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- 4 Guideline on quality aspects of phage therapy medicinal
- 5 products
- 6 Draft

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	manufacture



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43 **Executive summary**

- 44 The aim of this guideline is to clarify the regulatory expectations for quality documentation of
- 45 bacteriophage active substances and finished products for human use within marketing authorisation
- 46 applications. It addresses specific aspects regarding the manufacture, control of materials,
- 47 characterisation, specifications, analytical control, reference standards and stability of bacteriophage
- 48 active substances. In addition, guidance is given on the pharmaceutical development, manufacture,
- 49 control and stability of the finished product.

1. Introduction

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- 51 The number of bacteria resistant to antibiotic treatment is drastically increasing, and these cause life-
- 52 threatening conditions such as pneumonia, urinary tract infections, bacteriemia/sepsis, wound
- 53 infections, infections in cystic fibrosis and medical-device related infections. Antibiotic resistance has
- 54 become a serious problem worldwide contributing to morbidity and mortality and increasing the burden
- for society and hospitalisation costs.
- 56 Bacteriophages (phages) are viruses that exclusively infect bacteria, replicate within them, and often
- 57 cause the lysis of the bacterial cells during the release of progeny phage particles. Phage therapy
- refers to the use of phages for the treatment of bacterial infections, infectious diseases, or for the
- 59 eradication of specific bacteria. Phages are promising agents for the treatment of infections that do not
- 60 respond to conventional treatment options, either as monotherapy or in combination with antibiotics.
- 61 There is an increasing interest in the use of phages for the treatment of infections or infectious
- 62 diseases both from the healthcare providers and pharmaceutical industry, and the number of clinical
- 63 trials is increasing.
- 64 Phage therapy medicinal products (PTMPs) fall under the definition of biological medicinal products as
- defined in the Directive 2001/83/EC. Various guidelines established for biological medicinal products
- are applicable to PTMPs. Nevertheless, phages differ from other biological medicinal products in various
- 67 terms (e.g. high specificity, self-propagation, potential for evolution and risk of horizontal gene
- 68 transfer), and thus, specific considerations need to be taken into account throughout their
- 69 development and lifecycle. This guideline aims to establish regulatory expectations for the
- 70 development, manufacture, characterisation and control of phages active substances and finished
- 71 products intended for the treatment of bacterial infections and infectious diseases in humans.
- 72 The guideline is structured in accordance with the eCTD framework, ensuring concise direction
- 73 regarding the required data and information.

2. Scope

- 75 This guideline establishes quality requirements for the authorisation of PTMPs mainly intended for
- 76 treatment of bacterial infections or infectious diseases in humans. It applies to strictly lytic (virulent)
- 77 bacteriophages, whether naturally occurring or chemically/genetically modified, which are
- 78 manufactured by propagation in bacterial cells. This includes bacteriophages with synthetic genomes
- 79 propagated in bacteria during production.
- 80 Cell-free production systems (such as in vitro transcription-translation systems leading to production of
- 81 viable phage particles) are not specifically addressed; however, relevant principles of the guideline
- 82 apply.

- 83 Where the introduced genetic manipulation(s) result in the phage being classified as a gene-therapy
- 84 medicinal product, such product is then subject to the EU legislation and guidelines applicable to
- 85 Advanced Therapy Medicinal Products (ATMPs). While the principles of this quality guideline apply,
- specific guidance for such products is not included. Applicants are recommended to seek an opinion
- 87 from the Committee for Advanced Therapies (CAT) in order to confirm the classification of the product
- as early in development as possible.
- 89 Phage-derived products (e.g., lysins or other enzymes), magistral formulae or patient-individualised
- 90 phages not intended to be authorised through MAA procedure are out of scope of the guideline.
- 91 While this guideline is not specifically intended for investigational PTMPs, the principles apply in a
- 92 phase-appropriate manner to products in clinical development.

3. Legal basis

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- 94 This Guideline should be read in conjunction with the introduction and general principles of Annex I to
- 95 Directive 2001/83/EC, as amended, all relevant European guidelines, reflection papers, International
- 96 Conference of Harmonisation (ICH) guidelines applicable to PTMPs and European Pharmacopoeia
- 97 (Ph.Eur.) requirements. References to the relevant guidelines and reflection papers are made within
- 98 the relevant sections of this document and/or are listed in section 8.

4. Active substance

- 100 A PTMP active substance is manufactured in a bacterial production strain by a controlled propagation of
- a phage seed lot derived from a single phage clone, resulting in a genetically and phenotypically
- 102 consistent phage population.

4.1. General information

- 104 Information about the structure, including details on the capsid, tail, and any other components of the
- phage should be presented.
- The general properties of the phage should be clearly outlined, including at a minimum the following:
- taxonomic classification, target bacteria, potency, particle size, genome type and size, as well as
- details of any notable genes present and/or genetic/chemical modifications, if applicable. Additional
- 109 relevant characteristics may also be included to provide a comprehensive overview.

4.2. Manufacturers

- 111 Information on the manufacturers (including bacterial cell bank and phage seed lot manufacturing,
- testing and storage sites) should be provided, including the name, address, and specific responsibilities
- of each manufacturer and production site.

4.3. Manufacturing process and controls

- 115 The batch scale/size (including any proposed range) should be stated. Where applicable, blending of
- batches and/or sub-batches should be described and appropriately justified.
- An overview of the manufacturing process should be presented as a flow diagram, and detailed
- descriptions of each process step should be provided. The production process should yield a phage
- active substance (purified harvest) of consistent quality and stability which is ensured by monitoring of

- 120 relevant process parameters at relevant time points throughout the manufacturing process. Critical
- steps and intermediates should be identified and corresponding control testing with set acceptance
- 122 criteria indicated.
- 123 Any hold times should be defined based on appropriate studies and justified with data demonstrating
- the physicochemical, biological, and microbiological quality of the in-process material under the
- 125 proposed storage conditions.

4.4. Control of materials

127 <u>Bacterial cell banks</u>

- 128 The origin, history, description, and preparation of bacterial cells used for banking should be provided.
- 129 Bacterial cell banks should be established in accordance with the Ph.Eur. general chapter 5.31 and
- principles of the ICH guideline Q5D. The use of a two-tiered seed lot system is strongly recommended.
- 131 The entire bacterial genome (chromosome) and plasmids of the master cell bank (MCB) should be
- sequenced by using suitable technology (e.g., next-generation sequencing, NGS), followed by
- annotation by bioinformatic tools.
- 134 The following quality attributes should be included in the characterisation of the MCB: identity (based
- on the full genome sequencing), purity (absence of detrimental phage particles, microbial purity),
- viability, phage sensitivity, antibiotic susceptibility, and analysis of genes encoding for potential
- detrimental factors (i.e. prophages, antibiotic resistance determinants, toxins, virulence factors). The
- use of bacterial strains whose genome contains sequences coding for detrimental factors should be
- avoided, unless otherwise justified. In such a case, a risk assessment should be provided and steps
- taken to attempt the deletion of the detrimental sequences from the host should be presented. For
- genetically modified bacterial production strains, the modifications must be described, verified, and
- their effects characterised.
- 143 WCB should be tested for identity (by any suitable method), phage sensitivity, purity (absence of
- detrimental phage particles, microbial purity), and viability.
- 145 Phage seed lots
- The phages used to generate a seed lot should be strictly lytic, and the origin, history, and preparation
- of phage seed lots should be thoroughly documented. The use of a two-tiered seed lot system is
- strongly recommended. Phage seed lots should be established in accordance with the Ph.Eur. general
- chapter 5.31 and principles of the ICH guideline Q5D.
- 150 The entire genome of the master phage seed lot should be sequenced by using suitable technology
- 151 (e.g., NGS). The full genome sequencing and genome annotation should be performed once for each
- 152 established master seed lot. In case a working seed lot is established, the genome of the working seed
- 153 lot should also be fully sequenced and compared to the master seed lot's nucleotide sequence, unless
- 154 otherwise justified.
- 155 The established master and working seed lots should be characterised/tested for the following quality
- attributes: identity (full genome sequencing), purity (the absence of phage contaminants, sterility),
- 157 potency, analysis of genes encoding for potential detrimental factors (i.e., antibiotic resistance
- determinants, toxins, lysogeny modules). The use of seed lots containing any detrimental factor
- specified above should be avoided, unless otherwise justified. In such a case, a risk assessment should
- 160 be provided in the characterisation section. For genetically or chemically modified phages, the
- modifications should be fully described, verified, and their effects characterised.

4.5. Process validation and/or evaluation

- 163 Process validation studies should be performed in accordance with the principles of the EMA Guideline
- on process validation for the manufacture of biotechnology-derived active substances and data to be
- provided in the regulatory submission (EMA/CHMP/BWP/187338/2014).
- 166 In line with Ph.Eur. general chapter 5.31, process verification should address the genetic stability of
- the phage during the production in bacterial cell culture. For this purpose, full genome sequencing of
- the active substance should be performed on a suitable number of batches and compared to the
- master seed lot sequence to confirm that the phages are genetically stable during production in
- 170 bacterial cells.

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4.6. Characterisation

- 172 Characterisation is essential for gaining a comprehensive understanding of the phage active substance
- and to identify critical quality attributes of the active substance.

Elucidation of structure and other characteristics

- 175 A range of state-of-the-art analytical techniques should be employed to obtain a thorough
- understanding of the structure, biological activity, purity, and other characteristics of the phage active
- 177 substance. Characterisation should be performed using appropriate and sufficiently sensitive methods,
- with a clear description of the methods employed.
- 179 The characterisation studies should be conducted throughout the development process at the active
- 180 substance level.
- 181 Batches used for characterisation studies should be clearly identified (development, pilot, full scale)
- and should be representative of the batches used in pivotal clinical studies and of the batches
- manufactured by the proposed commercial process.
- 184 The following characterisation studies are expected to be performed as a general approach.
- 185 Phage structure
- 186 It is recommended to determine the phage morphology (e.g. by electron microscopy), especially if
- 187 bioinformatic analysis of the genome is not sufficient for phage classification.
- 188 Plaque phenotype
- An image of the plaques should be provided, accompanied by a description of their size and
- morphology, including characteristics such as clarity (e.g., clear or turbid/cloudy) and the presence or
- absence of halos. The host bacteria on which plaque morphology has been determined should be
- 192 stated.
- 193 <u>Genome characterisation</u>
- 194 It is acceptable to perform the whole genome sequencing and detailed genomic analysis at the level of
- master seed lot. Provided that genetic stability of a phage is demonstrated during process validation
- 196 the full genome characterisation does not need to be repeated at the active substance level (since the
- 197 master seed lot is considered representative of the active substance in terms of the nucleic acid
- 198 sequence). The detailed analysis of the results should be presented either in the characterisation or
- starting materials section with appropriate cross-reference.

- 200 The entire genome of the phage should be sequenced by appropriate high-throughput sequencing
- 201 technology such as next-generation sequencing. Bioinformatic tools should be employed to predict
- 202 Open Reading Frames (ORFs) and other genetic elements, as far as possible. A detailed genome map
- should be provided, which includes information about the genome size, type, and GC content, along
- with the function of each identified ORF.
- A comparative genomic analysis should be carried out to classify the phage within its taxonomic group.
- The percentage of genetic identity (degree of similarity) to the closest relative(s) should be reported,
- and coverage indicated.
- 208 The genome should also be analysed for the presence of genetic sequences coding for detrimental
- 209 factors (antibiotic resistance determinants, toxins, or lysogeny modules). In case the genomic analysis
- 210 reveals the presence of genes encoding for detrimental factors, a thorough evaluation should be
- 211 performed to confirm that these factors do not pose a risk to patients. The absence of lysogeny should
- be demonstrated. In the case of genetically modified phages the presence and integrity for
- 213 recombinant sequences should be verified.
- 214 Host range
- The determination of the host range of a phage implies the study of its ability to form plaques on a set
- of bacterial pathogens. In addition to the bacterial strain used for production, the host range study
- 217 should encompass a diverse range of bacteria, including multiple strains of the target species as well
- as closely related species. Strains representing clinically relevant isolates and growth forms (e.g.,
- 219 planktonic, biofilm-forming strains) of the bacterial strains intended to be treated should be included in
- 220 the study. If the PTMP is intended for use in specifical geographic locations with distinct host
- subpopulations, host strains should be ideally selected from those geographical regions. The number
- and variety of the bacterial strains/species included in the study should be justified.
- 223 Various assays may be employed for host range studies such as spot testing or plaque assay. The
- determination of host range may be supported by available knowledge on the receptor usage.
- 225 Potency
- The biological activity of the phage consists in its ability to propagate in bacteria, to lyse the bacterial
- 227 pathogen and subsequently to release the newly formed phage particles from the bacterial cell,
- 228 constituting the phage lytic activity. This activity should be measured by determination of the
- 229 infectious phage titre by a double layer plaque assay or any other suitable method in a defined
- bacterial strain (see Ph.Eur. general chapter 2.7.38).
- 231 If the mechanism of action involves activity towards bacterial biofilms, this should be investigated and
- 232 data presented.
- 233 <u>Transducing capacity</u>
- 234 Some phages can package host bacterial DNA into their capsid instead of or alongside their own DNA
- and transfer it into a receiving cell in a process known as transduction. This transducing capacity may
- enable the transfer of detrimental factors from the producer cells to the patient's strain. Specialised
- transduction where only the host DNA flanking the prophage are packaged, occurs exclusively in
- 238 temperate phages and is not a concern for phages demonstrated to be strictly lytic. However,
- 239 generalised transduction involves the random packaging of host DNA during the phage's DNA
- packaging process and can occur with exclusively lytic phages. Therefore, the capacity of the phages to
- mediate generalised transduction should be addressed in the regulatory filing.

242 **Impurities**

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Product-related impurities

- 244 Product-related impurities refer to variants of the desired product that differ in properties such as
- activity, efficacy and safety, compared to the intended therapeutic product. For phages, these
- 246 impurities may include for example phage aggregates or non-infective phage particles
- The propensity of phage active substance to aggregate should be thoroughly evaluated using
- 248 appropriate (orthogonal) methods such as high-pressure liquid chromatography, dynamic light
- 249 scattering, or analytical ultracentrifugation.

Process-related impurities

- 251 Process-related impurities are those derived from manufacturing process. These impurities may
- originate from cell substrates (residual host cell proteins, host cell DNA, pyrogens), cell culture (e.g.,
- 253 media components or other reagents) or downstream purification processing (e.g., residual reagents,
- column leachables, DNAse). All the bacterial derived impurities should be discussed and evaluated with
- regards to the production strain and proposed route of administration.
- 256 The manufacturing process should be evaluated for the capacity to remove process-related impurities.
- 257 Further considerations should be considered for the following process-related impurities:
- 258 Pyrogens
- 259 The manufacturing process should be evaluated for the capacity to remove pyrogenic impurities (see
- 260 Ph.Eur. general chapter 5.1.13). Cross-reference to process validation data (impurity clearance) is
- 261 acceptable.
- 262 <u>Host cell proteins</u>
- 263 The residual host-cell proteins should be quantified. Where the genome analysis of the bacterial strain,
- or other relevant information indicates potential for production of toxins or other virulence factors that
- 265 may pose safety risk to patients, the presence and quantity of these should be investigated by suitable
- 266 methods to establish an adequate control strategy.
- 267 Host cell DNA

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- The residual host cell DNA should be quantified using a suitable method.
- 269 <u>Induced prophages</u>
- 270 In exceptional cases where it is not feasible to use bacterial host cells devoid of prophage sequences,
- the use of such production cells may be permitted based on a thorough justification and risk
- assessment. In such cases, the prophage should be fully characterised, including full genome
- sequencing and an assessment of its potential to impact on product quality and safety.

4.7. Control of active substance

Active substance specification

- A relevant release and shelf-life specification should be established and justified in accordance with the
- 277 Ph.Eur. general chapter 5.31. Specifications should consider relevant quality attributes identified in
- 278 characterization studies. The acceptance criteria should be established and justified based on clinical

- data, safety margins derived from toxicological and clinical studies, and manufacturing process
- 280 capacity.
- 281 Identity
- The identity test should exhibit high specificity, ensuring the ability to differentiate between different
- phages (e.g. phages produced within the same manufacturing facility). qPCR, genomic fingerprinting or
- other state-of-the-art methods may be used for confirming the identity of the active substance.
- 285 Potency
- Potency refers to the infectious titre of the phage and is commonly determined using a plaque assay,
- 287 which is also used to assess phage quantity. Potency is typically expressed in plaque forming units
- 288 (PFU) per mL. Further guidance on phage potency testing is provided in Ph.Eur. general chapter
- 289 2.7.38ⁱⁱ.
- 290 Aggregation
- 291 Phage aggregation can lead to the decrease of the infectious titre. If relevant, phage aggregation
- should be determined by appropriate methods based on the results of the characterisation studies.
- 293 Residual Host cell proteins
- 294 Residual host cell proteins should normally be included in the active substance specification and
- controlled by a method capable of detecting a wide range of proteins and considering the
- recommendations given in general chapter 2.6.34. In certain cases, it may be acceptable not to test
- routinely the residual level of HCP. In such cases, a risk analysis should be provided to demonstrate
- 298 the low risk for the patient with regards to the route of administration. In addition, clearance studies
- 299 should demonstrate that the manufacturing process effectively removes residual HCP to levels deemed
- 300 acceptable for the intended use.
- 301 Residual Host cell DNA
- 302 Residual host cell DNA should normally be included in the active substance specification. However, the
- testing requirement may be waived if process validation studies (e.g., spiking studies, clearance
- 304 capacity of the purification steps), based on sufficient number of batches, provide sufficient evidence
- that the manufacturing process consistently and effectively ensures the removal of residual host cell
- 306 DNA to levels deemed acceptable for the intended use.
- 307 Pyrogenicity
- 308 Pyrogenicity should be determined, unless otherwise justified. It should be controlled according to the
- requirements of the General chapter Ph.Eur. 5.1.13.
- 310 <u>Microbiological quality</u>
- 311 In case the active substance is claimed to be sterile, the active substance should be tested for sterility
- 312 (Ph.Eur. 2.6.1). Otherwise, microbial quality should be controlled by a suitable method.
- 313 Residual reagents
- Residual reagents (e.g. DNAse) derived from the manufacturing process which might pose safety
- concerns should be controlled based on a safety risk-assessment and impurity clearance studies.
- 316 <u>Induced prophage</u>
- 317 In exceptional cases where it is not feasible to use bacterial host cells devoid of prophage sequences,
- the use of such production cells may be permitted based on a thorough justification and risk

assessment. The absence of expression of prophages should be verified in the active substance or its

320 content determined and proposed limit justified from a safety point of view.

4.8. Analytical considerations

- 322 Analytical procedures should be described for each active substance. In case the same procedure is
- 323 applied to more than one active substance, cross-reference could be made. Analytical procedures must
- 324 be developed and validated according to ICH Q14 and ICH Q2 guidelines, and validation summaries
- 325 should be provided. In certain cases, based on scientific justification and risk-based evaluation,
- 326 platform analytical procedures could be considered.

4.9. Reference standards or materials

- 328 Reference standards for PTMPs are mainly used for method validation and system suitability testing of
- 329 potency determination by the plaque assay. Reference standards can also be used for release testing if
- appropriate/relevant. Regardless of the specific use, reference standards should be established in line
- 331 with relevant ICH guidelines, should be well-characterised with respect to their identity, purity,
- 332 biological activity, and other relevant characteristics, and their stability should be appropriately
- 333 monitored.

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4.10. Stability

- The stability of the phage active substance can be impacted e.g. by temperature, pH or agitation.
- Relevant ICH stability guidelines should be followed to establish the shelf life of the active substance.
- 337 Stability indicating parameters should be identified in characterisation studies but should include at
- 338 least appearance, potency, microbiological quality, and pH. There are no specific requirements relating
- 339 to container closure system. Relevant EMA and ICH Guidelines should be considered.

5. Finished product

- The finished product can contain one active substance (i.e. single phage) or a combination of active
- 342 substances (i.e. several different phages). A finished product that consists of more than one phage is
- referred to as a multiphage product or a phage cocktail.

5.1. Description and composition of the finished product

- 345 The qualitative and quantitative composition of the finished product should be indicated. The
- composition should be stated listing all components, their amount and function, and a reference to
- their quality standards (e.g. compendial monographs or manufacturer's specifications). The
- composition should be stated on a per-unit base. The content of each phage is typically expressed in
- 349 PFU/mL. The container closure system used for the dosage form should be outlined. Solvents for
- reconstitution, diluents for dilution before administration and medical devices used for administration
- 351 (e.g. inhaler) should be indicated, if applicable.

5.2. Pharmaceutical development

- 353 The formulation development including the choice and quantity of excipients used should be detailed
- 354 with respect to their impact on the phage active substance critical quality attributes (e.g. phage
- activity). Comparability of product formulations employed during clinical studies with the commercial
- formulation should be demonstrated, or differences discussed where relevant.

- 357 The quality target product profile of the product should be presented and critical quality attributes
- indicated. The critical process parameters should be identified. Differences in the manufacturing
- processes during process development should be indicated.
- 360 If the product to be administered consists of a mixture of phage active substances, justification for
- 361 combining phage active substances should be provided. This includes the cases where different phages
- are mixed at the time of administration as recommended by the SmPC. If relevant, requirements of
- 363 combination packs need to be considered. Any recommendation as regards the maximum number of
- 364 phages to be combined should be justified and limited, if necessary. The potential interactions
- between phages mixed in the product to be administered should be discussed. In-use stability should
- 366 be established, if relevant.
- 367 If the phage finished product requires additional preparation (e.g. reconstitution, dilution, mixing with
- other phages) before administration, the used materials (e.g. solvents, diluents, bags and sets of
- 369 administration) should be identified, and the method of preparation summarised. Compatibility studies
- 370 should be performed and the in-use stability data provided to confirm the maintenance of the product
- 371 quality profile.
- 372 There are no additional requirements relating to container closure system. Relevant EMA and ICH
- 373 Guidelines should be considered.
- 374 If a medical device is intended to be used for the administration, the recommendations of the Guideline
- 375 on quality documentation for medicinal products when used with a medical device,
- 376 (EMA/CHMP/QWP/BWP/259165/2019), and other relevant EMA guidance documents should be applied.
- 377 The pharmaceutical development should also include usability studies to ensure appropriate use of the
- 378 finished product at the time of administration.

379 **5.3. Manufacture**

- 380 The manufacturing process should be appropriately described and validated. Refer to relevant active
- 381 substance section of this guideline.
- 382 Hold Times

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- 383 Any hold times should be defined based on appropriate studies and justified with data demonstrating
- the physicochemical, biological, and microbiological quality of the in-process material under the
- proposed storage conditions. For example, in the manufacture of multiphage products, the mixtures of
- drug substances which have not yet undergone final processing should be considered finished product
- intermediates and controlled using in-process testing against predefined criteria.

5.4. Control of finished product

- 389 A relevant release and shelf-life specification should be established and justified in accordance with the
- 390 Ph.Eur. general chapter 5.31. The specification should comprise the critical quality attributes of the
- 391 finished product, analytical procedures employed for determination of these attributes and acceptance
- 392 criteria and/or limits. The proposed acceptance criteria should be justified based on clinical data, safety
- margins derived from toxicological and clinical studies, and manufacturing process capability.
- Tests for appearance, potency, identity and microbiological quality are mandatory. Depending on the
- 395 route of administration, pharmaceutical form and other characteristics of the finished product,
- 396 additional tests (e.g. pH, osmolality, visible and subvisible particles, extractable volume, uniformity of
- dosage units, moisture content) may also be relevant for inclusion in the specification. If aggregation
- 398 has been detected, it should be addressed in the specification, unless justification is provided for its
- 399 exclusion. Reference is made to active substance specification where appropriate.

- 400 For multiphage products, potency should be determined for each individual phage component (i.e.
- active substance), unless otherwise justified. For this, separate plaque-based assays should be
- 402 performed using bacterial strains not susceptible to any other phages in the combination. Further
- quidance on phage potency testing is provided in Ph.Eur. general chapter 2.7.38ⁱⁱⁱ.
- 404 Microbiological quality should be determined depending on the route of the administration of the
- 405 finished product. Analytical methods should be described, and corresponding summary of validation
- 406 studies should be provided. If appropriate, reference could be made to relevant active substance
- 407 sections.

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5.5. Reference standards or materials

- 409 For reference standards or materials, refer to relevant section in the active substance part of this
- 410 guideline.

411 **5.6. Stability**

- 412 Finished product stability can be impacted e.g. by temperature, pH and agitation. Relevant ICH
- 413 stability guidelines should be followed. The guidance for potency testing of multiphage products
- applies also to stability studies (i.e. infectious titer of each phage should be determined).
- 415 If a medical device is intended to be used for the administration, the recommendations of the Guideline
- on quality documentation for medicinal products when used with a medical device,
- 417 (EMA/CHMP/QWP/BWP/259165/2019) should be applied.

6. Regulatory considerations

6.1. Composition of the finished product and post-marketing authorisation

420 change of active substance

- 421 Phages for human use are subject to requirements applicable to human biological medicinal products
- and governed by Directive 2001/83/EC and Regulation 1234/2008. As such, changes in the active
- 423 substance and a flexible composition of the medicinal product are not contemplated in Directive
- 424 2001/83/EC. A change in the composition of an authorised medicinal product, as regards the active
- 425 substance, requires a submission of an extension of the marketing authorisations stated in the Annex I
- 426 to the Variations Regulation. Such change should be supported by quality data, but also if necessary
- 427 non-clinical and clinical data demonstrating that the safety and efficacy of a replacement phage active
- substance are not significantly different from the previous one. Such change and those issues are
- 429 beyond the scope of this quality guideline. Any requests for a marketing authorisation extension will
- 430 therefore be assessed on a case-by-case basis and in light of the specific requirements for Phage
- Therapy Medicinal Products, applicants are recommended to seek scientific advice to address the
- 432 specific concerns and regulatory pathways for the respective product.

6.2. Use of prior knowledge

- 434 Prior knowledge (as per ICH Q11 guideline) can be used to support a new marketing authorisation or a
- line extension. Nevertheless, a product-specific dossier is still required, meaning the lead documents
- 436 need to be product-specific. Prior knowledge can be used throughout the dossier to support for
- 437 example reduced or focused process development and/or validation activities, method validation or
- 438 container closure usage.

- The supportive data should always be provided along with sound justifications for its relevance to allow
- for proper assessment of the proposed strategy. It should be noted that there are several factors that
- are considered important concerning the value of the supportive data. These include, but are not
- limited to, the number of licensed or developed products that can be considered representative, the in-
- depth understanding of parameters that are product-dependent vs. product-independent, and
- conclusive risk assessments in case product-specific data is reduced or omitted due to prior knowledge.
- Therefore, it will be a case-by-case decision whether the proposed approach is considered acceptable.
- 446 Generally, it is highly recommended to obtain scientific advice to address the specific concerns and
- regulatory pathways for the respective products.

7. Definitions

- 449 Bacterial biofilm A complex structured community of bacteria living within a complex extracellular
- 450 matrix that can protect them from environmental damage and external agents.
- 451 Bacteriophage (phage) Virus that infects bacteria and depends on the bacterial host for replication.
- 452 Phage consists of a genome comprised of single or double stranded DNA or RNA, encapsulated in a
- 453 protein capsid.

- 454 Bacteriophage active substance Phages manufactured in a bacterial production strain by a controlled
- 455 propagation of a phage seed lot derived from a single phage clone, resulting in a genetically and
- 456 phenotypically homogeneous population. Corresponds to purified harvest in Ph. Eur. 5.31 terminology.
- 457 Cell-free transcription-translation system An in vitro process that mimics the natural gene expression
- 458 in a cell, but without a need for living cells.
- 459 Generalised transduction A process where a random portion of bacterial DNA is encapsulated by a
- bacteriophage and transferred to another bacterium.
- 461 Host range A taxonomic diversity of bacterial hosts a bacteriophage can successfully infect.
- Induced prophage A temperate bacteriophage that has been reactivated from its latent (prophage)
- state to enter the lytic cycle.
- 464 Lytic bacteriophage Bacteriophage which is only able to sustain replicative cycles ending in bacterial
- 465 lysis. Only such strictly lytic bacteriophages are considered suitable for use in phage therapy.
- 466 Multiphage product (also called phage cocktail) Qualitatively and quantitatively characterised
- 467 combination of monophage components.
- Naturally occurring phage: Bacteriophage isolated from the environment, whose specificity or biological
- 469 activity may be enhanced through directed evolution or phage adaptation, without chemical
- 470 modification or genetic engineering.
- 471 Phage see bacteriophage
- 472 Phage cocktail see multiphage finished product.
- 473 Phage seed lot A collection of bacteriophages derived from a single clonal lineage, whose
- 474 characteristics and composition are defined and consistent, stored in appropriate containers under
- 475 controlled conditions. Each container contains an aliquot from a single, well-defined pool of
- 476 bacteriophages.

- 477 Phage therapy Use of bacteriophage products mainly for treatment of bacterial infection(s) or
- 478 infectious disease(s). Efficacy of treatment is linked to the lytic activity of bacteriophages that confers
- 479 bactericidal activity on those bacteriophages with specificity for the bacterial strain concerned.
- 480 Phage therapy medicinal product (PTMP) Preparation of phages used to treat or prevent human or
- 481 veterinary bacterial infections. A PTMP can contain one phage, or a combination of phages, combined
- 482 with excipients.
- 483 Specialised transduction A process where a region of the host DNA that flanks the prophage is
- 484 encapsulated by a bacteriophage and is transferred to another bacterium. This type of transduction
- 485 occurs only in temperate phages.
- 486 Temperate bacteriophages Bacteriophages which are dually able to sustain dormancy (typically by
- integration into the bacterial chromosome; lysogeny) as well as lytic replication in host bacteria,
- 488 depending on e.g. environmental conditions.
- 489 Transduction A phenomenon in which bacterial DNA is transferred from one bacterial cell to another
- 490 by phage particle.

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