September 26, 2016

Unit B5 – "Medicinal products – policy, authorisation and monitoring"
SANTE-B5-ADVANCED-THERAPIES@ec.europa.eu
European Commission
DM24 02/133
B-1049 Brussels (Belgium)

Re: Consultation Document
Good Manufacturing Practice for Advanced Therapy Medicinal Products

Dear Sir or Madam:

We submit these comments on behalf of Cook Group Incorporated (Cook). Cook is a privately held group of domestic and international corporations engaged in the manufacture of diagnostic and therapeutic products for use in various medical specialties. Cook employs approximately 12,000 people worldwide and does not meet the EU definition of a small and medium-sized enterprise.

Cook MyoSite Inc., Pittsburgh, PA USA and Cook General BioTechnology, Bjaeverskov Denmark are subsidiaries of Cook. Cook MyoSite, Inc. is an ATMP manufacturer that specializes in autologous muscle cell therapies. These therapies are currently under clinical investigation for the treatment of weakened genitourinary and gastrointestinal muscles. Cook General Biotechnology specializes in the manufacturing and distribution of ancillary materials for ATMPs, EU QP batch certification of ATMPs, and the distribution of medical devices and laboratory products. As ATMP manufacturers, we are able to provide an informed perspective in relation to this guidance.

We thank the European Commission for the opportunity to comment on the Draft Guidance, "Good Manufacturing Practices for Advanced Therapy Medicinal Products". Cook offers the following comments regarding the language that describes the environment for the reconstitution and administration of ATMPs in an operating room setting:

1. **<u>Section 17.4 Premises</u>**
    a. Page: 65-66, Line 2170 - 2181
        i. *As explained in Section 4, the room where a closed system is used should be of at least D grade. The transfer of the material into/from the equipment is a critical step and a validated procedure should be put in place to preserve the product from the risk of contamination.*

If justified having regard to the risks and provided that the approach is supported by validation data (e.g. leak testing and pressure check of the equipment), a controlled but non-classified background environment could be acceptable if the time between the donation and administration of the material is very short and the manufacturing is performed at the operating room in the hospital (the patient is also in the operating room waiting for administration of the ATMP). The conditions of the operating room where the manufacturing activity takes place should be adequate and sufficient to ensure the quality and safety of the product.

1. Please add a note to allow a private practice setting to Line 2178 under the appropriate circumstances *(..the patient is also in the operating room…)*:
    a. In some cases, the private practice setting should be included in reconstitution and product administration procedures:
        i. The private practice setting is adequate and sufficient for simple reconstitution and product administration procedures such as dilution and well-established injection methods. Procedures are conducted according to clinical protocols and procedural guidelines which outline environmental parameters necessary to perform the procedures (i.e. keep the sterile field away from doors, windows, and vents; minimize personnel entering and leaving the room; utilize aseptic technique; etc.). These procedures are identified in product labeling and marketing authorisations.
        ii. For reconstitution of ATMPs, sterile transfer devices can be used to prepare the ATMP with aseptic technique in a private practice setting.
        iii. For ATMPs that are administered through natural anatomical orifices with no surgical intervention, the private practice setting would be an appropriate environment. Aseptic technique is utilized in administration procedures to ensure sterility of the ATMP is maintained during the administration process.
        iv. The requirement of an operating room setting for reconstitution and administration will increase the cost for the ATMP treatment for patients and healthcare providers and is not scientifically justified in all cases.

Respectfully,

Anna Jessen

Director of Clinical and QA, Cook General BioTechnology

Stephen Westover

Director of GMP Compliance