

A Brave New World of Biosimilars



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- The presenter and their preceptor have no financial relationships with any commercial interests pertinent to this presentation.
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Pharmacist & Nurse Objectives:

Summarize the data requirements in the regulatory process of a biosimilar product

Identify Food & Drug Administration (FDA) requirements for biosimilar interchangeability

Recall pharmacovigilance efforts with biosimilar products

Pharmacy Technician Objectives:

Outline differences between biosimilar and generic drugs

Recall the complexity of the biosimilar manufacturing process

Recognize the implications of biosimilar interchangeability

Background



Biologics

Biologics are a class of compounds produced using living organisms

- Bacterial, mammalian host cells

Many types of biological products approved for use in the US

- Therapeutic proteins (filgrastim), monoclonal antibodies (infliximab), vaccines (tetanus & influenza)

Cost of development has steadily increased over decades; takes 8-10 years on average

What is a biosimilar?

- A biologic product which is highly similar to the reference product notwithstanding minor differences in clinically inactive components
- There must be no clinically meaningful differences between the biological product and the reference product in terms of the safety, purity, and potency of the product



Background

First biosimilar approved for use in 2006 by the European Medicines Agency (EMA)

- 20 countries have since adopted regulatory framework

First FDA-approved biosimilar was in 2015

- Filgrastim biosimilar



Main barriers to adoption include the lack of education regarding the comparative safety and efficacy of the agent to the reference product, payer coverage, as well as national policy on substitution

Source: Raedler, L. A. (2016) *Am Health Drug Benefits*, 9,150–154.

Source: Kang, et al. (2020). *Biologicals*. 65, 1–9.

Source: ASHP Advantage Media (2013).

Source: Araújo, F. C. (2016) *Current rheumatology reports*, 18(8), 50.

How Did Biosimilars Come About?

Hatch-Waxman Act of 1984 did not apply to biologic agents

- Not economically feasible for biologics developers to bring competing biologics to market

The Biologics Price Competition and Innovation Act of 2009 (BPCI Act) was passed as part of the Affordable Care Act, which was signed into law in 2010

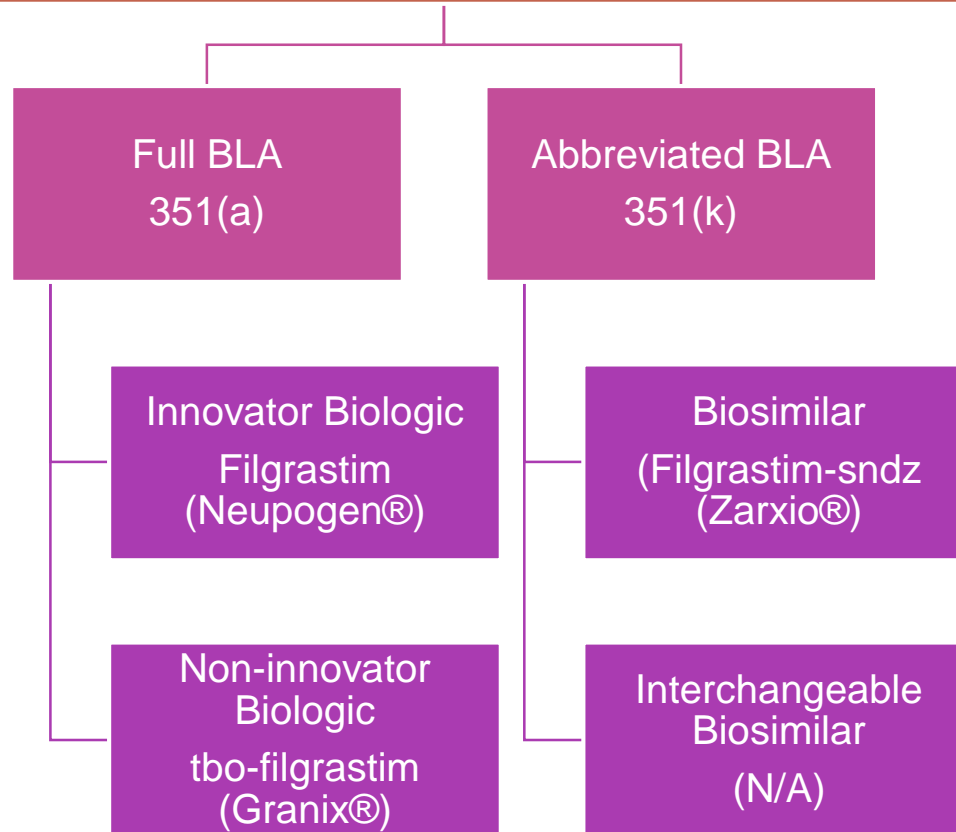
The BPCI Act amended the Public Health Service Act, and created an abbreviated licensure pathway for biological products shown to be biosimilar or interchangeable to an FDA-licensed biological reference product

- 351 (k) Biologics Licensure Application (BLA)

Biologics Price Competition & Innovation Act of 2009

Application Type	Biologics license application (BLA) or biosimilar interchangeable license application
Sponsor Exclusivity	12 years of exclusivity for new biological structures once FDA approved; an additional 6 months if pediatric studies are conducted
Filing Limitations	Biosimilar applications can be filed 4 years after FDA product approval of Sponsor product
Generic exclusivity	No exclusivity for biosimilars <ul style="list-style-type: none">• One year of exclusivity granted for the first interchangeable biosimilar

FDA Approval Pathways



Are Biosimilars the Same as Generic Drugs?

While each are approved through abbreviated pathways, they are NOT the same!

Active ingredients of generic drugs are the same as the active brand product

- Generic = brand product

Biosimilar active ingredients are NOT the same as the active innovator product

- Products derived from different cell lines
- 'Highly similar' to innovator

Generic Drugs Versus Biosimilar Agents

	Generic Drugs	Biosimilar
Time to develop	2 - 3 years	8 - 10 years
Cost to develop	\$1 - 4 million	\$100 - 250 million
Requirement for approval	Bioequivalence studies	Analytical, animal and clinical studies
Reference	Orange Book	Purple Book

Source: Araújo, F. C., et al (2016). *Curr Rheumatol Rep*, 18(8), 50.

Source: Biosimilar Development, Review, and Approval. U.S. Food & Drug Administration; 2017.

Generic Drugs Versus Biosimilar Agents

	Generic Drugs	Biosimilar
Structure	Simple	Complex
Size	Small, Low molecular weight	Large Protein, High molecular weight
Manufacturing Process	Predictable, controlled organic chemistry reactions - Small changes = less impact	Complex, involves unique living cell lines - Small changes = great impact
Immunogenicity	Low	High
Storage Requirements	High stability	Proteins typically vulnerable to environmental factors (temperature, light, moisture)

Recently Approved Biosimilar Agents

Biosimilar Name	Reference Product	Date of Approval	Interchangeable (Y/N)
Rituximab-arrx (Riabni®)	Rituximab (Rituxan®)	December 2020	No
Adalimumab-fkjb (Hulio®)	Adalimumab (Humira®)	July 2020	No
Pegfilgrastim-apgf (Nyvepria®)	Pegfilgrastim (Neulasta®)	June 2020	No
Infliximab-axxq (Avsola®)	Infliximab (Remicade®)	December 2019	No

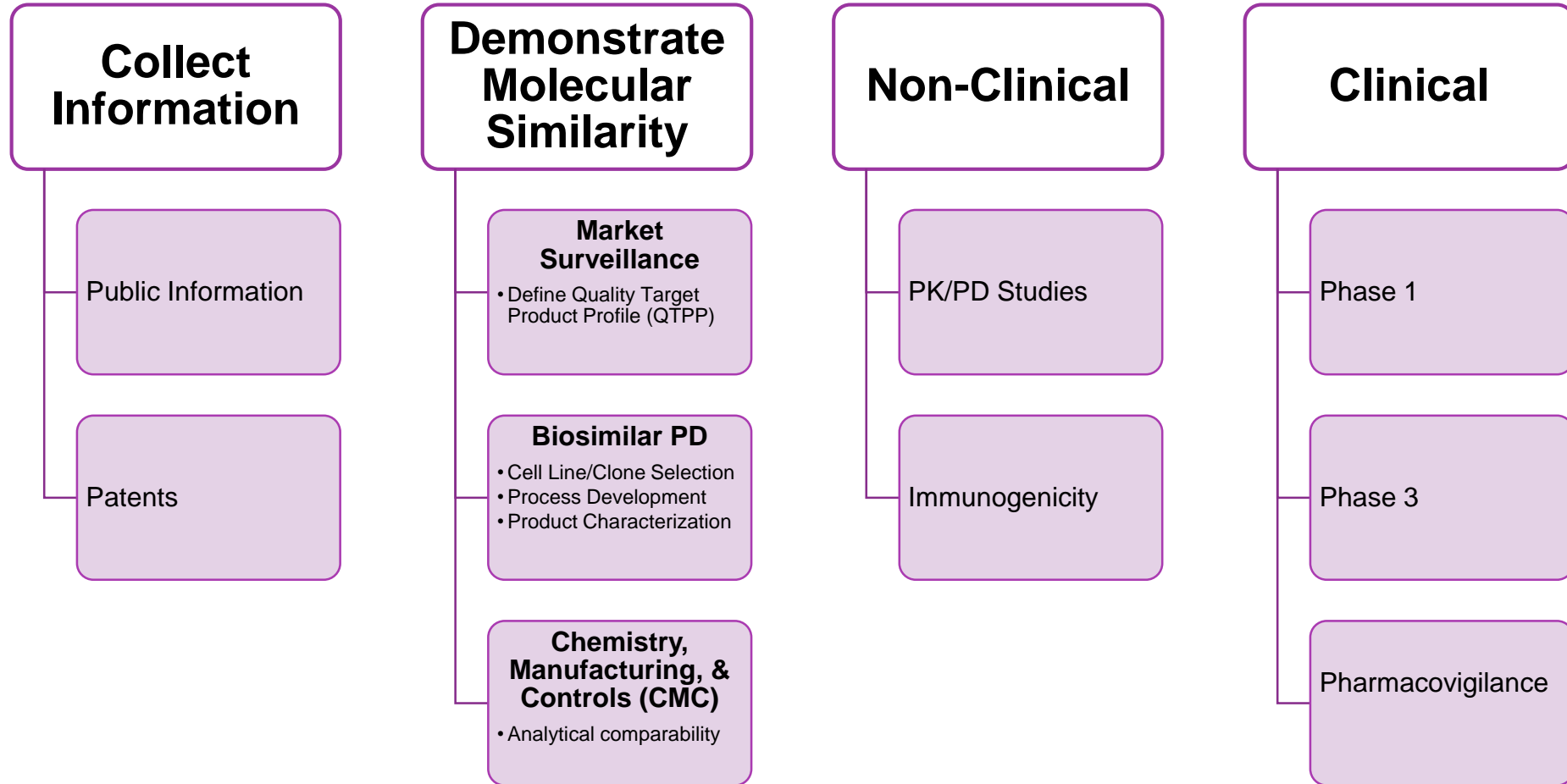
Biosimilar Cost Savings

- Biologics alone accounted for 38% of U.S. prescription drug spending in 2015⁴
 - High cost per dose
 - Accounted for 70% of drug spending growth over 5-year period⁵
- It is estimated that biosimilars will reduce direct drug spending by \$54 billion from 2017 to 2026⁶

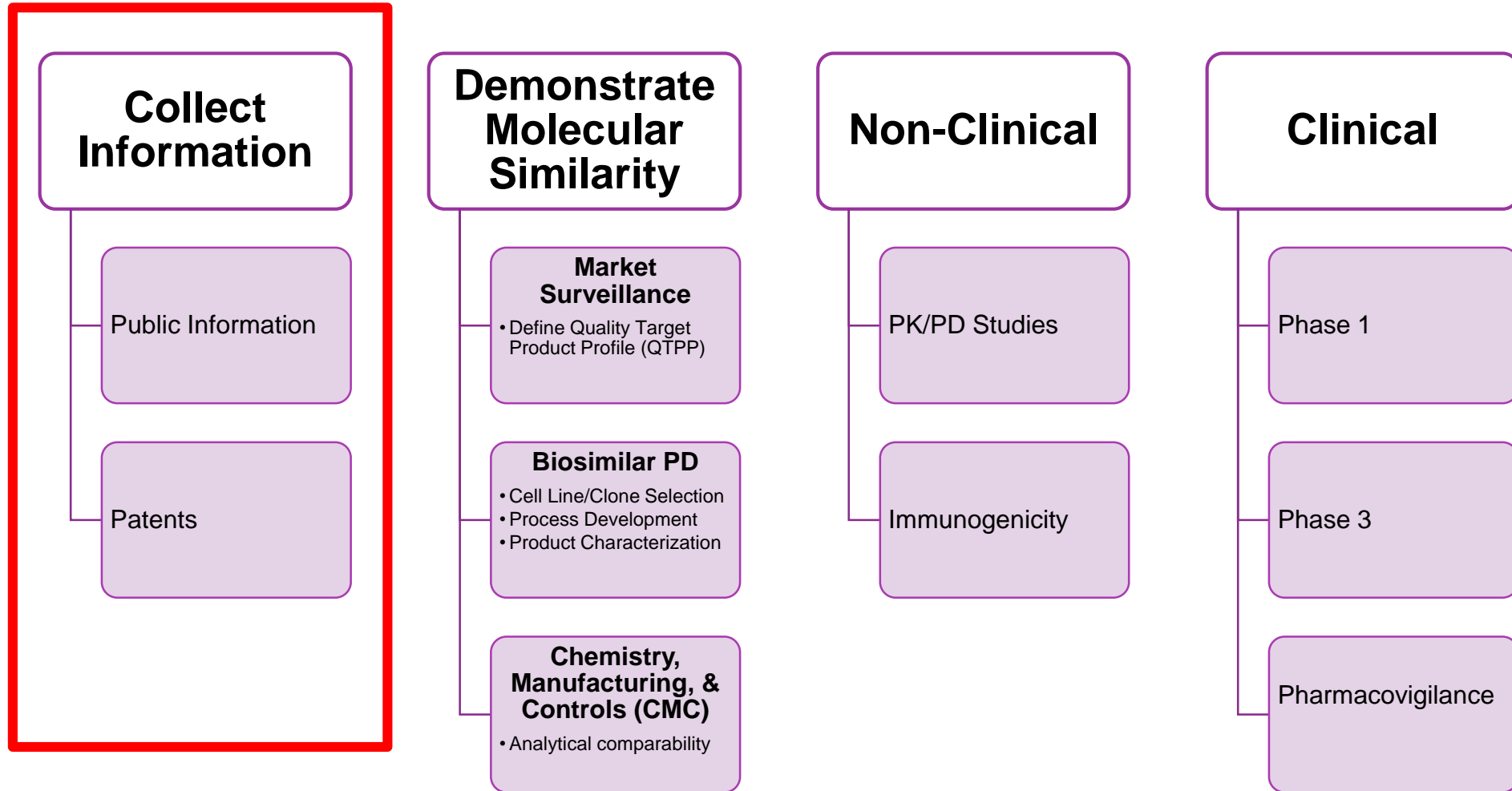
Biosimilar Development



Biosimilar Development



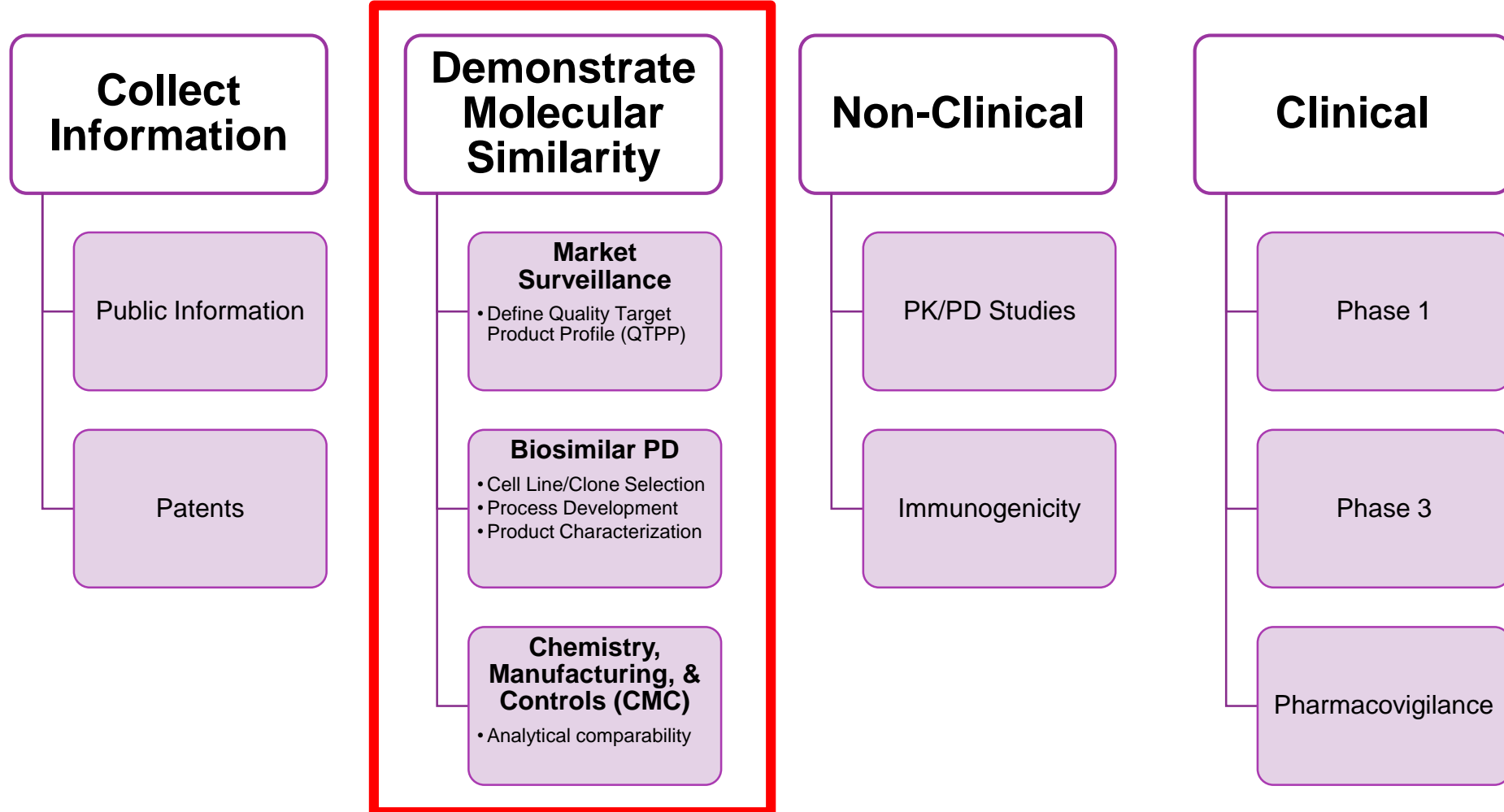
Biosimilar Development



Step 1: Collect Information

- Goal in this stage = understand the biochemical properties of the reference or innovator product
- Biosimilar developer lacks any proprietary information about the innovator product
 - Development reports, batch records, release specification
- Developer must mine public sources for information
 - Generally can obtain amino-acid (AA) sequence, type of product, mechanism of action, dosage, and formulation
 - Intellectual property laws prevent manufacturers from using innovator production process

Biosimilar Development



Step 2: Demonstrate Molecular Similarity

First must define the Quality Target Product Profile (QTPP), or the “originator fingerprint”

- Requires molecular analysis of reference product

QTPP is defined as a combination of **Clinical Quality Attributes (CQA's)**, or physicochemical attributes

- CQA's must closely match that of reference product to avoid clinically meaningful differences

Clinical Quality Attributes for Reverse Engineering



Protein functional
aspects

Shed light on
MOA & intended
biological activity



Structural
differences

Post-translational
modifications
(PTMs), ie
glycosylation,
deamidation



Protein molecular
state

Aggregation
versus
degradation

Quality Target Product Profile (QTPP)

Category	Quality Attribute	Analytical Method
Identity	Primary sequence of amino acids	Peptide mapping by RP-HPLC/UV
Content	Protein concentration	UV Spectroscopy
Purity	Size Variants	SEC-HPLC with UV detection, capillary electrophoresis
	Charge Variants	Capillary isoelectric focusing, Hydrophobic interaction chromatography
	Glycosylation	Oligosaccharide-mapping/normal phase HPLC with fluorescence detection
Potency	Binding affinity, proliferation	Specific assays
Process-Related Impurities	Residual process impurities	Specific to process
	Residual host cell proteins	Specific to expression system
	Residual host cell DNA	qPCR

Cell Line Selection and Engineering

First step in manufacturing process is selection of the cell line

- Cell line is key determinant of glycosylation patterns (impacts PK/PD)

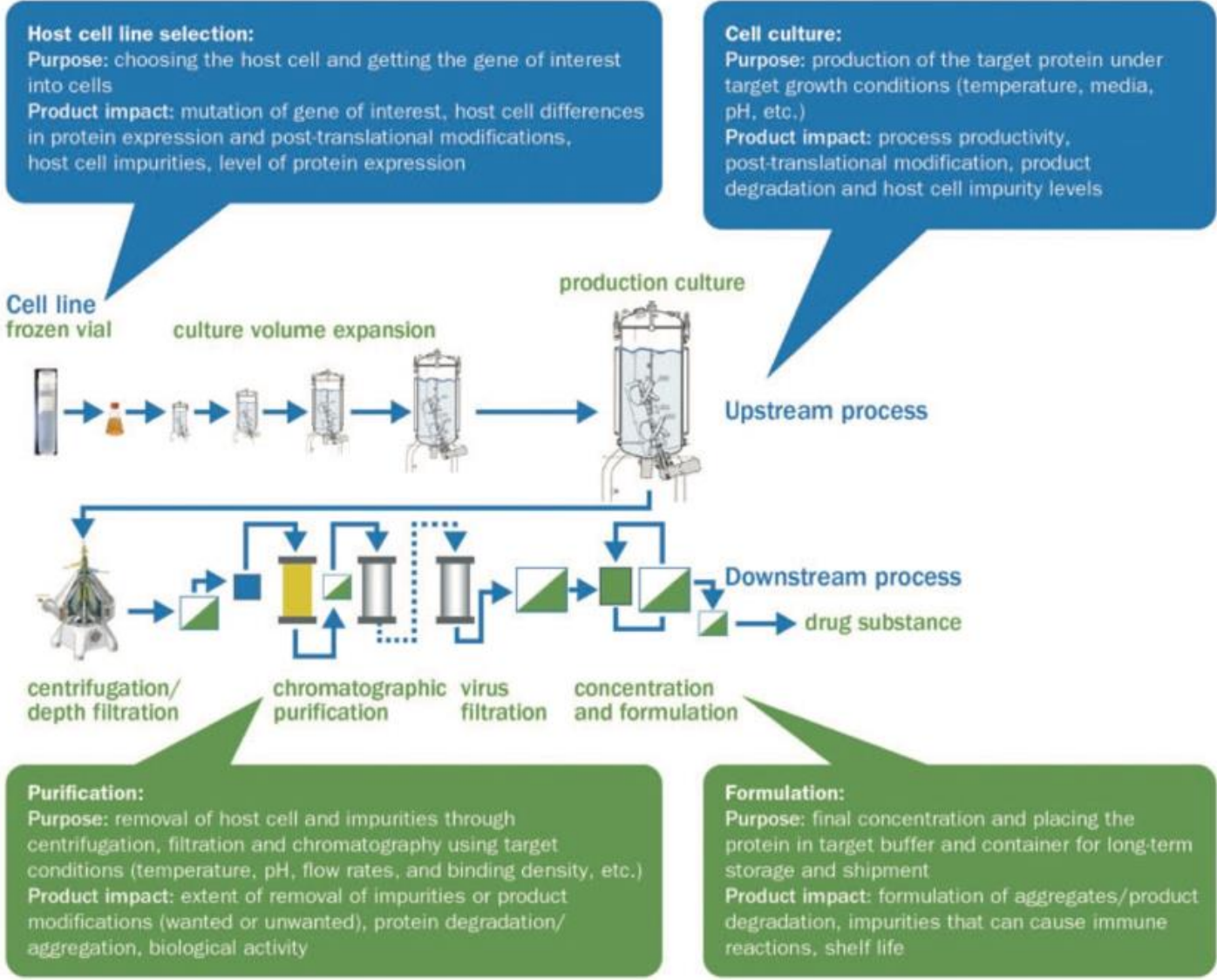
Cell Systems Used:

- Yeast
- *Escherichia coli*
- Baculovirus
- Mammalian cells

Chinese Hamster Ovary (CHO) cell lines are common

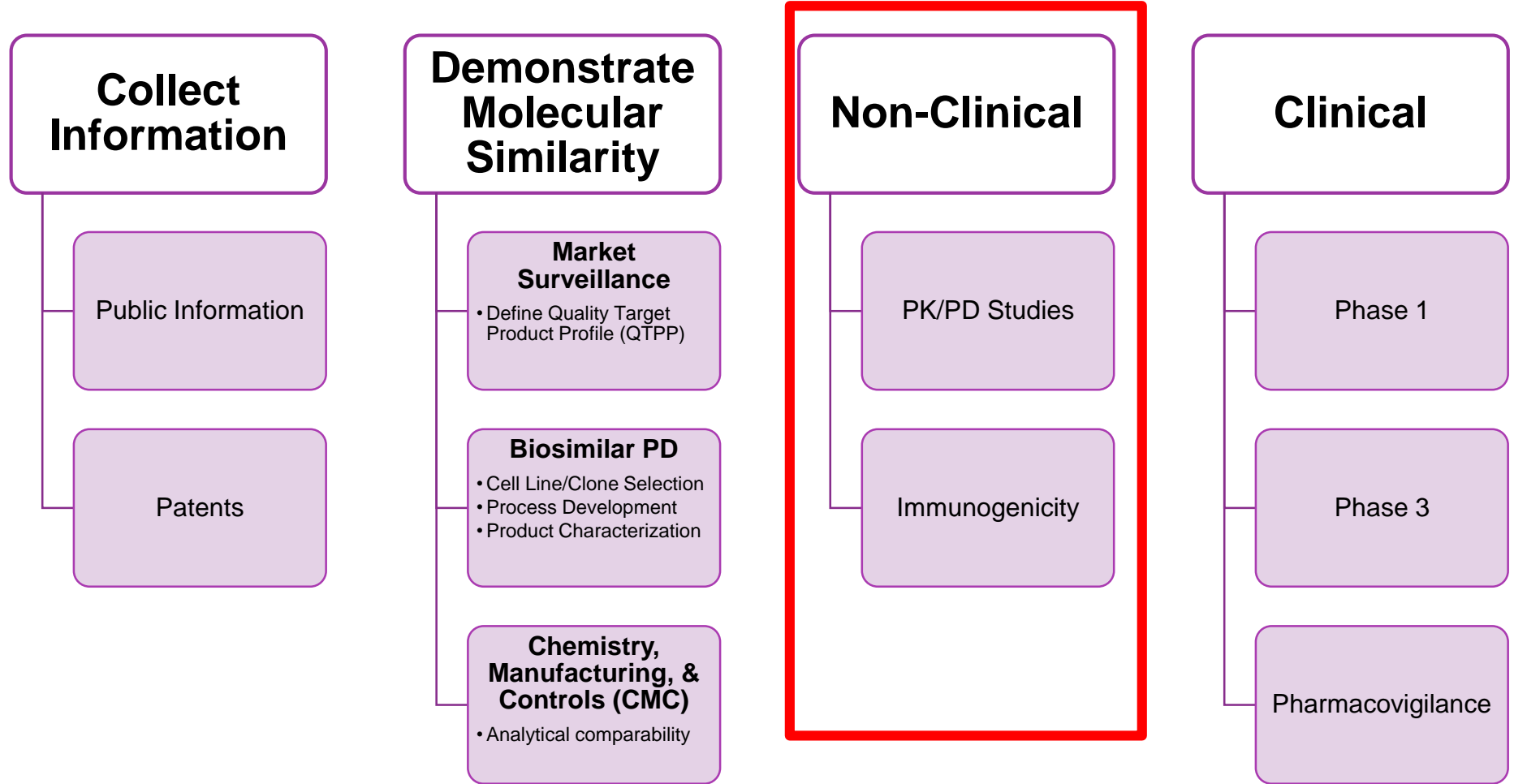
- Similar glycosylation patterns to humans
- Able to grow in suspension, stable in changing pH
- High specific yield

Protein Development



Source: Vulto, A. G., et al (2017). *Rheumatology* 56 (suppl_4), iv14–iv29.

Biosimilar Development

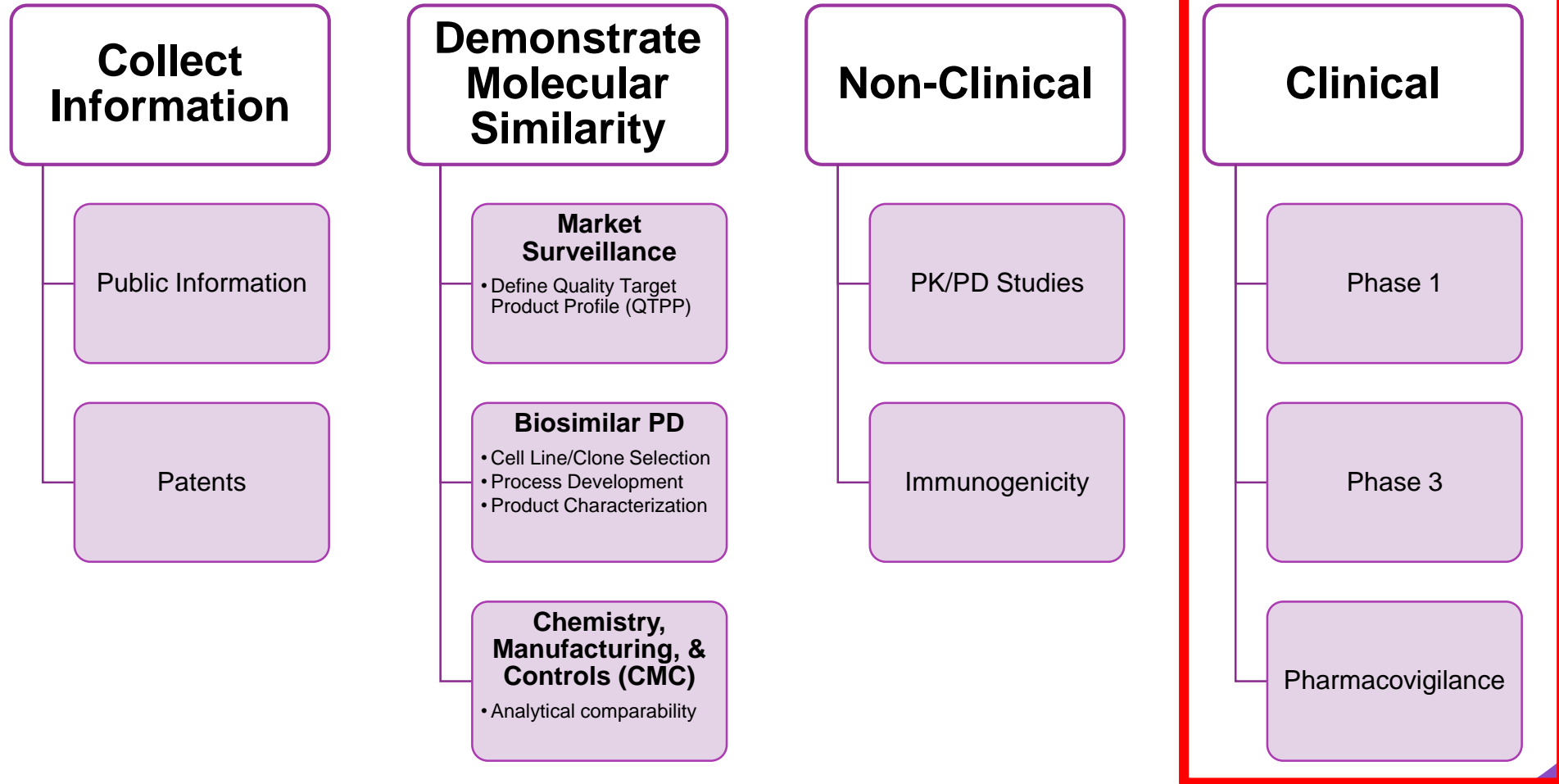


Step 3:

Nonclinical PK/PD Studies

- Animal studies
- If in humans, conducted in healthy volunteers
- Pharmacodynamic studies if residual uncertainty after PK studies
- Functional assays performed for detection of immunogenicity

Biosimilar Development



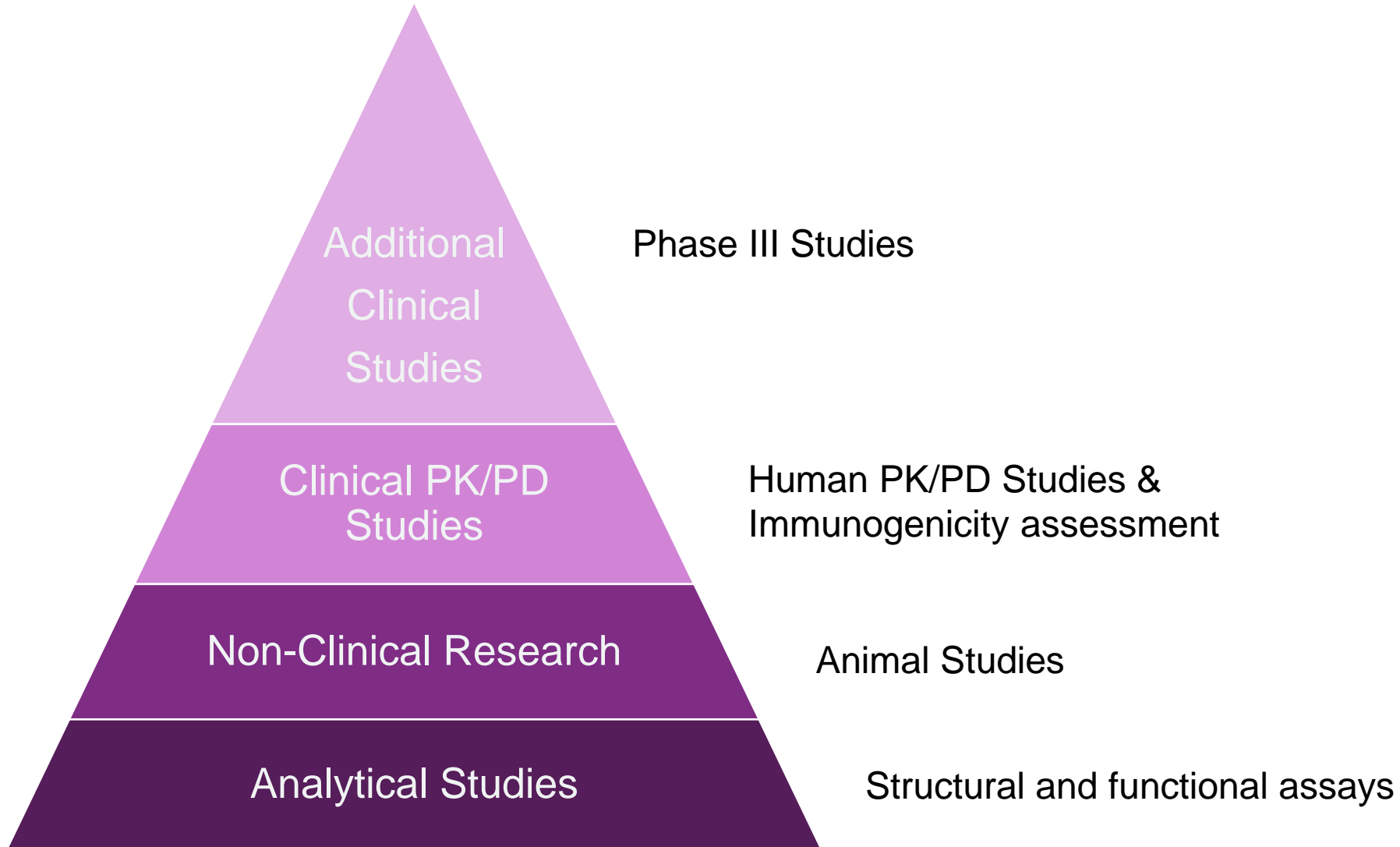
Step 4: Clinical Studies

- Phase III clinical trials conducted in patients with indication that is seeking approval
- Additional immunogenicity assessments
- The FDA sets a predetermined margin within which the biosimilar must perform to be approved

Step-Wise Evaluation of Biosimilars



Step-Wise Evaluation of Biosimilars



Step-Wise Evaluation of ABP 215, an approved bevacizumab biosimilar

Bevacizumab (Avastin®)

- A recombinant humanized monoclonal immunoglobulin G1 (IgG1) antibody.
- Bevacizumab binds to vascular endothelial growth factor A (VEGF-A) and prevents the binding of VEGF-A to VEGF receptors on the surface of endothelial cells, inhibiting endothelial cell proliferation and new blood vessel formation, thereby leading to normalization of the tumor vasculature.

Approval of ABP 215

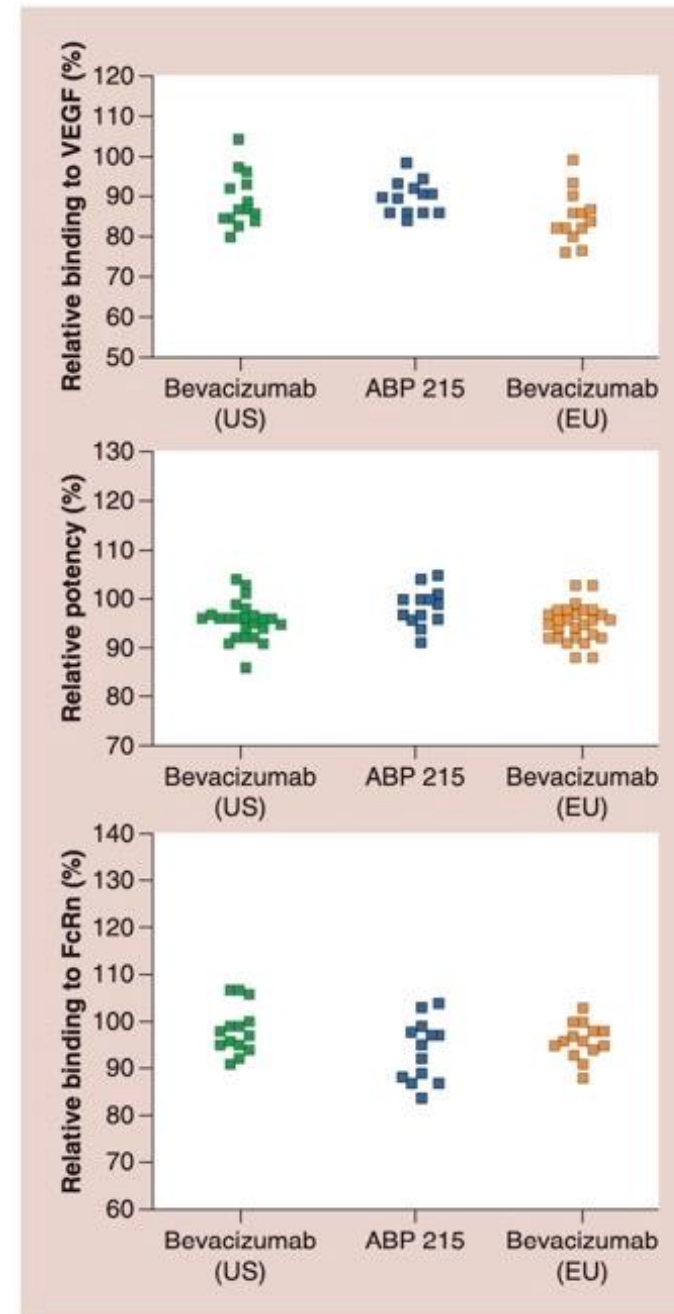
- Bevacizumab-awwb (MVASI®)
- Comparative structural analyses of ABP 215 to bevacizumab RP (Avastin®) demonstrated:
 - Structural similarity
 - Similar particle and aggregate levels
 - Similar degradation rates
 - General properties
 - Biological properties



Analytical Studies

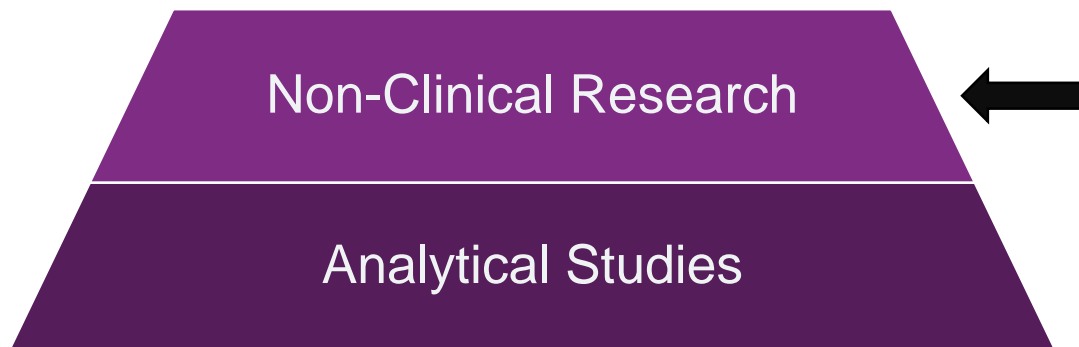
Functional Studies

- F_c binding characteristics
- Relative potency by proliferation inhibition
- Binding to VEGF

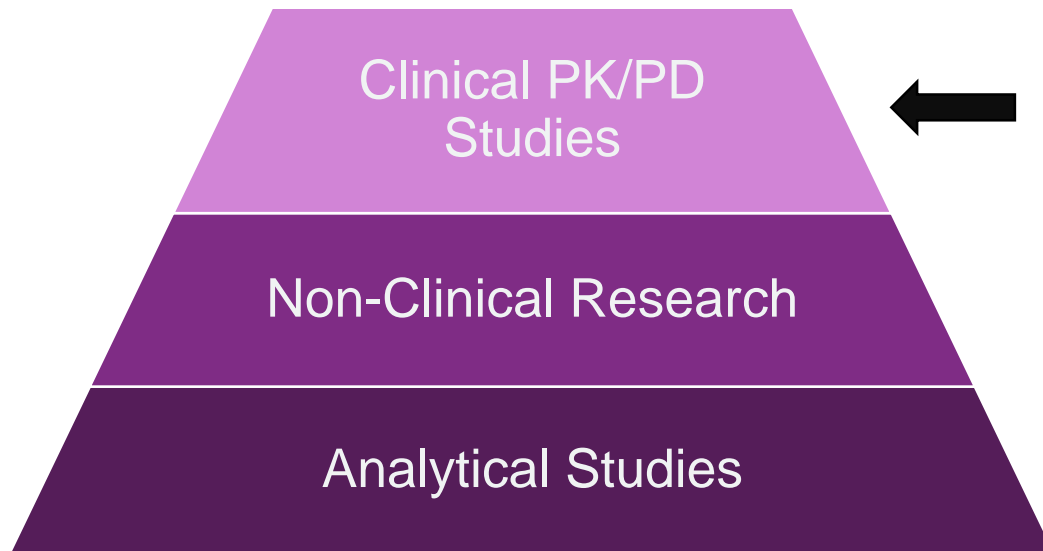


Approval of ABP 215

- *In vivo* assessments of functional similarity conducted for:
 - Antitumor activity of ABP 215

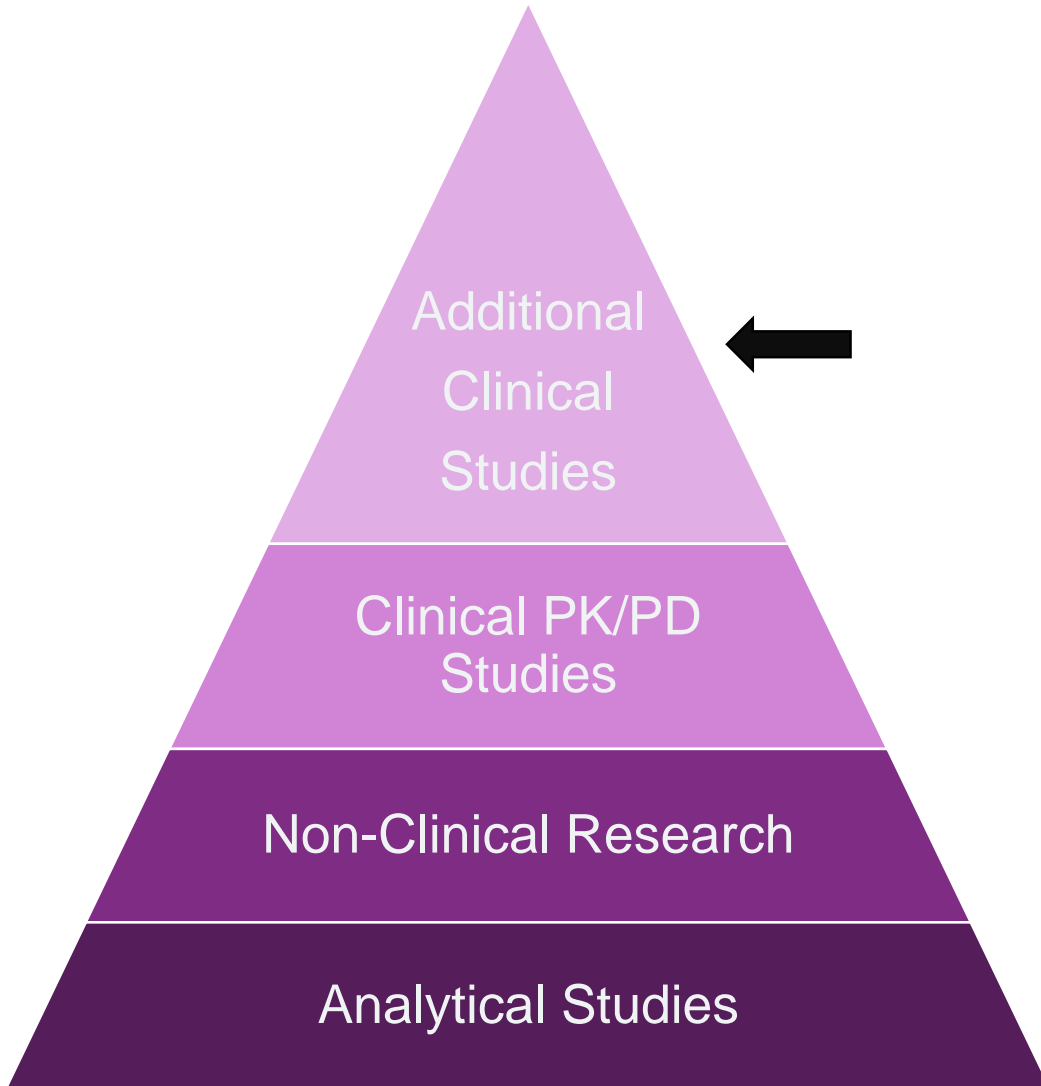


Approval of ABP 215



- Clinical pharmacokinetic analysis conducted in 202 healthy men
 - Randomized, single-blind 3 arm study; single 3mg/kg IV infusion
 - Primary endpoints:
 - Maximum serum concentration (C_{max})
 - Area Under the Curve (AUC)
 - Treatment emergent adverse events
 - Vital signs
 - Electrocardiograms
 - Incidence of antidrug antibodies

Approval of ABP 215



- Safety and efficacy evaluated in patients with non-squamous non-small cell lung cancer (NSCLC)- The MAPLE Study

The MAPLE Study

- Purpose: To confirm similarity of ABP 215 to (bevacizumab RP) in advanced non-squamous non-small cell lung cancer (NSCLC)
- Double-blind, randomized Phase III study
- Patients (N = 642) randomized to 15 mg/kg ABP 215 or bevacizumab RP in combination with paclitaxel & carboplatin for 4 to 6 cycles of treatment
- Primary Endpoints:
 - Risk rate of the Overall Response Rate (ORR) in the ITT population
- Secondary Endpoints:
 - Risk difference of ORR
 - Duration of Response (DOR)
 - Progression Free Survival (PFS)

MAPLE Study Results

Primary Endpoints:

- In the ITT population, RR of 0.93 [90% CI: 0.80 to 1.09]
 - Prespecified Equivalence Margin of 0.67 to 1.5

Secondary Endpoints:

- Risk Difference of ORR - 2.9% [90% CI: -9.26 to 3.45%]
- Duration of Response (DOR); Median 5.8 months [95% CI: 4.9 to 7.7] for ABP 215, 5.6 months [95% CI: 5.1 to 6.3] for bevacizumab RP
- Hazard ratio of PFS of 1.03 [90% CI: 0.83 to 1.29]

Safety:

- Serious AE frequency similar between groups
 - ABP 215: 26.2%
 - Bevacizumab RP: 23.3%

Totality of Evidence (TOE)

- TOE provides scientific justification for extrapolation across approved indications
- In the U.S., bevacizumab-awwb (Mvasi®) is currently approved for:
 - First line treatment of advanced, recurrent, or metastatic NSCLC
 - First or second-line treatment of metastatic colorectal cancer
 - Metastatic renal cell carcinoma
 - Recurrent or persistent cervical cancer
 - Recurrent glioblastoma

Extrapolation

- Extrapolation across indications refers to the Totality of Evidence (TOE)
- Extrapolation is not a given; must have scientific justification for mechanism of action, pharmacokinetics, immunogenicity
- This is unique to biosimilars
- Approval for all indications for which reference product (RP) is approved
 - May be exceptions in orphan disease states

BPCI Act and Interchangeability

- The Biologics Price Competition and Innovation Act also established additional requirements for interchangeability
 - Additional standards described in Section 351(k)(4) of Public Health Service Act
- **Interchangeability** is defined by the FDA as a ‘biological product that may be substituted for the reference product without the intervention of the health care provider who prescribed the reference product.
- Currently no biosimilars have been designated as “interchangeable”
- High cost associated with additional studies

Interchangeability Studies

Guidance for Industry

The FDA *recommends* that biosimilars seeking interchangeability should do so for all reference indications

Post-marketing data not sufficient for interchangeability designation; however, can be helpful in determining what data is necessary for determining interchangeability

Requirements

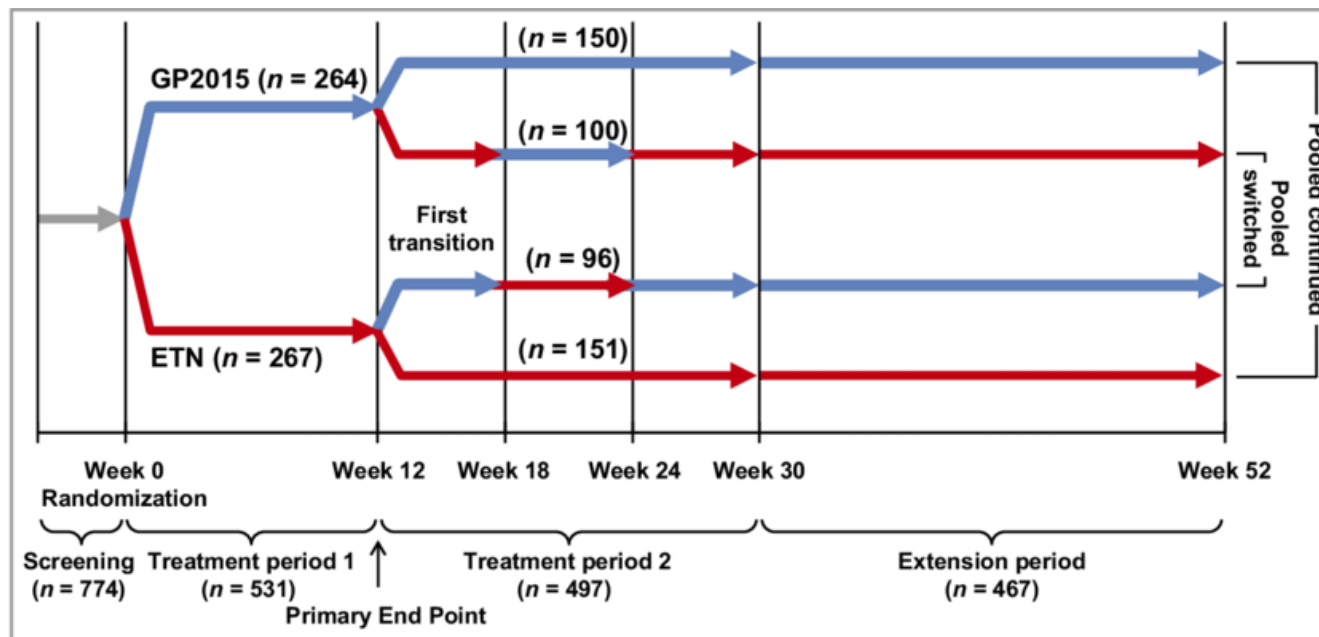
- Switching studies with two or more alternate exposures/switch intervals
- Study population should be adequately sensitive

Endpoint Assessments

- Clinical PK/PD endpoints & immunogenicity sampling after final switch
 - Most likely to be sensitive to changes in exposure and/or activity versus clinical endpoints

Interchangeability

The EGALITY study: a confirmatory, randomized, double-blind study comparing the efficacy, safety and immunogenicity of GP2015, a proposed etanercept biosimilar, vs. the originator product in patients with moderate-to-severe chronic plaque-type psoriasis.



GP2015 = Etanercept biosimilar; ETN = Etanercept

Pharmacovigilance Efforts

Biosimilar Nomenclature

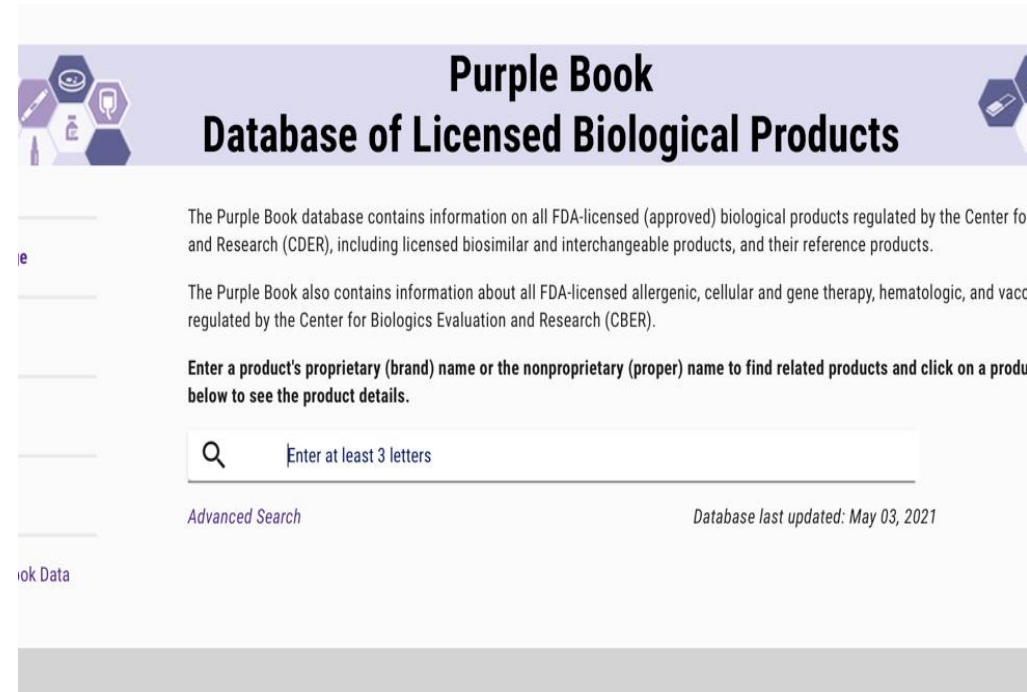
- Under the Public Health Service Act (PHS), biological products will bear a *nonproprietary name* with an FDA-designated suffix
 - The nonproprietary name will be a proper name that is a combination of the **core name** and a **distinguishing suffix** that is devoid of meaning and composed of 4 lowercase letters
 - Examples: Rituximab-arrx, infliximab-axxq
- Aids in accurate product identification for pharmacovigilance efforts
 - Proprietary names and NDCs can change over time

The Pharmacist's Role in Biosimilar Pharmacovigilance

- Pharmacovigilance programs are essential for recognizing and mitigating the risks associated with the use of biosimilar agents
- Pharmacists must prioritize use of the MedWatch FDA Adverse Event Reporting System (FAERS) in order to alert the FDA of serious adverse reactions to products, as well as reduce the risk of medication errors
- Information that should be reported to MedWatch:
 - **Unexpected side effects or adverse events**
 - **Product quality problems**
 - **Product Use/Medication Errors that can be prevented**
 - **Therapeutic failures**

The Purple Book

- In February 2020, the FDA launched a searchable, online database of biological products
- Accessible at:
<https://purplebooksearch.fda.gov>
- Continually updated, products added within 10 days of approval



The screenshot shows the homepage of the Purple Book Database of Licensed Biological Products. The header features the title "Purple Book Database of Licensed Biological Products" in a purple banner. Below the header, there is a search bar with a magnifying glass icon and the placeholder text "Enter at least 3 letters". To the right of the search bar, there is a link for "Advanced Search" and a note that the "Database last updated: May 03, 2021". The main content area contains two paragraphs of text describing the database's scope and a prompt to enter a product name to find related products.

Purple Book
Database of Licensed Biological Products

The Purple Book database contains information on all FDA-licensed (approved) biological products regulated by the Center for Drug Evaluation and Research (CDER), including licensed biosimilar and interchangeable products, and their reference products.

The Purple Book also contains information about all FDA-licensed allergenic, cellular and gene therapy, hematologic, and vaccine products regulated by the Center for Biologics Evaluation and Research (CBER).

Enter a product's proprietary (brand) name or the nonproprietary (proper) name to find related products and click on a product below to see the product details.

Search:

[Advanced Search](#) Database last updated: May 03, 2021

ok Data

[Home](#)[Food](#)[Drugs](#)[Medical Devices](#)[Radiation-Emitting Products](#)[Vaccines, Blood & Biologics](#)[Animal & Veterinary](#)[Cosmetics](#)[Tobacco Products](#)[Home](#) > [Drugs](#) > [Drug Approvals and Databases](#) > [Drugs@FDA](#)

Drug Approval Package: Mvasi (bevacizumab-awwb)

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Company: Amgen Inc.
Application Number: 761028
Approval Date: 09/14/2017

[Drugs@FDA information available about Mvasi](#)

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✓ FDA Approval Letter and Labeling

[Approval Letter\(s\) \(PDF\)](#)

- [Printed Labeling \(PDF\)](#)

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- [Officer/Employee List \(PDF\)](#)
- [Cross Discipline Team Leader Review \(PDF\)](#)
- [Medical Review\(s\) \(PDF\)](#)
- [Chemistry Review\(s\) \(PDF\)](#)
- [Pharmacology Review\(s\) \(PDF\)](#)

APPLICATION NUMBER:

761028Orig1s000

- Trade Name:*** Mvasi Injection, 100 mg/4 mL and 400 mg/16 mL
- Generic or Established:*** bevacizumab-awwb
- Sponsor:*** Amgen Inc.
- Approval Date:*** September 14, 2017
- Indication:*** Mvasi is indicated for:
- The treatment of patients with metastatic colorectal cancer, with intravenous 5 fluorouracil–based chemotherapy for first or second line treatment.
 - The treatment of patients with metastatic colorectal cancer, with fluoropyrimidine irinotecan or fluoropyrimidine oxaliplatin based chemotherapy for second line treatment in patients who have progressed on a first line bevacizumab product-containing regimen.
 - Patients with non-squamous non-small cell lung cancer, with carboplatin and paclitaxel for first line treatment of unresectable, locally advanced, recurrent or metastatic disease.
 - The treatment of glioblastoma, as a single agent for adult patients with progressive disease following prior therapy.
 - The treatment of patients with metastatic renal cell carcinoma with interferon alfa.

Assessment Questions

Pharmacist & Nurse Question 1

Immunogenicity does NOT increase with:

- A) Small-molecule generic drugs
- B) Proportion of aggregated and deaggregated proteins
- C) Process-related impurities
- D) Route of administration

Question 1: Correct Response

Immunogenicity does NOT increase with:

- A) Small-molecule generic drugs**
- B) Proportion of aggregated and deaggregated proteins
- C) Process-related impurities
- D) Route of administration

Pharmacist & Nurse Question 2

The regulatory process of biosimilar products requires the following data: animal studies, human PK/PD data, head-to-head clinical trials, and:

- A) Switching studies
- B) Comparative structural analyses
- C) A REMS program
- D) No additional studies are necessary

Question 2: Correct Response

The regulatory process of biosimilar products requires the following data: animal studies, human PK/PD data, head-to-head clinical trials, and:

- A) Switching studies
- B) Comparative structural analyses**
- C) A REMS program
- D) No additional studies are necessary

Pharmacist & Nurse Question 3

According to the most recent guidance by the FDA for pharmacovigilance of biosimilars, which of the unique identifiers should be added to the non-proprietary name?

- A) An asterisk
- B) NDC number
- C) A four-letter suffix, devoid of meaning
- D) Molecular name

Question 3: Correct Response

According to the most recent guidance by the FDA for pharmacovigilance of biosimilars, which of the unique identifiers should be added to the non-proprietary name?

- A) An asterisk
- B) NDC number
- C) A four-letter suffix, devoid of meaning**
- D) Molecular name

Pharmacy Technician Question 1

Of the below options, which is NOT characteristic of biosimilar agents?

- A) Cost of development between \$100-250 million per agent
- B) Reference Guide is the Orange Book
- C) Large, complex protein structure
- D) Analytical, animal, & clinical studies required for approval

Question 1: Correct Response

Of the below options, which is NOT characteristic of biosimilar agents?

A) Cost of development between \$100-250 million per agent

B) Reference Guide is the Orange Book

C) Large, complex protein structure

D) Analytical, animal, & clinical studies required for approval

Pharmacy Technician Question 2

True or False?

The manufacturing of biosimilars requires Clinical Quality Attributes (CQA's) to be defined for maximum safety and efficacy of the product.

Question 2: Correct Response

True or False?

The manufacturing of biosimilars requires Clinical Quality Attributes (CQA's) to be defined for maximum safety and efficacy of the product. There can be dozens of these for each molecular product. The FDA does not set a specific regulatory standard for each characteristic but does provide recommendations on statistical approaches when evaluating analytical similarity.

Pharmacy Technician Question 3

True or False?

All biosimilar agents are considered interchangeable with their reference product.

Question 3: Correct Response

True or **False**

Biosimilar agents are NOT considered interchangeable with the reference product unless designated as such in the Purple Book. The designation as interchangeable requires additional clinical 'switching' studies to confirm that immunogenicity does not develop when switching between agents.

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Thank you!!

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