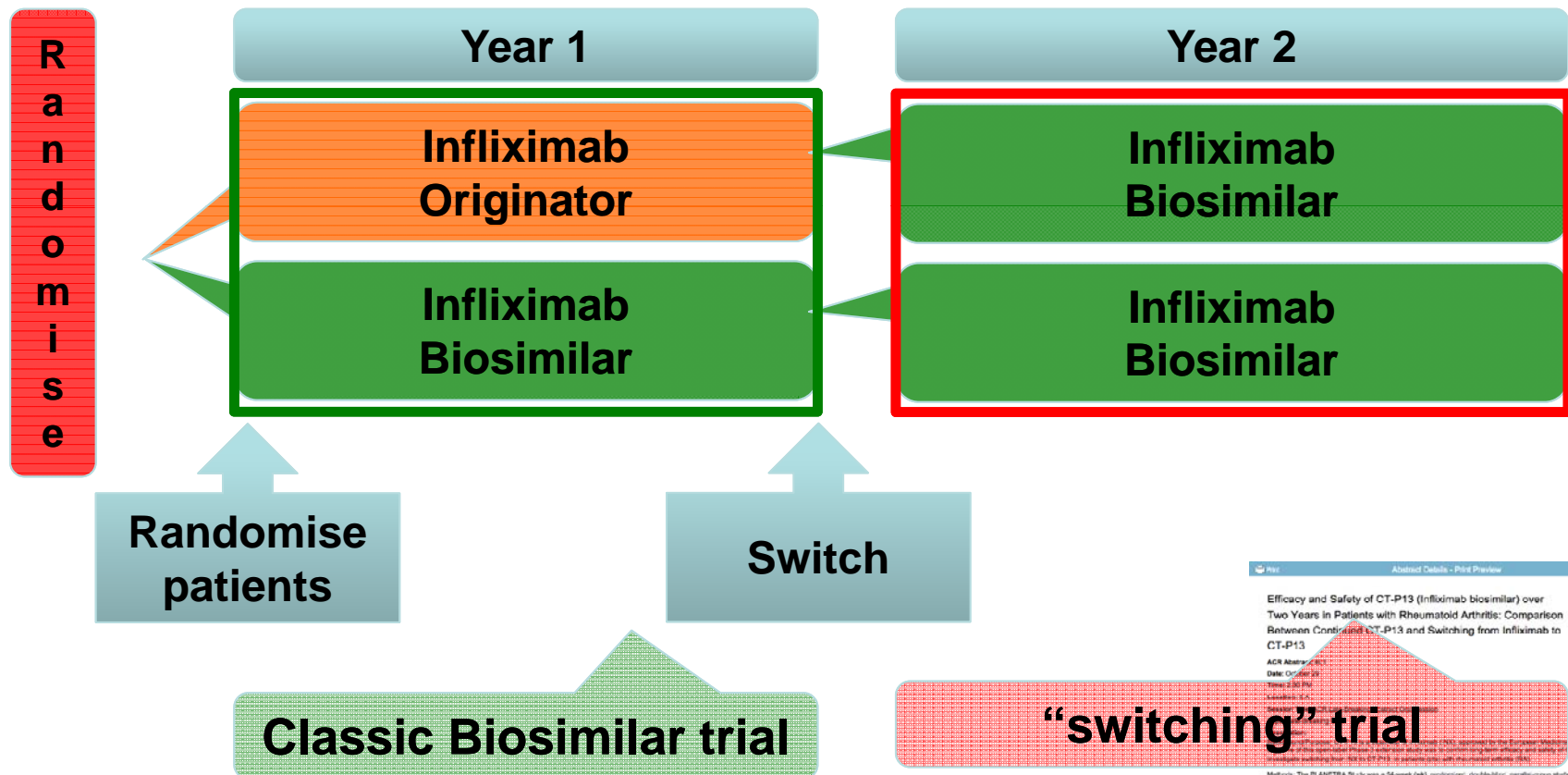
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- There is a worry that switching between Innovator and Biosimilar drugs during a single course of treatment could significantly increase the risks of adverse events
- Trials to support switching may be crucial for the concerns of some physicians and patient groups
- In the USA it may earn the registration as an “Inter-changeable” biosimilar.

# Substitution & Switching

- Plantera trial design: CTP13 Biosimilar vs originator reference



# Substitution & Switching: Plantera trial

- Response: by ACR20/50/70

	Response		
	Week 54	Week 78	Week 102
Arm 1	Original	Biosimilar	Biosimilar
Arm 2	Biosimilar	Biosimilar	Biosimilar

Randomise

Switch

Abstract Details - Print Preview

Efficacy and Safety of CT-P13 (Infliximab biosimilar) over Two Years in Patients with Rheumatoid Arthritis: Comparison Between Continued CT-P13 and Switching from Infliximab to CT-P13

ACR Abstract #L1  
 Date: October 26  
 Time: 2:30 PM  
 Location: 6 A  
 Session Title: ACR Late-Breaking Abstract Oral Session  
 Type: Late-Breaking Oral

Description:  
 Background/Purpose: CT-P13 is a biosimilar of infliximab (INX), approved by the European Medicine Agency. The objective of this open-label phase 2 extension study was to confirm long-term efficacy and safety of CT-P13 and to investigate switching from INX to CT-P13 in patients (pts) with rheumatoid arthritis (RA).

Methods: The PLANTRA Study was a 54-week (wk), randomized, double-blind, parallel-group study demonstrating efficacy and safety as adjunctive (CT-P13 (3 mg/kg) compared with INX when co-administered with methotrexate (12.5-25 mg/wk) and folate acid (5 mg/wk, oral) every 8 weeks to pts with RA. (Yoo DH, ACR2013:39033/78, in press, 2014) 165 pts who completed the scheduled visits were entered into the open-label extension phase for an additional 48 wks. 158 pts were maintained with CT-P13 (maintenance group) and 144 pts switched from INX to CT-P13 (switch group). Efficacy



# Substitution & Switching: Plantera trial

- Response: by ACR20/50/70

	Response		
	Week 54	Week 78	Week 102
Arm 1	77.5%/50.0%/23.9%	78.2%/47.9%/29.6%	72.2%/48.3%/24.5%
Arm 2	76.8%/45.7%/21.9%	71.5%/48.3%/24.5%	71.8%/51.4%/26.1%

No difference

Abstract Details - Print Preview

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Methods: The PLANTRIA Study was a 54-week (wk), randomized, double-blind, parallel-group study demonstrating efficacy and safety as adjunctive (CT-P13 3 mg/kg) compared with INX when co-administered with methotrexate (12.5-25 mg/wk) and sulfasalazine (500 mg bid) every 8 weeks to pts with RA. (Yoo DH, ACR2013:37033/77). In total, 3024 pts who completed the scheduled visits were entered into the open-label extension phase for an additional 45 wks. 158 pts were maintained with CT-P13 (maintenance group) and 144 pts switched from INX to CT-P13 (switch group). Efficacy

# Substitution & Switching: Plantera trial

- Anti-drug antibodies present

	Response		
	Week 54	Week 78	Week 102
Arm 1	49.3%	49.6%	49.6%
Arm 2	49.1%	50.4%	46.4%

No difference

Abstract Details - Print Preview

Efficacy and Safety of CT-P13 (Infliximab biosimilar) over Two Years in Patients with Rheumatoid Arthritis: Comparison Between Continued CT-P13 and Switching from Infliximab to CT-P13

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# Substitution & Switching:

**ClinicalTrials.gov**

A service of the U.S. National Institutes of Health

Example: "Heart attack" AND "Los Angeles"

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## Phase III Study Comparing the Efficacy and Safety of EP2006 and Filgrastim (PIONEER)

**This study has been completed.**

**Sponsor:**  
Sandoz

**Information provided by (Responsible Party):**  
Sandoz

**ClinicalTrials.gov Identifier:**  
NCT01519700

First received: January 13, 2012  
Last updated: November 3, 2014  
Last verified: November 2014  
[History of Changes](#)

[Full Text View](#)

[Tabular View](#)

[No Study Results Posted](#)

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[? How to Read a Study Record](#)

### ▶ Purpose

The study will assess the efficacy of EP2006 compared to Filgrastim with respect to the mean duration of severe neutropenia during treatment with myelosuppressive chemotherapy in breast cancer patients.

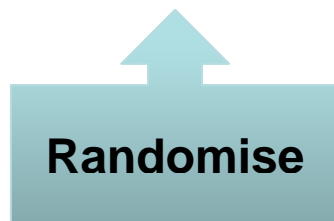
Ref PIONEER Trial. URL: <http://clinicaltrials.gov/show/NCT01519700>. Accessed Nov 7, 2014

# Substitution & Switching - Pioneer

---

- Pioneer trial: GCSF for chemotherapy induced neutropaenia. During TAC chemotherapy for breast cancer
- Biosimilar filgrastim – EP2006 VS Original reference drug neupogen

	Chemotherapy cycles					
Trial Arm	1	2	3	4	5	6



# Substitution & Switching - Pioneer

- Pioneer trial: GCSF for chemotherapy induced neutropaenia. During TAC chemotherapy for breast cancer
- Biosimilar filgrastim – EP2006 VS Original reference drug neupogen

	Chemotherapy cycles					
Trial Arm	1	2	3	4	5	6
A	EP2006	EP2006	EP2006	EP2006	EP2006	EP2006
2						
3						
B	Original	Original	Original	Original	Original	Original

Randomise

Classic Biosimilar trial

# Substitution & Switching - Pioneer

- Pioneer trial: GCSF for chemotherapy induced neutropaenia. During TAC chemotherapy for breast cancer
- Biosimilar filgrastim – EP2006 VS Original reference drug neupogen

Trial Arm	Chemotherapy cycles					
	1	2	3	4	5	6
1	EP2006	EP2006	EP2006	EP2006	EP2006	EP2006
2						
3						
4	Original	Original	Original	Original	Original	Original

Randomise

# Substitution & Switch

Pioneer has closed on the trials database: Results expected soon!

- Pioneer trial: GCSF for chemotherapy induced neutropaenia. During TAC chemotherapy for breast cancer
- Biosimilar filgrastim – EP2006 VS Original reference drug neupogen

Trial Arm	Chemotherapy cycles					
	1	2	3	4	5	6
1	EP2006	EP2006	EP2006	EP2006	EP2006	EP2006
2	EP2006	Original	EP2006	Original	EP2006	Original
3	Original	EP2006	Original	EP2006	Original	EP2006
4	Original	Original	Original	Original	Original	Original

Randomise

“switching” trial

# Promotion of Switching and Substitution

---

- This is not within the power of the EMA or WHO to control
  - They delegate this to individual countries
- Some countries have legislated to promote this
  - Examples: USA & France
- Many countries have advised against “automatic substitution” by a pharmacist
  - So pharmacists will have to notify the prescribing physician if this is possible

Some medical societies have requested evaluation of this process

# NOR-SWITCH

ClinicalTrials.gov Identifier: NCT02148640

---

- **Norwegian Health department currently funds Infliximab (Remicade) for**
  - **rheumatoid arthritis, spondyloarthritis,**
  - **psoriatic arthritis, chronic plaque psoriasis**
  - **ulcerative colitis, Crohn's disease**
- **Annual cost for a compliant patient was estimated at GBP 7580 (€12,226 , 40,000 RM) in the UK**
  - Kobelt G et al. The cost-effectiveness of infliximab (Remicade®) in the treatment of rheumatoid arthritis in Sweden and the United Kingdom based on the ATTRACT study. *Rheumatology* (2003) 42 (2): 326-335. doi: 10.1093/rheumatology/keg107
- **Infliximab Biosimilar costs 39% less than Remicade in Norway**
  - **It is the first choice Inflammatory Disease Modifying Biologic for the Norwegian NHS**
    - Spotlight On: Norway unveils near 40 percent discounting for biosimilarinfliximab – can it pave the way for a broader European trend?. FirstWordPharma. URL: <http://www.firstwordpharma.com/footer/benefits?tsid=17#axzz3G7Hs6Q99>. Accessed oct 14, 2014



# Promotion of Biosimilars: Switching and Substitution

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## Norway to facilitate switch to biosimilars with \$3m Remicade study

By Dan Stanton, 06-Dec-2013  
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The Norwegian Health Department has committed 20m NOK (\$3.3m) to a study in order to facilitate the use of biosimilars.

Related tags: Remicade, Inflectra, Norway, Biosimilars

Related topics: Biosimilars, Markets & Regulations, Analytical (technologies & services)

The Norwegian Health Department has committed 20m NOK (\$3.3m) to a study in order to facilitate the use of biosimilars.

- The NOR-SWITCH Study:
- Infliximab original vs Infliximab biosimilar (Remsima)
  - ClinicalTrials.gov Identifier: NCT02148640
- Aim: RCT to assess the safety and efficacy of switching from Remicade to the biosimilar treatment Remsima in patients with rheumatoid arthritis, spondyloarthritis, psoriatic arthritis, ulcerative colitis, Crohn's disease and chronic plaque psoriasis
- Primary Outcome Measures: Occurrence of disease worsening

Ref: Spotlight On: Norway unveils near 40 percent discounting for biosimilar infliximab – can it pave the way for a broader European trend?. FirstWordPharma. URL: <http://www.firstwordpharma.com/footer/benefits?tsid=17#axzz3G7Hs6Q99>. Accessed oct 14, 2014

# NOR-SWITCH

**ClinicalTrials.gov Identifier: NCT02148640**

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- **Budget for 500 patients for a year:**
  - **500 x 12,226 Euro a year per patient wholesale.**
  - **= 6.1 Million Euros (26 Million RM) a year**
    - $500 \times 12226 = 6113000$
- **Infliximab Biosimilar costs 39% less than Remicade in Norway**
  - **Budget impact if 50% of patients switched = 1.2 Million Euros**
    - $250 \times 12226 \times 0.39 = 1192035$
- **Most patients take infliximab for 2 years, after 2 years, savings should be 2.4 M Euros/year recurring**
- **Why not invest that 2.4 M Euros / 20 M Norwegian Krone in a trial to switch 50% of patients on infliximab to a biosimilar that is 39% cheaper for 1 year?**



# Biosimilars - Interchangeability and substitution

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- Questions
- Why have we been worried?
- Terminology
- Rules
- Evidence for safety
  - Regulatory
- Observational studies of substitution & switching
  - Originator to Originator
  - Originator to Biosimilar
- RCTs of switching
- Questions Revisited



# Question 1

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- You are part way through a course of treatment with infliximab for rheumatoid disease - The patient is responding without serious toxicity
- Your pharmacy colleagues tell you that the next treatment is likely to come from a new purchase of biosimilar infliximab (approved for use by the EMEA)
  
- Do you?
  1. Refuse – as the patient is part way through treatment and switching is not advised by Malaysian Guidelines
  2. Agree – but worry there is no data to support this change
  3. Agree to the switch – as no excess adverse events are expected

## Question 2

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- You are part way through a course of dose dense chemotherapy for breast cancer – supported by Filgrastim GCSF to prevent neutropaenia. The patient is responding without serious toxicity
- The patient will transfer mid-way through treatment to stay with her family in another area. Your colleague tells you that in their hospital, they use only biosimilar Filgrastim (approved for use by the EMEA and Malaysian Regulators)
  
- Do you?
  1. Refuse – the patient is part way through treatment and switching is not advised by Malaysian Guidelines
  2. Agree – but worry there is no data to support this change
  3. Agree to the switch – as no excess adverse events are expected

The logo for PhAMA, featuring the word "PhAMA" in white, bold, sans-serif font. The "Ph" is on a dark blue background, and "AMA" is on a red background.

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