

1 **1** Considerations for Developmental Toxicity Studies for Preventive
2 and Therapeutic Vaccines for Infectious Disease Indications

3 [PDF version of this document]
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5 **Draft Guidance**
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16 <http://www.fda.gov/cber/guidelines.htm>

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19 **U.S. Department of Health and Human Services**
20 **Food and Drug Administration**
21 **Center for Biologics Evaluation and Research**
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23

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¹ ¹ This guidance has been prepared by the Maternal Immunization Working Group in the Center for Biologics Evaluation and Research at the Food and Drug Administration. The availability of the draft guidance was announced in FR Vol. 65:54534, September 8, 2000. The document has been revised based on comments submitted to the Docket Management Branch and based on recommendations made by an expert panel convened at a Workshop entitled "Non-clinical Safety Evaluation of Preventive Vaccines: Recent Advances and Regulatory Considerations" held December 2 & 3, 2002, Arlington, VA, discussing approaches for developmental toxicity assessments for vaccines. This guidance document represents the Agency's current thinking on the assessment of the developmental toxicity potential of preventive and therapeutic vaccines for infectious diseases. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. An alternative approach may be used if such approach satisfies the requirements of the applicable statute, regulations, or both.

² This document does not address concerns regarding male reproductive toxicity and male and female fertility studies.

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38 **Guidance for Industry¹**
39 **Considerations for Developmental Toxicity Studies for Preventive and**
40 **Therapeutic Vaccines for Infectious Disease Indications**

41 **Draft - Not for Implementation**

42 **I. INTRODUCTION**
43

44 The document is intended to provide sponsors with guidance for the conduct of developmental
45 toxicity studies for investigational preventive and therapeutic vaccines and to consider
46 establishing clinical pregnancy registries for these products. The recommendations set forth in
47 this document pertain to the assessment of the developmental toxicity potential of preventive and
48 therapeutic vaccines for infectious diseases indicated for females of childbearing potential and
49 pregnant individuals². This guidance will be applied prospectively to investigational vaccines. It
50 does not apply retrospectively to already licensed vaccines except further conduct of additional
51 IND studies. The Center for Biologics Evaluation and Research (CBER) reviews a broad
52 spectrum of investigational vaccines for the prevention and treatment of infectious diseases
53 indicated for immunization of adolescents and adults. Thus, the target population for vaccines
54 often includes females in their reproductive years who may become pregnant during the time
55 frame of vaccination. In addition, there are a number of vaccines in clinical development
56 specifically intended for specific maternal immunization indications with the goal of preventing
57 infectious disease in the vaccinee and/or young infant through passive antibody transfer from
58 mother to fetus. Currently, unless the vaccine is specifically indicated for maternal immunization,
59 no studies are conducted regarding the vaccine's safety in pregnant women prior to product
60 licensure. During clinical development of most vaccines not intended for use during pregnancy,
61 pregnant women are actively excluded from participation in clinical trials. In addition, if pregnancy

62 occurs during a study, treatment is usually discontinued and the woman does not receive
63 additional immunizations. Consequently, there are seldom clinical data to address developmental
64 risk of the vaccine in pregnant women or females of childbearing potential at the time of product
65 licensure. However, as more women of child-bearing potential participate in clinical trials and as
66 more preventive and therapeutic vaccines are being developed for adolescents and adults, there
67 is increasing concern for the unintentional exposure of an embryo/fetus before information is
68 available about the risk versus benefit of the vaccine. Moreover, following approval, vaccines not
69 indicated for use during pregnancy may be recommended for use in pregnant women (1). In
70 addition, use of licensed vaccines in females of childbearing potential will likely result in
71 inadvertent exposure of the pregnant woman and her fetus to the vaccine. Considering that more
72 than half of pregnancies are unintended, it is unlikely that vaccine exposure would be avoided in
73 these pregnancies prior to their clinical recognition (2). In these situations, in the absence of
74 clinical data it is difficult for the practitioner to make an informed risk assessment, even in
75 situations where immunization of pregnant women may be appropriate.

76 Until recently, few or no licensed vaccines have been tested for developmental toxicity in animals
77 prior to their use in humans. However, for reasons listed above, there is a need to assess the
78 risks versus the benefits of immunization programs for pregnant women and/or females of
79 childbearing potential that should be addressed during the pre-marketing phase of the product.

80 Potential risks involved in prenatal immunization programs include developmental adverse effects
81 caused by the inherent biological activity of the vaccine antigen and constituents of the vaccine
82 product (e.g., adjuvants, preservatives, stabilizers). In addition, potential adverse effects on the
83 pregnancy status and or the developing embryo/fetus may be the result of maternal immune
84 modulation (3,4).

85 Because pregnant women are usually excluded from clinical trials, data from developmental
86 toxicity studies in animal models offer one approach to screen for potential developmental
87 hazards and may frequently present the only information available to draw conclusions regarding
88 developmental risk to be included into the product label required under 21 CFR 201.57(f)(6). As
89 there is virtually no scientific literature on animal developmental toxicity testing for vaccine

90 products, this guidance will outline general and specific considerations that should be taken into
91 account in the assessment of developmental toxicity for preventive and therapeutic vaccines for
92 infectious disease indications.

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95 **II. DEFINITIONS**

96 **A. Vaccine**

97 For the purpose of this document vaccines are a heterogeneous class of preventive, in
98 some cases therapeutic, medicinal products, the administration of which is intended to
99 elicit an immune response(s) that can prevent and/or lessen the severity of one or more
100 infectious diseases. A vaccine may be a live attenuated preparation of bacteria, viruses
101 or parasites, inactivated (killed) whole organisms, living irradiated cells, crude fractions or
102 purified immunogens, including those derived from recombinant DNA in a host cell,
103 conjugates formed by covalent linkage of components, synthetic antigens,
104 polynucleotides (such as plasmid DNA vaccines), living vectored cells expressing specific
105 heterologous immunogens, or cells pulsed with immunogen. It may also be a combination
106 of vaccines listed above. Antigens may be presented plain or delivered in combination
107 with other antigens, adjuvants, additives and other excipients. Therapeutic vaccines for
108 non-infectious diseases and monoclonal antibodies used as immunogens are not
109 considered here (5).

110

111 **B. Reproductive Toxicology**

112 Reproductive Toxicology is "the study of the occurrence, causes, manifestations, and
113 sequelae of adverse effects of exogenous agents on reproduction" (6).

114

115

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117

118 **C. Developmental Toxicity**

119 Developmental toxicity is any adverse effect induced prior to attainment of adult life. This
120 includes effects induced or manifested in the embryonic or fetal period and those induced
121 or manifested postnatally (7).

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124 **III. VACCINE TARGET POPULATION AND TIMING OF NON-CLINICAL DEVELOPMENTAL**
125 **TOXICITY STUDIES**

126 Developmental toxicity studies are usually not necessary for vaccines indicated for immunization
127 during childhood. However, for vaccines indicated for adolescents and adults and for vaccines
128 that are indicated or may have the potential to be indicated for immunization of pregnant women,
129 developmental toxicity studies should be considered.

130 There are currently differences in the timing of these studies to support inclusion of either
131 pregnant individuals or females of childbearing potential in clinical trials.

132 *Maternal immunization:* For products indicated specifically for immunization of pregnant women,
133 data from nonclinical developmental toxicity studies should be available prior to the initiation of
134 any clinical trial enrolling pregnant women.

135 *Females of childbearing potential:* For vaccines indicated for females of childbearing potential,
136 subjects may be included in clinical trials without nonclinical developmental toxicity studies,
137 provided appropriate precautions are taken, such as pregnancy testing and use of birth control.

138 For these products, data from developmental toxicity studies should be included with the initial
139 Biologics License Application submission, regardless of whether or not they have been submitted
140 earlier to the Investigational New Drug Application (IND).

141 *Males:* Currently, males may be included in phase I, II, and III clinical trials in the absence of male
142 fertility studies, although such studies may be recommended for certain products in the future.

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146 **IV. DESIGN OF DEVELOPMENTAL TOXICITY STUDIES**

147 **A. General Considerations**

148 Each vaccine will need to be evaluated on a case-by-case basis taking into consideration
149 historical use, product features, intended target population and intended clinical use. The
150 developmental toxicity study should be designed to detect potential developmental adverse
151 effects induced by components present in the vaccine formulation. However, it should be
152 recognized that despite efforts to maximize the predictive value of developmental toxicity studies,
153 there may always be limitations in evaluating or screening for potential risks and thus, limitations
154 in reducing the uncertainties of risk. Also, it should be kept in mind that lack of adverse effects on
155 embryo/fetal development in an animal study does not necessarily imply absence of risk for
156 humans. Factors that may limit risk prediction include species-specific differences in the immune
157 response, different developmental time lines, differences in placentation, etc. Nevertheless,
158 developmental toxicity studies in animal models are the best currently available nonclinical tools
159 to screen for adverse developmental effects of the product and information about developmental
160 risk from animal data is frequently the only information available at the time of product licensure.

161 **1. Previous clinical experience**

162 All available clinical experience in pregnant females should be considered in any
163 potential application with respect to the design of reproductive toxicity studies in animals.
164 Clinical experience derived from immunization of pregnant women may be helpful in the
165 evaluation of the potential for any adverse outcome on the viability and development of
166 offspring. Such information may also aid in the design/monitoring of appropriate pre-
167 clinical studies, and for product labeling.

168 However, clinical data that may have been obtained from a small number of pregnant
169 women enrolled in non-IND studies, e.g., immunized with the investigational vaccine or a
170 related product, will generally not replace the need for animal developmental toxicity
171 studies.

172

173

174 **2. Previous non-clinical experience**

175 All data generated from prior acute or repeat dose nonclinical toxicity studies should be
176 reviewed for their possible contribution to the interpretation of any adverse developmental
177 effects that appear in the developmental toxicology studies, i.e., fetal toxicity secondary
178 to maternal toxicity. In addition, data from prior nonclinical studies do frequently form the
179 basis for the choice of the animal model and vaccine dose used in the developmental
180 toxicity study.

181

182 **3. Vaccine formulation**

183 Candidate vaccine formulations for clinical trials should be prepared under conditions of
184 Good Manufacturing Practice for clinical trial material (8). Also, the nonclinical lot should
185 be adequately representative of the formulation intended for the clinical investigation.
186 Ideally, nonclinical testing should be done on the same lot as proposed for the clinical
187 trial. If this is not feasible, nonclinical lots should be comparable to clinical lots with
188 respect to physico-chemical data, stability, formulation etc. In addition, even though
189 pivotal clinical studies are frequently conducted with an intended final formulation;
190 optimizations of formulations are frequently made prior to product marketing. In these
191 cases, the applicability of nonclinical studies conducted with earlier clinical formulations
192 of the vaccine to the commercial formulation of the vaccine will be made on a case-by-
193 case basis. For a product specifically intended for maternal immunization nonclinical
194 developmental toxicity studies should be performed in advance of clinical studies that
195 enroll pregnant women. In these cases, to avoid performing multiple developmental
196 toxicology studies during development, sponsors may find it advantageous to conduct
197 Phase 1 and Phase 2 studies in non-pregnant subjects. Results from these studies can
198 be used as the basis for advancing the most promising product formulation(s) to studies
199 that enroll pregnant women.

200

201 **4. Vaccine product class**

202 There are a number of vaccines in clinical development that may be similar to or of the
203 same product class as either investigational or already licensed products, for which
204 developmental toxicity studies may have been performed. In these cases, the need for
205 additional development toxicity studies for the product under investigation will be
206 examined on a case-by case basis. Combination vaccines in clinical development, for
207 which the individual components are licensed and on which developmental toxicity
208 assessments have been performed, may not be subject to requirements for
209 developmental toxicity assessments. However, if the combination vaccine is formulated
210 with new adjuvant, new preservative or if significant changes to the individual products or
211 their manufacture were made and/or concern exist that combining the individual licensed
212 products may increase their toxic potential, additional developmental toxicity studies are
213 likely needed. Similarly, if no developmental toxicity studies have been conducted for the
214 individual already licensed or unlicensed components developmental toxicity studies
215 need to be conducted. In some instances, documentation on clinical and epidemiological
216 data, e.g., exposure to the infectious agent or use of related, licensed vaccines during
217 pregnancy, may be sufficient to evaluate the risk of the investigational product and may
218 be provided and considered in determining the need for developmental toxicity studies in
219 animal models. In these cases, the sponsor is advised to contact the FDA to reach
220 agreement regarding the need for additional developmental toxicity studies for that
221 particular product.

222

223 **5. Application of ICH guidance document S5A**

224 The ICH S5A guidance document entitled "Detection of Toxicity to Reproduction for
225 Medicinal Products," addresses the design of studies primarily for detection of toxicity on
226 reproduction dividing the reproductive cycle into different segments, defined as stages A
227 – F (7). Different studies can be conducted to address the various segments of the
228 reproduction cycle. For preventive and therapeutic vaccines for infectious diseases, the
229 primary concern is potential untoward effects of the test article on development and

230 growth of the embryo and fetus. Thus, the primary focus is on developmental toxicity
231 studies to detect adverse effects on the pregnant/lactating female and development of
232 the embryo/fetus and the offspring following exposure of the female from implantation
233 through end of pregnancy with follow-up of the offspring through weaning. These stages
234 are defined as stages C, D and E in the ICH S5a document. Depending on the product,
235 additional studies may be required to address additional segments of the reproduction
236 cycle on a case-by-case basis. CBER is recommending use of the ICH S5A guideline as
237 a general point of reference to assist in the general design of developmental toxicity
238 studies and evaluation of endpoints. However, the most important feature distinguishing
239 vaccines from drugs or other biological products is the intended vaccine-induced immune
240 response. Furthermore, vaccines are usually administered in limited, episodic dosages
241 with months or even years between doses. They include a broad range of product
242 categories such as live attenuated, inactivated, recombinant, polynucleotide,
243 polysaccharide, and protein antigens, vectored vaccines, and conjugate vaccines. These
244 may be adjuvanted or consist of a combination of different vaccine antigens. Thus, given
245 the complexity of these issues, the nonclinical testing strategies outlined in the ICHS5A
246 document may not be directly applicable to vaccines and study designs outlined in the
247 ICHS5A document will need to be tailored to the vaccine product under consideration.
248 Specific considerations that should be taken into account when designing developmental
249 toxicity studies for vaccines are outlined below. It is recommended that the sponsor
250 establishes an early dialogue with CBER to reach agreement on a specific protocol
251 including study endpoints prior to the conduct of the study.

252

253 **B. Specific Considerations**

254

255 **1. Animal model**

256 It is recognized that responses induced in an animal model may not always be predictive
257 of the human response. The sponsor should provide a justification for the choice of the

258 animal model. This should include a demonstration that the species is able to develop an
259 immune response to the vaccine antigen, even though there may be quantitative and
260 qualitative differences in immune responses between species. The laboratory species
261 most often used for developmental toxicity studies, on the basis of availability of
262 background data and historical experience, are rats, rabbits and mice. Most human
263 vaccines are immunogenic in rodents or rabbits. In some cases, only non-human
264 primates may show an adequate immune response. However, because of the technical
265 and logistic difficulties involved in using non-human primates for developmental toxicity
266 studies, these animals may only be considered if no alternative models are available.

267 In addition to demonstrating an immune response in the pregnant female exposure of
268 the fetus to the antibody should be verified. Since there are differences between
269 primates, non-rodents and rodent animal species in terms of timing of maternal antibody
270 transfer to the offspring, it is suggested that the pre- and postnatal exposure of the
271 offspring to maternal antibody be evaluated as a criterion for selecting the most
272 appropriate experimental model. The species selected should be amenable to fetal and
273 postnatal examinations.

274 In cases where lack of an appropriate animal model hinders the assessment of an
275 immune response, developmental toxicity studies may still provide important information
276 regarding potential embryo/fetal toxic effects of the vaccine components/formulation and
277 safety of the product in the pregnant animal.

278 In most cases, it is sufficient to conduct developmental toxicity studies using only one
279 species; thus, there is no requirement for the routine use of two species, i.e., one rodent
280 and one non-rodent.

281 The number of animals per group should be sufficient to allow meaningful interpretation
282 of the data. For example, for a developmental toxicity studies using rats or rabbits it is
283 recommended to assign 40 animals to each group whereby animals can be further
284 allocated to the Caesarean and littering subgroup using 20 animals each.

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2. Pharmacodynamics

It is recommended that information about onset and duration of the antibody response be obtained in pilot studies since this data may help in selecting the proper species, study design and dosing schedules. Initial information can be derived from non-pregnant animals. However, it may also be necessary to perform these pilot studies in a small group of pregnant animals to evaluate antibody formation in relation to test article exposure and placental antibody transfer to the fetus if there is evidence that antibody formation may differ in pregnant versus non-pregnant animals. It is recognized that antibody induction presents only one aspect of the overall immune response induced by the vaccine and that other immunological parameters, such as cytokines, induction of cytotoxic T cells, etc., may be evenly important. However, given the relative lack of validated assays to assess the induction of these parameters, antibody assessments are currently used as a marker for vaccine induced effects in these studies. This does not exclude the evaluation of additional immunologic parameters on a case-by-case basis. For example, if data are available which indicate that a vaccine antigen induces a particular cytokine response, respective cytokine measurements may be included, especially if the cytokine is one that may affect pregnancy.

3. Experimental procedure

In order to detect adverse effects on the pregnant/lactating female and development and growth of the embryo/fetus and the offspring, the female is exposed during the interval from implantation through closure of the hard palate to the end of pregnancy. The offspring should be followed to weaning and observed for normal growth and development. It is recommended to submit one subgroup of pregnant females to Caesarean examination at the end of pregnancy for routine uterine and fetal examinations. Another subgroup is allowed to litter and rear their offspring to weaning in order to monitor the post-natal development of the offspring up to weaning.

314 **4. Dosage**

315 It is recommended that a single dose level which is capable of inducing a immune
316 response in the animal model be assessed. Where possible, animals should be
317 administered the maximum human dose (e.g., 1 human dose = 1 rabbit dose) regardless
318 of body weight. If it is not feasible to administer the maximum human dose (e.g.,
319 limitation in total volume that can be administered; dosing induced local toxicity affecting
320 pregnancy, etc), a dose that exceeds the human dose on a mg/kg bases while still
321 capable of inducing an immune response in the animal should be administered.

322

323 **5. Frequency and Route of Administration**

324 The vaccination regimen should optimize maternal antibody titers throughout the
325 embryonic, fetal and early post-natal periods whereby timing and number of doses will
326 depend on the onset and duration of the immune response of the particular product.
327 Because of concerns that daily dosing regimen may lead to overexposure to the vaccine
328 antigen that could potentially result in immune tolerance, episodic dosing of pregnant
329 animals rather than daily dosing is recommended. In addition, episodic dosing appears
330 to be more relevant, as it better mimics the clinically proposed immunization schedule for
331 most preventive and therapeutic vaccines for infectious disease indications. Considering
332 the short gestational period of animal species most frequently used, it may be necessary
333 to administer priming doses to the animals several days or weeks prior to mating, in order
334 to elicit a peak antibody production during the critical phases of pregnancy, i.e, the period
335 of organogenesis. When dosing prior to implantation, stress reactions may be observed
336 in the animal that may affect the pregnancy status. Therefore, with treatment of animals
337 prior to mating/insemination, it may be necessary to add more animals to the study to
338 ensure that sufficient animals become pregnant for evaluation. It is recommended to
339 administer one or several additional doses during organogenesis (i.e., implantation to
340 closure of the hard palate) to evaluate potential direct embryotoxic effects of the
341 components of the vaccine formulation and to maintain high level of antibody throughout

342 the remainder of gestation. In certain cases, subgroups of animals that are dosed at
343 certain time points may be included to evaluate if the vaccine acts as a selective toxicant
344 bearing in mind that it may be difficult to adjust vaccine administration with gestational
345 timelines.

346 The route of administration should mimic the clinical intended route of administration.

347

348 **6. Control groups**

349 It is recommended that control animals be dosed with the vehicle at the same time and
350 frequency as test group animals. The potential toxicity of each of the components
351 presented in the vaccine formulation should be evaluated. Thus, additional groups
352 should be considered if the vehicle or components other than the vaccine antigen causes
353 effects or affect the action of the test substance. In addition, if the vaccine is formulated
354 with adjuvant, inclusion of an adjuvant only arm should be considered, in particular if the
355 adjuvant is novel.

356

357 **7. Endpoints**

358 In general, the study endpoints should include those recommended for studies for effects
359 on prenatal and postnatal development including maternal functions as stated in the ICH
360 S5a document (Ref. 7). When deciding on the endpoints to be evaluated one should
361 take into consideration the nature of the vaccine and particular concerns associated with
362 that product. The following parameters listed are intended to provide a basic panel of
363 endpoints to be evaluated that are not meant to be all inclusive.

364

365 **7.1 Premating/preinsemination period**

366 Clinical observations including data on general appearance and body weights
367 should be obtained weekly and on days of test article administration.

368

369 **7.2 Gestational period**

370 Maternal animals should be observed during the study for signs of morbidity and
371 mortalities. Clinical observations regarding general appearance and behavior
372 should be recorded. The evaluations should include body weight and body
373 weight change, potential signs of local toxicity, food consumption, duration of
374 pregnancy, abortions and premature deliveries and parturition (for maternal
375 animals not subjected to Caesarian sectioning).

376 7.3 Caesarean sectioning group

377 *7.3.1 Maternal Observations*

378 For groups subjected to Caesarean sectioning at terminal examination, a
379 necropsy (macroscopic examination) should be conducted and maternal tissue
380 with macroscopic findings should be preserved for histological evaluations as
381 deemed necessary by the gross findings. For example, histological evaluations
382 may be indicated if effects on organ to body weight ratios have been observed.
383 The number and distribution of corpora lutea, implantation sites, viable and
384 nonviable fetuses and early and late resorptions should be recorded. A gross
385 evaluation of the placenta should be performed.

386

387 *7.3.2 Fetal examinations*

388 Individual body weights of live fetuses should be obtained. Each viable fetus
389 should be examined for gross external, visceral and skeletal alterations. Late
390 resorptions and dead fetuses should also be examined for gross external
391 alterations to the extent possible. All fetuses should be examined internally to
392 determine sex.

393

394 7.4 Natural delivery group

395 *7.4.1 Maternal observations*

396 In addition to the parameters outlined in 7.2, duration of gestation and
397 parameters such as the fertility index, gestation index, and live birth index should

398 be determined. Animals that deliver a litter are sacrificed at the end of the pre-
399 weaning period. A gross necropsy of the thoracic, abdominal and pelvic viscera
400 should be performed. The number and distribution of implantation sites should
401 be recorded as well as any observed abnormalities. Animals that die or are
402 sacrificed because of moribund condition, abortion or premature delivery should
403 be examined for the cause of death and pregnancy status recorded. Aborted
404 fetuses and/or delivered pups should be examined to the extent possible.

405

406 *7.4.2 F1 generation*

407 Postnatal follow-up from birth to weaning is recommended to assess normal
408 growth, body weight gain, and nursing activity as indicators for normal
409 development. It is also recommended to include into the study design tests to
410 screen for normal neuro-development, for example, auditory and visual function
411 tests. Viability and lactation indices should be determined and individual sexes
412 should be recorded. At terminal sacrifice, a necropsy should be performed, any
413 abnormalities recorded and gross lesions retained for possible histological
414 examinations. Pups that die before examination should be evaluated for vital
415 status at birth. Pups found dead should be examined for gross lesions and
416 cause of death.

417

418 **8. Immunological Endpoints**

419 In addition to evaluating potential developmental adverse effects and adverse effects on
420 the pregnant animal, an assessment of the vaccine induced antibody response should be
421 included to verify exposure of the embryo/fetus to maternal antibody. Serum specimen
422 from maternal animals prior to and at additional time points following dosing should be
423 collected to assess the development of antibodies. Sampling is usually conducted prior
424 to test article administration and at day of Caesarean sectioning (where applicable) and
425 at the end of weaning period. In addition, cord blood samples should be obtained to

426 assess placental transfer of maternal antibodies from animals in the Caesarean subgroup.
427 It is recommended to also assess antibody levels from a representative number of
428 pups/litters at the end of the weaning period to verify exposure of the neonates to
429 maternal antibody induced. Antibody evaluations in developmental toxicity studies serve
430 the purpose of verifying an effect of the vaccine in the test species as opposed to
431 evaluating potential immunotoxic effects. Additional immune parameters may be
432 evaluated on a case-by-case basis. For example, if evidence exists that the vaccine
433 antigen or other vaccine components can trigger the release of a particular cytokine
434 potentially affecting pregnancy, respective assessments may be included.

435

436 **9. Additional assessments**

437 In cases where preclinical developmental toxicity studies reveal vaccine-induced adverse
438 effects on either the pregnant/lactating animal, embryo/fetal development or development
439 of the offspring further studies are required to evaluate the cause of the effect. Such
440 studies may include broader immunological evaluations, e.g., histochemical analysis for
441 antibody depositions, as well as neurological assessments, etc.

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445 **V. ESTABLISHMENT OF PREGNANCY REGISTRIES**

446 If the vaccine is administered to females of childbearing potential or is specifically indicated for
447 immunization during pregnancy, the safety of that vaccine in human pregnancy may need to be
448 further evaluated in a systematic manner under a Phase IV commitment. Alternatively, data on
449 potential risks with the use of the vaccine in pregnant individuals may be obtained for already
450 marketed products in order for the sponsor to update the product label. It is, therefore,
451 recommended that pregnancy registries are established for the purpose of monitoring the post-
452 licensure experiences from vaccinated pregnant women and their offspring to determine risks
453 associated with use of the vaccine during pregnancy. The establishment of a pregnancy registry
454 may encourage health care providers to prospectively report exposures in pregnancies. This will

455 result in better postmarketing data and provides a less biased sample than the retrospectively
456 reported cases commonly seen with adverse experience reporting. In contrast to drug exposures
457 during pregnancy that are typically defined as any exposure to a product from the first day of the
458 last menstrual period (LMP), vaccination occurring prior to conception or even the LMP may need
459 to be included in the definition of "vaccine exposure during pregnancy". The time period prior to
460 the LMP will depend on the particular product under consideration. The decision to conduct a
461 pregnancy registry should be made on a case-by-case basis and may depend on several
462 parameters such as the availability and extent of data derived from nonclinical and clinical studies,
463 type of vaccine and known adverse effect(s) of the wild-type disease on the pregnant woman and
464 the fetus. The agency has also published guidance with regard to the design of pregnancy
465 registries and suggested outcomes entitled "Draft Guidance for Industry: Establishing Pregnancy
466 Registries" (Ref.9).

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495 for Biologics Evaluation and Research at the Food and Drug Administration. The availability of
496 the draft guidance was announced in FR Vol. 65:54534, September 8, 2000. The document has
497 been revised based on comments submitted to the Docket Management Branch and based on
498 recommendations made by an expert panel convened at a Workshop entitled "Non-clinical Safety
499 Evaluation of Preventive Vaccines: Recent Advances and Regulatory Considerations" held
500 December 2 & 3, 2002, Arlington, VA, discussing approaches for developmental toxicity
501 assessments for vaccines. This guidance document represents the Agency's current thinking on
502 the assessment of the developmental toxicity potential of preventive and therapeutic vaccines for
503 infectious diseases. It does not create or confer any rights for or on any person and does not
504 operate to bind FDA or the public. An alternative approach may be used if such approach
505 satisfies the requirements of the applicable statute, regulations, or both.

506 ² This document does not address concerns regarding male reproductive toxicity and male and
507 female fertility studies.

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吹米におけるワクチン非臨床試験に関するガイダンスの比較 - 既に発行済みの EMEA のガイダンスを基準とし、WHO ドラフトの関連項目を記載。なお、WHO は毒性試験のみならず、多くのことが記載されているため、EMEA の記載から外れる部分は、表最後にリストアップした (WHO 緒言: P.9 はガイドライン作成に参考になる)。

EMEA (CPMP): CPMP/SWP/465/95	WHO ドラフト関連項目	CBER (Non-Clinical Safety Assessment of Vaccine)
<p>毒性試験の記載の EMEA と WHO の対応は概ね、以下のようになっている。 A1: 単回, A2: 反復, H: 局所 B/C: 生種, D/E: 変異原性及びがん原性 F2: 薬理試験 (免疫原性、安全性薬理) G: 薬物動態</p> <p>【緒言】 感染物質または毒薬あるいはそれにより生成された抗原に対し特異的で能動的な免疫を誘導できる抗原物質を含有する製剤</p> <ul style="list-style-type: none"> - 化学的あるいは物理的手段により不活化され、適切な免疫原性を保持した微生物 - 抗原性を保持したまま無毒化あるいは弱毒化された生微生物 - 有機体から抽出/分泌された抗原、あるいは組換え DNA 技術による産生された抗原 	<p>WHO 緒言・I.1 感染症に対し特異的、能動的かつ防衛的な宿主免疫を誘導できる免疫原物質を含有する異種の医薬品</p> <ul style="list-style-type: none"> - 化学的および/または物理的手段により不活化され、適切な免疫原性を保持している微生物 - 免疫原性を保持しつつ、弱毒性のために選択された生微生物 - 微生物から抽出されたか、微生物により分泌されるか、組み換え DNA 技術により製造された抗原 - キメラ微生物 - 生きたベクターあるいは核酸投与後に宿主で <i>in vivo</i> で生成した抗原 - <i>in vitro</i> で化学合成により製造された抗原 <p>抗原は①そのまま、②突然変異導入で不完全または改変、③化学または物理的手段で無毒化、④免疫原性を増加するために凝集、重合または担体に結合</p>	
<p>【適応範囲】 複合ワクチンを含む新ワクチン製品の前臨床評価を対象</p> <p>適応されるワクチン</p> <ul style="list-style-type: none"> - 欧州薬局方モノグラフや WHO 要求事項に未掲載の抗原を含む新ワクチン - 既知抗原の新規 conjugate 体 - 既知あるいは新抗原の新しい組み合わせ - 新規投与方法 (route/delivery) は特別な安全性を考慮した試験が必要 - 主要なワクチン製造過程の変更は前臨床試験の必要性を再検討 - 生微生物を含有する新ワクチン製品 <p>適応外のワクチン</p> <ul style="list-style-type: none"> - 毎年更新されるインフルエンザワクチン - immunogens として使用されるモノクロ抗体: see ICH S6 - 組換え DNA 蛋白ワクチン: see ICH S6 注釈 - DNA ワクチン - 遺伝子治療、遺伝子組み換え体細胞療法 	<p>WHO 緒言・I.1 新ワクチンの開発及び既承認ワクチンに対する改良 (新アジュバントの導入)</p> <p>適応されるワクチン</p> <p>感染症に対する予防および治療ワクチン適応症</p> <p>適応外として明記されているのは</p> <ul style="list-style-type: none"> - 非感染症のための治療ワクチン (がんワクチン) - 免疫原性に使用されるモノクロ抗体 (抗イデオタイプ抗体) 	<p>(3) Definition of Vaccine Preventive vaccines Pre- and post-exposure prophylaxis Therapeutic vaccines against infectious disease</p>

<p>【一般的な考え方】 ヒトの反応予測可能な適切な動物モデルがないため、動物種選択を個別に実施 安全性の評価は、「一般的な全身毒性」、「予期される毒性の増強」、「局所毒性」、「発熱性」、「自己免疫または感作などの有害な免疫反応」、及び（場合によっては）「確奇形性/生殖作用」によって行われる 新規ワクチンでは、既存医薬品で要求される全ての検査が必要ない可能性が認識されているが、前臨床安全性試験は常に試験プログラムの一部分とすべきである。しかしながら、既知の抗原を含む複合ワクチンの場合は、必ずしも必要ではないことがある。それでも免疫原性試験は推奨される（§F1）。 投与方法は臨床経路と一致させる。不可能な場合は正当な理由により他の経路も承認されるが正当な理由が必要。神経病原性や毒素の完全無毒化試験など、特定の安全性評価を行う試験では、他の投与方法を用いることが多い。局方に記載の方法が適応できるかを考慮する。 アジュバント、保存剤、賦形剤などの添加剤にも注意が必要（§R）</p>	<p>WHO-4.1 利用可能な最良の科学に基づき判断が、非臨床安全性試験の必要性、試験の種類、試験デザイン及びデータの解釈（リスクベネフィット、動物モデル、投与方法）に必要（4.1） 試験デザインの際、考慮する点 - 適切な動物種/系統 - 投与方法およびワクチン投与方法 - エンドポイントの評価タイミング - 投与経路は臨床試験で使用する経路に一致 評価のポイント：標的臓器・用量・曝露経路・曝露期間と頻度・観察された毒性作用の回復性 専用の単独の毒性試験、または試験デザインに毒性エンドポイントを組み込んだ安全性免疫原性試験が実施できる。また、局所刺激性の評価も含める。</p>	<p>(7) Key Components in Non-clinical Assessment - Immunogenicity - Pyrogenicity testing - General safety testing - Neurovirulence testing - Reversion to virulence - Biodistribution studies - Integration studies - Safety studies - Efficacy studies (19) Lot (20) Study design</p>
<p>歴史的にワクチン使用による神経毒性が知られていることから、新規ワクチン開発では、神経毒性を評価できるモデルが必要（Neurovirulence Tests）</p>	<p>WHO-6.1 野性型微生物に神経親和性がある、あるいは、ウイルスワクチンの弱毒化に神経組織による継代が使用された場合は、少なくともワクチンシードのレベルで神経病原性に対する試験を実施。ただし、神経病原性試験は必ずしも全ての生弱毒化ワクチンに必要かわけではない 小動物モデルでの神経病原性試験は許可される</p>	
<p>【A.1 単回投与試験】 ヒト用量に対して適切な安全マージンを与える用量 少なくとも1種類の動物種 毒性変化がみられた場合は、さらに用量反応関係を検討 これら試験結果は、主要器官の病理組織検査を行うことにより、動物の免疫原性試験（§F1）や安全性薬理試験（§F2）の一部になるかもしれない 異常毒性試験や発熱性試験の通常製造試験については、§Q 参照 単回投与試験結果は、主要器官の病理組織検査を行うことにより、動物の免疫原性試験（§F1）や安全性薬理試験（§F2）の一部になるかもしれない（A.1）</p>	<p>WHO-4.1 単回/反復の分類は明記されない 4.1.3 以下が予想される場合の単回投与試験実施について記載 ・ ワクチンで誘導される抗体が、生ウイルススベクターを中和して、対象遺伝子の発現を制限する場合（抗アデノウイルス免疫反応） ・ 動物に誘導された免疫反応が、ワクチン製剤中に存在する種特異的蛋白と反応する場合（アジュバントとして使用されるヒト組み換えサイトカイン） 専用の単独の毒性試験、または試験デザインに毒性エンドポイントを組み込んだ安全性免疫原性試験が実施できる。（4.1）</p>	