

# POINTS TO CONSIDER FOR THE COMMERCIAL MANUFACTURING OF ATMPS

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## Your Presenter: Richard Denk, Nick Name Mr. Containment

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- Studied Mechanical Engineering, GMP, Quality Control, Auditing, Hygienic Design, Pharmaceutical Engineering, Qualification/Validation
- PDA: Preventing Contamination and Cross Contamination
- PDA Isolator Expert Group
- PDA Program Committee for the EU ATMP
- PDA Advisory Board for ATMPs
- ISPE Chair CoP Containment and Chair Future Robotics
- ISPE Annex 1 Commenting Group





## Your Presenter: Richard Denk, Nick Name Mr. Containment

- ISPE CoP SPP Sterile Product Processing
- ISPE Chair Containment Guide
- PICs/Annex 2 – 2A ISPE Comments Team
- ISO TC 198 Aseptic Processing and Isolators

# The Commercial Manufacturing of ATMPs is a challenge to the Industry. Guidance is needed.

Introduction of the PDA Points to Consider Document for the Commercial Manufacturing of ATMPs. In the view of EU-GMP Annex1- PIC/s Annex 1 and PIC/s Annex 2A

# Why a PtC for the Manufacturing of ATMPs?



**EudraLex**  
**The Rules Governing Medicinal Products in the European Union**  
**Volume 4**  
**Good Manufacturing Practice**

**Guidelines on Good Manufacturing Practice specific to Advanced Therapy Medicinal Products**



Brussels, 22.8.2022  
C(2022) 5938 final

**GUIDELINES**

**The Rules Governing Medicinal Products in the European Union**  
**Volume 4 EU Guidelines for Good Manufacturing Practice for Medicinal Products for Human and Veterinary Use**

**Annex 1**

**Manufacture of Sterile Medicinal Products**

Annex 2A Manufacture of Advanced Therapy Medicinal Products for Human Use

**ANNEX 2A**

**MANUFACTURE OF ADVANCED THERAPY MEDICINAL PRODUCTS FOR HUMAN USE**

Methods employed in the manufacture of Advanced Therapy Medicinal Products (ATMPs) are a critical factor in shaping the appropriate regulatory control. ATMPs can be defined therefore largely by reference to their method of manufacture. For example, in the case of primary cell therapy ATMPs, genetic modifications can be obtained through a variety of methods (e.g. viral & non-viral vectors, mRNA, genome editing tools). The genetically modified cells can be of human origin (autologous or allogeneic) or animal origin (genetically modified cells), either primary or established cell lines. Genetically modified cells of microbial origin are excluded from the scope of this annex. In a medicinal product, genetically modified cells can be presented alone or combined with medicinal substances. This annex provides additional and specific guidance on the full range (as defined in the glossary) of ATMPs and the active substances that are used in their manufacture. Although one of the objectives of this present revision was to prepare a document that would stand for several years the field is quickly changing; it is recognised that amendments may be necessary to accommodate technological

# Contributors of the PtC for the Manufacturing of ATMPs

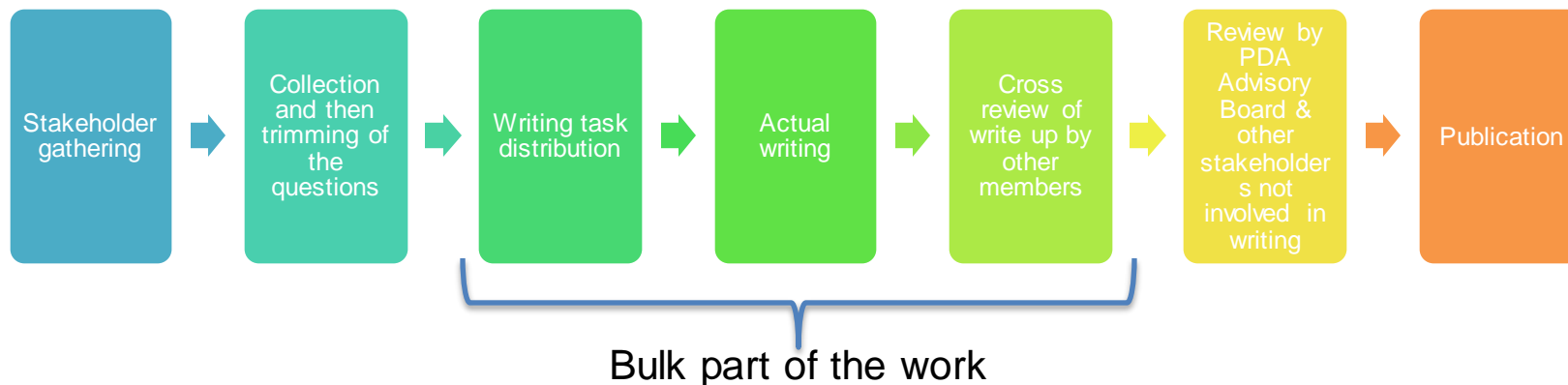
- Wide range of stakeholders
  - Various countries – Asia, Europe, Middle East, Americas, Australia
  - End users, equipment vendors, consumable vendors, etc.
  - Engineer, Quality, Product Manager, etc.
- Probably the first PtC with a good number of contributors from Asia

## Points to Consider for the Manufacturing of ATMPs

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# The process of actually writing this PtC



# Content of the PtC for the Manufacturing of ATMPs

Topic 1: What are important aspects to be considered while designing an ATMP facility?

Topic 2: Pressure Concepts / Cascades

Topic 3: Design differences during project execution between BSC and Isolators

Topic 4: ATMP GMP (Manufacturing) requirements

Topic 5: Risk Management

Topic 6: Contamination Control Strategy

Topic 7: Prevention of Cross contamination/ Product Mix Up

Topic 8: Occupational Safety Requirements

Topic 9: Disinfection & Decontamination

Topic 10: Cleaning and Hygienic Design

Topic 11: Transfer Technology / Closed Processes System

Topic 12: Single Use Technology

Topic 13: Scale out approach for ATMP facility vs Scale Up Challenges

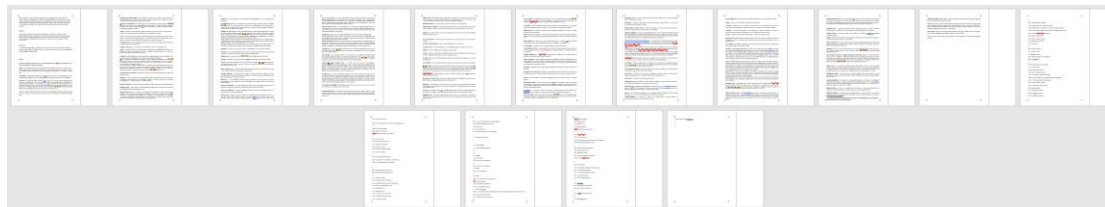
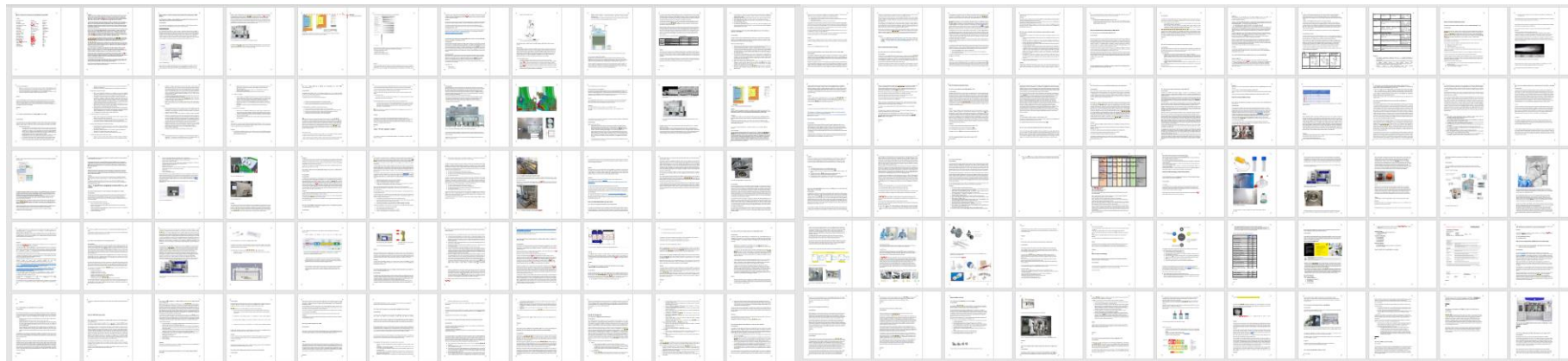
Topic 14: ATMP Fill & Finish

Topic 15: Sterility Test

Topic 16: Upcoming Technologies with Robots, Cobots (Sustainability)



# Content of the PtC for the Manufacturing of ATMPs



138 pages of  
Word file

Calibri size 11

## Topic 1: Important Points to Consider Manufacturing of ATMPs

- Which primary Containment Control can be used for your process?  
ATMPs often require very complex process structures.
  - Closed Single Use System
  - BSC Bio Safety Cabinets
  - BSC in combination with Single Use System
  - Isolators
- The primary Containment Control decides about your secondary Containment Control.

# Topic 1: Important Points to Consider Manufacturing of ATMPs



Single Use System



Isolator

## Topic 1: Important Points to Consider Manufacturing of ATMPs

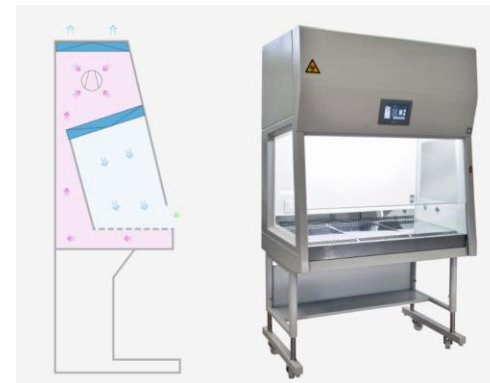
- Pros.
  - Less investment Cost
  - No Cleaning after use
  
- Cons.
  - Assembly could become very complex.
  - Integrity can't be tested with all connectors, bags etc. before use.
  - Disassembly could become a contamination risk.
  - Waste handling and the inactivation of waste is critical.



Courtesy Sartorius

## Topic 1: Important Points to Consider Manufacturing of ATMPs

- Pros.
  - Less investment Cost
  - Operator Friendly
- Cons.
  - Operator gets in contact of aseptic-sterile operations
  - Not considered as a Barrier (According Annex 1)
  - Contamination from outside to inside and inside to outside most likely.
  - Contamination and Cross Contamination Risk.
  - Higher demand on the secondary containment
  - GMP and Occupational Safety (Many ATMPs requires BSL2 facility)



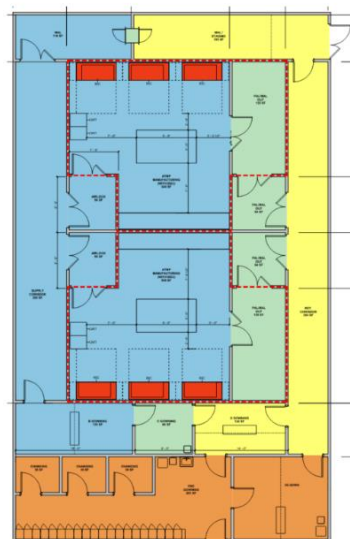
## Topic 1: Important Points to Consider Manufacturing of ATMPs

- Pros.
  - Validated Aseptic Conditions inside
  - Highest Protection of the Product and Operators
  - Lower demand on the secondary containment
  - Investment cost are compensated with the lower Secondary Cleanroom Level
  - Fast Decontamination times with vaporized Hydrogen-Peroxide possible.
- Cons.
  - Higher investment cost
  - Operator works through a Barrier
  - Contact with vaporized Hydrogen-Peroxide



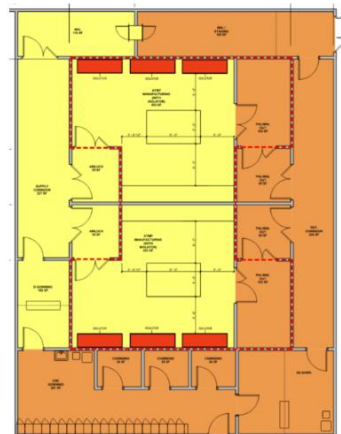
# Topic 1: Important Points to Consider Manufacturing of ATMPs

- Secondary Containment Control



Courtesy IPS

**BSC Option**



**Isolator Option**

AREA CLASSIFICATIONS	
REST OF WORLD	US FDA
UNCLASSIFIED	UNCLASSIFIED
UNCLASSIFIED WITH ENHANCED HVAC	UNCLASSIFIED
CONTROLLED/ NON-CLASS	CONTROLLED/ NON-CLASS
GRADE D	-
GRADE C	ISO 8
GRADE A AIR SUPPLY	LOCAL PROTECTION
GRADE B	ISO 7
GRADE A	ISO 5
---	BSL BOUNDARY

**Annex 1 allows Grade D background for fully closed isolators.**

	Savings Over BSC Option
Facility SF	30%
Construction (Incl. Indirects)	44%

# Topic 1: Important Points to Consider Manufacturing of ATMPs

- Secondary Containment Control

Further Comparison between BSC and Isolator for the facility Design:

	Bio Safety Cabinet	Isolator
Quick time to market (short lead time)		
Capital expenditure savings (low initial invest)		
Low volume product: Operational costs		
Medium/large volume product: Operational costs		
Consumable savings, e.g. for Monitoring, Gowning, HVAC		
Contamination control		
Workers' safety		
Sustainability		
GMP Annex 1 Compliance		

Highest Advantages



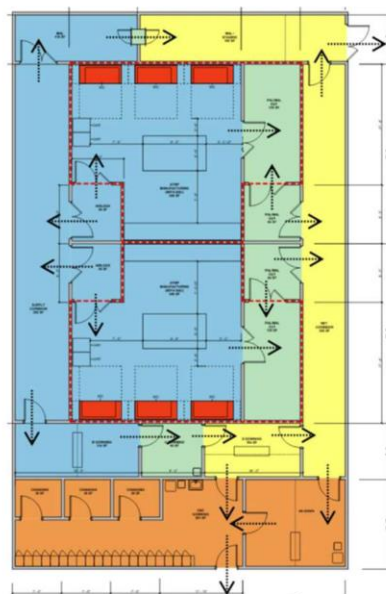
Lowest Advantages

The capital expenditure (CAPEX) and operational expenditure (OPEX) costs for Bio Safety Cabinets and Isolators need to be evaluated considering the individual circumstances like:

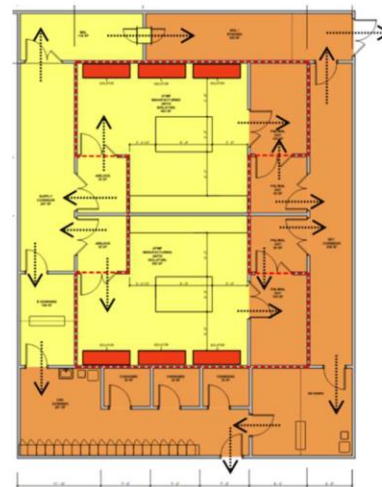
- Manufacturing time (short or long)
- Complexity of the process
- Degree of automation (like robotics)
- Global Location of facilities (hourly rate)



# Topic 2: Pressure Concepts



**BSC Option**



**Isolator Option**

AREA CLASSIFICATIONS	
REST OF WORLD	US FDA
UNCLASSIFIED	UNCLASSIFIED
UNCLASSIFIED WITH ENHANCED HVAC	UNCLASSIFIED
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GRADE D	-
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GRADE A AIR SUPPLY	LOCAL PROTECTION
GRADE B	ISO 7
GRADE A	ISO 5
---	BSL BOUNDARY
→	AIR FLOW

Courtesy IPS

## Topic 7: Prevention of Cross Contamination

- What are the Cross Contamination Risks.
  - Primary Containment isn't good enough. Airborne Contamination-Contact Contamination-Waste Contamination.
- What else could be the risk of Cross Contamination
  - Potency of the material in multi product facilities.
  - Cells from the patient could be contaminated.
  - Working with Viral Vectors – higher Bio Safety Level

## Topic 7: Prevention of Cross Contamination

- What means Bio-Safety Level 2 during Manufacturing.

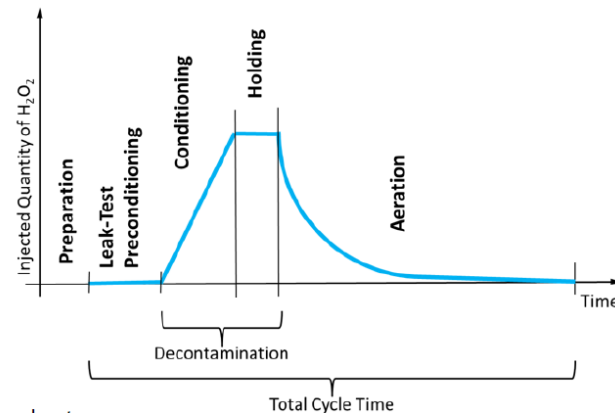
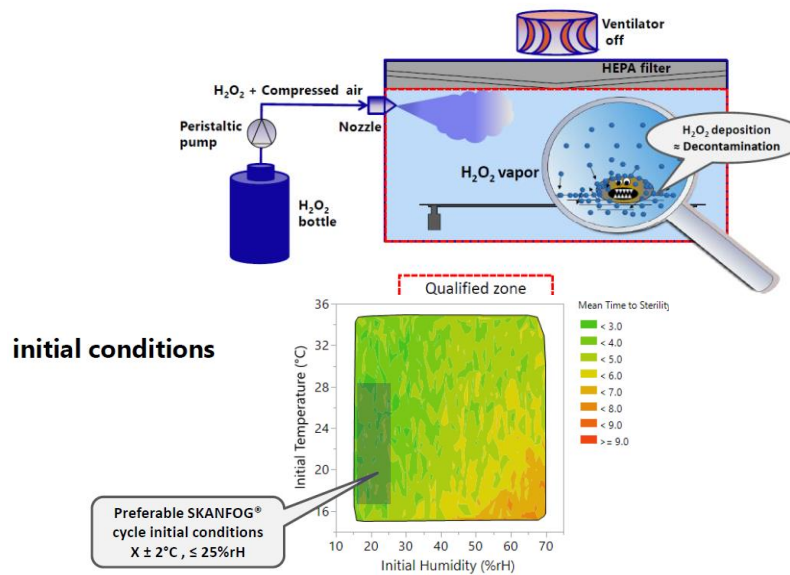


### Considerations during Manufacturing.

- Spreading inside of the Barrier
- Risk of Spreading outside the Barrier
- Surface Contamination
- Occupational Safety Risk
- Cleaning and Inactivation
- etc

# Topic 7: Prevention of Cross Contamination

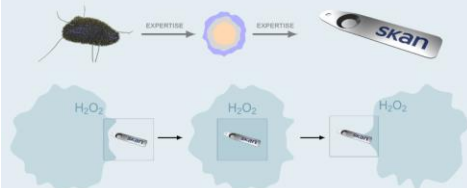
- Surface Inactivation with atomized  $H_2O_2$



# Topic 7: Prevention of Cross Contamination

## BI`s for the proof of inactivation

### Decontamination sensor ?



### Smart Operations team

- Customer contact (order and information)
- Shipment management (Parcel tracking, customs, GDP, cold chain)
- Lab. equipment management (Monitoring, qualification, calibration)
- Complaint management
- Material ordering process and stock management

### Bioprocess team

- In-house media preparation
- General pre-processing of materials
- Core production processes
- Ongoing R&D and technological watch on Bioprocess



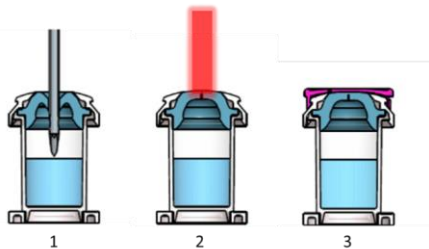
### Quality Control team

- Environmental monitoring program and hygiene control
- Material entry control program
- Change control and deviation management
- Certification
- Ongoing R&D and technological watch on QC methods



## Topic 14: Fill & Finish

- Closed Vial Technology.



Pictures Courtesy AT Aseptic Technology



## Topic 14: Fill & Finish

### AT-Closed Vial<sup>®</sup> technology

#### Features

Easy to implement filling technology minimizing contamination risks and ensuring Container Closure Integrity at cryogenic temperatures.

- Ready-to-fill closed vial
- Scalable filling equipment
- Full validation package
- Excellent suitability for Cell and Gene therapies



Thank you