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AAM GRX+BIOSIMS CONFERENCE

Streamlining Biosimilars Development

October 21, 2024

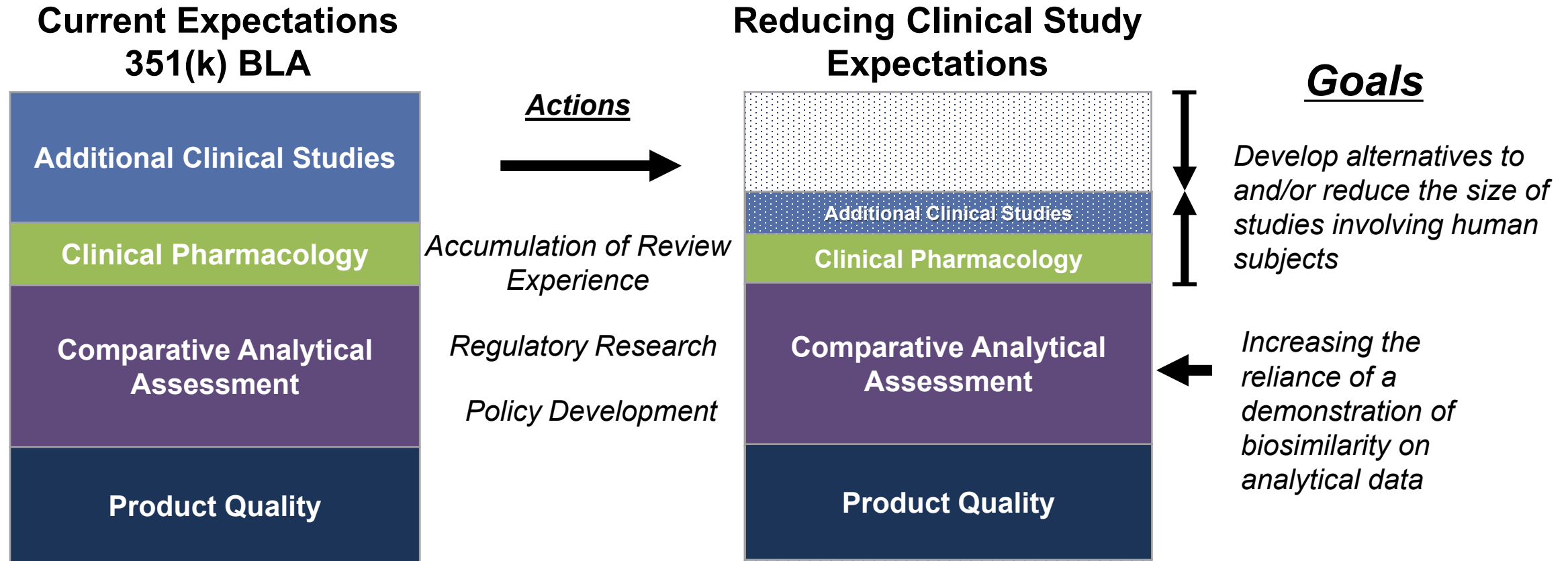
M. Stacey Ricci, M.Eng., Sc.D.

Director Scientific Review Staff

Office of Therapeutic Biologics and Biosimilars

Office of New Drugs | CDER | FDA

Improving Efficiency of Biosimilar Development



Reaching our Goals

- **60 Approved Biosimilars to 17 Reference Products, including: mAbs, fusion proteins, growth factors, insulins**



- **Conduct scientific and regulatory research projects**
- **Publish results and provide education**

- **Engage internal and external stakeholders**
- **Communicate new/revised recommendations**

What's on the horizon?

1. Increase confidence in comparative analytical data

➤ Conduct research



Research Priority A: Characterize relationships between product quality attributes with clinical performance

- *Landscape Assessment of Biosimilar Submissions*

➤ Develop and provide more detailed educational materials and disseminate broadly

- Who?

- FDA staff, health care providers, patients, caregivers, advocates, payors, other government agencies

- How?

- Webinars, professional conferences, college degree curriculum, Medscape CE Courses, targeted presentations, social media engagement

FDA/Global Efforts to Streamline Biosimilar Development

2. Refine clinical study expectations



September 12-13, 2023 (public)
September 19-21, 2023 (regulators only)

IPRP Biosimilars Working Group Workshop: “Increasing the Efficiency of Biosimilar Development Programs-Re-evaluating the Need for Comparative Clinical Efficacy Studies (CES)”

- Recordings and slides from the public meeting days available at **FDA.Gov** ([link](#))
- Workshop Summary Report including from regulators only sessions available at **IPRP.global** ([link](#))

Summary

First event of its kind to convene both global regulators and public speakers on this topic

- *Public sessions:*
 - *Utility and limitations of CES*
 - *Biosimilar development challenges*
- *Regulators only sessions:*
 - *Jurisdiction survey and current perspectives*
 - *Risk-based considerations for when a CES is/is not useful*
 - *Next steps for BWG*

• Selected Key Takeaways

- Both regulators and industry recognize limitations of CES
- Conservative approach historically taken due to timing of stepwise approach
- CES cannot resolve concerns that remain due to uncertainty about analytical or PK data
- PK comparison is more sensitive than a CES to detect product quality differences
- A variety of risk-factors may contribute to CES expectations
 - Limited experience with product type
 - Vulnerable or rare patient population
 - Immunogenicity concerns

• Current and Future Steps

- 1) Refine concepts (e.g., risk-based framework) for determining whether a comparative efficacy study would be helpful pre-approval
 - Based on characteristics of the Reference Product, including:
 - how well characterized and predictable are product quality attributes
 - how susceptible efficacy/safety might be if those are altered
 - Doesn't require stepwise approach (presumes high analytical similarity will be met for approval)
- 2) Draft and publish a concept paper on the topic

What's on the horizon?

- IPRP BWG Concept Paper on a framework for evaluating the need/utility of CES to support biosimilar approvals
- CDER Guidance Agenda (July 2024)
 - Considerations in Demonstrating Interchangeability with a Reference Product: Update (Published June 2024)
 - Scientific Considerations in Demonstrating Biosimilarity guidance (Revision 1)

Thank You

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