

Morakot Papassiripan, MSc, Thailand

- Reviewer, Biological Products Sub-Division, Bureau of Drug Control of Food and Drug Administration (Thai FDA), Ministry of Public Health Thailand

Clinical experience with EPO products approved via the generics pathway: the experience in Thailand

Morakot Papassiripan, PhD
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Reviewer, Biological Products Sub-Division,
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Administration (Thai FDA)
Ministry of Public Health Thailand

Introduction (1)

- In 1988, Erythropoiesis Stimulating Agent (ESA) was introduced and became the standard treatment for anemia in patients with Chronic Kidney Disease (CKD)
- In mid-1990s, a shift from the IV to the SC route of ESA occurred in many countries due to clinical and economic reasons
- In 2002, the Thai Health Product Vigilance Center received the 1st case of Pure Red Cell Aplasia (PRCA)
- In 1998, the original ESA product formulation using PS-80 as a stabilizer instead of HAS

Introduction (2)

- In 1998–2003, the cases of EPO antibody-mediated PRCA were increased in CKD patients receiving one specific Eprex formulation [uncoated Polysorbate -80 (PS-80) PFS] by the SC route
- In March 2004, uncoated PS-80 PFS Eprex formulation was completely removed from the market
- The worldwide incidence rate of EPO Ab-mediated PRCA reports were decreased, except in Thailand
- October 2008, 85 patients were reported in lack of efficacy in relation to ESAs in Thailand

What are the issues in Thailand

- 15 brands of EPO Alfa and 1 brand of EPO Beta were registered in Thailand
- Poor people can receive EPO products because the cost is lower than the original product
- But, what problem does Thai FDA find?

“Biosimilar recombinant human erythropoietin induces the production of neutralizing antibodies”

Kidney Int. 2011 Jul;80(1):88-92.

- “Studied 30 patients with CKD treated by **subcutaneous injection** with biosimilar r-Hu-EPO and who developed a sudden loss of efficacy ...”
- “Sera from 23 of these patients were positive for r-Hu-EPO neutralizing antibodies, and their bone marrow biopsies, indicated PRCA ...”

“Biosimilar recombinant human erythropoietin induces the production of neutralizing antibodies”

Kidney Int. 2011 Jul;80(1):88-92.

- “Thus, subcutaneous injection of biosimilar r-Hu-EPO can cause largely adverse immunological effects a large ...”
- “Long-term pharmacovigilance study is necessary to monitor and ensure patient safety for these agents”
- “Estimation risk for anti-r-Hu-EPO associated PRCA was 23/59,990”

“Biosimilar recombinant human erythropoietin induces the production of neutralizing antibodies”

Kidney Int. 2011 Jul;80(1):88-92.

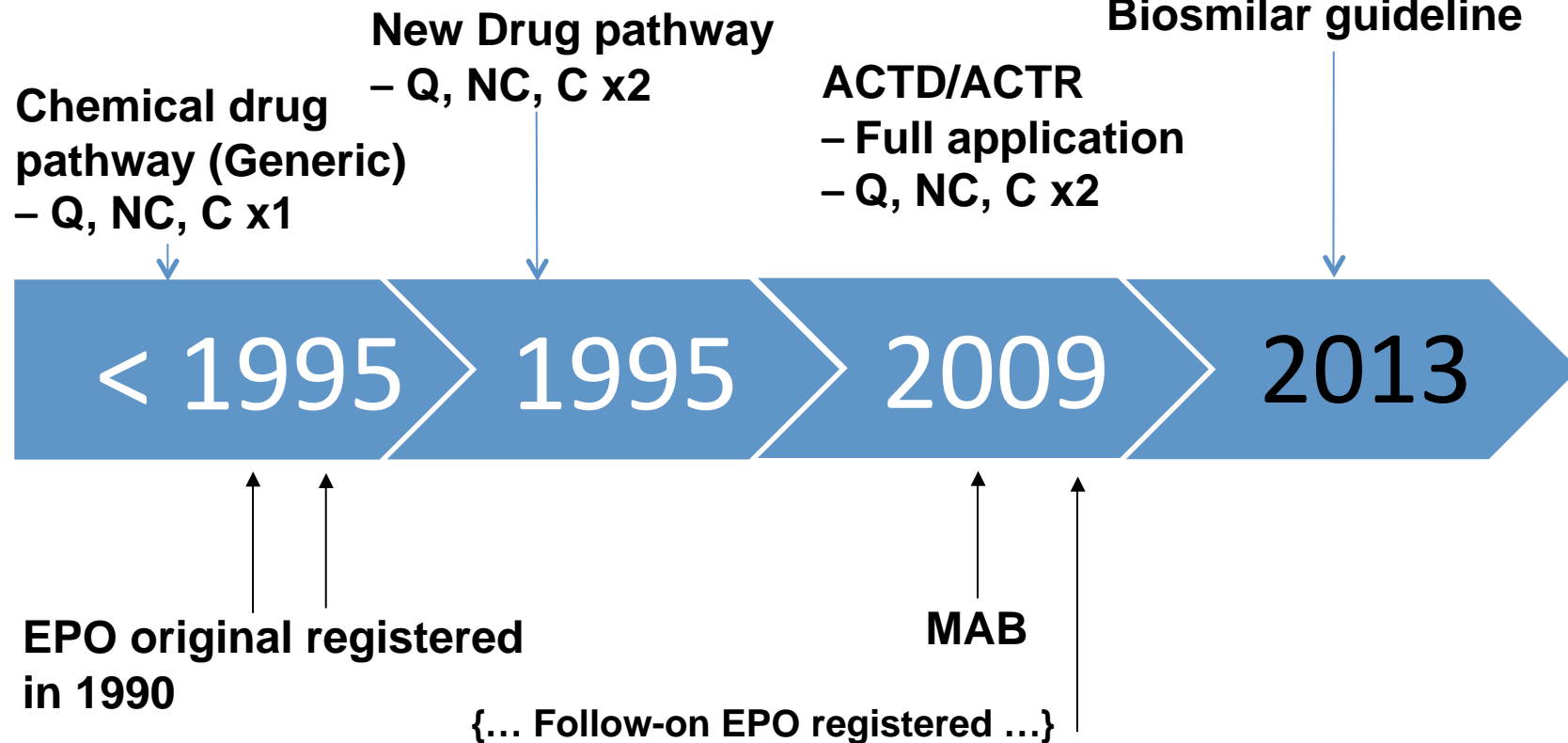
- “An estimation of the actual cases using biosimilar r-Hu-EPO denominator with this complication was 1:2,608”
- “The results could not provide sufficient information to determine exactly which specific biosimilar products are directly responsible for causing anti-r-Hu-EPO associated PRCA ...??” **Interchangeability?**
- “However, we can clearly state that **repeated subcutaneous** injection of biosimilar agents could result in the development of anti-r-Hu-EPO associated PRCA”

What are the solutions? (1)

- There are 16 EPO brands but none are biosimilar (even though Binocrit which was registered by the same pathway as the other EPO products) because of ...

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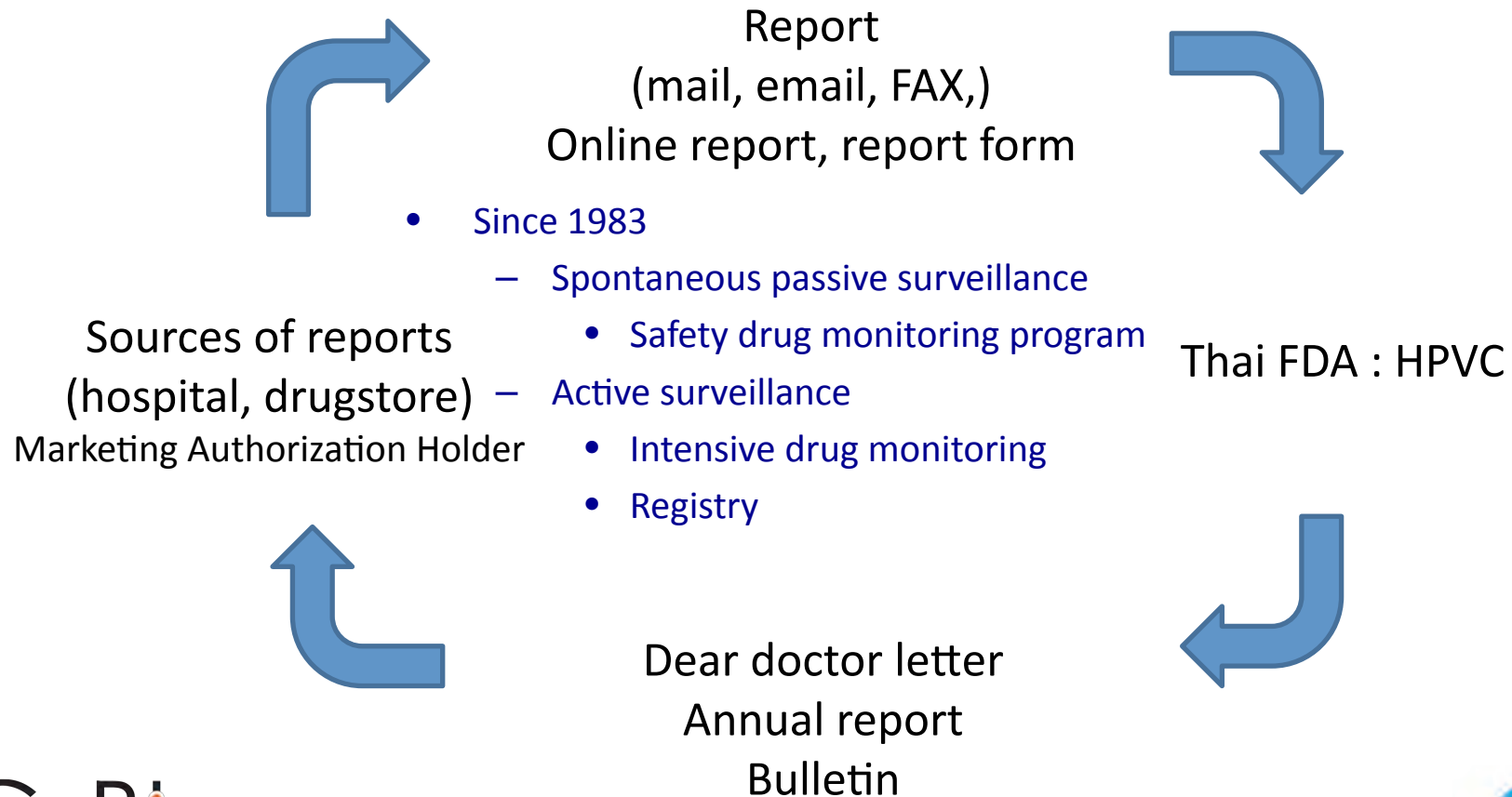
Development of registration pathway



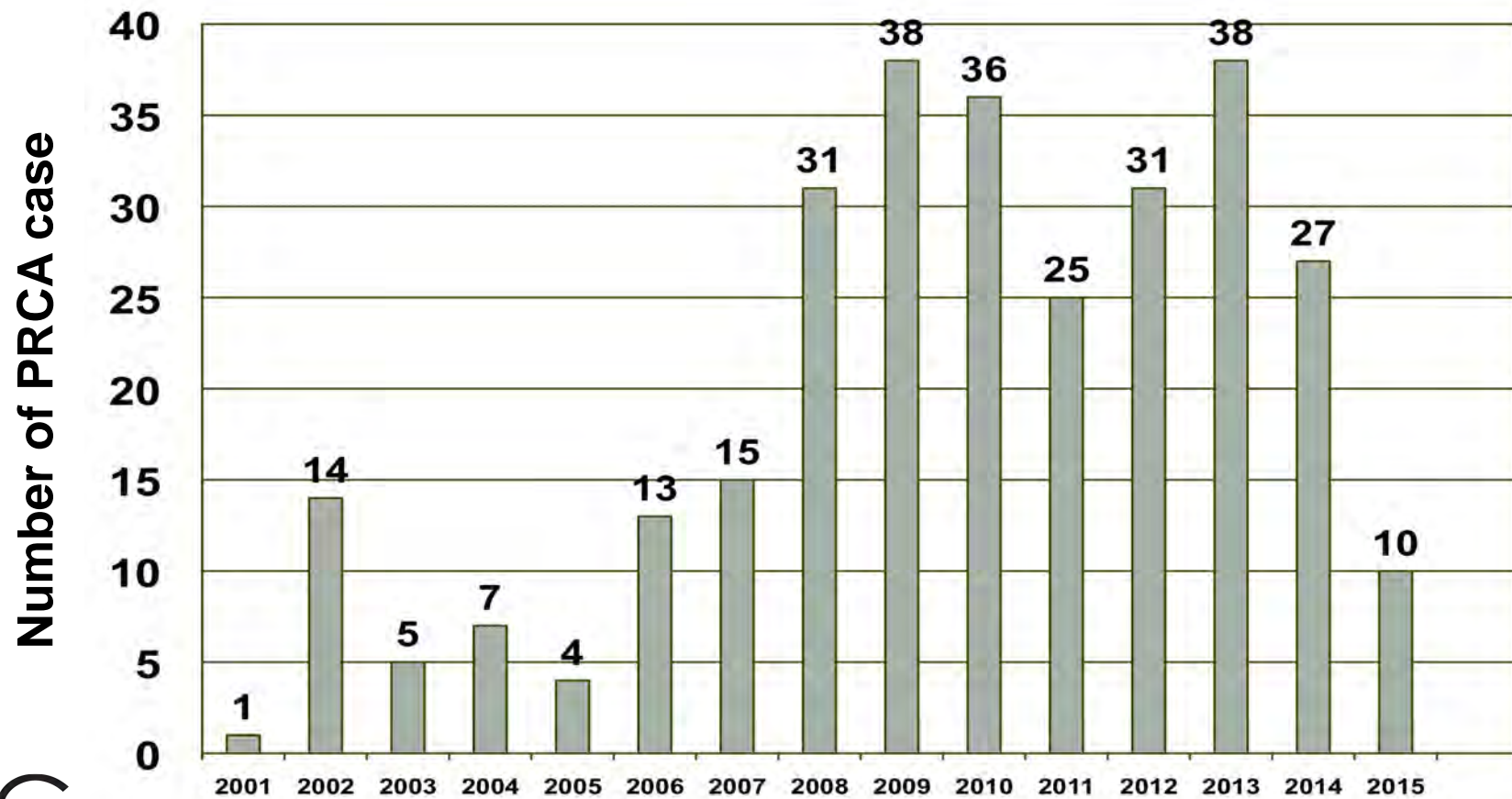
What are the solutions? (2)

- Legal actions
 - Revised regulations
 - 2009 ASEAN Harmonization/ICH
 - 2013 Biosimilar registration pathway
 - New products of EPO will submit in the stand alone pathway (new biological product pathway) / the biosimilar pathway
 - Re-assessment process for the EPO products in the market
 - Pharmacovigilance system
- Non-legal actions
 - Dear doctor letter, Alert letter

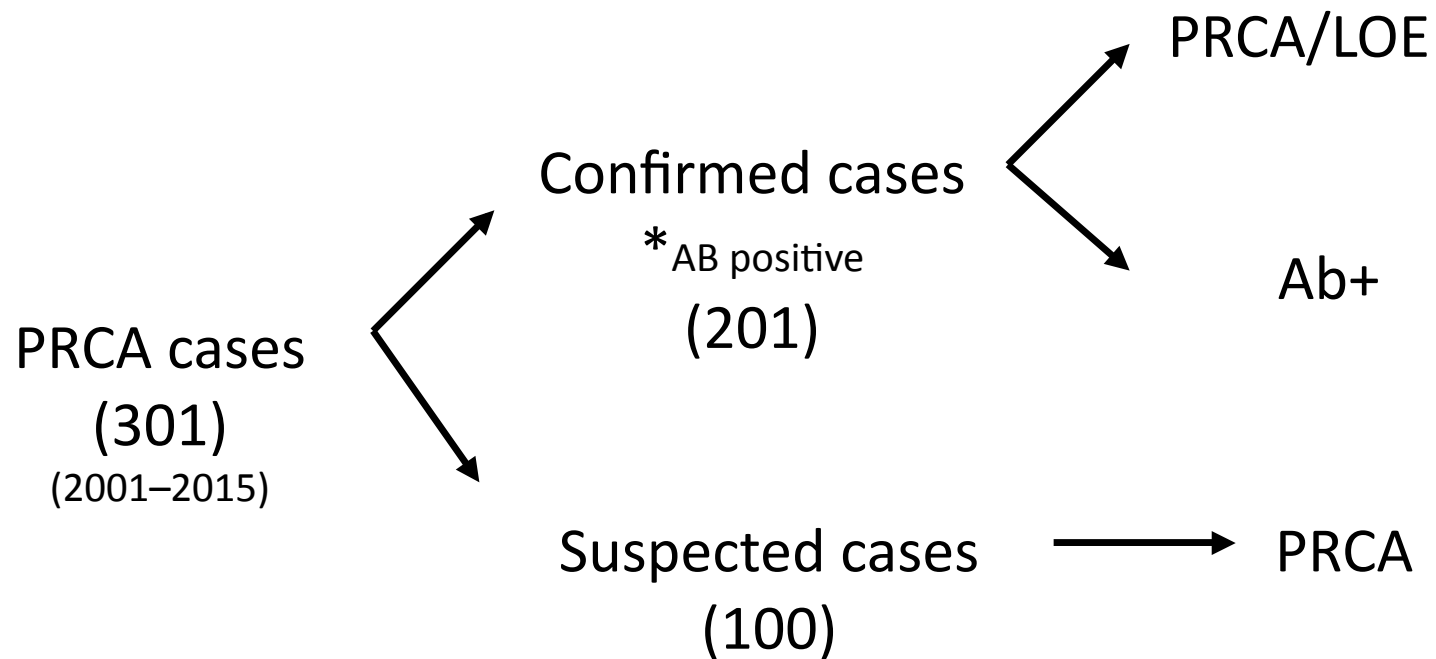
Pharmacovigilance



Current situation (1)



Current situation (2)



*Thai registry incidence = 1.7 : 1,000

Factors influencing immunogenicity

Product-related factors

- Protein (structure, primary sequence, novel epitopes, glycosylation, oxidation, deamidation)
- Product impurities, formulation, aggregation, degradation
- Protein properties, e.g. immunostimulatory, replacement therapy, physiologically important
- Administration: (dose, route **(subcutaneous for EPO)** , frequency of administration and duration of therapy
- **Interchangeability**

Patient-related factors

- Age
- Gender
- Genetic phenotype
- Ethnic sensitivity (IFN-alpha 2a more immunogenic in Chinese compared to Caucasian hepatitis patients 39% vs 14%)
- Immune status
- Disease

What are the possible causes for the high reporting rate of there events in Thailand?

- Product?
- Quality?
- Formulation?
- Storage and handling?
- Route of administration?
- Interchangeability of the products?
- Genetic phenotype?

Summary

Product

- How could Thai FDA solve this problem?
 - (Re-evaluation process, Biosimilar pathway)

Clinical practice

- Interchangeability
- Subcutaneous use
 - (Cooperate with the clinicians)

Consider

- Government's health budget supported
 - (If the price of product is over difference, the biosimilar product is necessary for use)
- Patient-related factors (in case of subcutaneous used)
 - Far and hard to go the hospital and receive drug

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