

20 March 2006

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 2005D-0286 Guidance for Industry: INDs – Approaches to Complying with CGMP During Phase 1 [71 Federal Register 2552, January 17, 2006]

Dear Sir/Madam,

Sanofi Pasteur Inc. of Swiftwater, Pennsylvania thanks the Food and Drug Administration (FDA) for the opportunity to comment on the above-referenced draft guidance for industry entitled, “INDs – Approaches to Complying with CGMP During Phase 1.” Headquartered in Lyon, France, sanofi pasteur is the vaccines business of sanofi-aventis Group. Sanofi-aventis is the world’s third-largest pharmaceutical company.

Sanofi pasteur is a world leader in vaccines and produces more than one billion doses of vaccines every year to immunize over 500 million people around the world. Sanofi pasteur, in close consultation with the US public health establishment, including the FDA, and Centers for Disease Control and Prevention (CDC), strives to alleviate the suffering and death of vaccine-preventable diseases.

We offer the following comments for your consideration concerning the FDA’s solicitation of responses as they apply to the Biologics (Vaccine) industry.

General Comments

Sanofi pasteur supports the development of this draft guidance, as it provides an incremental approach to CGMP application during investigational drug and biologic development and clarifies the manufacturing controls necessary for initiation of clinical trials in human subjects.

Also, we appreciate the general flexibility and non-prescriptive nature in most aspects of the draft guidance.

We acknowledge that FDA is considering additional guidance for CGMP requirements for Phase 2 and 3 investigational drugs and biologics, as noted in footnote 4 on page 2 of the draft guidance. We anticipate these additional guidance documents, as they will ideally provide clear Agency expectations of Industry relative to these pre-commercial levels of CGMP during advanced phase clinical development. Specifically, we would like to see Agency perspective on pre-qualification and validation of assays supporting manufacturing at this level.

Specific Comments

Section V, C. Facility and Equipment:

- Sanofi pasteur appreciates the broad general flexibility of this section, which takes into account various levels of work areas.

Section V, D. Control of Components: For each batch of the drug substance (or API), we strongly recommend performing confirmatory identity testing, regardless of whether documentation has been provided.

- We find this section overly prescriptive in that CBER does not appear to take into consideration resident expertise or documented and acceptable practices that govern the transfer of product or raw materials. Sanofi pasteur has adopted a general quality principle; whereby, the quality systems in our three main geographic sites are considered equal. Therefore, we consider appropriate documentation to be sufficient when exchanging vaccine intermediates within manufacturing sites of the Company.

Section VI, B. Multi-Product Facilities: Ideally, we recommend that one product be produced in an area or room at any given time separate from unrelated activities. However, the same area or room could be used for multiple purposes, including production of other investigational products or laboratory research, provided that appropriate cleaning and control procedures are in place to ensure that there is no carry-over of materials or products or mix-ups.

- Sanofi pasteur acknowledges FDA's ideal recommendations, but greatly appreciates FDA's recognition in this guidance of the necessity of multi-product facilities.

On behalf of sanofi pasteur we appreciate the opportunity to comment and thank you for your consideration of these responses. Should you wish to discuss any of our comments or concerns further, please address inquiries directly to Denise Rieker, Deputy Director, Regulatory Policy and Intelligence, by telephone at (570) 895-3465, or me directly at 570-839-4212.

Sincerely,

A handwritten signature in black ink that reads "Kenneth P. Guito". The signature is written in a cursive style with a large, prominent initial 'K'.

Kenneth P. Guito
Sr. Director, Regulatory Policy and Intelligence

KPG/DR/kh