

#### What Health Care Providers Need to Know

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#### **Learning Objectives**

#### Section 1: The Biosimilar Development Process

- Understand the biosimilar development process
- Discuss the Biosimilars Price Competition and Innovation Act (BPCIA)
- Review FDA definitions (nomenclature) and distinction between biosimilars, biologics, small molecules, and generics
- Understand the regulatory requisites associated with biosimilars including PK/PD, extrapolation, interchangeability and pharmacovigilance

### The Biosimilar Development Process Section 1



## Biological products have revolutionized treatment of autoimmune and inflammatory disorders

For nearly 20 years, biological products have become a cornerstone in the treatment of RA, Pso, PsA, AS, JIA, and IBD, revolutionizing the therapeutic approach and treatment paradigms <sup>1, 2</sup>



US dates and indications of initial approvals for anti-TNF biological products 3-14

1. Blüml S *et al. Int Immunol* 2012;24:275–281. 2. Ackerman C *et al. Expert Opin Ther Targets* 2007;11:1369–1384. 3. Pederson J *et al. World J Gastroenterol* 2014;20:64–77. 4. US FDA. Etanercept product approval information. Accessed May 2015. 5. US FDA. Infliximab product approval information. Accessed May 2015. 6. US FDA. Adalimumab product approval information. Accessed May 2015. 7. MedPage Today. FDA Approves Rituxan for Refractory Rheumatoid Arthritis. March 1, 2006. 8. US FDA. News Release. Accessed May 2015. 9. Johnson and Johnson. Press Release. Accessed May 2015. 10. US FDA. Golimumab label. Accessed June 3, 2020. 11. US FDA. Ustekinumab label. Accessed June 3, 2020. 13. US FDA. Abatacept label. Accessed June 3, 2020. 14. US FDA. Vedolizumab label. Accessed June 3, 2020.



## Growth and success of anti-TNF biologics has come at a cost

- While <2% of Americans use biologics, they represent ~40% of all prescription drug spending<sup>[a]</sup>
  - For outpatient IBD medications, the average biologic-taking patient accounted for \$36,051 per member per year in 2015<sup>[b]</sup>
- Biologics cost an estimated \$2.6 billion to develop\*<sup>[c]</sup>
- A recently published Rand Corporation analysis estimated that, from 2017 to 2026, biosimilars have the potential to reduce direct spending on biologic therapies by \$54 billion<sup>[a]</sup>





# Legislation to drive cost savings is the biggest factor driving biosimilar development

#### Global socioeconomics

- Mounting cost pressures on government budgets
- Desire to increase access to patients

#### Regulatory initiatives

- EMA in 2006
- FDA 2009: Biologics Price Competition and Innovation Act—BPCIA
  - To create an abbreviated licensure pathway for biological products that are demonstrated to be "biosimilar" to or "interchangeable" with an FDAlicensed biological product.
- Canada, Japan, Korea

#### Other factors

- Expiration of patents
- Technological innovation in biomanufacturing
  - Better selection of high-producing cell lines
  - Less costly bioreactors
  - Improved production yields, time and lower costs

#### Potential cost savings could increase access to care

#### 3.1% of total biologic sales in 2016

• range 0.2- 10.5%;or \$3.3 Billion of 2016 total sales

*\$54 billion cost saving potential of biosimilars over 10 years* 

- Sensitivity analyses suggest a range of \$25 to \$150 billion
  - Varying biosimilar penetration (5% to 60%; mean 28%)



### Biological products are complex, with distinct differences compared with conventional ("small molecule" medicines)

Small Molecules	Properties	Biological Products (Protein-based Drugs)
Methotrexate MW=454 Da	Example of Molecule Structure and Size	Monoclonal antibody MW≈150,000 Da Complex, with many options for post-translational modification <sup>5</sup>
Replicable in different laboratories	Manufacturing	Each manufactured in a unique living cell line
Relatively stable; usually degrades with first-order kinetics	Stability	Sensitive to storage and handling conditions
Reactions are intrinsic to the patient and not easily attributable to product	Immunogenicity	Reactions may be attributable to both product- and host-related factors



#### **Biosimilars are similar to originator biological products**

### *Like fingerprints from identical twins*, biosimilars are similar to originator biological products but not identical,<sup>1</sup> though they are tested for equivalent structure and function<sup>2</sup>.

**Originator Biological Product** 







# Biosimilars are defined as having equivalent efficacy and safety to originator biological products

#### Food and Drug Administration (US FDA)

"Highly similar to reference product notwithstanding minor differences in clinically inactive components [with] **no clinically meaningful differences** between the biosimilar and the reference product..."<sup>1</sup>

#### European Medicines Agency (EMA)

"Essentially the same biological substance, though there may be minor differences due to their complex nature and production methods...[differences] will have been shown not to affect safety or effectiveness"<sup>2</sup>

#### World Health Organization (WHO)

"...Similar in terms of quality, safety, and efficacy to an already licensed reference biotherapeutic product"<sup>3</sup>



### Biosimilars **≠** Generics

#### PHYSICIANS' POCKET GUIDE TO Understanding Biologics and Biosimilars



	Generics	Biosimilars
Size	Small	Large
Structure	Simple, well-defined	Complex (made up of many ingredients that are not well- defined)
Manufacturing	Predictable chemical process; exact copy can be made	Each manufactured in a unique living cell; similar, but not exact, copy can be made
Stability	Relatively stable	Highly sensitive to changes in environment (manufacturing and handling conditions)
Development cycle	Takes about 3 years to develop	Takes about 7 to 8 years to develop
Quality Assurance	About 50 QA tests done before possible approval	About 250 QA tests done before possible approval



#### **Biosimilars: FDA definitions and requirements**

A biological product that is *HIGHLY similar* to the reference product notwithstanding *minor* differences in *clinically inactive* components. No *clinically meaningful difference* between the biological product and the reference product in terms of *safety, purity,* and *potency*.





Produced from living organisms



carefully monitored to ensure consistent quality



The data from these comparisons must show that the biosimilar is highly similar to the reference product.

#### General principles to demonstrate biosimilarity: "Totality of Evidence" is evaluated

#### Stepwise procedure to establish "totality of evidence"<sup>1,2</sup>

Pharmacokinetics/ Pharmacodynamics Clinical efficacy/safety (including immunogenicity)

Pharmacovigilance





#### The development pathways for biosimilars are rigorous but abbreviated compared with development pathways for originator biologics



Human studies are used to assess biosimilarity and confirm previous results for biosimilars



#### **Evaluate pharmacokinetics and pharmacodynamics**

Pharmacokinetics (PK): what the body does to a drug (Absorption, distribution, metabolism, and excretion (ADME))

Pharmacodynamics (PD): what the drug does to the body (The treatment's biochemical and physiologic effects on the body)

For biosimilars, highly similar PK or PD alone is generally **insufficient** to establish "bioequivalence," as they are large & complex proteins with unique manufacturing processes



### Clinical efficacy, safety, and immunogenicity relative to reference product $\rightarrow$ Identify the most sensitive study population

The choice of study population must be **sensitive enough** to detect potential clinically meaningful differences between the biosimilar and its reference product<sup>1-4</sup>

• The "most sensitive" population within the "most sensitive" indication should be selected → largest placebo-adjusted difference



#### Treatment Effect of Infliximab in Different Approved Indications<sup>5</sup>

1. FDA Guidance for Industry. Scientific Considerations in Demonstrating Biosimilarity to a Reference Product. HHS FDA/CDER/CBER, Apr 2015; 2. EMA CHMP Guideline on Similar Biological Medicinal Products, Oct 2014; 3. WHO Guidelines on Evaluation of Similar Biotherapeutic Products. Geneva, 19–23 Oct, 2009; 4. EMA CHMP Guideline on Similar Biological Medicinal Products Containing Biotechnology-Derived Proteins as Active Substance: Non-clinical and Clinical Issues, Jan 2015; 5. Adapted from: Lee. AAPS J 2014;16:22–6; AAPS J 2015;17:1520–1



### Immunogenicity is "rigorously" tested for all biological products

Immunogenicity has the potential to compromise efficacy by preventing drug binding at the target site<sup>1</sup> Immunogenicity can cause safety concerns, including anaphylaxis and neutralization of endogenous proteins<sup>1</sup>

Immunogenicity is assessed extensively because it can arise from any biological product and has the potential to influence efficacy and/or safety<sup>1,2</sup>

But immunogenicity is different in IBD due to PK and use of MTX in RA



# Extrapolation of Biosimilar Efficacy and Safety Data: A key component of Biosimilar Approval Process to reduce developmental costs

Extrapolation	<ul> <li>Clinical trials in one indication used as rationale for clinical use in other indications for which the originator biological product is approved<sup>1</sup></li> </ul>
	<ul> <li>Requires appropriate scientific justification<sup>1</sup></li> </ul>

#### Extrapolation May Be Possible If...

- 1. Overall similarity with originator biological product is demonstrated based on the totality of the evidence<sup>2</sup>
- 2. Clinical similarity is demonstrated in a key indication<sup>2</sup>
- Discussion of product MoA and pathophysiology of the conditions involved supports justification<sup>3–5</sup>

1. US FDA. Biosimilars: Questions and answers regarding implementation of the Biologics Price Competition and Innovation Act of 2009. 2012. 2. Weise M et al. Blood 2012;120:5111–5117. 3. US FDA. Scientific considerations in demonstrating biosimilarity to a reference product. 2012. 4. EMA. Guideline on similar biological medicinal products containing biotechnology- derived proteins as active substance: non-clinical and clinical issues. 2013. 5. Health Canada. Information and submission requirements for subsequent entry biologics (SEBs). 2010.



#### **Post-Marketing Pharmacovigilance**

#### Monitoring, detecting and prevention of adverse events or drugrelated problems

- Consistent manufacturing methods
- Monitoring for immunogenicity
- Post-marketing surveillance
- Unique naming of biosimilar to be distinct and identifiable from reference product
  - Shared core name with distinguishing suffix:
    - "infliximab-dyyb" "infliximab-abda"
    - "adalimumab-atto" "adalimumab-adbm"



for approval



in FDA-licensed

facilities



Are tracked as part of post-market surveillance to ensure continued safety



#### **Key Considerations**

- Biosimilars cannot be considered generic biologics.
- Biosimilar development and approval is based on the totality of evidence:
  - Designed to demonstrate biosimilar is highly similar to RP
  - Not to independently establish its safety and effectiveness
- Manufacturers use a stepwise approach to demonstrate biosimilarity:
  - Similarity in structure and function
  - Scientific rigor and state-of-art analytics to identify any differences in "Critical Quality Attributes" to ensure desired quality
  - Taking into account safety and efficacy
- Small structural differences are permitted provided no impact biologic function, clinical safety or efficacy.
  - Small structural differences reconciled in studies demonstrating differences are not clinically meaningful
- Because immunogenicity is unpredictable, assessment of a biosimilar must be based on:
  - A thorough risk-benefit analysis
  - Robust post-marketing risk management programs such that physicians and pharmacists remain alert to unexplained changes in drug efficacy or side effects

