



PPTA perspective on clinical development and clinical use of Immunoglobulins

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**PLASMA PROTEIN
THERAPEUTICS
ASSOCIATION**

PPTA is the global industry association representing the manufacturers of **plasma-derived medicinal products (PDMPs)** and private sector collectors of source plasma (plasma for fractionation) used for PDMP manufacturing.

GRIFOLS

KEDRION
BIOPHARMA
Keep Life Flowing



Availability of Immunoglobulins

Differences in :

- manufacturing
- formulation
- route of administration
- dosing
- bioavailability, etc.

**Intravenous
Immunoglobulins (IVIg)**



**Subcutaneous
Immunoglobulin (SCIg)**



conventional SCIg (cSCIg)
(possible intramuscular administration)

hyaluronidase-facilitated SCIg (fSCIg)

**Patients have
more flexibility
with their care**

Immunoglobulins- Replacement therapy

Since decades, Ig Replacement Therapy (Ig-RT) has been a lifesaving treatment to prevent life-threatening microbial infections in immunocompromised individuals **with antibody deficiency**.

Revised draft guideline on clinical investigation for SCIg/IMIg

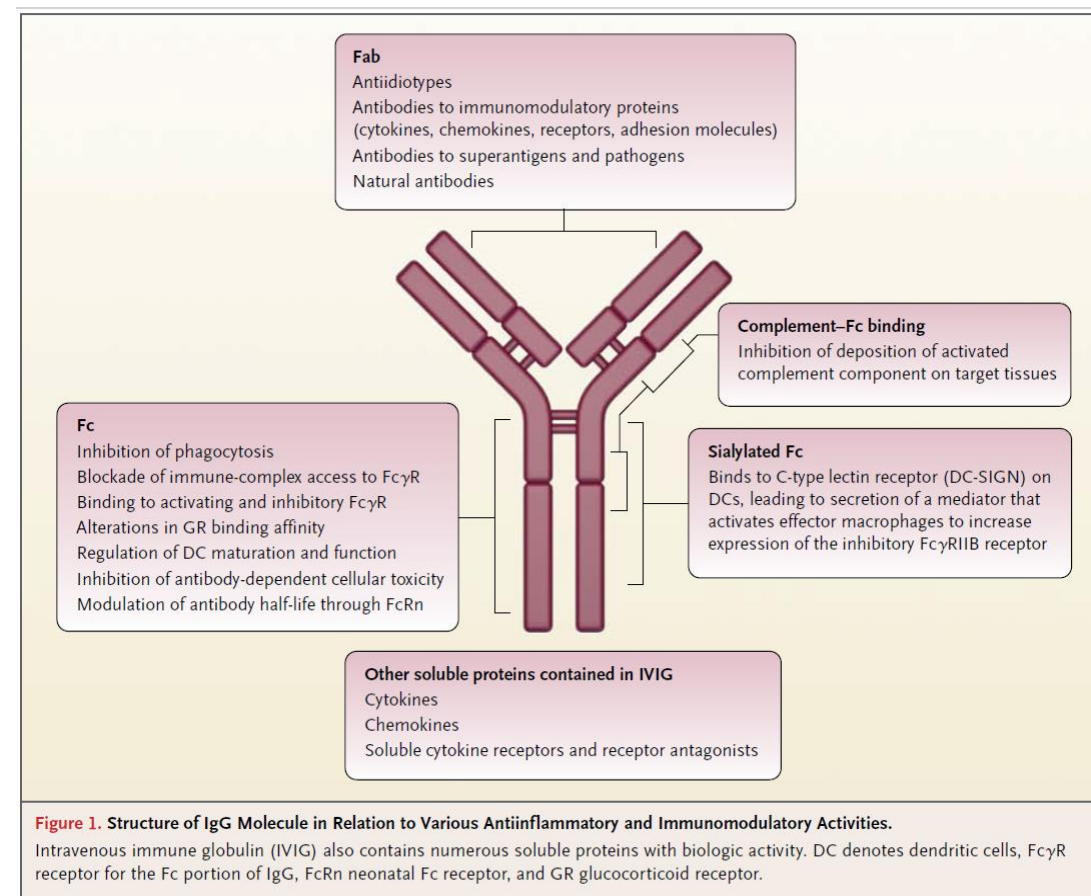
“If efficacy has been proven in primary immunodeficiency syndromes no further studies are required to demonstrate efficacy in [secondary immunodeficiencies]”

PPTA supports the extrapolation from primary immunodeficiencies (PID) into secondary immunodeficiencies (SID) for SCIGs

Immunomodulatory properties of Immunoglobulins

The pleiotropic effects of Igs may provide advantages in treating the various inflammatory and autoimmune conditions.

- Potential for benefits beyond Ig-RT are based on immunomodulatory and anti-inflammatory properties of Ig.
- Doses used in the treatment of autoimmune and inflammatory conditions are generally higher than those used for replacement therapy in patients with immunodeficiency disease.



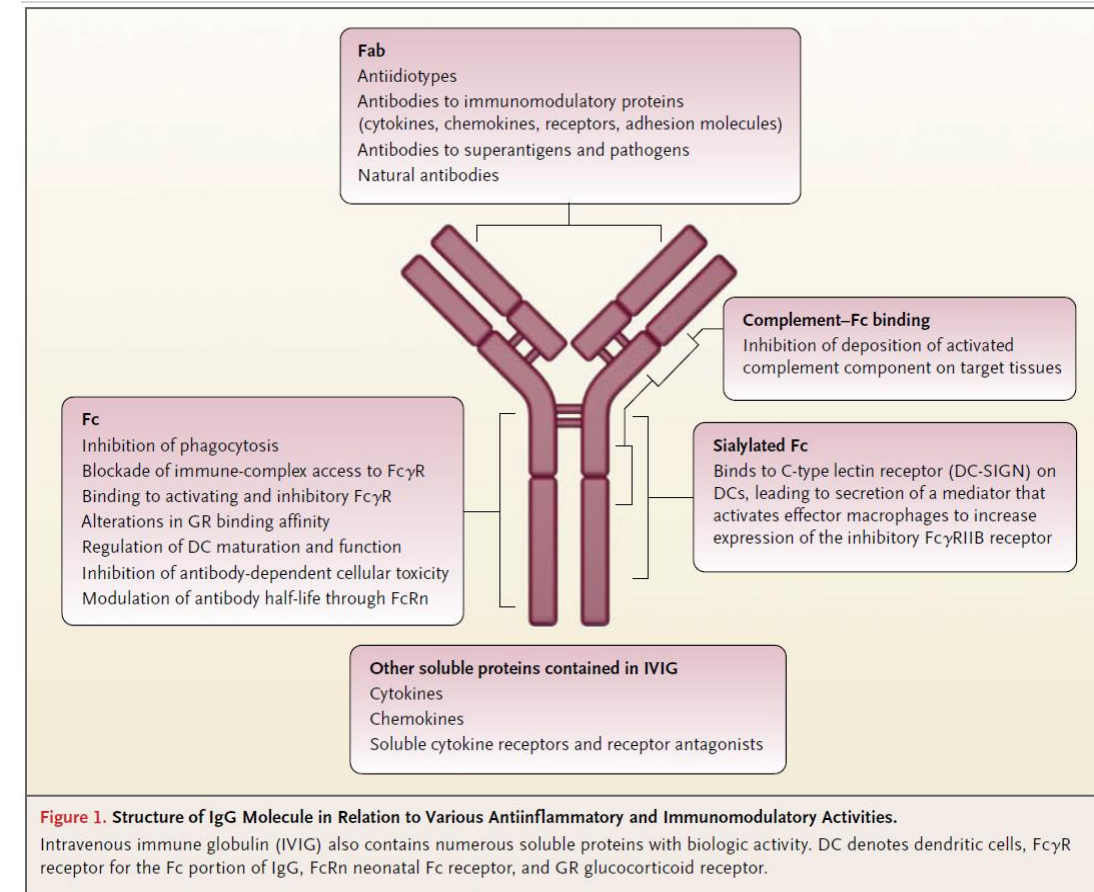
Immunomodulatory properties of Immunoglobulins

Revised core SmPC for SCIg does not explicitly list putative immunomodulatory mechanisms of Igs in autoimmune disorders, such as CIDP.

Revised draft guideline on core SmPC for SCIg/IMIg

“The mechanism of action in indications other than replacement therapy is not fully elucidated but includes immunomodulatory effects.”

PPTA recommends the development of standard, concise, and evidence-based mechanism of action statement on immunomodulatory actions of Igs in the core SmPC.



SCIg use in autoimmune diseases

Revised draft guideline on clinical investigation for SCIg/IMIg

“If the efficacy in primary immunodeficiency syndromes is established, then an extrapolation to maintenance therapy for CIDP after stabilisation with IVIg might be possible without the need to perform separate clinical trials in this indication, if adequately justified.”

PPTA welcomes consideration of the proposal to include CIDP to enable patient access to safe and efficacious SCIs;

In addition, PPTA welcomes the opportunity to engage with EMA to discuss the possibility of extending the indications to include MMN

PPTA members will provide additional feedback and supportive information for this patient population independently

Summary

PPTA members welcome the revision of the Guidelines on Clinical investigation of SClg and core SmPC of SClg to enable patient access to safe and efficacious immunoglobulins

- PPTA supports the use of extrapolation from PID into SID in line with the revised guidelines.
- PPTA recommends the development of a standard, concise, and evidence-based mechanism of action statement on immunomodulatory actions of Igs in the core SmPC.
- PPTA welcomes consideration of the proposal to include CIDP to enable patient access to safe and efficacious SClgs;
- In addition, PPTA welcomes the opportunity to engage with EMA to discuss the possibility of extending the indications to include MMN.

PPTA members will contribute independently to the ongoing public consultation with additional feedback.



Thank you