Finnish Red Cross
Blood Service

SANTE-B5-ADVANCED-THERAPIES
European Commission
DM24 02/133
B-1049 Brussels (Belgium)

Dear Sir/Madam

Submission of Comments on Public Consultation on the draft Guidelines on Good Manufacturing Practice for Advanced Therapy Medicinal Products

Comments from:

Name of organization: Finnish Red Cross Blood Service

The Finnish Red Cross Blood Service (FRCBS) is a financially and operationally independent, non-profit unit within the Finnish Red Cross. It is a centralized organization with about 500 employees providing nationwide blood services in Finland.

The Finnish Red Cross is a public-law association recognized by the State of Finland. The Finnish Red Cross is the only national association in Finland that belongs to the International Red Cross and Red Crescent Movement. In its operations, it complies with the basic principles adopted at the International Conferences of Red Cross.

As the only blood establishment in Finland, the FRCBS is responsible for collecting blood and supplying blood products to all Finnish hospitals in a centralized manner. In addition, the FRCBS provides other healthcare sector services, such as laboratory tests for organ, tissue and stem cell transplantations, and diagnostic services for coagulopathies and thrombocyte disorders. The FRCBS also hosts the Finnish Stem Cell Registry and the Finnish Hematological Registry and Biobank. The FRCBS has been involved in stem cell and cell therapy research since 2002 and has ATMP manufacturing experience since 2012.

1. General Comments

A specific GMP guideline for ATMPs is a very welcome and truly needed document since the manufacturing of ATMPs and the expertise needed differs significantly from the traditional pharmaceuticals. The current draft includes elements from the EU GMP guidelines, but also brings specific guidelines on quality system design and the utilization of a risk-based approach for this very diverse and complex group of medicinal products. A flexible and pragmatic approach has been introduced by considering the gradual increase of product knowledge.

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2. Specific Comments

1. Introduction

It is appreciated that principles of EU GMP guidelines have been introduced to the draft of this guideline. However, the position of the current document in ATMP manufacturing in relation to EU GMP Guidelines remains still unclear and further clarification is needed. For example does the guidance laid down in this document substitute those presented in EU GMP guidelines, also in case of possible discrepancies? Furthermore, the document does not cover all issues of GMP and therefore it is recommended to publish it as an annex to EU GMP.

2. Risk-based approach

2.3. Examples of the application of the risk-based approach

2.3.3. Additional considerations specifically relevant for ATMPs that are not subject to substantial manufacturing

Lines 300-302: it is defined that under no circumstances it is acceptable to conduct manufacturing in premises with air quality classification lower than a critical clean room of grade A in a background of grade D. However, lines 2171-2179 (automated production, closed system) state that manufacturing in controlled but non-classified background environmental is acceptable. This contradiction should be corrected in the text.

10. Qualification and Validation

10.3. Process Validation

If comparing this chapter with lines 255-257 and lines 1624-1631, it is understood that process validation (three consecutive batches under routine conditions) only applies for market authorized ATMPs. This could be specified clearer in the chapter.

12. Quality Control

12.2. Sampling

12.2.1. General principles: Does this chapter apply for all manufactured ATMPs despite developmental phase? If a gradual increase in the sampling requirements also applies for this chapter, it could be specified in more detail. It seems quite exhaustive to conduct sampling according to the current guideline for e.g. first-in-man ATMPs.

12.2.2. Retention of samples

Lines 1892-1894: it has been defined that reference samples are not required in the case of autologous ATMPs and certain allogenic ATMPs (matched donor scenario). It is not clear if the

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matched donor scenario for allogeneic ATMPs is presented merely as an example or is it the only case where reference samples are not required for allogeneic ATMPs? There are also a large variety of other allogeneic ATMPs, where the amount of the starting material is limited. For the sake of clarity this particular point could be further specified.

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