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4 **Joint MHLW/EMA reflection paper on the development of**
5 **block copolymer micelle medicinal products**

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11 **Table of contents**

12 **1. Introduction 3**

13 **2. Scope..... 4**

14 **3. Discussion 5**

15 **3.1. Chemistry, manufacturing and controls 5**

16 3.1.1. Pharmaceutical Quality5

17 3.1.2. Description and composition5

18 3.1.3. Quality characterisation5

19 3.1.4. Manufacturing process and process control7

20 3.1.5. Product Specification7

21 3.1.6. Stability8

22 3.1.7. Changes in manufacturing during development9

23 **3.2. Non-clinical studies..... 9**

24 3.2.1. General Considerations9

25 3.2.2. Non-clinical Pharmacokinetics 10

26 3.2.3. Non-clinical pharmacodynamics 11

27 3.2.4. Safety Pharmacology 11

28 3.2.5. Toxicology 12

29 **3.3. Considerations for first-in-human studies..... 12**

30 **4. Conclusions 13**

31 **5. Glossary 13**

32

33 **1. Introduction**

34 There has been significant interest in developing drug delivery technologies to achieve improved
35 delivery of poorly soluble, high-toxic and/or unstable drugs, to increase tissue targeting and/or to
36 improve the efficiency of cytosolic delivery of macromolecular drugs. One of the strategies under
37 development uses block copolymer micelles. Block copolymer micelles are self-assembled micelles, and
38 they are typically prepared from AB block copolymers. Other more complex compositions have been
39 proposed. An active substance can be incorporated into the inner core of the block copolymer micelle
40 product by chemical conjugation or by physical entrapment. Block copolymers with amphiphilic
41 character spontaneously assemble into polymeric micelles in aqueous media, hydrophobic interactions
42 typically drive this self-association. However, other driving forces may be used to promote micelle
43 formation and enhance micelle stability. For example, electrostatic interactions between charged block
44 copolymers and oppositely charged active substances, polymer–metal complex formation, and
45 hydrogen bonding. In specific cases functional features may also be added to the system, for example,
46 by targeting molecule conjugation to the block copolymer, or by the addition of another homopolymer
47 to stabilize the micelle or active substance, modify its release rate and/or increase the loading of the
48 active substance. In any given product, a proportion of the active substance could also be extra-block
49 copolymer micelle, free in bulk solution.

50 It should be emphasised that such block copolymer micelle products (as described above) have a
51 carefully designed structure in which the inner core typically serves as a container for active substance
52 and that is surrounded by an outer shell of hydrophilic polymers. Additionally the chemistry of such
53 block copolymer micelles may be designed to ensure high stability after dilution on administration due
54 to a low critical association concentration (cac), to optimize the pharmacokinetics (PK) (targeting), and
55 to control the drug release, etc. Thus the dissociation of such block copolymer micelles may be
56 kinetically slow. These properties are different from traditional surfactant micelles used to
57 entrap/solubilise/aid the transport of drugs. Moreover, a block copolymer micelle product can contain
58 multiple components within the core including chemically bound active substance, which in certain
59 cases may be covalently bound.

60 Furthermore, it has been shown in non-clinical studies that block copolymer micelles may have the
61 potential to preferentially accumulate in solid tumors due to microvascular hyperpermeability and
62 impaired lymphatic drainage (known as the enhanced permeability and retention (EPR) effect). The
63 specific physicochemical properties of block copolymer micelles, such as size, surface-charge,
64 composition, and stability can be important determinants of safety and efficacy in all proposed
65 applications.

66 Several block copolymer micelle products are currently in pre-clinical or in clinical development, for
67 example, products containing anti-tumor agents and proteins.

68 As block copolymer micelle products are of nano-scale size, contain more than one component, and are
69 purposely designed for specific clinical applications they may be considered as nanomedicines.

70 This reflection paper discusses the general principles for assessing block copolymer micelle products
71 but does not aim to prescribe any particular quality, non-clinical or clinical strategy.

72 **ICH Guidelines**

73 Where applicable, it should be read in connection with the following ICH guidelines:

- 74 • ICH Harmonised Tripartite Guideline Stability testing of new drug substances and products
75 Q1A(R2)
- 76 • ICH Quality of biotechnological/biological products Q5A(R1)-Q5E (Q5E Note for Guidance on
77 Comparability of Biotechnological/Biological Products Subject to Changes in their Manufacturing
78 Process)
- 79 • ICH Specifications: Test procedures and acceptance criteria for new drug substances and new drug
80 products: chemical substances Q6A
- 81 • ICH Specifications: Test procedures and acceptance criteria for biotechnological/biological products
82 Q6B
- 83 • ICH Pharmaceutical Development Q8(R2)
- 84 • ICH Guidance on Nonclinical Safety Studies for the Conduct of Human Clinical Trials and Marketing
85 Authorization for Pharmaceuticals M3(R2)
- 86 • ICH Guidelines for Toxicokinetics and Pharmacokinetics S3A and S3B
- 87 • ICH Duration of Chronic Toxicity Testing in Animals (Rodent and Non rodent Toxicity Testing) S4
- 88 • ICH Preclinical Safety Evaluation of Biotechnology-Derived Pharmaceuticals S6(R1)
- 89 • ICH Safety Pharmacology Studies for Human Pharmaceuticals S7A
- 90 • ICH The Non-clinical Evaluation of the Potential for Delayed Ventricular Repolarization (QT Interval
91 Prolongation) by Human Pharmaceuticals S7B
- 92 • ICH Immunotoxicology Studies for Human Pharmaceuticals S8
- 93 • ICH Nonclinical Evaluation for Anticancer Pharmaceuticals S9

94 **2. Scope**

95 This paper provides basic information for the pharmaceutical development, and non-clinical and early
96 clinical studies of block-copolymer micelle drug products created to affect PK, stability and distribution
97 of incorporated or conjugated active substances in vivo. Although the focus is on products designed for
98 intravenous administration, the principles outlined in this reflection paper might also be considered to
99 be applicable to block copolymer micelle products designed for other routes of administration. The
100 active substance could be a low molecular weight chemical entity, nucleic acids, or a biological or
101 biotechnologically derived entity (i.e. recombinant product), including, for example, peptides and
102 proteins.

103 Due to the complexity of the system, i.e. whether or not the active substance is chemically bound,
104 and/or additional stabilizers are used, it is recommended that an early dialogue with the regulators
105 takes place to discuss the likely critical product attributes of each particular block copolymer micelle
106 product. During this dialogue the sponsors are encouraged to discuss emerging methods that might be
107 applied to define quality and non-clinical properties relevant to the proposed clinical application.

108 This document, being a reflection paper, should be read in connection with relevant ICH guidelines
109 (listed above) and regional guidelines (Annexes I and II)¹.

¹ Post-marketing issues are not discussed. Drug products that use block copolymers as coating materials for nanoparticles of other materials such as homopolymers or metals are also not covered in this paper.

110 **3. Discussion**

111 **3.1. Chemistry, manufacturing and controls**

112 **3.1.1. Pharmaceutical Quality**

113 It is important to identify the critical quality attributes of block copolymer micelle products that will
114 have a major impact on the in vivo PK and pharmacodynamic (PD) properties that may impact on
115 safety and efficacy. Correctly identifying the parameters that define relevant physicochemical
116 properties of the block copolymer micelle product is critical to ensure its quality.

117 **3.1.2. Description and composition**

118 The typical components of block copolymer micelle products are, the active substance, the block
119 copolymer, and in certain cases, other components such as stabilizing agents.

120 The critical quality attributes of block copolymer micelle product should be carefully considered on a
121 product specific basis. Of particular importance may be:

- 122 • the content of the block copolymer and active substance in the block copolymer micelle product.
123 These should be expressed both as the molar ratio and the percentage of each by weight.
- 124 • the composition, mean molecular weight and polydispersity of the polymers (homopolymers,
125 copolymers etc.) used to synthesise the block copolymers (or block copolymer-active substance
126 conjugates).
- 127 • the composition, mean molecular weight and polydispersity of the block copolymers used to create
128 the block copolymer micelle.

129 Any acceptable ranges given should be fully justified.

130 **3.1.3. Quality characterisation**

131 The following are typical examples of properties, related to:

132 **A. Components containing block copolymers**

133 The chemical composition of block copolymers greatly impacts the driving force behind polymer self-
134 association, and therefore, size and physicochemical characteristics and *in vitro* and *in vivo* stability of
135 the resultant micelles. Crucial properties include:

- 136 • Chemical structure of the block copolymers:
- 137 • Chemical nature and stability of chemical linkage in the case of block copolymer-active substance
138 conjugate
- 139 • Impurity profile (e.g., macromolecular impurities)

140 **B. Block copolymer micelle products**

141 Properties relevant for the quality characterisation of the finished product are of different types and
142 include:

143 Properties related to the block copolymer micelle

- 144 • Block copolymer micelle size (mean and distribution profile)

- 145 • Morphology
- 146 • Zeta potential
- 147 • Association number
- 148 • Concentration dependency of the nano-structure (In some cases, this may be expressed as critical
- 149 micelle concentration (cmc), or critical association concentration (cac). It should be noted that
- 150 these parameters of some block copolymers are too low to be measured using the current
- 151 analytical techniques.)
- 152 • drug loading
- 153 • surface properties
- 154 • chemical structure
- 155 • physical state of the active substance
- 156 • in vitro stability of the block copolymer micelle in plasma and/or relevant media
- 157 • in vitro release of the active substance from the block copolymer micelle product in plasma and/or
- 158 relevant media
- 159 • in vitro degradation of the block copolymer in plasma and/or relevant media

160 Properties related to the manufacturing process

- 161 • validated process for reconstitution
- 162 • validated process for ensuring sterility

163 Properties related to the in vivo behaviour

- 164 • osmolarity
- 165 • fraction of active substance that is surface associated
- 166 • release rate and place of active substance release
- 167 • block copolymer degradation rate and place of degradation

168 Where the block copolymer component itself (not the active substance) has a biological activity which
 169 would have an impact on clinical efficacy and/or safety, its potency and physicochemical properties
 170 that are critical for its biological activity should be evaluated as part of characterisation.

171 A list of validated tests to be applied routinely to the block copolymer micelle product should be
 172 defined by the applicant and should be based on the parameters chosen to characterise the drug
 173 product including those described above, as appropriate.

174 Development of discriminating, in-vitro release methods is important for the purpose of:

- 175 • defining the release of the active substance or block copolymer-active substance conjugate from
- 176 the block copolymer micelle when in the circulation.
- 177 • defining the release of the active substance or block copolymer-active substance conjugate from
- 178 the block copolymer micelle at the targeted site of action. The proposed media should reflect the
- 179 physiological environment of the block copolymer micelle when in use.
- 180 • defining the stability on storage.

181 The methods used must be sensitive enough to ensure batch to batch consistency
182 This is particularly important to monitor in the case that a block copolymer-active substance conjugate
183 is involved.

184 **3.1.4. Manufacturing process and process control**

185 A well-defined manufacturing process with its associated process controls is needed to ensure that
186 acceptable product is produced on a consistent basis. It is known that small changes to block
187 copolymer micelle products may significantly influence their performance.

188 The manufacturing process should be controlled to ensure consistency in the product's performance in
189 terms of safety and efficacy. Data showing consistency in quality, and controls for critical steps and
190 intermediates should be provided. In addition to the information recommended by the ICH Q8(R2) –
191 pharmaceutical development, recommendations specific to block copolymer micelle products are
192 provided below.

193 **Components containing block copolymers and/or block copolymer active substance** 194 **conjugates**

195 Detailed descriptions of the synthetic process, extraction, and purification procedures should be
196 provided as applicable.

197 The source and specifications for any starting materials should be provided. In particular, for polymeric
198 starting materials, molecular weight and molecular weight distribution should be clearly described.
199 Impurities such as manufacturing impurities, and macromolecular reaction by-products should be
200 clearly specified.

201 Key intermediates in the manufacturing process should be identified and controlled.

202 Biotechnologically derived and/or entities of biological origin that are used as starting materials or
203 active substance should follow the requirement for medical use contained in the ICH quality guidelines
204 for biotechnological/biological products.

205 To identify the impact of a manufacturing process change, e.g. change in scale, a careful evaluation of
206 all foreseeable consequences for the product including process validation/evaluation should be
207 performed.

208 **Block copolymer micelle products**

209 In the manufacturing process of block copolymer micelle products, micelle formation process is critical.
210 When micelle formation occurs spontaneously, the process of micelle formation would be equal to the
211 dispersion process of block copolymer. When other methods are required for micelle formation, critical
212 quality attributes associated with the process (e.g. micelle size and solution transparency) should be
213 controlled.

214 Since block copolymer micelle products contain highly-functional polymers, it is highly recommended
215 that appropriate quality control of intermediates (i.e. the block copolymer) and/or the process, is
216 undertaken based on the Quality by Design (QbD) concept.

217 **3.1.5. Product Specification**

218 Regarding definition of an acceptable specification for a block copolymer micelle product (see
219 guidelines ICH Q6A or Q6B), it is recommended that the applicant engages in an *early dialogue with*
220 *the regulators*. Additional testing specific to block copolymer micelle products may be needed.

221 **Components containing block copolymers**

222 A detailed description of the tests, procedures, and acceptance criteria for block copolymers and/or
223 block copolymer-active conjugates should be provided. Evaluation of the polymer, such as mean
224 molecular weight and its distribution should be obtained. The composition of each component should
225 also be obtained.

226 **Block copolymers micelle products**

227 Because drug products based on block copolymers are functional polymeric structures, the critical
228 quality attributes should be defined in respect of the functions for the intended use. These attributes
229 will include particle size, release rate of the active substance from the micelle, and potency if the active
230 substance is a biotechnological/biological entity. Where present, the composition regarding average
231 number of targeting-molecules conjugated to the polymeric micelle to promote active targeting should
232 be justified.

- 233 • it should be noted that block copolymer micelle products may be a mixture of block copolymer
234 micelles and block copolymer unimers (with or without bound active substance), depending on the
235 individual characteristics of the block copolymers, the active substance and the test conditions
236 used. Therefore, analytical tests should be performed considering the product's form under
237 appropriate test conditions and procedures. The test concentration should be carefully considered,
238 because dilution of block copolymer micelle products may cause disassociation of micelles and
239 result in an increased proportion of unimers.
- 240 • considerations relating to identity and purity should take into account both the active substance
241 and the block copolymers. Impurities, including possible synthetic macromolecular by-products,
242 should be evaluated. Undesirable aggregates, precipitates, and degradation products will be also
243 considered as impurities.
- 244 • potency, if the active substance is a biotechnological/biological entity.

245 Other attributes are as follows:

- 246 • Physicochemical properties of block copolymer micelle products determined to be critical to product
247 quality. However, not all the characterization tests need to be included in the specifications. (See
248 section 3.1.3 on Physicochemical characteristics of block copolymer micelles).
- 249 • Assay of incorporated (or conjugated) and unincorporated (or unconjugated) active substance.
- 250 • Assay of block copolymers or weight fraction to active substance

251 Stability should be considered in the context of the proposed clinical use and justified in the
252 specification.

253 **3.1.6. Stability**

254 The concepts in ICH Q1A(R2) apply to the design of stability studies for block copolymer micelle
255 products. Those in ICH Q5C also apply to biotechnological/biological entities.

256 In general, stability studies should address the physical and chemical stability of the active substance,
257 the block copolymers (and if present block copolymer-active substance conjugates), and the resultant
258 micelles. Typical attributes that may be evaluated include, but are not limited to:

259 Physical stability

- 260 • mean block copolymer micelle size

- 261 • release of the incorporated or conjugated active substance
- 262 • secondary aggregation
- 263 • in vitro release of active substance, as appropriate under appropriate test conditions
- 264 Chemical stability
- 265 • stability of active substance
- 266 • stability of block copolymer components (e.g. degradation of polymers)
- 267 • if present, stability of block copolymer-active substance conjugates
- 268 In vitro methods, using conditions relevant to the proposed use, should be used to determine
- 269 • the release rate of the active substance entrapped in the block copolymer micelles
- 270 • the rate of release of active substance chemically bound to block copolymer micelles

271 **3.1.7. Changes in manufacturing during development**

272 If there are changes in manufacturing critical process parameters or equipment used for manufacture,
273 complete characterization of the block copolymer micelle product may be warranted on a case-by-case
274 basis. Approaches to determining the impact of any process change will vary with respect to the
275 specific manufacturing process, the product, the extent of the manufacturer's knowledge and
276 experience with the process and development data provided.

277 It is important to also consider applying the principles for assessing the comparability studies of
278 products before and after changes made in the manufacturing process, as those developed for
279 Biological Medicinal Products. The principles of comparability studies are outlined in section 1.4 of ICH
280 Q5E (Note for Guidance on Biotechnological/Biological Products Subject to Changes in their
281 Manufacturing Process).

282 **3.2. Non-clinical studies**

283 **3.2.1. General Considerations**

284 Significant changes in pharmacokinetic characteristics can occur when an active substance is
285 administered as a block copolymer micelle product, i.e. volume of distribution and clearance may be
286 changed, half-life prolonged and tissue distribution changed. Significant changes not only in the PK
287 characteristics but also in the PD and safety of the active substance can also occur when it is
288 administered as a block copolymer micelle product. Moreover, it has been noted that certain block
289 copolymers (not containing an active substance) can display inherent biological activity, which would
290 have an impact on clinical efficacy and/or safety. Cellular uptake of block copolymer micelle entrapped
291 active substance may be limited to the endocytic route.

292 The PK characteristics of the block copolymer micelle product could be dependent on:

- 293 • the rate of clearance of the block copolymer micelle containing entrapped or chemically bound
294 active substance
- 295 • the rate of dissociation of the block copolymer micelle. This may lead to release of block copolymer
296 unimers (with or without bound active substance) that would have lower molecular weight (smaller
297 size characteristics) and may display different clearance characteristics

- 298 • the rate of release of entrapped active substance from the block copolymer micelle
- 299 • the rate of release of active substance chemically bound to the block copolymer unimer
- 300 • the rate of degradation of the block copolymer
- 301 • clearance and metabolism of free active substance.
- 302 • the distribution of the block copolymer micelle
- 303 • interaction of the block copolymer micelle with plasma or serum proteins or blood cells

304 The rate and location of in vivo active substance release is a crucial parameter which often determines
 305 the toxicity and efficacy. An attempt should be made to develop the necessary methodology to define
 306 active substance release.

307 All non-clinical studies should be conducted using well-characterised block copolymer micelle product
 308 and the rate of micelle dissociation and product stability should be known under the chosen test
 309 conditions.

310 **3.2.2. Non-clinical Pharmacokinetics**

311 **Analytical Methods**

312 Validated analytical techniques should be developed, that are capable of measuring the concentrations
 313 of active substance both in total and in free form in blood, plasma or serum, and the total
 314 concentration of active substance in organs and/or tissues.

315 **Pharmacokinetics**

316 As the PK behaviour of block copolymer micelle products can be very different from that of the active
 317 substance administered without the block copolymer micelle carrier and this can impact significantly on
 318 efficacy and safety, in vivo PK should be determined. The choice of appropriate species and models to
 319 investigate in vivo PK, and release of the active substance should be justified in respect of proposed
 320 clinical use and the composition of the block copolymer micelle.

321 As physicochemical parameters such as size, surface-charge and morphology may impact on the
 322 distribution of block copolymer micelle product, the effect of variability in such parameters on
 323 distribution should be shown to justify the product specification. Therefore, in addition to the
 324 information recommended in the ICH S3 (S3A and S3B), S6(R1) and M3 (R2), the following
 325 parameters specific to block copolymer micelle products should be assessed:

- 326 • PK parameters such as C_{max}, half-life, and AUC, of the block copolymer micelle product both for
 327 total active substance and for free active substance in blood, plasma, or serum.
- 328 • PK parameters should be measured at different dose levels and at appropriate time points.
- 329 • Distribution of the block copolymer micelle products in organs and/or tissues relevant to proposed
 330 clinical use and route of administration. Specifically total amounts of active substance may be
 331 required - see analytical methods. A distribution time profile should be obtained using multiple
 332 time points with justification of the time course of the study.
- 333 • Sampling time points and sampling duration should be carefully selected so as to accurately
 334 quantify the time course of the concentrations of active substance both in total and in free form
 335 and metabolites in blood, plasma or serum, and the total concentration of active substance and
 336 metabolites in organs and/or tissues. Some factors should be considered for the sampling

337 schedules, for example, the block copolymer micelle stability after administration, and the profile
338 of localization to specific organs and/or tissues. In particular, samples taken in the initial
339 distribution phase (e.g. <15 min) are considered very informative for calculating the distribution
340 volume to estimate the stability of block copolymer micelles in blood circulation.

- 341 • Measurement of active substance metabolites in blood, plasma or serum and maybe organs and/or
342 tissues is especially important when the metabolite is acknowledged to be the primary active
343 compound. If one or more metabolites have substantial clinical activity then it might be necessary
344 to compare their kinetics, and where necessary, toxicokinetics, to determine accumulation
345 following multiple doses.
- 346 • Comparing the PK of the block copolymer micelle product and the active substance administered by
347 itself is recommended. Such comparative studies are also considered useful to demonstrate a
348 claimed pharmacokinetic advantage of the block copolymer product against the active substance
349 administered by itself.
- 350 • It may also be important to consider the protein and cellular interaction of block copolymer
351 micelles administered intravenously as these factors are known to have potential to influence the
352 distribution, stability and safety of nanomedicines.

353 The metabolic and excretion pathways of the active substance should be determined and fully
354 characterized after administration of the block copolymer micelle product. Furthermore, the metabolic
355 and excretion pathways of the micelle constituents are by themselves of interest. Their detailed
356 characterization is needed unless otherwise justified.

357 If there is concern that components of the block copolymer micelle drug products may cause drug-drug
358 interactions, for example by modulating membrane transporters such as p-glycoprotein, an appropriate
359 evaluation should be carefully undertaken.

360 **3.2.3. Non-clinical pharmacodynamics**

361 The non-clinical pharmacodynamic studies should include demonstration of pharmacodynamic response
362 in appropriately justified in vitro (where possible) and in vivo models. In vivo evaluation should involve
363 an appropriate route of administration, justified dose levels and a justified dosing regimen depending
364 on proposed clinical application. Appropriateness of the pharmacological model should be discussed in
365 respect of the PK of the block copolymer micelle product, and of the PD and PK of the active substance
366 when administered by itself.

367 The chemical composition and physicochemical properties of a block copolymer micelle product affect
368 properties including size, surface-charge, and the rate of release of the active substance. Some
369 important factors to consider when designing studies to discuss the mechanisms of action include:

- 370 • the fate of active substance (the location and rate of in vivo active substance release)
- 371 • the fate of the micelles (block copolymers or other stabilizing components) following administration
372 and/or cellular entry by endocytosis or other mechanisms.

373 The PD effect of the micelles should be assessed using in vitro and in-vivo pharmacodynamic models.

374 **3.2.4. Safety Pharmacology**

375 When applicable (e.g. for block copolymer micelle drugs out of the scope of ICH S9) the core battery of
376 safety pharmacology studies should be conducted, in accordance with ICH M3 (R2), ICH S7A and ICH
377 S7B.

378 **3.2.5. Toxicology**

379 For the non-clinical evaluation of toxicities of block copolymer micelle products, the recommendations
380 in the ICH safety guidelines especially of S4, S6(R1) and S9 and M3 (R2) should be followed.

381 Relevant toxicity studies of the block copolymer micelle product should be conducted to assess both
382 the toxicological profile and exposure-response relations according to the ICH safety guidelines.

383 **Toxicokinetics**

384 In addition to blood, plasma, or serum concentration, the active substance should be measured in the
385 target tissue(s) and toxicologically relevant organs related to proposed clinical use.

386 **Additional studies**

387 Depending on the physicochemical and/or pharmacokinetic characteristics of the block copolymer
388 micelle product and/or the block copolymer used for its manufacture, target organ function evaluation
389 may be necessary.

390 Certain nanomedicines have the potential to induce infusion reactions. Studies designed to investigate
391 complement activation, hematotoxicity, antigenicity, and/or immunotoxicity (ICH S8) should be
392 considered depending on the characteristics of the block copolymer micelle product.

393 **3.3. Considerations for first-in-human studies**

394 Block copolymer micelle products are often designed to change the distribution of active substance.
395 Therefore, in addition to the information recommended in the ICH S3 (S3A and S3B), S6(R1), M3 (R2)
396 and PMFS/ELD Notification NO. 0402-1, April2, 2012 or EMEA/CHMP/SWP/28367/2007 (as
397 appropriate), when considering first-in-human studies it will be essential to consider non-clinical
398 pharmacokinetic data specific to the block copolymer micelle product e.g. the block copolymer micelle,
399 the active substance, the proposed clinical use and the route of administration, using sampling time
400 points and sampling duration that is carefully selected so as to accurately quantify the time course of
401 block copolymer micelle products for total active substance and for free active substance and
402 metabolites, as follows:

- 403 • PK parameters such as C_{max}, half-life, and AUC, of block copolymer micelle products both for total
404 active substance and for free active substance in blood, plasma or serum.
- 405 • A sufficient number of samples to adequately describe the plasma concentration-time profile should
406 be collected. Frequent sampling at early time points are considered useful for providing reliable
407 information about the initial distribution process. Generally the sampling schedule should also
408 cover the plasma concentration time curve long enough to provide a reliable estimate of the total
409 extent of exposure.
- 410 • Distribution of the block copolymer micelle products in target lesion and major organs; specifically
411 total amounts of active substance in target lesion and major organs and their time profiles at
412 multiple time points over an adequate period of time.

413 The starting dose for first-in-human studies should be chosen in compliance with ICH M3(R2), and
414 regional guidelines, and following careful consideration of all related non-clinical data, including critical
415 product attributes, pharmacological dose-response, PK, and pharmacological/toxicological profile as
416 discussed in sections 3.1 and 3.2 above.

417 Dose-limiting toxicity in humans can be determined in a similar way to that of conventional drugs,
418 except for hypersensitivity reactions because these reactions are not always dose-dependent.

419 Potential critical quality attributes for each block copolymer micelle product should be identified and
420 used to evaluate consistency as discussed in section 3.1. Consistency of the quality attributes should
421 be confirmed between the products used for non-clinical studies and those for first-in-human studies,
422 and test procedures should be established before commencement of first-in-human studies. If the
423 manufacturing process used to prepare block copolymer micelle product for non-clinical studies is
424 changed before first-in-human studies comparability should be demonstrated or otherwise justified.

425 Stability data that ensure the block copolymer micelle stability throughout the first-in-human studies
426 are required.

427 **4. Conclusions**

428 Given the complexity of block copolymer-micelle products and the fact that experience with such
429 products is limited companies are advised to seek product-specific scientific advice regarding specific
430 questions on the data requirements.

431 **5. Glossary**

432 The purpose of this glossary is to describe terms as they are used in this RP.

433 1. Active substance: Molecule which shows the main therapeutic effect.

434 2. Block copolymer: More than two kinds of polymer connected in series to form such as AB or ABA
435 type copolymer (or others).

436 The block copolymer is also called a unimer: the minimum unit from which the block copolymer micelle
437 is prepared. The active substance may be chemically bound to the unimer.

438 3. Block copolymer micelle: A micelle which consists of block copolymers. Active substances can be
439 incorporated into the inner core of the block copolymer micelle by chemical conjugation (including
440 covalent conjugation) or by physical entrapment.

441 4. Block copolymer micelle product: "Medicinal product", a drug product which contains active
442 substance, block copolymers and in certain cases, other ingredients.

443 5. Free active substance: Active substance present in the drug product that is not incorporated within
444 the block copolymer micelle by chemical conjugation or by physical entrapment.

445 Free active substance may be released from the block copolymer micelle product after administration.
446 In this reflection paper, the term "free" does not suggest the disassociation of active substances from
447 plasma or serum proteins.

448 6. Biological activity: The specific ability or capacity of a product to achieve a defined biological effect.

449 7. Potency (expressed in units): In the case that the active substance is a protein, the quantitative
450 measure of biological activity based on the attribute of the product which is linked to the relevant
451 biological properties, whereas, quantity (expressed in mass) is a physicochemical measure of
452 protein content.

453 **Regional guidelines**

454 **Annex I: MHLW**

- 455 • ICH Harmonised Tripartite Guideline Stability testing of new drug substances and products
456 Q1A(R2)[June 3, 2003, PMSB/ELD Notification No.0603001]
- 457 • ICH Quality of biotechnological/biological products Q5A(R1)-Q5E (Q5E Note for Guidance on
458 Comparability of Biotechnological/Biological Products Subject to Changes in their Manufacturing
459 Process) [February 22, 2000, PMSB/ELD Notification No.329 (Q5A(R1)), January 6, 1998,
460 PMSB/ELD Notification No.3 (Q5B), January 6, 1998, PMSB/ELD Notification No.6 (Q5C), July 14,
461 2000, PMSB/ELD Notification No.873 (Q5D) and April 26, 2005, PFSB/ELD Notification No.0426001
462 (Q5E)]
- 463 • ICH Specifications: Test procedures and acceptance criteria for new drug substances and new drug
464 products: chemical substances Q6A [May 1, 2001, PMSB/ELD Notification No.568]
- 465 • ICH Specifications: Test procedures and acceptance criteria for biotechnological/biological products
466 Q6B [May 1, 2001, PMSB/ELD Notification No.571]
- 467 • ICH Pharmaceutical Development Q8(R2) [June 28, 2010, PFSB/ELD Notification No.0628-1]
- 468 • ICH Guidance on Nonclinical Safety Studies for the Conduct of Human Clinical Trials and Marketing
469 Authorization for Pharmaceuticals M3(R2) [February 19, 2010, PFSB/ELD Notification No.0219-4]
- 470 • ICH Guidelines for Toxicokinetics and Pharmacokinetics S3A and S3B [July 2, 1996, PMSB/ELD
471 Notification No.443 and PMSB/ELD Notification No.442]
- 472 • ICH Duration of Chronic Toxicity Testing in Animals (Rodent and Non rodent Toxicity Testing) S4
473 [April 5, 1999, PMSB/ELD Notification No.655]
- 474 • ICH Preclinical Safety Evaluation of Biotechnology-Derived Pharmaceuticals S6(R1) [March 23,
475 2012, PFSB/ELD Notification No.0323-1]
- 476 • ICH Safety Pharmacology Studies for Human Pharmaceuticals S7A [June 21, 2001, PMSB/ELD
477 Notification No.902]
- 478 • ICH The Non-clinical Evaluation of the Potential for Delayed Ventricular Repolarization (QT Interval
479 Prolongation) by Human Pharmaceuticals S7B [October 23, 2009, PFSB/ELD Notification No.1023-
480 4]
- 481 • ICH Immunotoxicology Studies for Human Pharmaceuticals S8 [April 18, 2006, PFSB/ELD
482 Notification No.0418001]
- 483 • ICH Nonclinical Evaluation for Anticancer Pharmaceuticals S9 [June 4, 2010, PFSB/ELD Notification
484 No.0604-1]
- 485 • Guidelines for Non-clinical Pharmacokinetic Studies [June 26, 1998, PMSB/ELD Notification No.
486 496]
- 487 • Guidance for Establishing Safety in First-in-Human Studies during Drug Development [April 2,
488 2012, PFSB/ELD Notification No. 0402-1]

489 **Annex II: EMA**

- 490 • ICH Harmonised Tripartite Guideline Stability testing of new drug substances and products
491 Q1A(R2) [CPMP/ICH/2736/99]
- 492 • ICH Quality of biotechnological/biological products Q5A-Q5E (Q5E Note for Guidance on
493 Comparability of Biotechnological/Biological Products Subject to Changes in their Manufacturing
494 Process) [CPMP/ICH/295/95 (Q5A(R1)), CPMP/ICH/139/95 (Q5B), CPMP/ICH/138/95 (Q5C),
495 CPMP/ICH/294/95 (Q5D) and CPMP/ICH/5721/03 (Q5E)]
- 496 • ICH Specifications: Test procedures and acceptance criteria for new drug substances and new drug
497 products: chemical substances Q6A [CPMP/ICH/367/96]
- 498 • ICH Specifications: Test procedures and acceptance criteria for biotechnological/biological products
499 Q6B [CPMP/ICH/365/96]
- 500 • ICH Pharmaceutical Development Q8(R2) [EMA/CHMP/167068/2004]
- 501 • ICH Guidance on Nonclinical Safety Studies for the Conduct of Human Clinical Trials and Marketing
502 Authorization for Pharmaceuticals M3(R2) [CPMP/ICH/286/95]
- 503 • ICH Guidelines for Toxicokinetics and Pharmacokinetics S3A and S3B [CPMP/ICH/384/95 and
504 CPMP/ICH/385/95]
- 505 • ICH Duration of Chronic Toxicity Testing in Animals (Rodent and Non rodent Toxicity Testing) S4
506 [CPMP/ICH/300/95]
- 507 • ICH Preclinical Safety Evaluation of Biotechnology-Derived Pharmaceuticals S6(R1)
508 [EMA/CHMP/ICH/731268/1998]
- 509 • ICH Safety Pharmacology Studies for Human Pharmaceuticals S7A [CPMP/ICH/539/00]
- 510 • ICH The Non-clinical Evaluation of the Potential for Delayed Ventricular Repolarization (QT Interval
511 Prolongation) by Human Pharmaceuticals S7B [CPMP/ICH/423/02]
- 512 • ICH Immunotoxicology Studies for Human Pharmaceuticals S8 [CHMP/167235/2004]
- 513 • ICH Nonclinical Evaluation for Anticancer Pharmaceuticals S9 [EMA/CHMP/ICH/646107/2008]
- 514 • Guideline on requirements for first-in-man clinical trials for potential high-risk medicinal products
515 [EMA/CHMP/SWP/28367/2007]
- 516 • Reflection paper on the pharmaceutical development of intravenous medicinal products containing
517 active substances solubilised in micellar systems (non-polymeric surfactants)
518 EMA/CHMP/QWP/799402/2011
- 519 • Draft Reflection paper on the data requirements for intravenous liposomal products developed with
520 reference to an innovator liposomal product EMA/CHMP/806058/2009
- 521 • Guideline on strategies to identify and mitigate risks for first-in-human clinical trials with
522 investigational medicinal products EMA/CHMP/SWP/28367/07
- 523 • Guideline on the Investigation of Pharmacokinetic Drug Interactions (CPMP/EWP/560/95/Rev. 1)
- 524 • Guidance for Industry. Bioanalytical Method Validation U.S. Department of Health and Human
525 Services Food and Drug Administration. May 2001
- 526 • Guideline on bioanalytical method validation. EMA/CHMP/EWP/192217/2009