

January 5, 2005

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Dockets Management Branch, HFA-305
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

VIA E-Mail & USPS

SUBJECT: Public Workshop, "Scientific Considerations Related to Developing Follow-On Protein Products." September 2004.

Docket No. 2004N-0355.

Addendum to Comments Submitted November 12, 2004

Reference No. FDAA04020

Dear Sir or Madam:

The Plasma Protein Therapeutics Association (PPTA) is pleased to provide these additional comments on the Food and Drug Administration's (FDA's) Public Workshop entitled, "Scientific Considerations Related to Developing Follow-On Protein Products." [Hereinafter "Workshop"]. PPTA is the international trade association and standards-setting organization for the world's major producers of plasma-derived and recombinant analog therapies. Our members provide 60 percent of the world's needs for Source Plasma and protein therapies. These include clotting therapies for individuals with bleeding disorders, immunoglobulins to treat a complex of diseases in persons with immune deficiencies, therapies for individuals who have alpha-1 anti-trypsin deficiency which typically manifests as adult onset emphysema and substantially limits life expectancy, and albumin which is used in emergency room settings to treat individuals with shock, trauma, burns, and other conditions. PPTA members are committed to assuring the safety and availability of these medically needed life-sustaining therapies.

We mentioned in our original comments of November 12, 2004, that international harmonization is a strategic goal for the plasma products industry. Similarly, we asked the Agency to investigate other international regulatory regimes and policies regarding follow-on protein products. At the time of our comments, we had not yet analyzed the draft European Medicines Agency (EMA) document entitled, "Guideline on Similar Biological Medicinal Products" with reference number CHMP/437/04, which is currently being considered for consultations and not in final form. In our previous comments, we stated:

As presented at the [September FDA] Workshop, a European marketing authorization considers a biological product to be a specific, independent product by studying a number of factors: the cell line used, the manufacturing process, scale of manufacture, and particular facilities. The European requirements also demonstrate the differences in consideration between comparability and that of copying. We also agree

that, irrespective of the theoretical or practical aspects of FOPP manufacturing, any regulatory structure in the U.S. must take into consideration the European regulatory structure and that of the ICH as well.

We would like to use this opportunity to make the Agency aware of language contained in the EMEA document. For example, on page 7/8, Section 3.4:

The [Biotechnology Working Party] and [Blood Product Working Group] guidelines listed below should be taken into consideration, in addition to the applicable CHMP guidelines (Section 3.1 and 3.2).

In view of the complex and variable physico-chemical, biological and functional characteristics of the products listed in the BPWG guidelines mentioned below, it will not be acceptable to submit a reduced clinical dossier when claiming similarity to an original (reference) medicinal product. As a result, applications for such similar products will still need to satisfy the safety and efficacy requirements described in these BPWG guidelines for “new products”.

In essence, the EMEA has, at this point, precluded the use of a comparability-like approach to the licensure of a “similar” plasma-derived product. This policy approach is used by the EMEA for naturally-derived plasma products and for recombinant analog therapies. We mentioned in our presentation at the Workshop that the complexity of our member companies’ therapies may be prohibitive in terms of adequate characterization and other attributes that would allow for a follow-on framework. It is apparent that the EMEA shares our caution with regard to these and other issues, and we ask that the FDA take this into consideration prior to issuing any draft guidance document.

Should you have any questions regarding these comments or would like additional information, please contact PPTA. Thank you for your consideration, and we look forward to working on the exciting possibilities that the Initiative may present.

Respectfully submitted,



Mary Gustafson
Senior Director, Global Regulatory Policy
Plasma Protein Therapeutics Association