

# Has MABEL kept the promise? 10 years of experience



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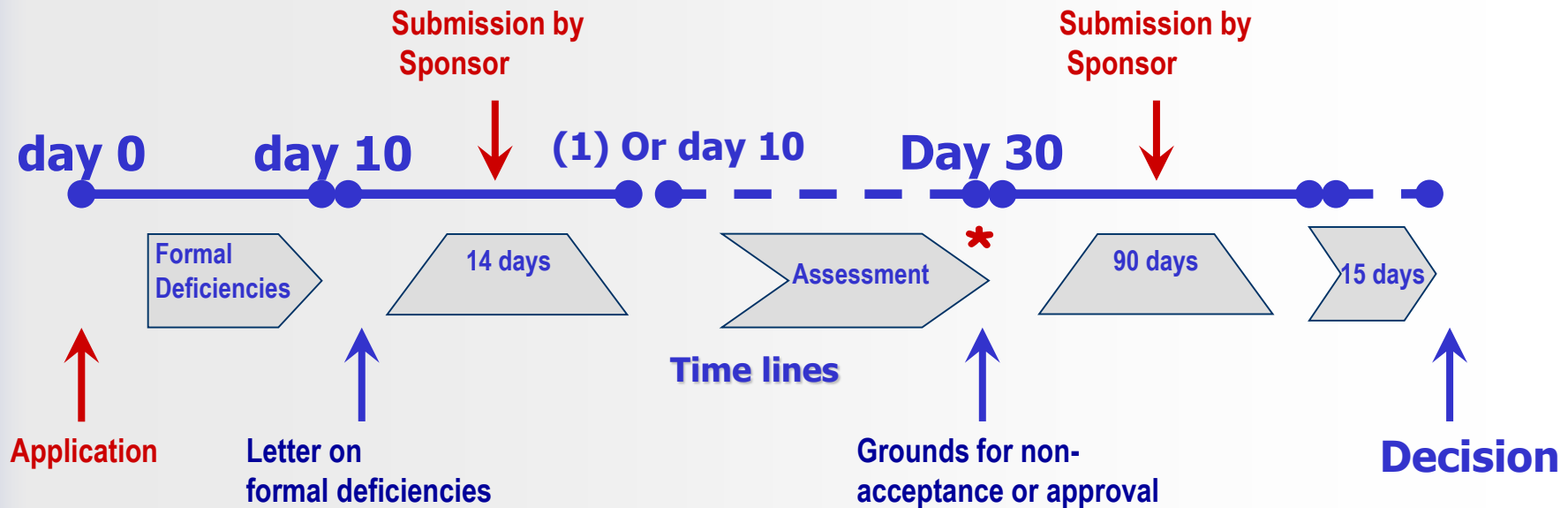
**Paul-Ehrlich-Institut**  
Federal Agency for Vaccines and Biomedicines



- ❖ **Clinical trial application - DE (PEI)**
- ❖ **The TeGenero case and it's consequences**
- ❖ **First in men studies (FIM studies) requirements**



# Clinical trial application (DE)

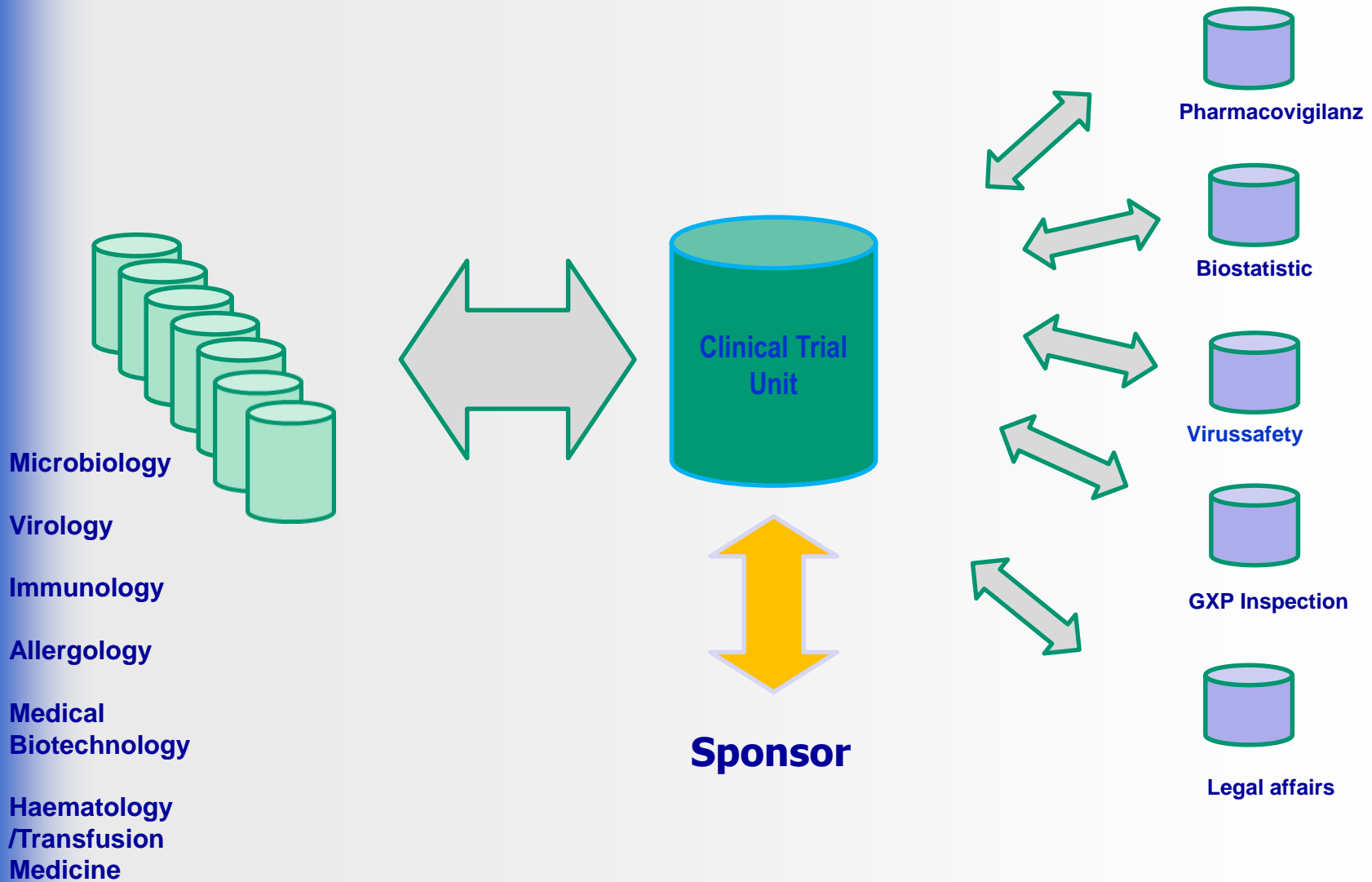


<b>Biological Products (human or animal origin)</b>	<b>60 Days</b>
<b>Somatic Cell-Therapeutics; Gene Therapy Products Genetically modified Organisms (GMO)</b>	<b>90 Days</b>
<b>Xenogene Cell-Therapeutics</b>	<b>No time-limit</b>

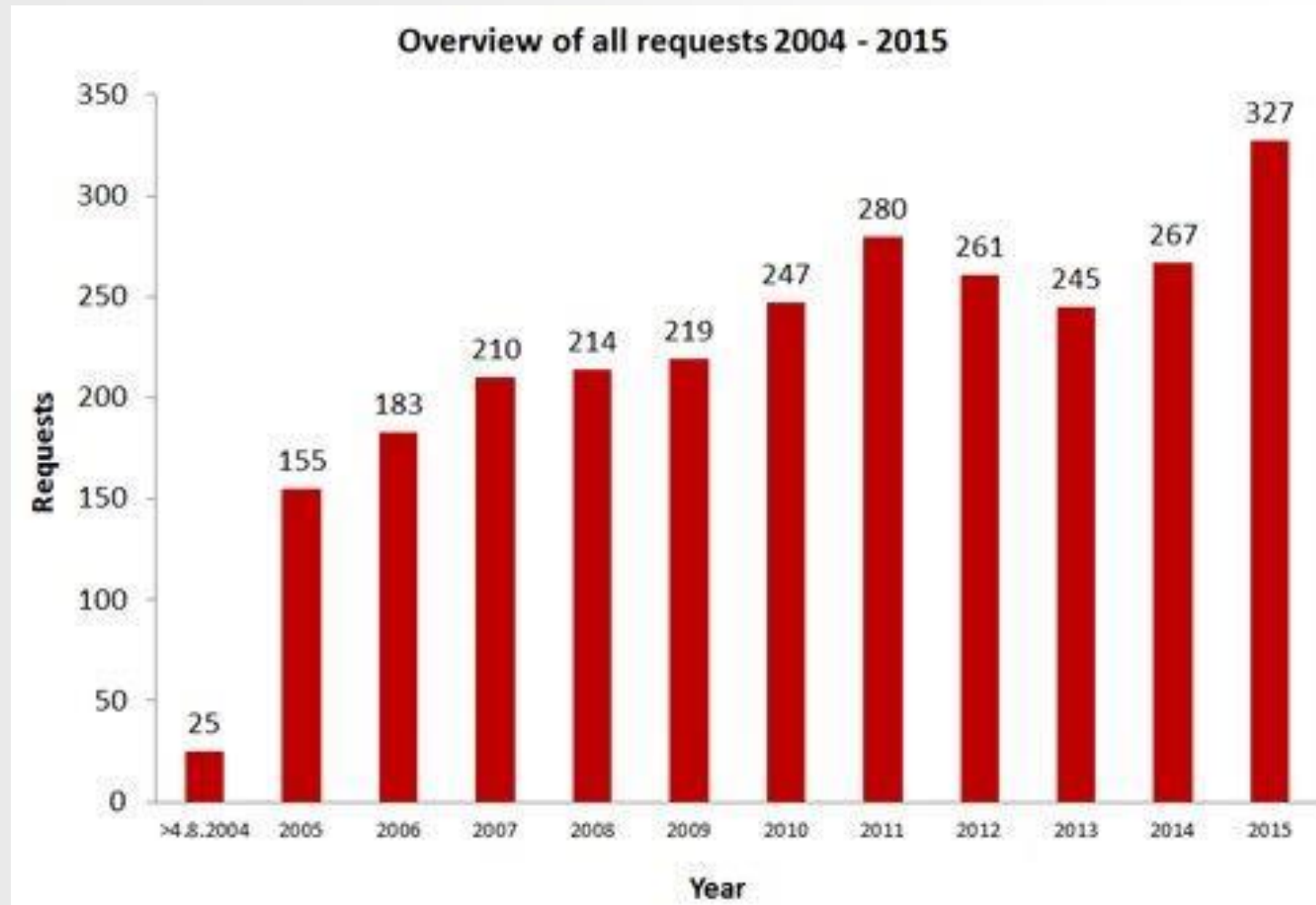
\* Products under 30 days: Vaccines; Allergens; Biotech. acc. Reg. 726/2004/EC



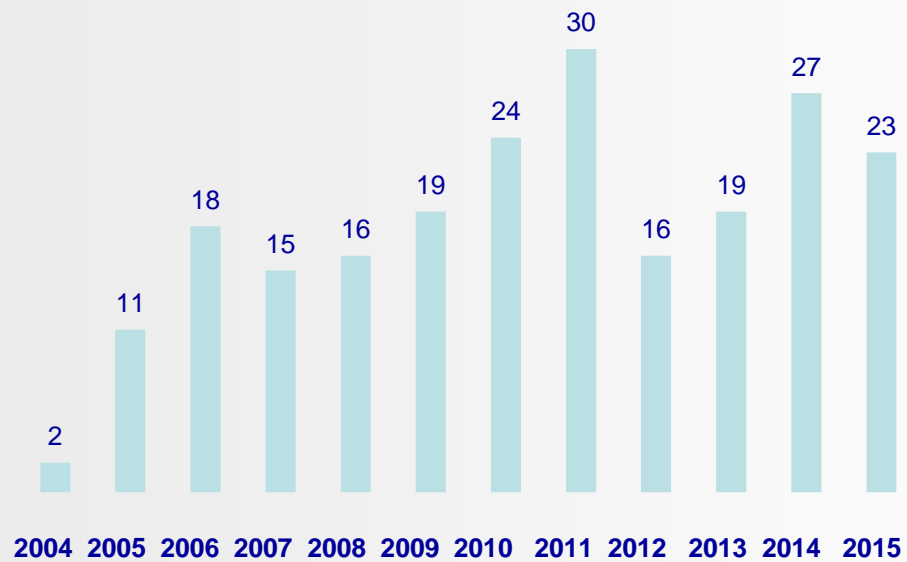
# Clinical trial application



# Clinical trial application (PEI)



# FIM Studies – PEI

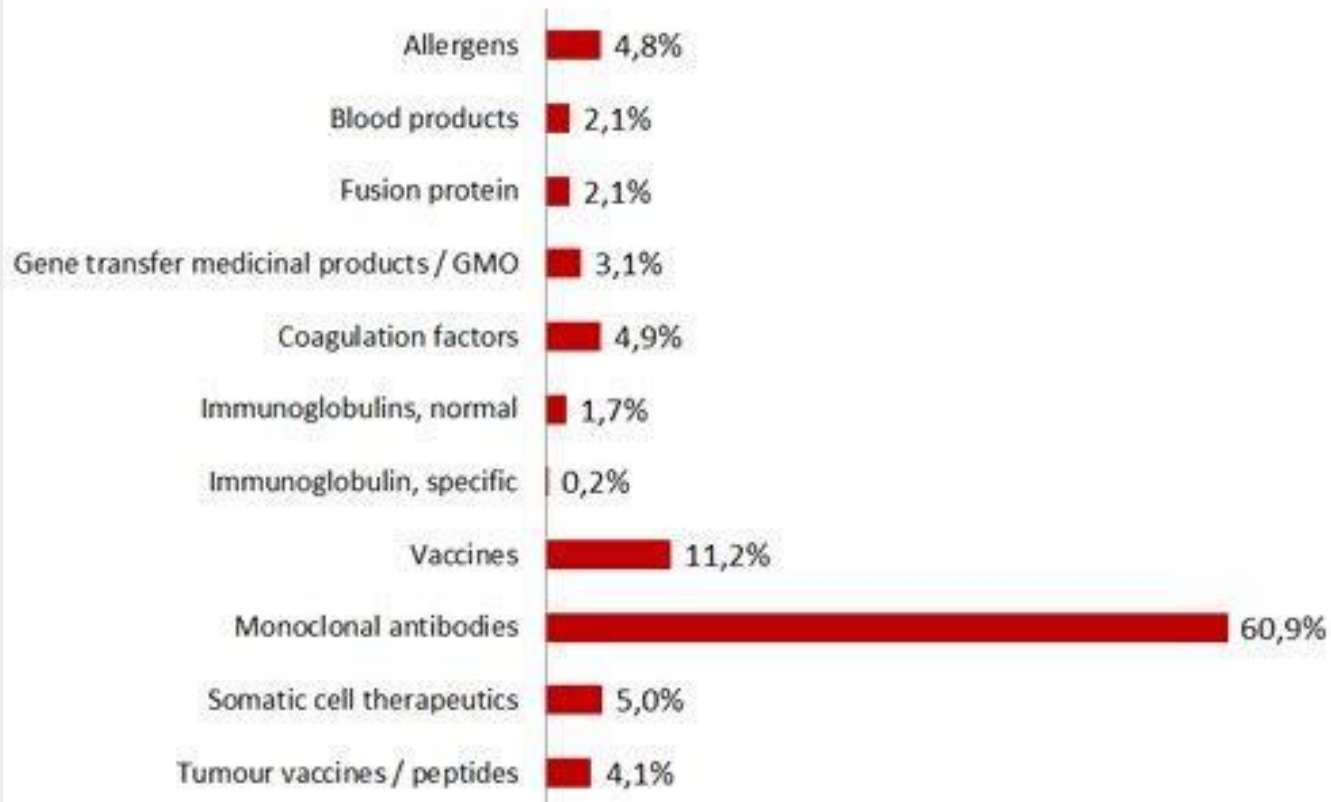


**8/2004 - 12/2015**



# Clinical trial application (PEI)

All CTA requests by groups 8/2004 - 12/2015 in percent



# TGN1412

## FIM trial

- Target CD28 ( CD28 agonist; hypothesis: activation of Treg; expression of anti-inflammatory cytokines )
- 8 subjects (2 placebo; 6 TGN1412)
- "Sub-clinical" dose; 500 fold lower than safe dose in animals
- dosing 10 min apart
- SIRS (6 subjects); MOF (4 subjects)





# "Risk mitigation guideline" - CHMP/SWP/28367/07

**Scope: All new chemical and biological IMPs**



European Medicines Agency

London, 19 July 2007

Doc. Ref. EMEA/CHMP/SWP/28367/07

**COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE  
(CHMP)**

**GUIDELINE ON STRATEGIES TO IDENTIFY AND MITIGATE RISKS FOR FIRST-IN-  
HUMAN CLINICAL TRIALS WITH INVESTIGATIONAL MEDICINAL PRODUCTS**



# **FIM studies**

## **Key issues**

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- ❖ **Identification of risk factors**
- ❖ **Risk communication**
- ❖ **Risk mitigation**



## Identification of risk factors

### ➤ Mode of action

- **Extent of knowledge of the supposed mode of action**
- **Nature and intensity (extent, amplification, duration, reversibility) of the effect**
- **Dose response**

### ➤ Nature of the target

### ➤ Relevance of animal model



## ❖ Risk communication

### ➤ IB / reference safety information, protocol

✓ Potential risks

✓ Known risks

### ➤ Patient information



## **Risk mitigation**

### **❖ Study design**

- Study population**
- Trial sites (e.g. facility for resuscitation)**
- Dosing (starting dose, dose escalation increments)**
- Stopping rules and communication**
- Decision making process**
- AE management**



# FIM studies

## Design issues

### Study population

#### ❖ **Healthy subjects vs patients**

- **Presence of the target**
- **Higher variability in patients**
- **Better tolerability of potential AEs in healthy subjects**
- **Potential pharmacogenomic difference between target population and healthy subjects**
- **Predictive value of data derived from healthy subjects**



# FIM studies

## Design issues

### Starting dose

- ❖ **IMP**

- **Strength and potency**
- **Reliability of very small**

- ❖ **First in human dose (MABLE)**

- **In vitro and in vivo information from PK/PD data**

- ❖ **Route of administration**

- ❖ **Staggered approach**

- **Adequate length of observation**



# **FIM studies**

## **Design issues**

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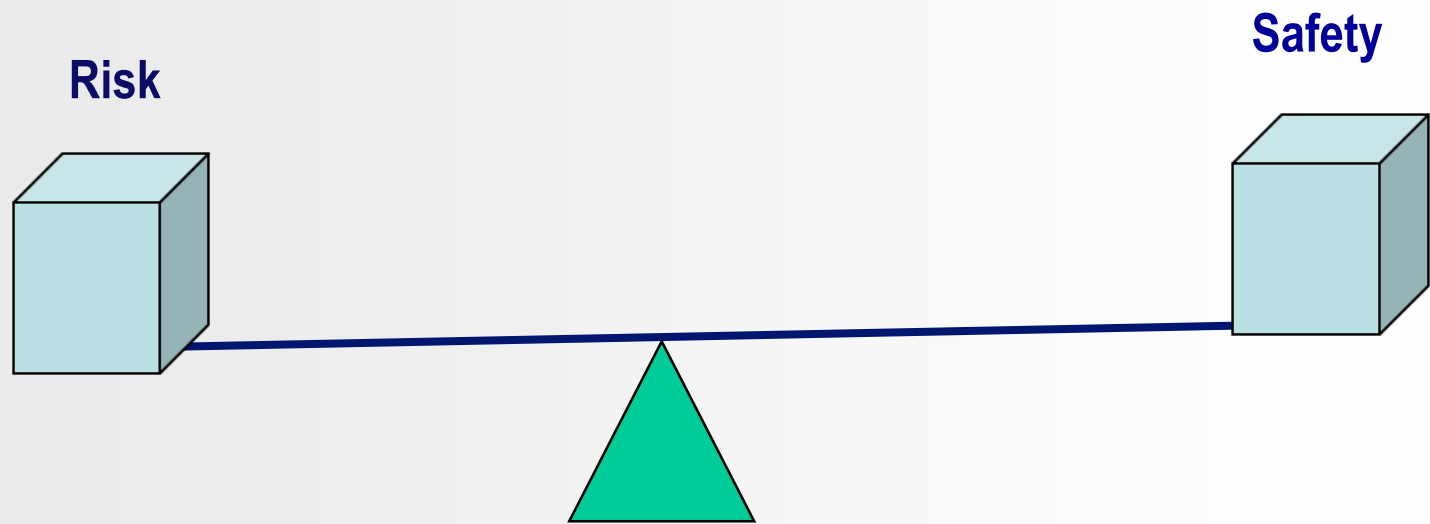
### **Adverse events**

- ❖ **Guidance on early detection and management**
  - **Adverse events of special interest**
  - **Treatment guidance (institutional guidelines)**
  
- ❖ **Reporting lines**





# Risk mitigation - 10 years of experience



# Risk mitigation - 10 years of experience

- ❖ **Implementations of various measures to enhance the safety of the patient in clinical trials, including FIM trials came in force**
- ❖ **Administering a safe starting dose may not prevent the occurrences of unexpected adverse events.**
- ❖ **Robust measures to detect these and manage these events must be in place**



# Thank you for your attention



This presentation represents my personal view and not the view of the Paul-Ehrlich-Institut or any other regulatory body

