

and it is most important that the measures are rational and serve the intended purpose. It may be acceptable to omit a portion of the items listed below, after providing the appropriate scientific basis, with respect to the quality tests or controls of the final product or intermediates, or control of the manufacturing process, if the quality and safety, and their constancy, can be assured.

I. Raw Materials and Materials Used in Manufacturing

1. Human somatic cells that serve as raw materials

(3) Source and origin, justification of their selection

Explain the source and origin of the somatic cells used as raw materials when establishing the human iPS(-like) cell line, and justify the reasons for selecting these somatic cells.

(2) Characteristics and eligibility of somatic cells serving as raw materials

(i) Features of biological structure and function, and selection criteria

Explain and justify the reasons for selecting the somatic cells used as raw materials based on the characteristics of their biological structure and function, such as for example, morphological characteristics, growth characteristics, biochemical indicators, immunological indicators, specific substances produced, HLA typing, and other suitably chosen and appropriate genotype or phenotype indicators.

This should lead to the identification of the main cell characteristic indicators that are to be employed when preparing the somatic cells in question newly as raw materials. It is recognized that such study can only be performed to a reasonably possible

extent since there are quantitative limits to samples as well as technological limits.

(ii) Donor selection criteria and eligibility

Indicate that the selection of donors was carried out in an appropriate and ethical manner and that a proper procedure was taken. Establish selection criteria and eligibility criteria that take into consideration age, sex, ethnic characteristics, genetic characteristics, disease history, health condition, test parameters related to any type of possible infection that may occur via cell and/or tissue samples, immunological compatibility, and so on, and justify their appropriateness. If donor genome or gene analysis is undertaken, they shall be performed in accordance with "Ethical Guidelines for Human Genome/Gene Analysis Research", issued jointly on December 28, 2004 by the Japanese Ministry of Education, Culture, Sports, Science and Technology, Ministry of Health, Labor and Welfare, and Ministry of Economy, Trade and Industry.

Infections of hepatitis B virus (HBV), hepatitis C virus (HCV), human immunodeficiency virus (HIV), adult human T-lymphotropic virus (HTLV), and parvovirus B19 shall be ruled out by physician-donor interviews and clinical laboratory tests, such as serological tests and nucleic acid amplification methods. Infection of cytomegalovirus, EB virus, and West Nile virus shall also be ruled out, if necessary, by performing the appropriate clinical laboratory tests.

In addition to the above, further investigate and decide their eligibility as a donor by examining the past history mentioned below of the donor through physician-donor interviews and so on, and if they have ever had a blood transfusion or undergone a

transplantation procedure.

- Bacterial infections, such as syphilis (*Treponema pallidum*), chlamydia, gonorrhea, and tuberculosis bacillus
- Sepsis, or suspected sepsis
- Malignant neoplasm
- Serious metabolic or endocrine diseases
- Collagen and blood diseases
- Hepatic diseases
- Confirmed or suspected transmissible spongiform encephalopathy (TSE), or other cognitive disorders
- Specific genetic disease or family history of a specific genetic disease

Alternatively, it may be acceptable to perform some parts of the aforementioned studies concerning specific genetic features or infectious status of the donors at the stage of cells (intermediate products or cell banks) derived from processing of iPS(-like) cells in investigations, after having justified their appropriateness.

(3) Records related to the donor

All records related to the donor shall be complete and kept so that any information necessary with respect to ensuring the safety of somatic cells used as raw materials can be verified. Concrete measures shall be described. For patients and donors of test samples, it is enough to only prepare and keep each specific information corresponding to the intended use of individual cells.

(4) Collection, storage, and transport of cells and tissues

- (i) Eligibility of personnel and medical institutions collecting samples
Describe the technical requirements for personnel and medical institutions that collect the cells and tissues.
- (ii) Suitability of sampling site and sampling method
Describe the rationale for

selecting the cell and tissue sampling sites as well as the sampling method, and clearly state how these sites selected are both scientifically and ethically appropriate. For the cell and tissue sampling methods, indicate the suitability of the equipments and drugs used and the measures adopted to prevent microbial contamination, erroneous sampling (mix-ups), and cross contamination.

- (iii) Informed consent from donors
Describe the details of the informed consent, including the clinical application, of the donor of the cells or tissue.
- (iv) Protection of donor privacy
Indicate the measures adopted to ensure protection of the privacy of the donor.
- (v) Tests to ensure donor safety
If tests such as those to confirm the state of the sampling site need to be performed in order to ensure the safety of the donor at the time of cell or tissue sampling, describe the details of the tests, as well as any interventions undertaken for test results that indicated a problem existed.
- (vi) Storage method and measures to prevent erroneous sampling (mix-ups)
If the somatic cells collected need to be stored for a definite period of time, set the storage conditions and storage period, and justify the appropriateness (validity) for their setting. Describe in detail the measures and procedures to be taken to prevent erroneous sampling (mix-ups).
- (vii) Transportation methods
If cells and/or tissues or iPS(-like) cells collected need to be transported, set the containers used for transport and the transportation procedure (including temperature control, etc.) and justify their

- appropriateness.
- (viii) Preparation of records and keeping procedures
Written records for (i) through (vii) above shall be prepared and proper keeping procedures for the records shall be described in detail.

2. Raw materials other than target(desired?) cells and tissues as well as materials used in manufacturing

Describe raw materials other than target(desired?) cells and tissues as well as other materials used in the manufacturing process, indicate their appropriateness for their intended use, and if necessary establish their specifications (set of acceptance criteria and analytical procedures). Proper quality control for these materials should be carried out.

When so called 'Biological Products' or 'Specific Biological Products' (refer to Article 2.9 and 2.10 of Pharmaceutical Affairs Law) are used as raw materials, the amounts used should be kept to the minimum amount required and should strictly obey the relevant laws and notifications, such as "Standards for Biological Raw Materials" (Notification Number 210, Japanese Ministry of Health, Labor, and Welfare, 2003). It is particularly important to sufficiently evaluate information related to the inactivation and elimination of viruses, as well as to indicate measures for ensuring retrospective and other studies.

The technical requirements described in this paragraph should be taken into consideration when the process of reprogramming or dedifferentiation from the raw materials into iPS(-like) cells, and of directed differentiation from iPS(-like) cells into the final products in question include any relevant elements/concerns be applied.

- (1) When culturing cells
(i) Indicate the appropriateness

of all the components of any media, additives (serum, growth factors, antibiotics, etc.) and reagents, etc. used in the treatment of cells, and set specifications if necessary. Give consideration to the route of clinical application, etc. of the final product when setting specifications concerning the appropriateness of each component.

(ii) Take into consideration the following points with respect to media components

① The ingredients and water used in media should be of high quality and high biological purity, and whose quality is controlled at standards equivalent to those for pharmaceuticals and pharmaceutical raw materials.

② Provide information on not only the main ingredients used in media, but all components, as well as the rationale for their selection, and if necessary, the quality control and other procedures. However, widely known and commercially available media products such as DMEM, MCDB, HAM, and RPMI are regarded as one raw material.

③ Conduct sterile tests and performance tests on media that contain all components in order to determine whether they are suitable as target media. Set specifications for any other relevant parameters believed to be controlled in process and perform proper quality control.

(iii) Heterologous serum or components derived from heterologous or homologous serum shall not be used unless they are essential for processes such as cell activation or cell growth. For products that may be used repeatedly in particular, investigate as much as possible ways to avoid using these serum components. If the use of serum or other such material is unavoidable, give consideration

- to the following points, and investigate ways to prevent the contamination and spread of bacteria, fungi, viruses, and abnormal prions from the serum and other products, as well as treatment methods for their elimination, to the greatest extent possible, from the final product.
- (a) Clarify the origin of the serum or other component.
 - (b) Make strenuous efforts to minimize the risk of prion infection, such as by strictly avoiding the use of serum from areas or regions with known outbreaks of bovine spongiform encephalopathy (BSE).
 - (c) Only use these sera after having confirmed that they are not contaminated with viruses or other pathogens by conducting appropriate tests to prove the absence of specific viruses and mycoplasma that originate in animal species.
 - (d) Conduct appropriate inactivation and elimination procedures for bacteria, fungi, and viruses to an extent that does not impact the activation and growth of the cells. For example, to avoid the risks associated with latent viral contamination, perform combinations of heat treatment, filtration, irradiation, and/or UV treatment, if needed.
 - (e) Preserve and store a portion of the serum used in order to be able to monitor for viral infections in cultured cells, monitor for outbreaks of viral diseases at the patient, and measure antigen production in response to a component of the heterologous serum used.
 - (iv) When using feeder cells, conduct quality evaluation while referring to “Derivation and Characterisation of Cell Substrates Used for Production of Biotechnological/Biological Products” (Pharmaceutical Notification Number 873, Ministry of Health, Labor, and Welfare, July 14, 2000), “Guidelines on Public Health Infection Issues Accompanying Xenotransplantations” (Notification 0709001, Research and Development Division, Health Policy Bureau, Japanese Ministry of Health, Labor, and Welfare, issued July 9, 2002), and “Guidelines on Epithelial Regenerative Therapy Using 3T3J2 Strain or 3T3NIH Strain Cells as Feeder Cells” based on “Guidelines on Public Health Infection Issues Accompanying Xenotransplantations” (Notification 0702001, Research and Development Division, Health Policy Bureau, Japanese Ministry of Health, Labor, and Welfare, issued July 2, 2004) in order to prevent the contamination and spread of bacteria, fungi, viruses, and abnormal prions from the feeder cells, and indicate the methods for the inactivation of cell division potential and conditions such as cell density when using the feeder cells. However, for example, if the feeder cells or equivalent cells are being used in the manufacture of a cell or tissue product that has already been used clinically and whose characteristics and microbiological safety have already been assessed and confirmed, it may be possible to omit the virus tests or parts of other tests by demonstrating the appropriateness of using these cells.
 - (v) The use of antibiotics should be avoided as much as possible. However, if it is thought the use of antibiotics in the initial stages of processing is indispensable, attempt to decrease their use in subsequent steps as much as possible, and clearly state the appropriateness of their use from perspectives such as the scientific

rationale, estimated residual amounts in the final product, and the effects on the patient. If it has been verified that an antibiotic can be adequately eliminated, its use need not be restricted. On the other hand, if a patient has a past history of allergy to the antibiotic used, in principle, this therapeutic method should not be used. If there is no way to avoid the use of antibiotics, administer them very carefully and make sure informed consent is obtained from the patient.

- (vi) If growth factors are used, show the appropriate quality control methods with established acceptance criteria and assay methods, such as for example purity and potency, in order to guarantee the reproducibility of the cell culture characteristics.
- (vii) For media components that may be contained in the final product and other components that are used in manipulation, choose components that do not have any harmful biological effects.
- (viii) When using cells derived from a different species (heterologous cells) as feeder cells, ensure the safety of the cells from the viewpoint of the risk of infection of heterologous-derived cells.

(2) When combining with noncellular components

(i) Quality and safety of noncellular raw materials

If the final product consists of cells together with noncellular components such as matrix, medical materials, scaffolds, support membranes, fibers, and beads, describe in details the quality and safety of the noncellular components.

Provide any relevant information concerning the noncellular raw materials, taking into consideration their type and characteristics, form and function in the final product, and

evaluation of the quality, safety, and efficacy from the perspective of the presumed clinical indication. When using materials that are absorbed by the body, perform the necessary tests on any degradation products.

With respect to the tests that should be carried out, refer to "Basic Views on Biological Tests Necessary for Regulatory Approval for Manufactured or Imported Medical Devices" (Notification No. 02013001, Pharmaceutical and Food Safety Bureau, Japanese Ministry of Health, Labor, and Welfare, issued February 13, 2003), and describe the test results and justify the use of such raw materials. It is encouraged to use rationally knowledge and information obtained from the literature as well.

(ii) Interactions with target (desired?) cells

Demonstrate the validity of test methods used and justify the results obtained for the following three items with respect to the interactions between noncellular components and the cells in the final product as well as in any intermediate products.

(a) The noncellular components do not have any deleterious effects on the function, growth capability, activity, or stability of cells in the final product required for the presumed clinical indication or the cells in any intermediate products.

(b) Evaluate to the greatest extent possible any potential interactions between the cells and noncellular components, taking into consideration for example the mutation, transformation, and/or dedifferentiation of cells in the final product or cells in intermediate products.

(c) Show there is no loss of the expected properties of the noncellular components in the

presumed clinical indication due to any interactions between the noncellular components and the cells in the final and intermediate products.

- (iii) When using noncellular components with the objective of segregating the cells from the application site.

When using noncellular components with the objective of segregating the cells from the application site, confirm their efficacy and safety by referring to (a) through (e) below.

- (a) When immunological segregation is the objective, describe its level
- (b) Membrane permeability kinetics and pharmacological effect of target physiologically active substances derived from cells in the final product.
- (c) Diffusion of nutritional components and excretory products
- (d) Effects of noncellular components on the area near the application site.
- (e) When a pharmacological effect of a target physiologically active substance derived from a desired cell is anticipated and the objective is segregation of the application site and the desired cells or undifferentiated cells, confirm that the cells do not leak out caused by the degradation, etc. of noncellular components.

- (3) When cells undergo genetic modifications

When genes are introduced into cells, provide the details concerning the following items.

- (i) For the target gene (specific gene encoding a desired protein or RNA), information related to its structure, origin, method by which it was obtained, cloning methods, and for cell bank of the target gene, methods of preparation, control, and renewal, and so on.

- (ii) Nature of the transgene.
- (iii) Structure, biological activity, and properties of the desired gene products
- (iv) All raw materials, properties, and procedures (transgenic method, and origin, properties, and method of obtaining vector used in gene introduction) needed to produce the transgenic construct.
- (v) Structure and characteristics of the transgene construct
- (vi) Control and preparation methods for cell and virus banks in order to prepare vectors and transgenic constructs.

For the manufacturing methods for transgenic cells, refer to Chapter 2 and other sections of “Guidelines for Ensuring the Quality and Safety of Gene Therapy Pharmaceuticals”, which is an appendix of “Concerning Guidelines for Ensuring the Quality and Safety of Gene Therapy Pharmaceuticals” (hereinafter referred to as “Gene Therapy Pharmaceutical Guidelines”), published as Notification 1062 by the Ministry of Health and Welfare on November 15, 1995. Also, state clearly the appropriateness of the establishment in accordance with the appendix of the same notification.

Be aware that, based on the law (Law No. 97, 2003) concerning ensuring the biodiversity by regulating the use, etc. of genetic recombination organisms, etc., a separate application procedure will be required when living organisms including certain cells, as well “viruses”, and “viroids” are genetically modified. The following cells are not regarded as living organism: “human cells, etc.” or “cells that have the ability to differentiate, or differentiated cells but are not viable when alone under natural conditions”.

Regardless of what is mentioned above, if a gene introduced into cells is used as a reagent in the

manufacturing process and does not either chemically or functionally make up part of the final product, it is acceptable to just describe how the quality and safety of the gene conform to the intended use, based on the most up-dated knowledge.

(4) When proteins are introduced into cells

When proteins are introduced into cells, provide the details of the items listed below.

(i) Origin, and quality attributes including structure, biological activity and the physicochemical properties of the proteins.

(ii) Information concerning the procurement, manufacturing, quality control, and renewal methods for the proteins

(iii) Methods for introducing the proteins into the cells

(iv) Quality attributes including the structure, biological activity, and the physicochemical properties of the chemical substances used to introduce the proteins into the cells

(v) When preparing a construct for introducing the proteins in question into the cells, provide information related to its preparation, quality control, and renewal methods.

(vi) Preparation of cell banks and cell bank control methods in order to produce introduced proteins.

Regardless of what is mentioned above, if a protein introduced into cells is used as a reagent in the manufacturing process and does not either chemically or functionally make up part of the final product, it is acceptable to just describe how the quality and safety of the protein conform to the intended use.

(5) When reprogramming or dedifferentiating, and/or differentiating cells by drugs or any chemicals

When reprogramming or dedifferentiating cells, and/or differentiating by drugs or any other

chemicals, provide the details related to the following items.

(i) Origin, and quality attributes including the structure and biological activity, if any and the physicochemical properties of the drugs or chemicals in question.

(ii) Information concerning the procurement, manufacturing, quality control, and renewal methods for the target drugs or chemicals.

(iii) Cell treatment methods using target drugs, etc.

(6) When performing cell reprogramming or dedifferentiation, and/or differentiation using physical methods

Describe the details of the methods used when performing cell reprogramming or dedifferentiation, and/or differentiation using physical methods in question.

(7) When performing cell reprogramming or dedifferentiation, and/or differentiation using a combination of methods

Describe the details of the methods when using any combination consisting of genetic modification, the introduction of a protein, drug/chemical treatment, or physical methods to conduct cell reprogramming or dedifferentiation, and/or differentiation.

3. Establishment of human iPS(-like) cell line

Establish human iPS(-like) cell line after having determined to the greatest extent possible the genetic background of the donor. Describe the methods used up until the establishment of iPS(-like) cells from somatic cells that serve as the raw material, and indicate, to the greatest extent possible, the appropriateness of the methods. These include the methods for obtaining the human somatic cells, the separation and culturing of somatic cells, the reprogramming or dedifferentiation of

the somatic cells, methods for the isolation and preparation of cell lines of the reprogrammed or dedifferentiated cells, as well as the media, culture conditions, culture period, yield, and so on at each step in the process until establishment of the human iPS(-like) cell line.

In order to maintain the stability and consistency of the quality of human iPS(-like) cell line, identify critical quality attributes of the cells from among the various cell characteristics (for example; cell purity, morphological features, HLA typing, phenotype specific markers, karyotype, DNA fingerprinting, cell growth properties, pluripotency, etc.) and set acceptance criteria for them. Also demonstrate the potent number of passages or of cell divisions within which cells can be proliferated with keeping their quality in terms of the criteria specified.

4. Storage and transport of human iPS(-like) cell line

For human iPS(-like) cell line, perform appropriate stability tests based on cell viability and potency etc., of the cells, establish storage method and validity period, and make clear their appropriateness, taking into the due consideration duration of storage and distribution and storage form. In particular, when freezing and thawing, confirm whether the process of freezing and thawing have effect on stability and any criterion of the cell line, if needed. Evaluate storage over standard storage period, and confirm the margin of stability to the extent possible. However what are mentioned above are not adopted when using the cells immediately following establishment.

When transporting human iPS(-like) cells, the containers used for transport and the transportation procedure (including temperature control, etc.) shall be determined and their appropriateness clearly indicated.

5. Preparation of records and keeping procedures

Written records for 2. through 4. above shall be prepared and proper keeping procedures for the records shall be clearly described.

II. Manufacturing Process

When manufacturing pharmaceuticals and medical devices derived from processing of human (allogenic) iPS cells or human (allogenic) iPS-like cells (i.e., human iPS(-like) cell-based products), describe in detail the manufacturing method and verify, to the greatest extent possible, the appropriateness of the method using the items listed below in order to maintain consistency of the quality of the product.

a. Lot composition and lot control

Indicate whether or not a lot is made up of final products and intermediate products. If a lot is composed of both final and intermediate products, establish standardized procedures concerning the make up and control of the lot.

b. Manufacturing method

Provide an outline of the manufacturing method from the time of receipt of the cells and tissues or somatic cells that serve as the raw materials through to the establishment of human iPS(-like) cells and cells that have progressed to the differentiation stage and then to the final product, and describe the technical details of the process and necessary process control and product quality control.

(1) Tests upon receipt

Establish a battery of tests as well as acceptance criteria to assess appropriateness of the cells and tissues, somatic cells or human iPS(-like) cells, respectively that will serve as the raw materials, taking into account the nature of the cells and its intended use. These may include, for example, visual test, microscopic

examination, recovery factor of target(desired?) cells, cell viability, characterization of cells and tissues, microbiological tests, and so on. At the stage of initiating clinical trials, provide the actual measured values obtained up until that point with test samples, and propose provisional a set of acceptance criteria based on these values.

(2) Inactivation and elimination of bacteria, fungi, viruses, and other microorganisms

For cells and tissues, human somatic cells or human iPS(-like) cells that serve as raw materials, carry out the inactivation and elimination of bacteria, fungi, viruses, and other microorganisms if needed and whenever possible, to such an extent that the procedures do not have any effect on the cell viability, phenotype, genetic traits, specific functions, or other characteristics and quality of the cells and tissues serving as raw materials. State the appropriateness of measures, procedures and evaluation methods taken, if any.

(3) Tissue disintegration, cell separation, isolation of specific cells, etc.

Describe the methods for the disintegration of tissue, separation of somatic cells, the isolation of specific somatic cells, as well as the methods for washing, etc. of these cells and tissues in order to generate the iPS(-like) cells,, that is performed in the early stages of manufacture of the iPS(-like) cell-based products from collected cells and tissues. When isolating specific somatic cells, establish identification methods for the cells.

(4) Establishment of human iPS(-like) cell line

Establish human iPS(-like) cell line after having determined to the greatest extent possible the genetic background of the donor. Describe the methods used up until the establishment of iPS(-like) cells from somatic cells that serve as the raw

material, and indicate, to the greatest extent possible, the appropriateness of the methods.

Identify critical quality attributes of the cells from among the various cell characteristics and set acceptance criteria for them. Also demonstrate the potent number of passages or of cell divisions within which cells can be proliferated with keeping their quality in terms of the criteria specified. (Refer to chapter II-I.-3.)

(5) Establishment of intermediate cell line derived from human iPS(-like) cells

It should be noted that in some cases the establishment of a cell line (intermediate cell line) as an intermediate product may be important in terms of the stable manufacture of a safe final product, as well as rather scientifically rational procedure. When such a measure is chosen, explain its advantages and appropriateness. If a cell line that exhibits a different phenotype is established in stages, describe the methods (for example, differentiation induction methods, methods for the isolation, culturing, and cell line establishment of the target(desired?) cells, as well as the media, culture conditions, culture period, yield, and so on at each stage until establishment of the cell line) until the establishment of each respective cell line, and justify their appropriateness to the extent possible.

In order to maintain the stability and consistency of the quality of the intermediate cell line, identify important critical quality attributes of the cells from among the various cell characteristics (for example; cell purity, morphological features, phenotype specific markers, karyotype, cell growth properties, pluripotency, etc.) and set acceptance criteria for them. Also demonstrate the potent number of passages or of cell divisions within which cells can

be proliferated with keeping their quality in terms of the criteria specified. Although comprehensive cell characterization is always desirable, it is recognized that there may be difficult to perform the study fully since there are quantitative limits to samples as well as technological limits. Then, it is acceptable to consider to perform the study to some extent possible.

If establishing cell bank from the intermediate cell line in accordance with what described above and utilizing, refer to (7).

(6) Preparation of cells that make up principal component of the final product as an active ingredient

Describe the methods, either directly from a human iPS(-like) cell line or an intermediate cell line that is derived from human iPS(-like) cells, to prepare the cells that serve as the active ingredient of the final product. The methods to be described include induction of differentiation, isolation, and culturing of the desired cells, and the media, culture conditions, culture period, yield, and so on used at each step. Describe to the extent possible the appropriateness of each method.

(7) Establishment of cell banks

When a cell bank is established at any stage during the process of manufacturing human iPS(-like) cell products, describe the details of the rationale for preparing the cell banks, the methods used to prepare the cell banks, characterization of the cell banks, the storage, maintenance, and control methods, renewal methods, as well as any other processes and tests performed, and justify the appropriateness of each. Refer to "Derivation and Characterisation of Cell Substrates Used for Production of Biotechnological/Biological Products" (Pharmaceutical Notification Number 873, Ministry of Health, Labor, and Welfare, July 14, 2000) and other relevant documents. Nevertheless, it is acceptable to omit

a portion of the test items, if there is rational reason that the cells have been already evaluated properly at an upstream point in the process.

(8) Measures to prevent erroneous sampling (mix-ups) and cross contamination during the manufacturing process

It is extremely important to prevent erroneous sampling and cross contamination during the manufacturing process when manufacturing human iPS(-like) cell-based products. Therefore, clearly describe preventative measures in the process control.

3. Characterization of cells that make up principal component of a final product as an active ingredient

Analyze various attributes of the cells such as cell purity to control contamination by undifferentiated cells or non-target cells, the cell viability, morphological characteristics, growth characteristics, biochemical markers, immunological markers, distinctive substances produced from cells, karyotype, differentiation potency, and other appropriate genotypic and phenotypic markers of cells that make up principal component of the final product. Also characterize with respect to biological functions, where necessary. Furthermore, in order to evaluate the appropriateness of the culture period and stability of the cells, use appropriate cell characteristic markers to prove there have been no unintended changes in cells cultured for duration beyond the proposed culture period. When performing these studies, it is acceptable to study and verify beforehand using test samples obtained from donors who are not patients. Based on these results, it is necessary to identify the critical cell characteristics that should be used when applying the product to a patient. Although comprehensive

cell characterization is always desirable, it may not always be possible to perform the study fully since there are quantitative limits to samples as well as technological limits. Then, it is acceptable to just perform the study to the extent possible. When cell processing like growth within the body is anticipated after clinical application, clearly demonstrate the functions expected using the passage number or number of cell divisions based on specified criteria.

4. Form and packaging of final products

The form and packaging of the final product shall ensure the quality of the final product.

5. Storage and transport of final product

If intermediate or final product needs to be stored and transported, storage procedure and duration, the containers used for transport and the transportation procedure (including temperature control, etc.) shall be stated and their appropriateness clearly indicated. (Refer to chapter-III)

6. Consistency of the manufacturing procedure

When manufacturing human iPS(-like) cell-based products, assess beforehand whether or not during the manufacturing process and for each individual product there has been any significant differences between each production (each lot) with respect to the number of cells, cell viability, and cell characteristics (such as relevant markers of phenotype, appropriate markers of genotype, functional characteristics, and the percentage content of desired cells) from the point of view of application methods and intended use of the product. It is acceptable to use test samples obtained from donors who are not patients in place of the real products that will be prepared for clinical trial.

Evaluation using intermediate products may provide a good reflection of the appropriateness of cells and tissues used as raw materials and the validity of the manufacturing process up until the point of intermediate products, as well as also being an appropriate guidepost leading up to the final product. Therefore, it may be reasonable to adopt such approach, where necessary and appropriate.

When the cryopreservation period or time of cell cultivation last to a long term during the manufacturing process, perform sterilization tests and so on at constant intervals to confirm that the sterility has been ensured.

7. Changes in manufacturing process

If the manufacturing process is altered at some point during development, and test results obtained using products manufactured prior to the change in manufacturing method are to be used in the application for clinical trial or regulatory approval, demonstrate the comparability of the products manufactured before and after changing the manufacturing process.

III. Quality Control of Final Product

1. Introduction

The overall quality control strategy of human iPS(-like) cell-based products include specification of final products, quality control of raw materials for each different application to each individual patient, verification of the appropriateness of the manufacturing process and maintenance of consistency thereof, as well as the proper quality control of intermediate products, if any. One of the most critical issues on iPS(-like) cell-based products is a measure to ensure there

has been no contamination of the cells by undifferentiated cells other than the desired cells. It is preferable that no contamination by non-target undifferentiated cells is verified, as much as possible, at the intermediate product stage.

Since specifications for the final product are to be different depending upon the type and properties of the desired cells and tissues, manufacturing methods, intended clinical use and method of application for each product, stability, and test methods that can be available, these differences that depend on the cell or tissue being handled shall be taken into sufficient consideration when setting acceptance criteria and test procedures. Also, specifications shall be set and justified from the perspective of achieving the purpose of quality control as a whole by taking into consideration the mutually complementary relationships between the verification of the suitability of the manufacturing process and the method of maintaining consistency and quality control of the raw materials and intermediate products. The purpose of the assessment for initiating of clinical trials is to confirm that product can be deemed to have no significant quality/safety problems for using investigational clinical trials. Therefore, it may be possible to set provisional specifications with allowances for some variation on the basis of the values measured on a few test specimens, as long as one can argue the relationships between the results of clinical tests and such quality attributes after clinical trials. However, testing for sterility and presence of mycoplasma is essential. It should be noted that quality control strategy including specifications shall be enriched and developed along with the progress of clinical trials.

2. Quality control of the final product

Refer to the general quality control parameters and tests shown below and set necessary and appropriate specifications for the final product, and justify the rationale for the specifications set.

Set appropriate acceptance criteria and test procedures for the individual products that do not make up a lot and for the lot consisting of the products that do make up a lot since normally each individual lot is the unit subjected to quality control.

(1) Cell number and cell viability

The number and viability of cells as being active ingredient in the final product or if needed, in an appropriate intermediate product in the manufacturing process should be determined. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(2) Tests of Identity

Confirm that the cells are the intended target cells by means of important cell characteristic markers selected from among the morphological characteristics, biochemical markers, immunological markers, characteristic products, and other appropriate genotypes or phenotypes of the intended target cells and tissues.

(3) Tests of Purity

If necessary, set the test parameters, test methods, and acceptance criteria for evaluating and controlling the purity of cells with respect to non-target cells, such as undifferentiated cells, cells exhibiting abnormal growth, transformed cells, and the presence of any contaminating cells, taking into consideration the origin of the target cells and tissues, the culture

conditions and other parameters of the manufacturing process, quality control of intermediate products, and so on. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(4) Tests for cell-derived undesirable physiologically active substances

Specify appropriate permissible dose limiting tests for any potential undesirable physiologically active substances that are derived from target cells and their significant presence in the product is presumed clearly to impact on the safety of the patient. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(5) Tests for process-related impurities

For substances that may be present in the final product as contaminants, residues, or as newly generated products or degradation products, etc., potentially originating from raw materials, non-cellular components, media ingredients (including feeder cells), chemical reagents, or any other process-related materials, and that may have deleterious effect on the quality and safety (for example, albumin derived from fetal calf serum, antibiotics, etc.), it is necessary to either prove that the substance is not present in the final product by taking into consideration the results of process evaluation related to elimination of the substance or the results of in-process control of the substance, or alternatively establish appropriate tests with which to control permissible levels for the substance in the final product. When selecting substances to be tested and setting their acceptance criteria, their appropriateness should be explained and justified.

At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(6) Sterility tests and tests for the presence of mycoplasma

The sterility of the final product should be sufficiently assessed to ensure sterility throughout the entire manufacturing process using test samples. The sterility (negative for common bacteria and fungi) of the final product should be demonstrated in tests before use in a patient. Appropriate tests confirming the absence of mycoplasma should also be carried out. A validated nucleic acid amplification method can be used. If the results of the sterility and other tests on the final product can only be obtained after administration to the patient, the methods for dealing with non-sterility after administration should be established beforehand. In such an instance, demonstrate by testing that the intermediate products are sterile, and the sterility should be strictly controlled in all processes up until the final product. If a product from the same facility and same process has already been used in patients, its sterility had to be confirmed by testing in all patients. If complete closure (hermetically sealed) of the product comprising a lot has been assured, tests using only representative samples are sufficient. When tests need to be conducted for each different application and if the results of sterility and other tests can only be obtained after administration to the patient, whether or not application should be done or not will be determined based on the most recent data. However, even in such an instance, sterility tests and other tests on the final product shall be conducted.

While it is desirable that every

possible effort be made so that antibiotics are not used in cell culture systems, if they are used, adopt measures to ensure that the antibiotics do not influence the sterility tests.

(7) Endotoxin tests

Carry out the endotoxin test, taking into consideration the impact of the contaminant in the samples. The acceptance criteria do not necessarily depend on the actual measured values. It is recommended to set acceptance criteria taking into consideration the safety ranges given in the Japanese Pharmacopoeia and/or any other relevant compendia that are based on a single dose of the final product. Endotoxin testing can be established as an in-process control test, however, in such cases, specify criteria, including validation results, and justify their appropriateness.

(8) Virus tests

Conduct tests for titer of possible viruses in the intermediate and the final product and confirm administration of the iPS(-like) cell-based products do not lead any disbenefit to the patient, when using cells which are not banked in neither raw materials nor manufacturing processes, and are from donors not proved in the window period of infection, and in which HBV, HCV, HIV or HTLV can propagate. If components of a biological origin are used in the manufacturing process, it may be necessary to consider conducting tests on the final product for viruses originating from those components. However, whenever possible, it is preferable to verify there is no contamination by testing or process evaluation at the stage of the original component.

(9) Efficacy tests

In some instances, it will be necessary to consider efficacy testing that takes

into consideration cell type, intended clinical use, or distinctive characteristics of the cells. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(10) Potency tests

If the secretion of a specific physiologically-active substance from the cells or tissues accounts for the efficacy or the essential effect of an iPS(-like) cell-based product, establish test parameters and/or acceptance criteria related to the substance in order to demonstrate the intended effect. Set acceptance criteria for potency, amount produced, and so on for phenotype products or for a desired product secreted from cells when a gene has been introduced. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

(11) Mechanical compatibility tests

For products that require a certain degree of mechanical strength, set acceptance criteria to confirm mechanical compatibility and durability that take into account the site of application. At beginning of the clinical trial, it is acceptable to set provisional acceptance criteria based on actual measured values from a small number of test samples.

Chapter III Stability of Human iPS(-like) Cell-based Products

Taking into full consideration the storage and distribution periods and the storage form, perform suitable stability testing on human iPS(-like) cell-based products and/or critical intermediate products based on the cell viability, potency, etc. to establish storage methods and expiration date,

and justify their appropriateness. In particular, when freezing and thawing are involved in the storage and use of the products, confirm that the freezing and thawing processes do not have any effects on the stability or criteria of the product. Where necessary and possible, it is recommended to conduct stability studies on the products whose manufacturing period or storage period exceeds normal periods in order to confirm to the greatest extent possible the limits of stability. This does not apply if a product will be used immediately after being produced.

If a human iPS(-like) cell-based product will be transported, the relevant transportation vessels and transportation procedures (such as thermal management, etc.) shall be set and justified their appropriateness.

Chapter IV Preclinical Safety Testing of human (iPS)-like Cell-based Products

Relevant animal tests and/or in vitro tests may be performed in order to elucidate safety concerns on a human iPS(-like) cell-based product to a scientifically reasonable and technically possible. The type, characteristics and intended clinical use of the individual final product should be critical elements when considering the scope and protocol of the non-clinical safety study and demonstrating the propriety thereof.

Non-cellular constituents and process-related impurities should be evaluated as much as possible by physicochemical analyses but not tests using animals. Also, there is an important safety concern regarding the presence of undifferentiated cells in the final product and their potential to cause any ectopic tissue formation, tumorigenicity, or malignant transformation. For this, it is necessary to strive as much as possible to reduce the risk of contamination of such cells by thorough analysis to the greatest

extent possible at the cell bank and/or intermediate product stage, or alternatively by developing and utilizing methods that effectively separate, remove, and/or inactivate these contaminating undifferentiated cells from the target cells during manufacturing process. Furthermore, selection of route of administration and so on for the target cells may also be a useful measure to minimize any safety concerns.

It is not always true that meaningful results can be obtained by testing of products of human origin with experimental animals. Thus, where more useful information is expected to be obtained by preparing product models of animal origin and conducting tests with appropriate experimental animals, there may be a scientific rationale for using such a type of test system. In such a case, consider conducting tests using suitable animal models for each target diseases. (Note: For example, monkeys may be suitable for nervous system diseases, while pigs and/or dogs may be suitable for cardiovascular diseases). However, since cell groups that possess identical characteristics to cells that constitute a human iPS(-like) cell-based product will not necessarily be obtained from non-human animal species even though the preparation procedures are same as human, and since an animal cell origin product manufactured using identical culture conditions and so on will not necessarily be comparable to a human cell product, careful study beforehand are needed when adopting, conducting, and evaluating such tests. When conducting animal experiments using iPS(-like) cell-based products obtained from non-human animal species, explain the feasibility of extrapolation. Depending on the case, consider test systems that employ cells, and clearly explain the appropriateness of the test system

when conducting tests using this kind of approach.

Presented below are examples of items and points to consider that should be referred to, if necessary, when confirming the preclinical safety of a product. These are merely examples for illustration purposes and are not suggesting tests with no rational basis be carried out. Conduct necessary and appropriate tests, taking into account the characteristics of the product, intended clinical use, and so on, and evaluate and discuss the results in a comprehensive manner.

1. For cells expanded beyond the defined limit for cultivation (by a period of time, population doubling level of the cells, or passage level of the cells) for routine production, clearly demonstrated that transformations other than the target transformation and abnormal proliferation of non-target cells have not occurred.
2. It may be necessary to conduct quantitative assays of some special physiologically-active substances produced by the cells and tissues and discuss their effects when given to patients. In some cases, significant amounts of active substances including cytokines and growth factors would be produced by the cells and this may result in undesirable effects on the patients.
3. Examine and discuss the potential effects and consequence from safety aspect of the product on the normal cells and tissues of a patient.
4. Investigate and discuss the possibility of the formation of ectopic tissue by cells in the product and/or contaminating undifferentiated cells and potential safety consequence thereof when the product is given

to the patient. Discuss in a comprehensive manner, taking into account the type and characteristics of the product, the route of administration, target diseases and appropriateness of the test system, etc.

5. Investigate and discuss the possibility and safety of undesirable immunological reactions due to the product and/or expression product of a transgene, and safety consequence thereof.
6. Using an appropriate animal model or other system, investigate and discuss the possibility of tumor formation including benign tumor and/or malignant transformation of cells in the final product or in an intermediate product. Discuss in a comprehensive manner in terms of the type and characteristics of the product, route of administration, target diseases, appropriateness of the tests systems, and so on. If tumorigenicity or malignant transformation is a possibility, clearly state(describe?) the appropriateness of its use and the rationale, taking into consideration the relationship with the anticipated efficacy (Note: The most important aspect of a tumorigenicity test is to accurately assess the tumorigenicity of a final product that will be used in patients. However, it is conceivable that the tumorigenicity will need to be evaluated using cells from the intermediate product because that cells comprising the final product cannot be used for various reasons, such as the inability to obtain a sufficient number of cells. Furthermore, various conditions such as cell dispersion and cell adhesion to the scaffolding, cell density, and administration site in tumorigenicity tests using animal

models are not necessarily the same as for the final product. There are also differences in sensitivity depending on the species, strain, and immunological state of the animal. The tumorigenicity of the final product should be evaluated taking into consideration these circumstances in a comprehensive manner. The risks to the patient arising from tumorigenicity of the final product should be rationally evaluated based on the balance between any risks and the benefits to the patient by treating the disease.).

7. If an exogenous gene is introduced into certain cells in the manufacturing process and it may have functions or remain as a residue in the final product, conduct tests in accordance with "Gene Therapy Pharmaceutical Guidelines", published as Notification 1062 by the Ministry of Health and Welfare on November 15, 1995. In particular, if virus vectors are used, test quantitatively to determine the potential presence of any propagating viruses such as replication-competent retrovirus or replication-competent adenovirus and justify the appropriateness of the test method employed. Describe the safety of the transgene and its products based on their characteristics. For cells, discuss the possibility of changes in cell growth, tumor formation including benign tumor and malignant transformation. Whenever the vector which may be inserted in a chromosome is used, consider the necessity of evaluating possible occurrences of abnormal proliferative characteristic and/or tumorigenicity due to insertion mutation in the cells as well as of implementing long-term

follow-up for clinical applications.

8. Consider conducting rationally designed general toxicology tests if it is easy to obtain the product, including an animal-derived model product, and if useful information on its clinical application is obtainable.

When conducting general toxicology tests, refer to "Guidelines for Toxicology Studies on Pharmaceuticals", which is an appendix in the document entitled "Guidelines on Toxicology Studies Required for Regulatory Approval for the Manufacture or Import of Pharmaceuticals" (Drug Evaluation Notification 1:24, Ministry of Health and Welfare, September 11, 1988).

Chapter V Studies Supporting the Potency or Efficacy of human iPS(-like) Cell-based Products

1. A well designed study with experimental animals and/or cells should be performed in order to demonstrate the functional expression, sustainability of effect, and/or the anticipated clinical efficacy (Proof-of-Concept) of a human iPS(-like) cell-based product to a scientifically reasonable and technically possible extent.

2. For transgenic cells, demonstrate the expression efficiency, sustainability of expression and biological activity of desired products from the transgene, and discuss about the feasibility of anticipated clinical efficacy (Proof-of-Concept) of the human iPS(-like) cell-based product in question..

3. Where appropriate models of products derived from processing of animal iPS(-like) cells and/or disease model animals are available, use them

to study the potential therapeutic efficacy of the product.

4. At beginning of the clinical trial, detailed experimental studies will not necessarily be required if it can be justified by means of scientific literatures and/or other well-known information available that the potency or efficacy of therapy using the product in question is expected to be markedly superior compared to that using a different therapeutic method.

Chapter VI Pharmacokinetics of Human iPS (-like) Cell-based Products

1. Studies on pharmacokinetics relating to internal behavior of cells/tissues that constitute the final products or expression products of transgenes, which may include absorption and distribution in experimental animals should be performed to a technically possible and scientifically reasonable extent. Thereby, it is expected to presume the survival duration and duration of effect of cells/tissues in products that have been applied to patients and clarify if the intended efficacy is achieved to a sufficient extent. (Note: Testing methods may include histological studies, Alu-PCR, MRI, PET, SPECT, and bioimaging).

2. Clarify, through animal studies, the rationale for the administration method for the human iPS(-like) cell-based products. In particular, extrapolate from animal experiments the systemic distribution of cells after systemic administration and discuss the distribution from the point of view of clinical usefulness. (Note: Although it is unclear exactly where the cells adhere for each administration route, it is assumed that local administration may be preferable to systemic administration. However, even with systemic administration, if the benefits to

patients undergoing administration can be explained in a rational manner, it may be acceptable to use systemic administration. For example, an administration method that minimizes distribution of iPS(-like) cell-based product to organs other than target organ would be the rational. Even if the cells do locate to a different site, it might be used as an administration method if there are no adverse effects on patients. A disadvantage due to ectopic differentiation may be, for example, arrhythmia caused by osteogenesis of some kinds of cells which ectopically locate to the heart.).

3. When the cells or tissues are directly applied or alternatively targeted to a specified site (tissue, etc.) where they can be expected to exert their actions, clarify the localization and discuss the effect of the localization on the efficacy and safety of the product.

Chapter VII Referring to Clinical Trials

The main purpose of the present guideline is to address points to consider for evaluating the quality and safety of human (allogenic) iPS (-like) cell-based products at the time of application for marketing authorization as well as at beginning of investigational clinical trial. In the latter case, it is necessary to evaluate, taking into consideration the clinical usefulness, if there is any quality or safety problems that might pose an obstacle to initiating human clinical trials (First-in-Man). This leads to the necessity of the evaluation by referring to the points outlined below for intended clinical trials in question. At that time, first any presumed known risk factors associated with the product quality and safety should be eliminated as much as possible using up-to-date science and technology, and the scientific appropriateness should be clearly described. The remaining unidentified risks should

be weighed against the risks associated with not performing the trials in patients suffering from diseases that are serious and life-threatening, involve marked functional impairment, or a marked loss of quality of life (QOL) due to the loss of a certain degree of physical function or form, and for diseases in which existing therapies have limitations and do not provide cures. Furthermore, it is also critical to entrust the right to make a decision to the patient after making all of this information available, including all identified/unidentified risks and anticipated benefits to the patient .

- 1.Target disease
- 2.Point of view with respect to the subjects and patients who should be excluded as subjects
- 3.Details of the therapy to be performed in the subjects, including the application of human iPS(-like) cell-based products and drugs used concomitantly (Note: If it is believed drugs to maintain, enhance, and/or induce the function of administered or transplanted cells will be co-administered, verify the activity of the drugs either in vitro or in vivo).
- 4.Appropriateness of conducting the clinical trials in light of comparison with existing therapeutic methods.
- 5.Plan for explaining the clinical trial to the patients, including the risks and benefits of the product from currently available information.
Clinical trials should have an appropriate study design and specified endpoints, and should be designed based on in light of the desired cells/tissues, target disease, and method of application.

C. 12.7 ヒトES細胞加工医薬品等の品質及び安全性の確保について英文版

Guidelines on Ensuring the Safety and Quality of Pharmaceuticals and Medical Devices Derived from Processing of Human Embryonic Stem Cells

(September 7, 2012)

Introduction

1. The present guidelines outline the basic technical elements to ensure the quality and safety of pharmaceuticals and medical devices derived from processing of human embryonic stem cells (ES cells). These products are hereinafter referred to as ES cell-based products or merely as “desired cell products”.

At the present time it is assumed these guidelines will apply to drugs manufactured by processing already existing ES cell-derived differentiated cells that are the principal component in the manufacture of a drug. When the intention is to manufacture a drug or other product in the future by newly establishing human ES cells, the donor must be thoroughly briefed, and their consent obtained, about the aim of establishing the cells prior to providing to the donor as much of the necessary information as possible outlined below in 1. In Vitro Fertilized embryos (see I. Raw Materials and Materials Used in Manufacturing, Chapter 2 Manufacturing Methods) and ensuring the anonymity of the donor. Following this, devise appropriate measures in accordance with 3 “Human ES cell strains and

human ES cell-derived differentiated cell strains”, also in Chapter 2, and clearly explain their appropriateness. There are many different types of desired cell products, and methods of clinical application. On the other hand, the scientific progress and accumulation of experience and knowledge in this field are constantly advancing. Therefore, it is not always appropriate to consider that the contents of the present guidelines are all inclusive and all definitive. Consequently, when testing and evaluating each individual product, it is necessary to take flexible approaches, on a case-by-case basis, based on rationale that reflects scientific and technological advances at that specific point in time.

2. The main purpose of evaluation of quality and safety of the desired cell products prior to conducting investigational clinical trials (e.g., at the time of “clinical trial consultation”) is to confirm whether or not there are any quality and/or safety problems that would obviously be a hindrance to initiating human clinical trials on ES cell-based products in question, whether certain quality attributes (QA) of the product are grasped enough to check the relationship between clinical findings and the QA, and whether consistency of the QA are ensured within a definite range. At that time, it is also important at first to eliminate any presumed known risk factors associated with the product quality and safety as much as possible using up-to-date science and technology and to describe the scientific appropriateness of the results of such

action. The remaining unidentified risk factors should be weighed against the risks associated with not performing the trials in patients suffering from diseases that are serious and life-threatening, involve marked functional impairment, or a marked loss of quality of life (QOL) due to the loss of a certain degree of physical function or form, and for diseases in which existing therapies have limitations and do not provide cures. Furthermore, it is also important to entrust the right to making a decision to the patient after making all of this information available. In applying for investigational clinical trials, applicants can submit reasonably-prepared provisional data package, which fulfill conditions to meet the purpose as aforementioned, on the premise that data package for ensuring quality and safety at the time of marketing application/registration are enriched and developed along with the progress of clinical trials in line with the guidelines.

Finally, applicant are encouraged to discuss with the Pharmaceuticals and Medical Devices Agency (PMDA) with respect to the type and extent of data that may need for initiating individual clinical trials. There may be numerous variations in individual data package that could not be definitively clarified in the present guidelines due to differences such as in the origin of the product, target disease, target patients, sites of application, methods of application, and methods of processing.

3. The items, test methods, criteria, and any other technical requirements described in the present guideline are