

## ロットリリースの対象とするロットの種別

Q. Which classes of lots are subject to lot release?

問い. どのような種別のロットがロットリリースの対象になっていますか？

日本	カナダ	欧州
国内で生産され流通するワクチン	国内で生産され流通するワクチン	国内で生産され流通するワクチン
輸入又は調達されて国内で流通するワクチン	国内で生産され輸出のみされるワクチン 輸入又は調達されて国内で流通するワクチン	輸入又は調達されて国内で流通するワクチン

中国	韓国
国内で生産され流通するワクチン	国内で生産され流通するワクチン
輸入又は調達されて国内で流通するワクチン	輸入又は調達されて国内で流通するワクチン

7

## 試験の実施頻度

### 2.1 Consideration for Establishing Lot Release Procedures by NRA/NCL

Initially, the NRA/NCL should test the vaccine in addition to critical review of the summary protocols. After confirmation of the consistency of the quality through testing the chosen parameters, release of further lots should include full or selected testing or no testing depending on the nature of the product and established experience.

### 2.1 NRA/NCLによるロットリリースの手順制定のための検討事項

NRA/NCLは、当初、注意深くサマリープロトコールを審査することに加えて、ワクチンに対する試験を実施することが適切である。選択されたパラメータに対する試験を通じて品質の一貫性が確認された場合、以降のロットのリリースについては、製品の性質やそれまでに蓄積された経験に応じて、全試験若しくは一部の選ばれた試験を実施する、又は全く試験を実施しないという選択肢がある。



Q. What percentage of lots is tested?

問い. 何パーセントのロットに対して試験を実施していますか？

8

## 試験の実施頻度

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問い. 何パーセントのロットに対して試験を実施していますか？

日本	カナダ	欧州
100%	100%未満	100%

中国	韓国
100%	100%未満

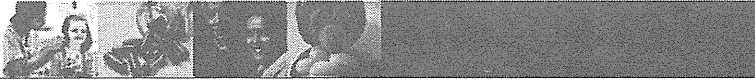
9

## 試験の実施頻度:カナダの事例

**Evaluation Groups**

- Group 1A / 1B (clinical lots / consistency, pre-market only)
- Group 2 (lab testing and protocol review)
- Group 3 (protocol review)
- Group 4 (company informs BGTD of lots in the market)

It is a risk-based approach which allows BGTD to allocate resources based on priorities – risk is periodically reassessed, product can move from one category to another



臨床試験ロットに対してもロットリリースが行われる (Group 1A)

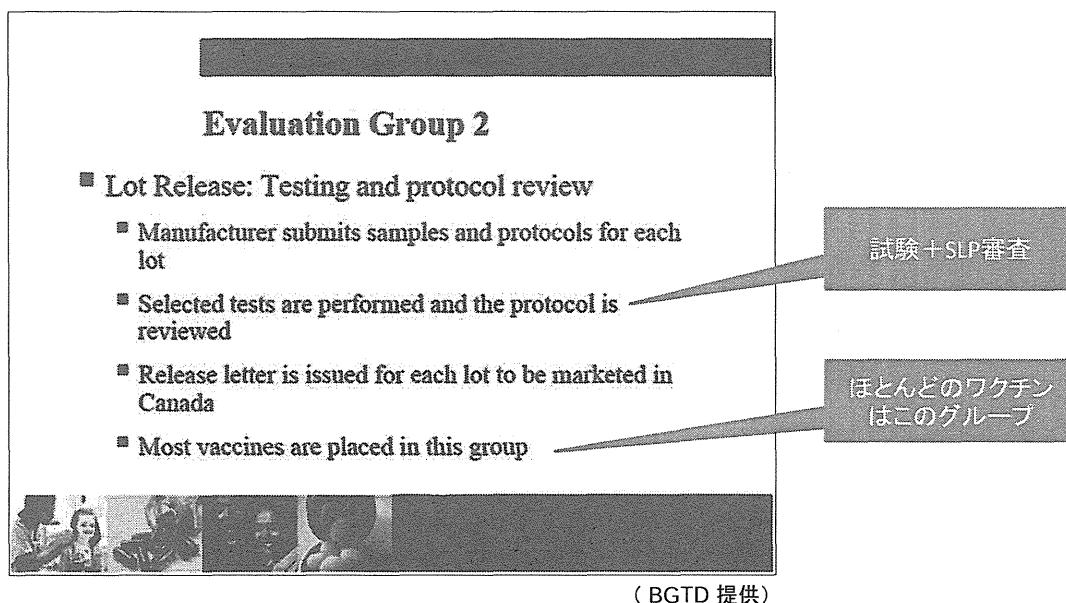
ワクチンのロットリリースはGroup 2 又は3

届出のみ。ワクチンへの適用事例はない。

グループ分けはリスクベースで定期的に見直される

(BGTD 提供)

## 試験の実施頻度:カナダの事例



**Evaluation Group 2**

- Lot Release: Testing and protocol review
  - Manufacturer submits samples and protocols for each lot
  - Selected tests are performed and the protocol is reviewed
  - Release letter is issued for each lot to be marketed in Canada
  - Most vaccines are placed in this group

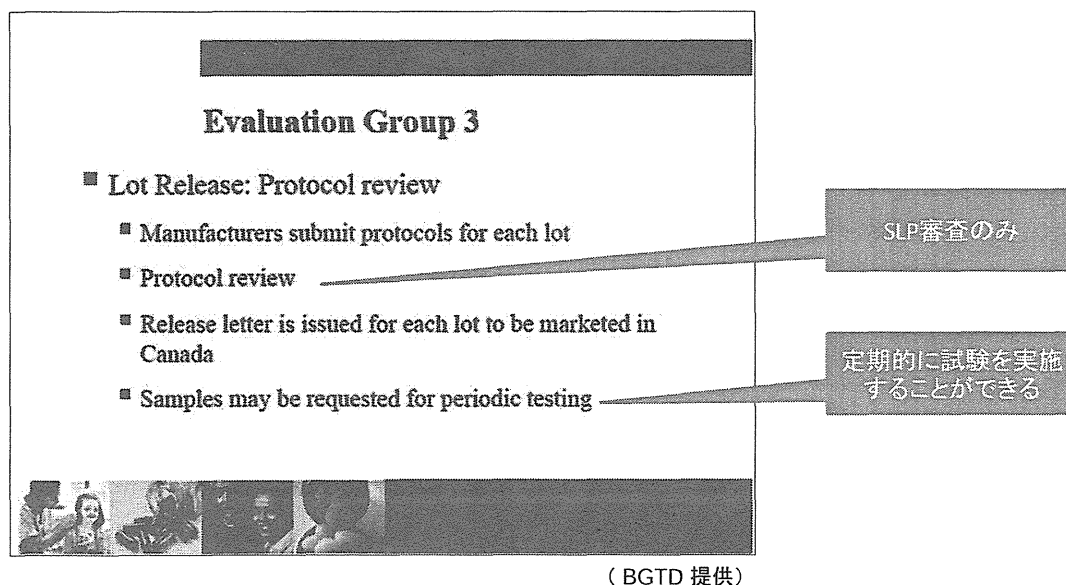
試験+SLP審査

ほとんどのワクチンはこのグループ

(BGTD 提供)

11

## 試験の実施頻度:カナダの事例



**Evaluation Group 3**

- Lot Release: Protocol review
  - Manufacturers submit protocols for each lot
  - Protocol review
  - Release letter is issued for each lot to be marketed in Canada
  - Samples may be requested for periodic testing

SLP審査のみ

定期的に試験を実施することができる

(BGTD 提供)

12

## 試験の実施頻度:カナダの事例

### リスク評価の項目

#### Factors considered during assignment of products to Evaluation Groups

##### 1 Product Indication

- age of target population (e.g. infants, seniors etc.)

- 

##### 2 Nature of the Product

- source and level of control of the raw materials
- complexity, robustness and level of control of the manufacturing process

- 

##### 3 Production History

##### 4 Inspection History

##### 5 Testing History

##### 6 Post-market Experience

GUIDANCE FOR SPONSORS Lot Release Program for Schedule D (Biologic) Drugs (Health Canada 2005)

13

## 試験の実施頻度:カナダの事例

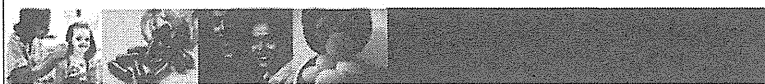
### Yearly Biologic Product Report (YBPR) - Implemented 2006

- The information from the YBPR could be used to assess the ongoing safety and quality of the product, to verify the consistency of the process, and to highlight any trends. BGTD will review the YBPR and, where appropriate, notify sponsors of changes in the assignment of the Evaluation Group.

製品ごとに年次報告を提出させるしくみがある

YBPRにより、継続的に安全性と品質が評価される

評価結果により Evaluation Groupが変更される



(BGTD 提供)

14

## 試験項目の選択

### 4.2.4 Criteria for Selection of Tests for Lot Release and Percentage of Lots to Be Tested

Once the decision to perform testing is taken, the NCL should concentrate on a selection of critical elements from the marketing authorization requirements to be tested and the percentage of lots to be tested.

Key elements of focus where tests may be considered necessary include appearance, identity, potency, specific safety and for some products thermostability. .... Some parameters are better monitored through other tools such as GMP compliance. In all cases the added value of the independent results for the tests chosen should be carefully considered in the context of the overall evaluation of the lot.

### 4.2.4 ロットリリースの試験項目の選択と試験を実施する頻度の基準

試験を実施することにした場合、NCLは、製造販売承認事項から試験を実施すべき重要項目を選び出し、それによるような頻度で実施するかについて十分に検討する必要がある。

試験の実施を考慮する重要項目には、外観、同定、力価、特異的安全性、そして製品によっては温度安定性が含まれる。.....GMPの遵守など、他の方法によってモニターする方が適切な項目もある。いずれの場合でも、選択した試験について製造業者から独立した試験結果を得ることによってもたらされる利益について、ロットを総合的に評価するという文脈の中で慎重に考慮されるべきである。



Q. What items are tested when independent testing of acellular pertussis vaccine is performed?

Q. What items are tested when independent testing of human papillomavirus (r-DNA) vaccine is performed?

問い. 精製百日せきワクチン/ヒトパピローマウイルスワクチンの試験項目は何ですか？

## 試験項目の選択

Q. What items are tested when independent testing of acellular pertussis vaccine is performed?

問い. 精製百日せきワクチンの試験項目は何ですか？

日本	カナダ	欧州
力価試験(脳内攻撃法) マウスヒスタミン増感試験 毒性復帰試験 エンドキシン試験 異常毒性否定試験 ホルムアルデヒド含量試験	力価試験(マウス免疫原性試験)	外観 力価試験(マウス免疫原性試験)(最終バルクごと) 百日咳毒素の残存活性(マウスヒスタミン増感試験等)(最終バルクごと) エンドキシン試験(最終バルクごと) 同定試験

中国	韓国
力価試験(脳内攻撃法) 百日咳毒素の残存活性(マウスヒスタミン増感試験等) 無菌試験 同定試験	外観 力価試験(マウス免疫原性試験 又は脳内攻撃法) 百日咳毒素の残存活性(マウスヒスタミン増感試験等) 毒性復帰試験 エンドキシン試験 無菌試験 異常毒性否定試験 アジュバント含量試験 保存剤含量試験 不活化剤残留試験 pH試験 同定試験

## 試験項目の選択

Q. What items are tested when independent testing of human papillomavirus (r-DNA) vaccine is performed?

問い. ヒトパピローマウイルスワクチンの試験項目は何ですか？

日本	カナダ	欧州
異常毒性否定試験 MPL含量試験(該当する場合) 力価試験(in vitro相対力価法)	無回答	外観 MPL含量試験(該当する場合) 力価試験(in vitro相対力価法) 力価試験(in vivo法) 確認試験(各型) L1純度試験(中間段階) L1モノマー含量試験(中間段階)

中国	韓国
承認されているワクチンがない (2013.12現在)	外観 無菌試験 エンドキシン試験 異常毒性否定試験 たん白質含量試験 吸着率試験(各型) 力価試験(in vitro相対力価法) pH試験 採取容量試験 確認試験(各型)

17

## 試験法の開発と技術移転

### 4.2.2 Prerequisites for Setting Up Independent Testing for Lot Release

.....NCLs should discuss with the manufacturer the transfer of assays if required. This should begin as early as possible in the marketing authorization procedure to allow transfer and qualification/validation of the methodology prior to apply to the first lot for lot release testing. ....

### 4.2.2 ロットリリースのための当局による試験をセットアップする前提条件

.....NCLは、試験法の技術移転について、必要に応じて製造業者と協議する必要がある。このプロセスは、試験法の技術移転と適格性評価/バリデーションが最初のロットリリース試験に間に合うように、承認審査の過程のできるだけ早い段階で開始すべきである。.....

18

## 試験法の開発と技術移転

### 4.2.4 Criteria for Selection of Tests for Lot Release and Percentage of Lots to Be Tested

Development of testing methodology and capability should begin as soon as possible for both responsible NRA/NCL and manufacturer, possibly at the clinical trial stage.

### 4.2.4 ロットリリースの試験項目の選択と試験を実施する頻度の基準

試験方法と試験実施能力の開発は、NRA/NCL及び製造業者ともに、臨床試験の段階など、可能な限り早い段階から開始すべきである。



Q. For a new product, at what stage do you usually start a collaboration/discussion with a manufacturer regarding development and/or transfer of testing methodology and capability?

問い. 新規製品について、通常、どの段階から試験法と試験実施能力の開発及び／又は技術移転について、製造業者との協力／協議を開始していますか？

19

## 試験法の開発と技術移転

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日本	カナダ	欧州
承認申請後	承認申請前の後期(臨床試験の段階等) 承認申請直前 承認申請後 承認後	承認申請前の後期(臨床試験の段階等) 承認申請直前

中国	韓国
承認申請前の早期(非臨床試験の段階等)	承認申請前の早期(非臨床試験の段階等) 承認申請前の後期(臨床試験の段階等) 承認申請直前 承認申請後 承認後

20

## 異なる規制部門間の連携と情報交換

### 2. General Considerations

Lot release is part of the whole regulatory framework which includes marketing authorization, GMP (good manufacturing practices) inspection, and post marketing surveillance (PMS) etc. The relationship between the NRA and the NCL varies from country to country, but in all cases it is essential that the different branches of the regulatory structure interact and exchange information effectively.

### 2. 一般的な留意事項

ロットリリースは、製造販売承認、GMP査察、市販後調査(PMS)等を含む全体的な規制の枠組の一部である。NRAとNCLの関係は国によって様々であるが、いかなる場合においても、規制体系を構成する異なる部門同士が、効果的に連携し情報を交換することが必要である。

### 4.2.2 Prerequisites for Setting Up Independent Testing for Lot Release

..... Knowledge of the marketing authorization dossier is essential to identify and assess the critical parameters for testing. Ideally the NCL staff should be involved in the marketing authorization evaluation process (for pharmaceutical quality information at least).

### 4.2.2 ロットリリースのための当局による試験をセットアップする前提条件

..... 製造販売承認書の内容を知っていることは、試験を実施すべき重要パラメータを同定し、評価するために必須である。理想的には、NCLの職員は、製造販売承認の審査過程(少なくとも品質に係る部分について)に関与することが適切である。

## 異なる規制部門間の連携と情報交換

### 4.2.3 Establishment of Testing Policy

..... Other information to be considered includes GMP inspection report, adverse event following immunization (AEFI) report, product complaint and other post marketing surveillance safety and quality information.

### 4.2.3 試験ポリシーの確立

..... 他に考慮すべき情報として、GMP査察報告書、接種後有害事象報告(AEFI)、製品への苦情、その他の市販後安全/品質監視情報などがある。

### 4.2.9 Evaluation of NCL Results

A feed back mechanism from NCL to NRA and/or the GMP inspectorate is highly advisable in order to coordinate and optimize regulatory actions (e.g. urging license variation, refinement of product specification based on trend analysis etc.).

### 4.2.9 NCLの試験結果の評価

規制の実施(例えば、緊急の承認事項一部変更、トレンド分析に基づく製品規格の改善等)を調整し最適化するために、NCLからNRA及び/又はGMP査察当局に対して情報をフィードバックする仕組みを持つことが強く勧められる。



## 異なる規制部門間の連携と情報交換

機能	日本	カナダ	ドイツ
承認審査	PMDA/厚労省	BGTD	PEI
市販後調査 (AEFI)	PMDA/厚労省	Other than BGTD	PEI
ロットリリース	感染研/厚労省	BGTD	PEI
試験所機能	感染研/厚労省	BGTD	PEI
GMP査察	PMDA/厚労省	Other than BGTD	Local government
臨床試験の監視	PMDA/厚労省	BGTD	PEI

AEFI: Adverse Event Following Immunization  
 BGTD: Biologics and Genetic Therapies Directorate  
 PEI: Paul-Ehrlich Institut

## 異なる規制部門間の連携と情報交換：欧州の事例

単なるロットリリースを越えて...

OCABR: More Than Just Batch Release

Real-time monitoring of trends in consistency; a global picture, not possible through spot-checks

Proactive action before the product reaches the patient

Compliments GMP inspections, MA evaluation and monograph development (both during the process and as feedback for action)

Helps ensure an independent technical expertise for all branches of the regulatory scheme

Is an open channel for exchange and cooperation with manufacturers

トレンドのリアルタイムモニターを可能にする

予防措置の実施

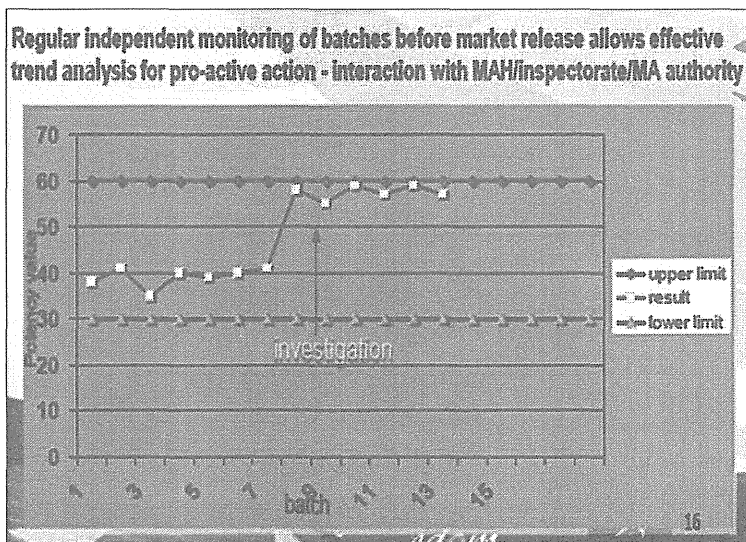
GMP査察、承認審査、基準の策定を補う

当局の技術的専門性を確かなものにする

(EDQM提供)

OCABR: Official Control Authority Batch Release

## 異なる規制部門間の連携と情報交換：欧州の事例



出荷前のロットを恒常的にモニターすることによって、予防措置につながる効果的なトレンド解析が可能になる

製造販売業者、査察当局、承認審査当局との相互作用

(EDQM提供)

## 国家間のネットワーク形成と業務分担

**2.2 Encouragement of Networking and Work-sharing**  
 Regional laboratory networks can serve as a forum for sharing information, exchanging experience on technical issues and facilitating assistance between NRAs/NCLs. ....  
 Development of a network expands the capacity of individual NRAs/NCLs beyond their own limits through work-sharing and ideally avoids having the same lot tested a number of times unnecessarily by different NCLs by building confidence in the evaluation performed by other network members. ....  
 Although full mutual recognition of lot release certificates among NRAs/NCLs would be ideal, it is recognized that it is a complex issue with a number of difficulties in practice. Nevertheless an effective regional network can help build the foundations necessary for such a goal.

**2.2 ネットワーク形成と業務分担の奨励**  
 地域内実験室ネットワークは、情報共有、技術的な問題に関する経験の交換(相互活用)、NRA/NCL間の支援の促進等のための意見交換の場として役に立つ。 ....  
 ネットワークを確立すれば、業務分担を行うことによって、それぞれのNRA/NCLのキャパシティが自身の限界を超えるまでに拡大し、また、理想的には他のネットワークメンバーが行った評価を信頼できるような体制を構築することによって、1つのロットに対して複数のNCLが必要以上に何度も試験を実施しなくて済むようになる。 ....  
 NRA/NCL間のロットリリース証明書の完全な相互認証が理想的ではあるものの、実行するとなると多くの困難を伴う複雑な問題であると考えられている。それでもなお、効果的な地域内ネットワークは、最終目標を達成するために必要な礎を構築する一助となるだろう。


## 国家間のネットワーク形成と業務分担：欧州の事例

OCABR Network

**Clear rules to follow – only 1 OMCL tests!**  
**Mutual Recognition Required By Law**  
 Made possible due to formation of a harmonised  
**OCABR NETWORK**

Responsible for elaboration of a *Defined/codified system*

- > Administrative procedures and technical guidelines
- > Issuing of an OCABR certificate which is recognised by other MS
- > Communication, Co-operation and Transparency



明確なルール、試験は一ヶ所のOMCLのみで実施！

相互承認を法令により規定している

発行されたOCABR Certificateは、他のメンバー国で認証される

(EDQM提供)

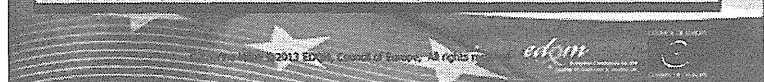
OCABR: Official Control Authority Batch Release  
 OMCL: Official Medicine Control Laboratory

## 国家間のネットワーク形成と業務分担：欧州の事例

OCABR Network

Network established in 1994: works within the General European OMCL Network (GEON)

FULL OCABR NETWORK		
Network for Human Immunologicals (Vaccines)	Network for Medicinal Products Derived from Human Blood (Blood)	Plenary Meeting 1 / year
Role: Manage OCABR issues related to testing and cooperation between MS AND feedback and exchange information with other regulatory branches and manufacturers		
OCABR Advisory Group	6 elected members (3 vaccine, 3 blood)	Meetings: at least 2 /year
Role: Follow issues between plenary meetings and propose solutions and strategies. Interact with other external contacts in the name of the OCABR Network		
OCABR Vaccine Drafting Group	7 members representing the major BR OMCLs	Meetings: at least 2 /year
Role: Draft new and revised guidelines for OCABR of vaccines to present to the OCABR network for adoption in line with the needs of the products on the EU market		



年1回の総会

年2回以上のAdvisory Groupによる会議

起草グループによるガイドラインの作成/改訂  
年2回以上の会議

(EDQM提供)

OCABR: Official Control Authority Batch Release

## 国家間のネットワーク形成と業務分担：欧州の事例

EU加盟国以外(スイス、ノルウェイなど)も参加している

2012年からカナダとOCABRネットワークはロット情報を共有している


**OCABR/Testing Situation in European OCABR Network for Vaccines**

- Require OCABR certificates for vaccine (28)
- Perform EU OCABR testing (vaccine) (19)
- Perform OCABR based testing on local vaccines -- no EU certificate
- Accept but do not require OCABR certificates (4)

As of October 2012 Israel and the EU have an agreement for mutual recognition of OCABR for vaccines. Presently, Israel accepts but does not perform OCABR.

As of July 2012 Canada and the OCABR network share information on batches based on a memorandum of understanding. This doesn't include mutual recognition of certificates.

EU Member States



(EDQM提供)

OCABR: Official Control Authority Batch Release

## 国家間のネットワーク形成と業務分担：欧州の事例

① DTaPワクチンを製造

③ 1か所のOMCLに検体とSLPを提出

⑤ すべて適合ならばCertificateが発行される

⑥ Certificateは32メンバー国で有効

不適合ロットの情報は全メンバー国に通知される

② 欧州市場で販売したければOCABRが必要

④ SLP審査と試験を実施

**OCABR: How it works**

Vaccine for Diphtheria, Tetanus, Acellular Pertussis Licensed in EU meets Ph. Eur. requirements, produced under GMP, has undergone QC testing at the manufacturer

Samples and protocol sent to 1 qualified EU OMCL for testing and protocol review

All elements COMPLIANT → EU OCABR certificate issued to MAH

MAH presents OCABR certificate and Marketing Information Form (MIF) to any of the 32 MS - if no objection within 7 days the batch can be marketed

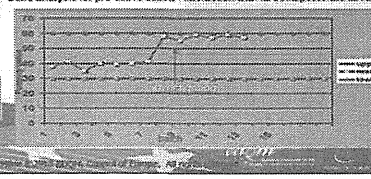
MAH and all network members notified of non-compliant batch. Batch release forbidden

MAH wants to place a batch on the market but OCABR is required

OMCL reviews protocol to ensure compliance with the MA, performs tests according to the OCABR guideline - 50 DAY LIMIT

- Appearance
- D, T, aP potency and identity
- Test for residual pertussis toxin
- Test for bacterial endotoxin

Regular independent monitoring of batches before market release allows effective trend analysis for pre-active action - Intervention with MAH in the presence of MA authority



(EDQM提供)

OCABR: Official Control Authority Batch Release  
OMCL: Official Medicine Control Laboratory

## まとめ

- 調査したすべての国／地域においてワクチンに対するロットリリースが行われており、SLP審査がその必須要件であった。
- カナダにおいては製品ごとのリスクを評価して、ロットリリースにあたって実施する試験の頻度を変えている。
- 新規製品の試験法等の開発や技術移転をするために、公的試験所と製造業者との間で協力や協議を始める時期について、製品によりケースバイケースではあるが、多くの国で承認申請前の段階から開始することもあるようである。
- ロットリリースを実施する機関と他の規制(製造販売承認、GMP査察、市販後調査など)を実施する機関が同一な国もある。規制部門間の連携と情報交換が重要である。
- 欧州では、ロットリリース証明書を共有し、同一ロットに対する試験を繰り返さないネットワークが構築されている。

31

## 謝辞

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32

S1-2

## Industry Perspective US FDA Vaccine Lot Release

**Peter J. Mlynarczyk**

*Quality Assurance Director*

*Authorized Official for Lot Release & Global Vaccine Release Liaison*

*Merck & Co., Inc.*

This presentation will provide an understanding of the US Vaccine lot release system, the regulations that govern the process, systems used, an understanding of key requirements that facilitate lot release for CBER and manufacturers, and introduce the topic of alternatives to lot release. This presentation will also discuss how and when sample and protocol requirements are defined, how CBER manages to support product launch upon Biologic License Approval, and provide an understanding of CBER performance considering the number of lots received for lot release.

# Second International Symposium on Vaccine Lot Release

February 2, 2015

Industry Perspective on United States Food & Drug  
Administration, Center for Biologics Evaluation and  
Research, Lot Release

Peter J. Mlynarczyk

Quality Assurance Director

Merck Authorized Official for Lot Release &  
Global Vaccine Release Liaison



## Introduction

- Peter J. Mlynarczyk
  - 24 years with Merck
  - 18 years in Quality, supporting FDA and International Lot Release
  - 10 years Merck CBER Liaison
  - 1 year Authorized Official for Lot Release
- Acknowledgement:
  - Presentation is based on:
    - "CBER's Lot Release System: Overview of the Current Process"  
<http://fda.yorkcast.com/webcast/Play/8589e08c935d4fb793a5a567df0d63771d>
    - Quality experience and shared experience with lot release individuals from multiple companies



## FDA Regulation of Licensed Products

- Lot Release is a component of the overall US system for regulation of licensed products to ensure release of safe and effective products. This system of regulation for products includes the following:
  - Biological License Application (BLA) Process
  - Establishment of sample requirements and lot release protocol content
  - Inspections
  - Approval of Supplements and filing of Annual Reports to BLA
  - Review of Biological Product Deviation Reports (BPDR) & Adverse Events
    - BPDRs – Reportable deviations electronically submitted to FDA involving distributed product that may affect safety, purity, or potency.
  - Lot Release System
    - Review of data in lot release protocols
    - Selected lot release testing



## FDA Regulation of Licensed Products cont

- Products licensed under the Public Health Service Act are subject to lot release, which includes vaccine products.
- Lots may not be distributed until released by CBER.
- Currently, there is no mechanism to accept releases from other regulatory authorities.
- The lot Release process is initiated during the license application review process.
  - Protocol content/format is negotiated between manufacturer and CBER
    - Data to be reported and specifications are agreed upon.
  - Agreed upon format is used for future lot release applications
- Knowledge of the manufacturers analytical methods and product specifications from the license application allows CBER to use lot release protocols as a means to monitor (real time) manufacturing performance, assess impact of manufacturing changes, and assure product quality.
- All lots manufactured and licensed in the US are subject to CBER lot release.
  - CBER Lot release can be for Drug Substance or Drug Product or both
- Lots manufactured in US, but, not approved in US may be exported from US without CBER lot release under Section 802 of the Federal Food, Drug, & Cosmetic Act (FDCA).
- All lots imported for US distribution are subject to CBER lot release.





## 21 CFR Part 610. Subpart A.

- 21 CFR Part 610. Subpart A. provides the basis for the lot release process
  - Sec. 610.1 Tests prior to release required for each lot.
    - Lots cannot be released until the manufacturer's testing is complete; testing should not be performed until the manufacturing processes that may affect the testing have been completed.
    - Specifically:
      - "No lot of any licensed product shall be released by the manufacturer prior to the completion of tests for conformity with standards applicable to such product. Each applicable test shall be made on each lot after completion of all processes of manufacture which may affect compliance with the standard to which the test applies. The results of all tests performed shall be considered in determining whether or not the test results meet the test objective, except that a test result may be disregarded when it is established that the test is invalid due to causes unrelated to the product."



## 21 CFR Part 610. Subpart A. Cont:

- Sec. 610.2 Requests for samples and protocols; official release.
  - Provides the basis for manufacturers to submit samples and protocols to CBER (provisions for lot release approval letters)
  - Indicates the manufacturer shall not distribute material until the CBER release is issued.
  - Provides for alternatives to lot release
    - i.e. Biannual submission of one lot of Drug Product and Drug Substance to CBER under surveillance with samples and protocols.
  - Specifically:
    - "(a) *Licensed biological products regulated by CBER* . Samples of any lot of any licensed product together with the protocols showing results of applicable tests, may at any time be required to be sent to the Director, Center for Biologics Evaluation and Research (see mailing addresses in 600.2 of this chapter). Upon notification by the Director, Center for Biologics Evaluation and Research, a manufacturer shall not distribute a lot of a product until the lot is released by the Director, Center for Biologics Evaluation and Research: *Provided*, That the Director, Center for Biologics Evaluation and Research, shall not issue such notification except when deemed necessary for the safety, purity, or potency of the product."



## Samples

- Taken by manufacturer from license defined manufacturing steps.
- Submitted directly to the Product Release Branch (PRB) sample custodian by courier with correspondence indicating purpose of samples i.e. for release.
- Can be submitted in parallel to the manufacturer's testing (saves time with CBER not becoming lot release bottleneck, CBER release cycle time typically < 30 days).
- CBER has consolidated from multiples sites to one site in Silver Spring, Maryland for the entire organization (CBER Laboratories are all on site)
- PRB:
  - Receives and holds samples.
  - Informs product specific distribution list of Scientific Reviewers of sample availability for confirmatory testing and provides them with protocol for review.



## Lot Release Testing Plans

- Scientific Reviewers determine if the product requires confirmatory testing according to the product lot release testing plan and may request samples from PRB.
  - Testing plans provide a system to determine which lots the Center will test.
  - Testing plans are risk based and determined based on CBER expertise and the resources available.
  - CBER does not perform confirmatory testing on every lot and also do not inform manufacturer of which lots will be tested.
  - Lot Release Testing Plans are defined as – documentation of CBER's current approach to evaluating licensed product including circumstance under which CBER would or would not conduct testing.
  - SOPP 8408.1 Development of Testing Plans and Release of Lots as part of the Approval Process

<http://www.fda.gov/BiologicsBloodVaccines/GuidanceComplianceRegulatoryInformation/ProceduresSOPPs/ucm245350.htm>



## Lot Release Testing

- Functional System in place with written procedures.
- Uses scientifically sound methods.
- CBER has participated in collaborative studies and developed many tests.
- Tests are performed/supervised by experts in the field
- Evolving Program to:
  - As applicable perform confirmatory testing that adds value to the regulatory/lot release process
  - Maintain Assay Proficiency
- Laboratory Quality System was Accredited to ISO 17025 in October 2010.



## Protocols

- Developed during product licensure between CBER and the Manufacturer as part of SOPP 8408.1
- Forms of Protocol Submission:
  - Paper (mostly new products ~10 non-launch lots to establish consistency then can move to electronic)
  - Electronic Files (Protocol + Electronic Submission Letter)
    - Compact Disc (CD)
    - Electronic Submission Gateway (preferred)
- Protocols are received by the PRB and routed to scientific reviewers.
  - Paper document are manually routed.
  - Electronic documents are loaded into the Electronic Tracking Database and circulated in parallel.
  - Reviewers ensure that reported manufacturer testing is reviewed/trended and meets the licensed specifications.



## Manufacturer Lot Release Requirements

- Key Manufacturing Lot Release Process Activities
  - Authorized Communication List
    - Authorized Official for Lot Release
    - Authorized Contacts/Call-in
    - Authorized Lot Release Protocol Signers (includes supporting documents)
  - Sample Submission
    - Need for samples (or not) is discussed between CBER and the manufacturer during the license review process i.e. drug substance samples may not be required.
  - Protocol Submission
    - Protocol content is negotiated during the license review process.
      - CBER requests the manufacturer to propose testing, spec and data to be reported.
      - CBER and Manufacturer collaborate to ensure reasonable testing information is provided i.e. data is valuable to assess quality of lot & is not of extreme hardship to produce per lot.
- Samples and protocol requirements are formally communicated in product approval letter.



## Product Launch

- CBER Follows SOPP 8408.1 Development of Testing Plans and Release of Lots as part of the Approval Process
- Samples and agreed upon protocol submitted during filing review
- CBER and Manufacturer coordinate to have materials provided to CBER with enough time to release product around PDUFA (Prescription Drug User Fee Act of 1992) date.
- No product can be released until the BLA is approved.

