

Biosimilar Definition



- Highly similar to the reference product
- **→** No clinically meaningful differences
 - Differences in raw materials or manufacturing processes between biosimilar and reference product may require pre-clinical tests or clinical trials
- **→** Does not equate to "Me,too" or 2nd generation biologicals
- Provisions for generic medicinal products may not be sufficient for biological medicinal products





US Regulatory Pathway

- → The Patient Protection and Affordable Care Act and Biologics
 Price Competition and Innovation Act (BPCI Act) (signed March)
- Scientific Considerations in Demonstrating Biosimilarity to a Reference Product (draft FDA guidance)
- Quality Considerations in Demonstrating Biosimilarity to a Reference Protein Product (draft FDA guidance)
- ➢ Biosimilars: Questions and Answers Regarding Implementation of the Biologics Price Competition and Innovation Act of 2009 (draft FDA guidance)



23, 2010)



Biologics Price Competition and Innovation Act (BPCI)

- Creates an abbreviated licensure pathway for biological products
- Section 351(k) of the Public Health Service Act
- Similar to the Abbreviated New Drug Application process in Section 505(j)





→ 351(k) Application Requirements

- Is biosimilar to a reference product
- Utilizes the same mechanism(s) of action for the proposed condition of use as the reference product
- Condition(s) of use proposed in labeling have been previously approved for the reference product
- → Has the same route of administration, dosage form, and strength as the reference product





EU Regulatory Pathway



- **→** Directive 2001/83/EC, as amended (2004/27/EC)
- ➢ Guideline on Similar Biological Medicinal Products Containing Biotechnology-Derived Proteins as Active Substance: Non-Clinical and Clinical Issues
- CHMP Guideline on similar biological medicinal products





Application Requirements



- CTD Module 3 Quality
- CTD Module 4 Non-Clinical (Cross reference)
- CTD Module 5 Clinical (Cross reference)
- ➤ Integrate Comparability Exercise to demonstrate the biosimilar and reference product have similar quality, safety and efficacy profiles.





Interchangeability/Interchangeable - US

- Biosimilar to the reference product
- Produces the same clinical result in the patient population
- ➤ May be substituted for the reference product without the authorization of the health care provider





Interchangeability/Interchangeable - EU

- **▶** Interchangeability is outside of the EMEA authority
- May be different meanings based upon the territory





Kelly Davis
Associate Director, Regulatory Affairs
Baxter's BioPharma Solutions business

kelly_davis@baxter.com

http://www.baxterbiopharmasolutions.com



