UNITED STATES FOOD AND DRUG ADMINISTRATION

CENTER FOR DRUG EVALUATION AND RESEARCH

PHARMACEUTICAL SCIENCE AND CLINICAL PHARMACOLOGY ADVISORY COMMITTEE MEETING

DAY 1

Rockville, Maryland

Tuesday, July 22, 2008

PARTICIPANTS:

Committee Members:

KENNETH R. MORRIS, Ph.D., Chair

College of Pharmacy University of Hawaii at Hilo

JESSIE L-S. AU, Pharm.D., Ph.D.

The Ohio State University

CAROL A. GLOFF, Ph.D.

Carol Gloff & Associates

MERRILL GOOZNER

Consumer Representative

Center for Science in the Public Interest

MARILYN E. MORRIS, Ph.D.

School of Pharmacy

State University of New York

ANNE S. ROBINSON, Ph.D.

Department of Chemical Engineering

University of Delaware

ELIZABETH M. TOPP, Ph.D.

Department of Pharmaceutical Chemistry

The University of Kansas

Temporary Members (Voting):

JERRY M. COLLINS, Ph.D.

National Cancer Institute

National Institutes of Health

ARTHUR H. KIBBE, Ph.D.

Nesbitt School of Pharmacy

Wilkes University

MELVIN V. KOCH, Ph.D.

University of Washington

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PARTICIPANTS (CONT'D):
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 2
    MARVIN C. MEYER, Ph.D.
     College of Pharmacy
 3
    The University of Tennessee
 4
    HARRIET B. NEMBHARD, Ph.D.
     Pennsylvania State University
5
     Committee Members (Non-Voting):
6
     RICHARD J. STEC, JR., Ph.D.
7
     Industry Representative Hospira, Inc.
8
    PATRICIA C. TWAY, Ph.D.
     Industry Representative
9
    Merck Manufacturing Division
10
    Designated Federal Official:
11
    LCDR. DIEM KIEU H. NGO, Pharm.D., BCPS
12
    Guest Speakers:
13
    DARRELL R. ABERNETHY, M.D., Ph.D.
     United States Pharmacopeia
14
    DARIN Y. FURGESON, Ph.D.
15
    School of Pharmacy
     University of Wisconsin-Madison
16
     STEPHEN B. RUDDY, Ph.D.
17
     Pharmaceutical Development
     Elan NanoSystems
18
    LAWRENCE TAMARKIN, Ph.D.
19
    CytImmune Sciences, Inc.
2.0
    HELEN WINKLE
     Director, Office of Pharmaceutical Science
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Branch Chief, Division of Pre-Marketing Assessment II

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NORMAL SCHMUFF, Ph.D.

- 1 PROCEEDINGS
- 2 (8:36 a.m.)
- 3 DR. MORRIS: Well, good morning,
- 4 everybody. I believe we're good to go now.
- 5 We have our technical difficulties resolved
- 6 and I'd just like to welcome everybody. This
- 7 is the first meeting since 2006 of the
- 8 Committee and we have a lot of interesting
- 9 topics to discuss.
- 10 Before we get started there's a
- 11 brief statement that I'll read and then we'll
- 12 go around the table and have everybody make
- 13 brief introductions.
- 14 The statement is: For topics such
- 15 as those being discussed at today's meeting,
- 16 there are often a variety of opinions, some
- 17 of which are quite strongly held. Our goal
- is that today's meeting will be a fair and
- 19 open forum for discussion of these issues and
- 20 that individuals can express their views
- 21 without interruption. Thus, a gentle
- 22 reminder, individuals will be allowed to

- 1 speak into the record only if recognized by
- 2 the Chair. We look forward to a productive
- 3 meeting.
- 4 And in the spirit of the Federal
- 5 Advisory Committee Act and the Government in
- 6 the Sunshine Act, we ask that the Advisory
- 7 Committee members take care that their
- 8 conversations about the topic at hand take
- 9 place in the open forum of the meeting. We
- 10 are aware that members of the media are
- 11 anxious to speak with the FDA about these
- 12 proceedings, however, FDA will refrain from
- 13 discussing the details of this meeting with
- 14 the media until its conclusion.
- 15 Also, the Committee is reminded to
- 16 please refrain from discussing the meeting
- 17 topics during breaks or during lunches.
- 18 Thank you very much.
- 19 And of course, in terms of the
- 20 topics, they are all general topics and we're
- 21 not talking about specific products anyway.
- 22 So with that, if we can go around

- 1 and do a brief introduction. Shall we start
- 2 with Keith?
- 3 MR. WEBBER: Keith Webber, deputy
- 4 directory of the Office of Pharmaceutical
- 5 Science, Center for Drug Evaluation Research.
- 6 MS. WINKLE: Helen Winkle, director
- 7 of the Office of Pharmaceutical Science,
- 8 CDER.
- 9 MS. NGO: Lieutenant Commander
- 10 Diem-Kieu Ngo, designated federal official.
- 11 MR. MORRIS: Ken Morris, University
- 12 of Hawaii Pharmaceutics.
- MS. ROBINSON: Anne Robinson,
- 14 Chemical Engineering, University of Delaware.
- MS. MORRIS: Marilyn Morris,
- 16 Pharmaceutical Sciences, University of
- 17 Buffalo.
- 18 MS. TOPP: Liz Topp, Pharmaceutical
- 19 Chemistry, University of Kansas.
- 20 MS. NEMBHARD: Harriet Nembhard,
- 21 Industrial Engineering, Penn State
- 22 University.

- 1 MR. KOCH: Mel Koch, the Center for
- 2 Process Analytical Chemistry, University of
- 3 Washington.
- 4 MR. MEYER: Marvin Meyer, emeritus
- 5 professor, University of Tennessee, College
- 6 of Pharmacy.
- 7 MR. KIBBE: Art Kibbe, chair,
- 8 Pharmaceutical Sciences, Wilkes University.
- 9 MR. GOOZNER: Merrill Goozner. I'm
- 10 with the Center for Science in the Public
- 11 Interest. I'm the consumer rep on the
- 12 committee.
- 13 MR. COLLINS: Jerry Collins,
- 14 National Cancer Institute at NIH.
- MS. GLOFF: Carol Gloff, Boston
- 16 University and independent regulatory
- 17 consultant.
- 18 MS. TWAY: Pat Tway, Merck &
- 19 Company, representing Pharma.
- 20 MR. STEC: Rich Stec, Hospira,
- 21 Inc., representing generic industry.
- MS. NGO: Before I read the meeting

- 1 statement, I would like to remind everyone to
- 2 silence your cell phones and pagers if you
- 3 have not already done so and also Mr.
- 4 Christopher Kelly from our press office is
- 5 here, if you can stand up.
- 6 The Food and Drug Administration
- 7 has convened today's meeting of the Advisory
- 8 Committee for Pharmaceutical Science and
- 9 Clinical Pharmacology of the Center for Drug
- 10 Evaluation Research under the authority of
- 11 the Federal Advisory Committee Act of 1972.
- 12 With the exception of the initial
- 13 representatives, the members and temporary
- 14 voting members of the Committee are Special
- 15 Government Employees or regular federal
- 16 employees from other agencies and are subject
- 17 to federal conflict of interest laws and
- 18 regulations.
- 19 The following information on the
- 20 status of this Committee's compliance with
- 21 federal ethics and conflict of interest laws
- 22 covered by but not limited to those found at

- 1 19 USC Section 208 and Section 712 of the
- 2 Federal Food, Drug, and Cosmetic Act, FD&C
- 3 Act, is being provided to participants in
- 4 today's meeting and to the public.
- 5 FDA has determined that the members
- 6 and temporary voting members of the Committee
- 7 are in compliance with federal ethics and
- 8 conflict of interest laws. Under 18 USC
- 9 Section 208, Congress has authorized FDA to
- 10 grant waivers to Special Government Employees
- 11 and regular federal employees who have
- 12 potential financial conflicts when it is
- determined that the agency's need for a
- 14 particular individual's services outweighs
- 15 his or her potential financial conflict of
- 16 interest.
- 17 Under Section 712 of the FD&C Act,
- 18 Congress has authorized FDA to grant waivers
- 19 to Special Government Employees and regular
- 20 federal employees with potential financial
- 21 conflicts when necessary to afford the
- 22 Committee essential expertise.

- 1 Related to the discussions of
- 2 today's meeting, members and temporary voting
- 3 members of this Committee have been screened
- 4 for potential financial conflicts of interest
- 5 of their own as well as those imputed to them
- 6 including those of their spouses or minor
- 7 children and for purposes of 18 USC Section
- 8 208, their employers. These interests may
- 9 include investments, consulting, expert
- 10 witness, testimony, contracts, grants,
- 11 CRADAs, teaching, speaking, writing, patents,
- 12 royalties, and primary employment.
- For today's agenda, the Committee
- 14 will one, receive presentations from the
- 15 Office of Pharmaceutical Science and discuss
- 16 current thinking on issues pertaining to the
- 17 use of nanotechnology in drug manufacturing,
- 18 drug delivery, or drug products, and two,
- 19 receive an update from OPS, discuss and make
- 20 comments on current strategies and directions
- 21 for the testing of lead in pharmaceutical
- 22 products. This is a particular matters

- 1 meeting during which general issues will be
- 2 discussed.
- 3 Based on the agenda and all
- 4 financial interests reported by the Committee
- 5 members and temporary voting members,
- 6 conflict of interest waivers have been issued
- 7 in accordance with 18 USC Section 208(b)(3)
- 8 and Section 712 of the FD&C Act to Dr. Marvin
- 9 Meyer for his stock ownership in two health
- 10 care sector mutual funds. The waivers allow
- 11 this individual to participate fully in
- 12 today's deliberations. FDA's reasons for
- 13 issuing the waivers are described in the
- 14 waiver documents which are posted on the
- 15 FDA's website at
- 16 www.fda.gov/ohrms/dockets/default.htm.
- 17 Copies of the waivers may also be obtained by
- 18 submitting a written request to the Agency's
- 19 Freedom of Information Office, Room 630 of
- 20 the Parklawn Building.
- 21 A copy of this statement will be
- 22 available for review at the registration

- 1 table during this meeting and will be
- 2 included as part of the official transcript.
- 3 Additionally, we would like to disclose that
- 4 Dr. Jessie Au is excluded from participating
- 5 in today's discussions on the use of
- 6 nanotechnology in drug manufacturing, drug
- 7 delivery, or drug products due to her related
- 8 interest in the topic.
- 9 We would also like to disclose that
- 10 Dr. Richard Stec and Dr. Patricia Tway are
- 11 serving as non-voting industry
- 12 representatives acting on behalf of all
- 13 regulated industry. Dr. Stec is an employee
- of Hospira and Dr. Tway is an employee of
- 15 Merck & Company.
- We would like to remind the members
- 17 and temporary voting members that if the
- 18 discussions involve any other products or
- 19 (off mike) not already on the agenda for
- 20 which an FDA participant has a personal or
- 21 imputed financial interest, the participants
- 22 need to exclude themselves from such

- 1 involvement and the exclusion will be noted
- 2 for the record.
- 3 FDA encourages all other
- 4 participants to advise the committee of any
- 5 financial relationships that they may have
- 6 with any firms at issue. Thank you.
- 7 MR. MORRIS: Thank you, Diem. So I
- 8 think at this point we'll start by turning
- 9 things over to Helen Winkle, the Director of
- 10 OPS, for an opening statement.
- 11 MS. WINKLE: Good morning everyone.
- 12 This is such a new configuration. It's
- 13 really different. It really is my pleasure
- 14 to be here with each of you this morning and
- 15 to welcome everyone to the Advisory
- 16 Committee. I especially want to welcome Ken
- 17 Morris back as Chair of the Committee. We've
- 18 enjoyed working with Ken in the past and we
- 19 look forward to continuing to work with him
- 20 in the future even though he's moved to
- 21 Hawaii, far away from us, we can still bring
- 22 him back that far.

- 1 A special welcome too to all of our
- 2 new members. We have a number of new members
- 3 and I hope that each of you as you
- 4 participate in various topics on this
- 5 committee over the next few years will really
- 6 find it extremely interesting but also I
- 7 think and hope that you'll find it rewarding
- 8 for many of your scientific endeavors now and
- 9 in the future.
- 10 I also want to thank all of OPS's
- 11 staff as well as other staff in CDER who have
- 12 worked together to make this meeting
- 13 possible. It takes a lot of work to put
- 14 these presentations together and I really
- 15 believe that the presentations that we have
- 16 put together for the next few days, that you
- 17 will find interesting and beneficial and I'm
- 18 really hoping that the discussions around the
- 19 topics that we have will be very helpful to
- 20 FDA in making regulatory decisions in the
- 21 directions we want to go as far as these
- 22 particular topics are concerned.

- 1 Last of all, I want to welcome all
- 2 the interested parties. We're glad to have
- 3 you with us.
- 4 I just want to talk a little bit
- 5 about FDA. I mean, I feel almost compelled
- 6 to talk a little bit about what's going on.
- 7 We haven't met since 2006, the Committee, and
- 8 we do have new members on the Committee, so I
- 9 want to just give a brief update. I don't
- 10 want to spend a lot of time talking, but I
- 11 thought I would talk a little bit about some
- of our challenges that we've had over the
- 13 last few years and some of the skepticism
- 14 that now seems to be rising over our various
- 15 regulated products and about some of the
- 16 initiatives that we're working on really to
- 17 resolve any of the issues and skepticism that
- 18 exists out there.
- 19 I consider these really to be
- 20 exciting and challenging times and with the
- 21 challenges though come opportunities, so as I
- 22 go through a lot of what I'm going to talk

- 1 about this morning, I think you will see
- 2 where many of these opportunities exist and I
- 3 think these opportunities are things that
- 4 this Advisory Committee can really take
- 5 advantage of.
- 6 First of all, we've made a lot of
- 7 progress over the last few years on
- 8 implementing the concepts to improve quality,
- 9 our new CMC Review Paradigm. And I think
- 10 many of you have heard about this but
- 11 probably there are some of the new members
- 12 that haven't, and this is really where we've
- 13 been focusing a lot of our efforts to
- 14 implement what we're calling Quality by
- 15 Design. And all three of the offices in OPS
- 16 have been working very diligently at this
- 17 implementation.
- 18 Our Office of New Drug Quality
- 19 Assessment has really made a lot of progress.
- 20 They've had a pilot in which various
- 21 companies submitted applications that
- 22 contained information on pharmaceutical

- 1 development and on process and manufacturing
- 2 understanding. And basically this pilot has
- 3 been very useful in helping us to determine
- 4 what information is really relevant in
- 5 processing and application under the new
- 6 Review Paradigm, and where our scientific and
- 7 regulatory gaps exist so that we can begin to
- 8 fill those gaps.
- 9 The information in the pilot has
- 10 also helped us in looking ahead as to how we
- 11 want to continue to implement this paradigm
- 12 and some of the things that we need to
- 13 consider along that road.
- 14 The Office of Generic Drugs has
- 15 also implemented what it's calling it's
- 16 question-based review. And this review
- 17 basically provides a template of questions
- 18 that relate to the quality of design
- 19 principles and have been very useful in
- 20 helping companies to identify what
- 21 information they need to incorporate into
- 22 their applications. And I feel like in the

- 1 long run it's really going to expedite us
- 2 getting the applications through.
- We've currently received, and
- 4 Lawrence can correct me when he gets up here,
- 5 but we have received over 400 applications
- 6 using this new template. Now we haven't had
- 7 a chance to review all 400 but many of them
- 8 are in our queue in Generic Drugs, but the
- 9 whole concept has been extremely helpful in
- 10 providing us with information and helped the
- 11 generic industry focus more on the concept of
- 12 quality by design.
- 13 The Office of Biotech Products has
- 14 just issued a federal registry notice. They
- 15 plan to do a similar pilot as has been done
- in our office of OMDQA and they're looking to
- 17 see what kind of information is really
- 18 necessary in being able to do a biotech
- 19 application.
- 20 So a lot has been going on in this
- 21 area. We've talked about this many times at
- 22 previous advisory committees. We will not be

- 1 talking about Quality by Design at this one
- 2 but I'm hoping at the next meeting that we
- 3 have that we will have a better understanding
- 4 of where some of our scientific and
- 5 regulatory gaps are and that we can have
- 6 further discussion with the Committee as we
- 7 progress in our implementation.
- 8 We've also focused a lot over the
- 9 last couple of years on improving the science
- 10 base in the Office of Generic Drugs through
- 11 the implementation of Quality by Design, as I
- 12 mentioned, but through other activities as
- 13 well. And in strengthening our science base
- in the Office of Generic Drugs, we've really
- 15 been better able to approve generic drugs in
- 16 a more expeditious timeframe.
- 17 There has been a really tremendous
- 18 demand for generic drug approvals and through
- 19 some of the more modern science spaces that
- 20 we've been able to implement, we've been able
- 21 to improve on getting generic drugs out on
- 22 the market. I think as you see from the

- 1 agenda, we have several topics tomorrow on
- 2 generic drugs and some of our scientific
- 3 challenges in the area of generic drug
- 4 regulation. And I think the discussions that
- 5 we will have tomorrow will be very helpful in
- 6 going that next step in sort of supporting
- 7 our scientific knowledge base for
- 8 bioequivalence.
- 9 I also wanted to mention as I'm
- 10 talking about progress is just international
- 11 harmonization. FDA has worked very hard with
- 12 other regulatory regions to harmonize on a
- 13 variety of issues having to do with quality
- 14 and have been very successful under the
- 15 International Conference for Harmonization in
- 16 implementing guidances, one Q8 on
- 17 pharmaceutical development, Q9 on risk
- 18 management, and Q10 on quality systems, and
- 19 all three of these guidances have been
- 20 incorporated into our thinking on regulating
- 21 CMC in OPS.
- 22 But, again, as I said, these are

- 1 challenging times and I just wanted to go
- 2 through some of the challenges that we have
- 3 been seeing and some of the issues, I think,
- 4 that are important as we talk and discuss
- 5 things at this Advisory Committee, that
- 6 you're aware of some of these things so that
- 7 we can build this into some of our
- 8 discussions.
- 9 All one really has to do is open
- 10 the newspapers, and I think every day you see
- 11 "FDA" and if it isn't the front page it's at
- 12 least the second page of the paper, a lot of
- 13 it having to do with drug safety and many of
- 14 the issues that we've had post-approval with
- 15 products. At least we aren't having to deal
- 16 with tomatoes, but we have had a number of
- 17 issues that have come up recently that have
- 18 provided us with a lot of action here in the
- 19 agency. I think most notable is Heparin, but
- 20 there have been a number of other issues as
- 21 well.
- There are a lot of perceived

- 1 vulnerability on CDER's drug safety program
- 2 and we are really focused on trying to deal
- 3 with a lot of those issues. And as I talk
- 4 about some of the initiatives, you can see
- 5 some of the efforts that we're putting forth
- 6 in dealing with the drug safety.
- 7 Despite our improved scientific
- 8 base in OGD, we've also seen growing
- 9 skepticism regarding generic drugs and our
- 10 approval process. We've seen a number of
- 11 articles and in various newspapers, in
- 12 journals, and have received numerous letters
- 13 questioning, really, our regulatory process
- 14 and questioning the sameness of some of our
- 15 generic products.
- 16 Currently, it's a priority in the
- 17 center to determine how best to handle the
- 18 skepticism out there in the public and to get
- 19 better information out to both the public and
- 20 health care providers both on the safety and
- 21 quality of generic drugs so even though this
- 22 is a challenge, I think we're looking at ways

- 1 to resolve it.
- 2 Another thing I wanted to bring up
- 3 because I always get a lot of questions on it
- 4 is, where are we with follow-on biologics.
- 5 Although we've had a number of congressional
- 6 bills that have been proposed, we still do
- 7 not have any legislation on follow-on
- 8 biologics. We do continue though to keep up
- 9 with the science. We have had several
- 10 workshops to discuss scientific issues around
- 11 follow-on biologics and we will continue to
- 12 focus on that science both for chemistry and
- immunogenicity until we do have a final
- 14 decision either to move ahead with follow-on
- 15 biologics or to take some other course.
- 16 Another challenge that we have and
- 17 it's a never ending challenge, is to
- 18 understand how to regulate new dosage forms
- 19 and new technologies. We will talk a little
- 20 bit about new technologies in our first
- 21 session this morning, on nanotechnologies.
- 22 It's always -- a lot of effort that has to go

- 1 in to determining how best we're going to
- 2 regulate if indeed we need to change any of
- 3 our processes in that regulatory arena in
- 4 order to handle these new technologies. So I
- 5 look forward to some good discussion on that
- 6 this morning.
- 7 And last of all, there's always a
- 8 big challenge to train our employees. It's
- 9 especially been a lot of necessity with the
- 10 changing paradigm to do a lot of training and
- 11 this is one of the things we've been focused
- 12 on quite a bit in the last year.
- 13 Okay, as I said, I wanted to talk a
- 14 little about initiative and other activities
- 15 that effect programs at OPS. I'm not going
- 16 to talk at length about any of these
- 17 initiatives or I would talk for the next few
- 18 days. Obviously, there's so many. But we
- 19 have continuing initiatives that we're
- 20 working on -- Pharmaceutical Quality for the
- 21 21st Century Initiative, the Critical Path
- 22 Initiative, PDUFA, which really handles a lot

- 1 of our resource issues, we have a number of
- 2 new initiatives and other activities that are
- 3 going on. Back in the fall of 2007, we
- 4 received a report from the Science Board.
- 5 The Science Board had been commissioned by
- 6 the commissioner to come in and look at the
- 7 science within the agency and we have
- 8 received their report. We received a report
- 9 early in 2007 from IOM talking about our
- 10 safety issues. We also have a new initiative
- 11 called the Safety First and Safe Use
- 12 initiative, and last of all, we just received
- 13 new legislation on FDAAA or the FDA
- 14 Amendment's Act.
- I thought what would be best,
- 16 instead of going through all of these, is to
- 17 sort of give you an overall idea about the
- 18 general purpose of the initiatives and the
- 19 activities as they relate to CDER.
- 20 All of these initiatives basically
- 21 had some of the same principles and some of
- 22 the same concerns in them, and I think it's,

- 1 as we read through these or as I read through
- 2 them, I think you can see how beneficial they
- 3 will be to the FDA in making improvements.
- 4 And again, I think it's very good to keep all
- 5 of these principles in mind as we think about
- 6 the various topics that we're going to talk
- 7 about over the next two days.
- 8 The main thing that all of the
- 9 initiatives focus on was insuring adequate
- 10 scientific support, for insurance safety,
- 11 efficacy, and quality of marketed products.
- 12 Also the initiatives focus on providing
- 13 scientific and technical methods to improve
- 14 predictability and efficiency to better
- 15 develop and manufacture drug products. Also
- 16 to facilitate adoption of quality management
- 17 techniques in regulatory processes, not only
- 18 while we're looking at implementing quality
- 19 management techniques within the industry or
- 20 at least supporting that concept, we're also
- 21 looking at doing it in the agency to improve
- 22 upon our own internal processes. Implement

- 1 risk-based approaches to product regulation.
- 2 We have spent a lot of time both for our
- 3 inspection programs as well as our review
- 4 programs, at looking at the best (off mike)
- 5 risk based approaches that can facilitate us
- 6 getting our job done. Enhance post market
- 7 authorities to better insure product safety
- 8 -- this is basically to maintain focus on
- 9 drugs once they are on the market.
- 10 One of the things that came out of
- 11 the IOM report, and we're spending a lot of
- 12 time in at CDER, is to improve upon our
- 13 professional culture. There was a lot of
- 14 criticism of the fact that the disciplines
- 15 did not work well together within the agency
- 16 and we are very focused right now on that.
- 17 In fact, tomorrow I will be away from the
- 18 committee for a while during the middle of
- 19 the day to attend a work culture session with
- 20 all our directors and mid-level managers to
- 21 discuss some of our cultural problems.
- 22 Prepare scientific and regulatory

- 1 process for the future including
- 2 understanding new technologies and preparing
- 3 for different ways of developing drugs. This
- 4 includes novel dosage forms, and last to
- 5 ensure adequate resources. Almost every
- 6 particular activity that we had or report
- 7 that came in really focused on our lack of
- 8 resources in the FDA.
- 9 Again, I said it was really
- 10 necessary to keep some of these things in our
- 11 mind as we talk as an Advisory Committee. I
- 12 wanted to just speak a moment to the Advisory
- 13 Committee's role. I think that this
- 14 Committee is extremely valuable, when we look
- 15 back at the number of scientific issues that
- 16 do come before this Committee and the help
- 17 this Committee has been able to provide us.
- 18 The Advisory Committee along with
- 19 others in the Center basically promote a
- 20 better FDA and industry understanding of the
- 21 unique challenges in the present and in the
- 22 future health care environment. And there

- 1 has not really been a time in FDA that I can
- 2 remember in the recent future (sic) where our
- 3 science capabilities have been so questioned.
- 4 So it's really very useful for us to bring a
- 5 group of scientists such as yourself together
- 6 to help us really address these issues.
- 7 I took this quote out of the
- 8 Science Board Report of 2007 because I really
- 9 wanted you to get an essence of how FDA is
- 10 viewed from a science standpoint and why your
- 11 role is so extremely important and the quote
- 12 basically says, "Science at FDA is in a
- 13 precarious position. The Agency suffers from
- 14 serious scientific deficiencies and is not
- 15 positioned to meet current emerging
- 16 regulatory responsibilities." That's a
- 17 pretty negative quote but we really are
- 18 looking internally within our office as well
- 19 as in CDER to take advantage of as much
- 20 outside expertise to help support our science
- 21 and to really bring us in to the 21st century
- 22 as far as our knowledge and scientific

- 1 expertise is concerned.
- 2 I want to talk a little bit about
- 3 the agenda. I won't spend long on this. Day
- 4 one is basically on two areas where we have
- 5 had some concerns and questions. The first
- 6 is on nanotechnology. This particular topic
- 7 has been brought to the Committee before as
- 8 an awareness topic. In the fall of 2007, FDA
- 9 issued a report regarding nanotechnology and
- 10 how it should be regulated throughout FDA and
- 11 we're still in a position of figuring out how
- 12 we want to regulate and if we really do need
- 13 to spend any additional time our concern over
- 14 the safety of products which contain
- 15 nanoparticles. So we'd like to run that by
- 16 the Committee today and have some discussion
- 17 on that.
- 18 The second topic is lead in
- 19 pharmaceutical products. There has been a
- 20 national focus on all products containing
- 21 lead. We really want to talk a little bit
- 22 about pharmaceutical products that do contain

- 1 lead. We have done some studies. We'll
- 2 share some information with you. We have
- 3 looked at some other centers and how they
- 4 have regulated lead and we would like to
- 5 ensure that we have the appropriate
- 6 regulatory framework as we move forward in
- 7 this area and we look for your advice on
- 8 that.
- 9 I do want to say before I move on
- 10 to day two, is that as we go through these
- 11 various topics that are on the agenda, we
- 12 really are not talking about any specific
- 13 products. We really are looking at general
- 14 information on all of these topics and we
- 15 really feel that the decisions that come out
- 16 of these Advisory Committee Meetings will
- 17 really assist us in making decisions on
- 18 classes of products or on all of the products
- 19 we regulate, but again, nothing on a specific
- 20 product.
- 21 Agenda for day two is, we have
- 22 basically devoted this to generic drugs. The

- 1 first item on the agenda is bioequivalence
- 2 for locally acting drugs that treat
- 3 gastrointestinal conditions. We need to
- 4 ensure that we're using the most scientific
- 5 bioequivalence methodology. We will discuss
- 6 that. The second topic is drug
- 7 classification of orally disintegrating
- 8 tablets. This is basically a nomenclature
- 9 inconsistency issue which we will discuss
- 10 with the committee.
- 11 And the last topic is the use of
- 12 inhaled corticosteroid dose response as a
- 13 means to establish bioequivalence of
- 14 inhalation drug products. And again here,
- 15 we're looking at bioequivalence methodology.
- So with that, again I want to
- 17 welcome each of you. I look forward to some
- 18 very interesting discussions over the next
- 19 two days and I want to thank you all again
- 20 for your attendance here.
- 21 MR. MORRIS: Thank you, Helen. I
- 22 noticed that that comment on the report

- wasn't directed to OPS, right?
- 2 So that brings us to our first
- 3 topic, and the first topic, as Helen
- 4 introduced, is nanotechnology and drug
- 5 manufacturing, drug delivery, and drug
- 6 products. And our first speaker is Keith
- 7 Webber who is the deputy director of OPS.
- 8 Keith?
- 9 MR. WEBBER: Okay. Welcome to this
- 10 session on nanotechnology. I think that as
- 11 you know, I'm sure, nanotechnology is a
- 12 relatively new and quite exciting area of
- 13 materials and engineering that's moving
- 14 forward at quite a rate these days. Given
- 15 that it's new, there's a lot of uncertainty
- 16 involved with its applications. There is a
- 17 lot of promise. And I think the task that
- 18 the agency has ahead of it is to sort of
- 19 filter out the hype, the promise, into
- 20 reality and kind of use as best we can, and I
- 21 should say to the best we can, absolutely we
- 22 need to use the science base to -- and the

- 1 scientific knowledge to do that such that we
- 2 can be sure we move forward with the
- 3 appropriate regulatory policies.
- 4 Now, what I'd like to do first is
- 5 to introduce really the purpose of this
- 6 session, is to (off mike) had an earlier
- 7 session in which we introduced this as sort
- 8 of an informational topic at a previous
- 9 meeting. We would like to update the
- 10 Advisory Committee on the CDER's nanotech
- 11 related activities. We want to familiarize
- 12 the Committee with some pharmaceutically
- 13 relevant nanotechnology concerns as well as
- 14 some technologies that our presenters will
- 15 show you after my presentation. And then
- 16 receive advice from the Committee on the
- 17 scientifically sound basis for some of the
- 18 regulatory questions that we are faced with
- 19 related to nanotechnology.
- 20 Background, from my particular
- 21 talk, I really just want to introduce some of
- 22 the nanotechnology products that we have and

- 1 then some of the impacts that those have on
- 2 our evaluation system within CDER. We had a
- 3 task force at the FDA level that evaluated
- 4 this issue or these issues related to
- 5 nanotechnology and (off mike) provide some
- 6 summary recommendations that came out of that
- 7 committee as well as some public meetings we
- 8 had in relation to that as well as
- 9 subsequently, and then discuss briefly some
- 10 of our initiatives within CDER, which include
- 11 developing a database of products and some of
- 12 the research activities we have going on on
- 13 MAPP. Which if you're not familiar with what
- 14 MAPP means, it's essentially an internal
- 15 standard operating procedure basically of how
- 16 we handle or would handle an application that
- 17 proposed to introduce a nanotechnology drug
- 18 product into either human use, human studies
- 19 as an IND or to the market. And then the
- 20 question of whether we need guidance related
- 21 to development of nanotechnology products.
- Now, this slide essentially goes

- 1 through and illustrates the wide variety of
- 2 nanoparticle products that are being
- 3 developed and these include essentially your
- 4 nanospheres which are either of consistent
- 5 structure or encapsulated. Again, another
- 6 sphere that is in a liposome-type format
- 7 where you encapsulate a drug or you have
- 8 targeting (off mike) outside and then
- 9 polymeric particles that can be used to
- 10 provide multivalent structure to a drug
- 11 product for targeting or delivery of a drug.
- 12 And then there are the inorganic
- 13 particles that are used for a variety of
- 14 applications, some for example in imaging
- 15 technologies.
- So we're really dealing with quite
- 17 an array of products. It's not a simple
- 18 horizon that we're dealing with here.
- 19 Some of the potential
- 20 pharmaceutical applications of nanotechnology
- 21 include, as I mentioned, targeted therapies.
- 22 They hold the promise of being able to

- 1 increase the delivery of a drug to the site
- 2 of action which essentially increases the
- 3 concentration at the point where it's most
- 4 useful. That allows one to perhaps decrease
- 5 the systemic exposure of the product which
- 6 oftentimes, adverse events relating to
- 7 systemic exposure.
- 8 There are multifunctional particles
- 9 which could provide a drug which actually has
- 10 more than one activity, so it arrives at its
- 11 site of action and then it not only, for
- 12 example, binds to the site, (off mike) it
- 13 actually has another function which is
- 14 related to its therapeutic purpose.
- There are a variety of novel dosage
- 16 forms that might be available, for example,
- 17 transdermal delivery of products, directly
- 18 through the skin. Carrier function which
- 19 again is to bring a drug product to a
- 20 particular site, and then folks are working
- 21 on how to develop novel forms of controlled
- 22 or sustained release products that could

- 1 provide a better therapeutic activity for
- 2 products that they are required to have a
- 3 long term steady state exposure. For (off
- 4 mike) products, if you can encapsulate them,
- 5 you might be able to protect them from
- 6 degradation until they reach their site of
- 7 activity, and then enhanced bioavailability
- 8 is a possibility as well for some of these
- 9 products.
- 10 Some of the challenges that we have
- in terms of dealing with these, we have it as
- 12 well s the manufacturers do, is related to
- 13 product quality assessment. How do you
- 14 characterize what technologies are needed to
- 15 characterize nanotechnology products?
- 16 Initial to that is really what are the
- 17 relevant characteristics of a nanotech
- 18 product that one needs to be concerned with,
- 19 and then do you have the technologies
- 20 available to evaluate those? During
- 21 manufacturing questions come up of how are
- 22 you going to ensure the quality of those

- 1 products such that you have consistent lot to
- 2 lot quality of a product that's going to go
- 3 to market or into patients? And then what
- 4 are the best ways to manufacture these
- 5 products? These are all things that
- 6 certainly our office is concerned about
- 7 specifically in the product quality area.
- And then from a safety assessment
- 9 side one needs to be concerned with
- 10 biodistribution of the products. Do they go
- 11 where they belong? Do they stay where they
- 12 are or do they get cleared? Some people have
- 13 concern that some of these particles may
- 14 reside in the body for a long term so
- 15 clearance is certainly a consideration. How
- 16 are they metabolized? What are their
- 17 metabolite products that are produced and are
- 18 those a concern from a toxicological
- 19 perspective?
- Now, some of the products that we
- 21 have so far dealt with in our center are
- 22 sunscreens, where there are titanium oxide

- 1 and zinc oxide nanoparticles present which
- 2 are essentially to smaller size for -- the UV
- 3 absorbent material provides a better
- 4 presentation of the product, basically. It's
- 5 clear on the skin, doesn't give you that
- 6 white, unsightly stuff on your nose.
- 7 So other areas are in
- 8 reformulations of previously approved
- 9 products, so you have nanoemulsions of
- 10 products that can hopefully have better
- 11 transport through membranes and then
- 12 nanocrystal colloid dispersions.
- In preparation for dealing with
- 14 nanotechnology products throughout the
- 15 agency, the commissioner's office convened a
- 16 nanotechnology task force a couple of years
- 17 ago. And the focus of this group was really
- 18 -- it was an intercenter task force that was
- 19 to look at ways that we could enable the
- 20 development of safe and effective products in
- 21 this technological area and evaluate what we
- 22 currently have in our regulatory repertoire

- 1 to find policy gaps that exist. And then
- 2 also, because science is really critical to
- 3 how we regulate products at the agency, to
- 4 identify what science and technology needs we
- 5 have. And then because it was an intercenter
- 6 group, they were also looking at how we can
- 7 strengthen our collaborations with other
- 8 agencies -- EPA, USDA, NCI, Nanotechnology
- 9 Laboratories, National Institute for Science
- 10 and Technology. So that, I think, is another
- 11 important area that we really develop our
- 12 abilities to leverage with other agencies.
- 13 So what were the bottom lines of
- 14 this task force? What came out of it?
- 15 Really they said that these types of
- 16 materials can be found or could be used in
- 17 almost all products regulated by the agency,
- 18 and that the challenges that they present are
- 19 really similar to other emerging
- 20 technologies, not necessarily the same as but
- 21 that we have other emerging technologies that
- 22 have challenges as well.

- 1 With nanotechnology, the fact that
- 2 the safety and efficacy potentially can vary
- 3 with the size of the material adds an
- 4 additional level of complexity in terms of
- 5 having to deal with a physical characteristic
- 6 such as size as opposed to just a chemical
- 7 characteristic.
- 8 They didn't find any evidence that
- 9 nano scale materials as a group have inherent
- 10 hazards above and beyond other materials of
- 11 similar nature and that we need to take steps
- 12 to better inform our reviewers as well as the
- industry, about what's know, what is needed
- 14 in this area, and what we should be expecting
- 15 from manufacturers.
- Some of the specific
- 17 recommendations that the taskforce came with
- 18 was that we should issue guidance
- 19 recommending that sponsors identify particle
- 20 size of small particle materials in FDA
- 21 regulated products. That's essentially an
- 22 identification requirement that if we don't

- 1 know the size of products in general, we
- 2 won't necessarily recognize nanotech unless
- 3 someone specifically identifies it in their
- 4 application and they may or may not do that
- 5 for various reasons.
- 6 From a safety and efficacy
- 7 perspective, they recommend that we issue a
- 8 call for safety and effectiveness data. This
- 9 again is for all FDA regulated products, but
- 10 for CDER it would be specifically for the
- 11 pharmaceuticals of course. And then a number
- 12 of issues -- they recommended that we issue
- 13 quidance in a variety of areas, the main one
- 14 of importance for CDER would be in
- 15 manufacturing areas since these others are
- 16 primarily focused on other centers.
- 17 With regard to labeling, that's a
- 18 very complex issue because as I said, some
- 19 people would like to say new and improved, we
- 20 have nanotechnology in our product. Other
- 21 people may not want it to be there because
- 22 there's fear of nanotechnology. So the

- 1 agency is pretty much required to come up
- 2 with, on a product by product basis, whether
- 3 or not a label should contain information
- 4 related to nanotechnology or whether it
- 5 shouldn't depending upon the relevance,
- 6 basically, scientific relevance of the fact
- 7 that the product is a nanotech product to its
- 8 safety and efficacy activity.
- 9 We did have a number of public
- 10 meetings. In association with the taskforce,
- 11 they held a public meeting on nanomaterials
- 12 in October. Part of the follow up to that
- 13 from a scientific perspective was that we
- 14 were working with the Alliance for
- 15 NanoHealth, which is a consortium of
- 16 universities in Texas to hold a meeting in
- 17 March to really look at the scientific needs,
- 18 scientific potential, for nanotechnology in
- 19 the health care related field. And then in
- 20 September, we are planning to have an
- 21 FDA-wide meeting which would be another open
- 22 meeting to get comment from the public. Each

- 1 center will be participating. We'll have
- 2 centers -- so there will be center specific
- 3 issues presented and our main focus, I
- 4 believe at this point, will be on
- 5 characterization, instrumentation, and
- 6 manufacturing concerns for this particular
- 7 meeting.
- Now, some of the initiatives that
- 9 we have going on now or will shortly in the
- 10 future, from a policy perspective, as I
- 11 mentioned, we're developing a database of
- 12 drug products so that we can identify what
- data gaps there might be in the applications
- 14 that we have for these products, for example,
- 15 particle size information, and then the
- 16 ability to track these files. So that if we
- 17 need to consolidate information or fish out
- 18 specific generalities based on the
- information we have, that we'll be able to
- 20 pull those files easily out of our database
- 21 to look at, so we need to have a good system
- 22 for tracking.

- 1 And then as I mentioned, developing
- 2 a MAPP, internal procedures for how to
- 3 capture the data that's necessary as well as
- 4 how to be sure that we're looking at the
- 5 right information, relevant information from
- 6 a scientific perspective for this type of
- 7 product.
- 8 There are a number of research
- 9 activities going on in the office, or in the
- 10 center. We're collaborating with NIST, the
- 11 Nanotech Characterization Laboratories, NCI,
- 12 as well as CDRH. Some of the projects that
- 13 are ongoing are evaluating dermal penetration
- 14 of nanoparticles that are found in
- 15 sunscreens, characterizing nanoparticles in
- 16 these sunscreens, that's to get data to
- 17 respond to a Citizen Petition, concerned with
- 18 that, and then also looking at the potential
- 19 for toxicity of selected nanoparticles that
- 20 see if we can correlate in vitro findings of
- 21 size and composition with in vivo results.
- In the future, we are considering

- 1 developing a definition for drug related
- 2 purposes if that's necessary. As I
- 3 mentioned, nanotechnology is not just
- 4 nanoparticles. It's a very broad field. So
- 5 that is a huge challenge that we've been
- 6 faced with and are still considering. One of
- 7 the questions that we'll ask you is what sort
- 8 of characteristics or issues we should
- 9 consider if we're going to develop a
- 10 definition for these products over this
- 11 product area.
- We need to identify areas that will
- 13 require guidance for industry and then
- 14 finally, if we do identify those areas, to
- 15 develop guidance as needed.
- Now, for today's presentations to
- 17 really give you a better feel for the
- 18 industry are as well as some of the concerns
- 19 with nanotechnology products, we've invited
- 20 three presenters: Dr. Tamarkin from
- 21 CytImmune Sciences who will talk about some
- 22 products that his company is developing, Dr.

- 1 Ruddy from Elan along those lines, and then
- 2 Dr. Furgeson from the University of Wisconsin
- 3 who will give some presentations as well.
- 4 As you're listening to those
- 5 presentations, I put the questions up here
- 6 that we have for the committee, to keep those
- 7 in mind as you're listening because really
- 8 this is where we need the scientific guidance
- 9 from you and that is really to give us advice
- 10 on whether guidance is needed for the
- 11 development of these products at this point
- 12 for drug applications and if the guidance is
- 13 needed, as I mentioned just a moment ago,
- 14 what areas of these guidances should they
- 15 focus on. And then, for regulatory purposes,
- 16 what elements or factors should we consider
- if we're going to develop a definition for
- 18 nanotechnology.
- 19 And with that, I think we'll move
- 20 on to the first speaker who is Dr. Tamarkin
- 21 from CytImmune.
- 22 MR. MORRIS: And as Dr. Tamarkin

- 1 comes up, what is typical is we would take
- 2 any -- if there are any clarifying questions
- 3 that the Committee has for Keith or for any
- 4 of the speakers, but we'll hold the
- 5 discussion of the full questions until after
- 6 everyone has presented. So if anybody has
- 7 nay clarifying questions, this is the time.
- 8 Otherwise we'll do it after each speaker.
- 9 DR. TAMARKIN: Thank you. Thank
- 10 you, Keith for the introduction. What I'd
- 11 like to do this morning is I've been asked to
- 12 comment on the issues and challenges
- 13 associated with creating, developing, and
- 14 testing nanoparticle-based therapy and then
- 15 specifically I'd like to focus my comments on
- 16 our cancer therapy when we started with
- 17 nanoparticles, now it's become a term called
- 18 nanomedicines. And the best way I felt I
- 19 could share my views of this is to draw upon
- 20 our own experience from developing our own
- 21 cancer therapy which we call internally
- 22 CYT-6091 and we've given it the trade name

- 1 Aurimune. This work traces its roots back
- 2 now over 20 years to when Giulio Paciotti and
- 3 I first used colloidal gold nanoparticles to
- 4 bind cytokines as a way of creating an
- 5 immunogenic construct to develop antibodies
- 6 for enzyme immunoassays that we were
- 7 developing as research products.
- 8 In 1996, we basically turned our
- 9 full attention to developing our first
- 10 nanomedicine and that's what I'd like to
- 11 share with you this morning.
- 12 So in cancer what's basically the
- issue and the opportunity? The problem for
- 14 most cancer therapeutics is that they
- inherently are toxic and they are toxic to
- 16 rapidly dividing cells and those cells could
- 17 either be cancer cells or sometimes,
- 18 oftentimes, healthy rapidly growing cells as
- 19 well. So the best way that we thought that
- 20 you could -- and again, this is sort of the
- 21 promise that Keith alluded to, the promise of
- 22 nanomedicines is that you can, by limiting

- 1 the biodistribution, you can -- and then
- 2 targeting the tumor, we are not just looking
- 3 for an improved or extended pharmacokinetics
- 4 but we're basically looking for time to
- 5 tumor. So if we get the time to tumor to be
- 6 reduced, that would limit the exposure of
- 7 healthy tissues and organs to cytotoxics.
- 8 And the solution of nanomedicines
- 9 is basically to engineer these new
- 10 formulations to harness the therapeutic
- 11 potential of therapeutics, and basically in
- our mind's eye, the ideal way is there are
- 13 plenty of cancer therapeutics that already
- 14 exist that we can try to capitalize and using
- 15 the nanomedicines or nanotechnology,
- 16 nanoparticle based technology, we should be
- 17 able to elevate the dose, limiting the
- 18 toxicity, and that should lead to an improved
- 19 response which in cancer then is tumor
- 20 regression with reduced side effects.
- Now in my mind's eye, there are
- 22 three legs to the stool that we need to be

- 1 considering when we develop a nanomedicine
- 2 and they need to be thought about in the very
- 3 early planning stages. Basically the first
- 4 thing we need to do is to create a structure,
- 5 a construct, that will avoid uptake by the
- 6 reticulum endothelial system, otherwise known
- 7 as the RES, primarily liver and spleen.
- 8 Secondly, there needs to be a
- 9 strategy to target the tumors and that not
- 10 only has to be a passive strategy but an
- 11 active strategy and the corollary to that, if
- 12 it's well constructed and well designed, that
- 13 should lead us to less severity or frequency
- of side effects compared to the unformulated
- 15 active pharmaceutical ingredient.
- 16 And thirdly, and just as equally
- 17 important in the designing and
- 18 conceptualization of a nanomedicine is that
- 19 the product needs to be manufactured to
- 20 defined specifications and those
- 21 specifications need to be robust and I mean
- 22 the design manufacturing needs to be robust

- 1 and what I mean by that in my mind's eye,
- 2 again, is it needs to be simple. It needs to
- 3 be reproducible and that again -- in other
- 4 words, we have to be able to characterize it
- 5 very well and reproducibly. And lastly, and
- 6 not of directly relevance to this committee,
- 7 but to anyone in the industry that's trying
- 8 to make a drug, it needs to be developed in a
- 9 manufacturing strategy that is in fact cost
- 10 effective.
- 11 So, let me run through this video.
- 12 Basically when we manufacture these
- 13 nanomedicines, we basically each particle has
- 14 to be constructed the same way so that when
- it's injected systemically into the body, the
- 16 particles need to be small enough to safely
- 17 traverse through the body again avoiding
- 18 immune detection, big enough so they don't
- 19 exit the circulation through healthy, normal
- 20 blood vessels, but then go to the tumor and
- 21 exit the circulation through the inherent
- 22 leakiness of the neovasculature that supports

- 1 every growing tumor. And by allowing this to
- 2 happen you would sequester more drug at the
- 3 site of disease.
- 4 Let me just -- this is the core of
- 5 what the promise of nanomedicine is about.
- 6 So again, let me just run through this one
- 7 more time. Again, the manufacturing process
- 8 has to ensure that we have -- each
- 9 nanoparticle is uniformly coated so that when
- 10 it's then rehydrated or put into the body.
- 11 It's masked from detection from the immune
- 12 system. It's small enough, again, to safely
- 13 go through the body not being picked up. So
- 14 we work with the NNI definition of about 100
- 15 nanometers, 1 to 100 nanometers in size, the
- 16 fenestrations, the holes of the gaps in the
- 17 neovasculature about 200 nanometers in size,
- 18 so the particles of anywhere from 50 to 100
- 19 nanometers, again, should exit the
- 20 circulation bringing more drug to the site of
- 21 disease.
- Let me share with you our blueprint

- 1 of our nanomedicine and this is simple,
- 2 again, the way I think I can share with you
- 3 the challenges that we thought of as we
- 4 designed this nanoparticle based
- 5 nanomedicine.
- 6 Firstly, the core of our
- 7 nanomedicine is a nanometer particle of gold
- 8 and on the surface of that gold particle we
- 9 bind two other molecules, polyethylene
- 10 glycol, to which a distal thiol group has
- 11 been added and TNF. And TNF serves two
- 12 purposes on this molecule: One is a
- 13 targeting molecule and one is a therapeutic
- 14 payload.
- The polyethylene glycol serves to
- 16 hydrate the nanoparticle and you can see that
- 17 this blue circle around the nanoparticle
- 18 essentially is a water shield. And what
- 19 we've learned is that prevents the
- 20 nanoparticle from being (off mike) or
- 21 recognized by the immune system allowing it
- 22 to traffic freely through the body.

- 1 So why gold in the first place?
- 2 Gold has been used since the 1930s to treat
- 3 rheumatoid arthritis. So we knew that
- 4 colloidal gold had a long history of safety
- 5 in medicine, so that seemed to be a good idea
- 6 to start with.
- 7 Also, it's been used in in vitro
- 8 diagnostics for years. And we knew that the
- 9 surface of gold binds protein very avidly and
- 10 the chemistry of that was through dative
- 11 covalent bonds and dative covalent bonds are
- 12 unique bonds that form between thiol groups
- 13 and gold Au Zero (Au-0). Also interestingly,
- 14 gold nanoparticles can be seen in
- 15 electromicroscopy and we'll use that benefit
- 16 later on.
- But so that we're all on the same
- 18 page, why did we choose Tumor Necrosis Factor
- 19 Alpha otherwise known as TNF? The promise of
- 20 nanomedicines as I see it is to take not only
- 21 molecules that are approved by the FDA and
- 22 improve their therapeutic index, but also to

- 1 take potentially molecules whose safety
- 2 profile has been unacceptable and to
- 3 repackage them onto a nano platform and
- 4 potentially capture the therapeutic potential
- 5 of many therapeutics that have not been
- 6 successful thus far. So this TNF is an
- 7 example of just such a molecule.
- 8 In 1975, it was discovered and it's
- 9 actually part of our own immune system and in
- 10 animals it was shown to have significant
- 11 anti-cancer activity. In 1985, Genentech
- 12 made the first recombinant form of TNF. And
- 13 then over the next decade more than 100
- 14 clinical trials tried to harness the
- 15 therapeutic potential of systemically
- 16 administering TNF.
- 17 The maximum dose given in a single
- 18 dose was 400 micrograms and at that dose, no
- 19 clinical benefit was seen. At doses of 1
- 20 milligram, patients with one dose experienced
- 21 severe hypertension which led to a
- 22 catastrophic series of organ failures,

- 1 otherwise known as complete organ failure.
- In 1992, two French surgical
- 3 oncologists recognized that they could limit
- 4 the biodistribution of TNF in patients who
- 5 have tumors on their arms or legs, basically
- 6 surgically isolating the major blood supply
- 7 to an effected limb, putting that blood
- 8 vessel on a heart-lung machine, and then
- 9 regionally profusing a high dose of TNF into
- 10 that limb, basically in this case, now today
- 11 it's being done. It's approved by the EMEA
- 12 in Europe and Boering-Ingelheim is the
- 13 supplier of that TNF.
- 14 If one milligram currently is being
- 15 used, then followed 30 minutes later by a
- 16 chemotherapy that's either doxorubicin or
- 17 melphalan, with one milligram and then what
- 18 you basically have to do is then allow either
- 19 through washing out or through just general
- 20 metabolism where the patients in the early
- 21 days were hooked up to the heart-lung machine
- 22 for actually 12 hours of the TNF degraded

- 1 over time, then reconnect the blood supply.
- 2 At that dose, the local response rates, the
- 3 published local response rates, ranged from
- 4 60 to 85 percent.
- 5 So what we learned from that
- 6 clinical experience is that if we can limit
- 7 the biodistribution of this potent cancer
- 8 therapy and combine it with another
- 9 chemotherapy, you'd have a very dramatic
- 10 response rate, and that is the promise of
- 11 nanomedicines.
- 12 So let me share with you a summary
- 13 of our preclinical data, again, to highlight
- 14 some of the issues that I think are germane
- 15 to any nanomedicine. First of all, the
- 16 PEG-Thiol binding to the surface of gold did
- 17 prevent the nanoparticle from being picked up
- 18 by the RES and I'm going to show you some
- 19 information on that in a minute.
- Secondly, 6091, we have shown,
- 21 delivers TNF to solid tumors through two
- 22 independent mechanisms -- passively, by

- 1 extravagating from the tumor neovasculature,
- 2 and actively, by binding to TNF receptors in
- 3 and around the solid tumor, and what we've
- 4 found is, that the binding of TNF is actually
- 5 independent of whether the cells, the cancer
- 6 cells themselves, have TNF receptors, because
- 7 it actually accumulates whether the cancer
- 8 cells in a xenograph model has receptors for
- 9 TNF or it doesn't. If it's a TNF sensitive
- 10 model, one -- just singly -- one injection of
- 11 6091 induces a potent anti-tumor response.
- 12 But in most circumstances, TNF receptors are
- 13 not present on cancer cells. So in a TNF
- 14 insensitive tumor, we've learned a very
- 15 interesting number of things. Number one, a
- 16 single treatment only induces a very
- 17 transient response and it's not a very strong
- 18 response at all, but interestingly, multiple
- 19 doses cause cytostasis where the tumor
- 20 remains about the same size and lastly, in
- 21 combination just like we saw in the isolated
- 22 limb profusion, the combination to a

- 1 chemotherapy, doxorubicin, for example, is
- 2 additive.
- 3 Here is a very early study that we
- 4 did and this shows you a couple of things.
- 5 This is the liver and spleen from a mouse on
- 6 our extreme right.
- 7 And that's a healthy, untreated
- 8 mouse. You see the color of the tissue is
- 9 still nice and pink, and the middle is our
- 10 first formulation. Basically, we just simply
- 11 coated TNF onto surface of gold, inject it
- into tumor bearing mice and what looked for
- 13 clinical signs of toxicity, there were none.
- 14 The mice look fine. The tumors didn't seem
- 15 to respond very much but then we opened up
- 16 the animals and lo and behold, the livers and
- 17 spleen were black. Why are they black?
- 18 They're black with aggregated particles of
- 19 gold. In other words, this drug was safe
- 20 because it trafficked almost exclusively to
- 21 the liver and spleen. It (off mike) to the
- 22 site of disease.

- 1 What you see on the extreme left
- 2 now is our current formulation and the color
- 3 of the tissue is much like it is in the
- 4 untreated animal. This was the effort of
- 5 approximately 200 or more different
- 6 formulations to get to this result. In other
- 7 words, trying to avoid immune detection is a
- 8 challenge and it's not necessarily easily
- 9 done. It took us lots and lots of trial and
- 10 error to find that.
- 11 Secondly, the question is, what
- 12 happens to the two part -- does the TNF and
- 13 the gold traffic together? As I shared with
- 14 you, TNF is a very toxic molecule, so we're
- 15 very concerned about whether the nanoparticle
- 16 construct actually stays together once it's
- 17 injected in vivo. In vitro studies only
- 18 share some insight into what's going on but
- 19 really the critical element is whether or not
- 20 these two elements stay together in vivo.
- 21 And what you're seeing here is a study that
- 22 was done in collaboration with the

- 1 Nanotechnology Characterization Laboratory,
- 2 part of the National Cancer Institute, in
- 3 which they use a rat model, a cannulated rat
- 4 model, and injected 6091 into the rat and
- 5 then samples were taken over time in the
- 6 upper panel. In the bottom panel is the
- 7 analysis of these data and let me direct your
- 8 attention to the lower line which is the
- 9 terminal half life.
- 10 The terminal half life of TNF just
- 11 like many other protein drugs, is very short,
- 12 to about 26 minutes. In contrast, the half
- 13 life of TNF when it's bound to the gold
- 14 nanoparticle is almost nine times -- eight
- 15 times longer. Interestingly, the half life
- of the gold and the TNF are similar in amount
- 17 of time. So what that suggests is that the
- 18 two components are trafficking together,
- 19 they're staying together in vivo, and this is
- 20 critical if we're going to think about safety
- 21 and biodistribution.
- The next question one would have to

- 1 ask and that was proposed again in Keith in
- 2 his -- where does this all go and how long
- 3 does it stay there? Okay, what happens to
- 4 it? And this is a study done by Dr. John
- 5 Bischof, another collaborator at the
- 6 University of Minnesota and what he did is
- 7 injected 6091 and looked at the concentration
- 8 of gold by ICPS atomic emissions spectroscopy
- 9 and in this case what he did is to follow the
- 10 gold in a number of different tissues over a
- 11 period of time. And again, looking at blood
- 12 in the red and then various tissues in the
- lung, liver, spleen, and a summary of these
- 14 data are here on the next slide, and as you
- 15 can see, over the course of 60 days, most of
- 16 the gold particles actually gets to the liver
- 17 and then it starts to decrease. In fact, if
- 18 we look at the total recovery, if we look at
- 19 the column on our extreme left, we see that
- 20 at the end of a 120 days, we can only recover
- 21 from these major -- these are the major
- 22 organs which we thought would take up the

- 1 gold nanoparticles, again, the liver and
- 2 spleen are the obvious candidates, kidney,
- 3 because if the size of the nanoparticle is
- 4 under 10 nanometers or 10 nanometers or
- 5 under, then it has the possibility of being
- 6 filtered out by the kidney.
- 7 Particles that exceed 10 nanometers
- 8 will be excluded from kidney filtration.
- 9 This is something that's also important as we
- 10 go forward in designing the nanoparticle.
- 11 So as you can see in the extreme
- 12 left hand column that after 120 days,
- 13 actually only 35 percent of all the gold that
- 14 was administered was actually recovered. We
- 15 believe that 63 percent was excreted. We
- 16 don't have evidence for that, but these are
- 17 the major organs that we would expect to see
- 18 gold, and as you can see, the kidney took up
- 19 very little, the spleen, somewhat more, but
- 20 the bulk goes into the liver.
- 21 Now last (off mike) question is
- 22 targeting what we talked about. Does a

- 1 nanoparticle actually get to the site of
- 2 tumor and what you're looking at here is an
- 3 electron micrograph of a split from an animal
- 4 that had a xeno-transplant, in other words,
- 5 it had a tumor injected on its belly, and we
- 6 looked at the spleen, the tumor, and the
- 7 liver, and what you're seeing is just one
- 8 micrograph. And the center, you can see it
- 9 where it says tumor, you can see a number of
- 10 black dots.
- 11 We know that gold nanoparticles are
- 12 electron dense. We believe that those black
- dots that were primarily present in the tumor
- 14 were in fact gold nanoparticles, but again,
- 15 proving this is somewhat more challenging.
- 16 And again, in collaboration with the
- 17 Nanotechnology Characterization Lab, we did
- 18 energy dispersive X-ray analysis of a single
- 19 micrograph, what you're looking at is a
- 20 single micrograph taken from a mouse that had
- 21 a tumor. Now, you have to do this -- this is
- 22 a little complex, so let me walk you through

- 1 this. This is a TEM of that, and you can
- 2 see, these are the black particles that were
- 3 focused on. You do it under scanning
- 4 electron microscopy and this is what we have
- 5 to look at. What the X-ray beam is actually
- 6 shining on is either this section of the SEM
- 7 compared to the background here and then
- 8 we're looking at the spectral analysis and
- 9 asking the question, does the spectrum, which
- 10 is a fingerprint of a particular element,
- 11 actually going to be gold. And what you see
- 12 here in this spectral analysis is that this
- 13 is in fact a gold nanoparticle, but this here
- 14 is not and so what we have here is
- 15 qualitative evidence now that those black
- 16 dots, by EDX are indeed nanoparticles of
- 17 gold.
- 18 Let me walk you through a little
- 19 bit, again, more of the pre-clinical data.
- 20 This is in a TNF sensitive model. A single
- 21 injection -- this is the promise of
- 22 nanomedicines. A single injection of TNF

- 1 alone, 15 micrograms, causes complete -- as
- 2 you can see in the open circles in the bottom
- 3 there -- complete suppression of the tumor
- 4 growth in this xeno-transplant. These are
- 5 MC-38, these are colon carcinoma cells that
- 6 have TNF receptors on them.
- 7 The problem here, with one
- 8 injection, 40 percent of the animals died. A
- 9 typical chemotherapy protocol requires at
- 10 least -- well, usually four to six
- 11 treatments, so clearly this is unsafe.
- 12 If you lower the dose only by half,
- 13 you have a much better survival profile, only
- 14 10 percent of the animals die, but again, as
- 15 represented by the triangles you see that you
- 16 get much less efficacy.
- 17 In contrast, in 6091 -- again,
- 18 represented here as the trade name Aurimune
- 19 -- 15 micrograms of Aurimune was 100 percent
- 20 safe, none of the animals died, and it had
- 21 exactly the same efficacy as native TNF. But
- 22 more interestingly, because of the targeting,

- 1 one half of the dose -- of course it's safe,
- 2 but it's equally effective.
- 3 So this again is the promise of
- 4 nanomedicines. Theoretically and
- 5 practically, we may be able to -- for very
- 6 toxic agents, we may be able to actually use
- 7 less of a dose and get a therapeutic
- 8 response.
- 9 Now let's turn our attention to a
- 10 TNF insensitive model. This is a model --
- 11 B16/F10 melanoma cells do not respond to TNF
- 12 in vitro. They simply do not have TNF
- 13 receptors on them. If you put these tumors
- 14 into mice, what they're going to do is
- they're going to grow and then we're going to
- 16 treat with a chemotherapy, doxorubicin, but a
- 17 suboptimal dose, a dose that we knew wouldn't
- 18 be terribly efficacious. Then we're going to
- 19 give 6091 multiple treatments and then we're
- 20 going to give a combination. The combination
- 21 is designed much like the isolated limb
- 22 protocol is to give 6091 first followed two

- 1 hours later by the doxorubicin and then we're
- 2 going to look at the response over time.
- 3 You can see in this figure here, is
- 4 that what you see is that doxorubicin at 50
- 5 micrograms doesn't slow down tumor growth and
- 6 in fact the animals had to be terminated
- 7 because of the size of the tumor. But
- 8 multiple injections of 6091 by itself
- 9 surprising to us actually caused cytostasis.
- 10 The tumor stopped growing for the
- 11 most part. And when we added doxorubicin, we
- 12 got somewhat of an additive effect.
- The question we asked ourselves,
- 14 why is this happening and in fact, similar to
- 15 the isolated limb perfusion, when we looked
- 16 -- this is the vascular bed of a B16/F10, the
- 17 slide on your right is the untreated animal
- 18 and you can see these holes -- this is a
- 19 cross section of a blood vessel, basically,
- 20 and surrounding it are the endothelial cells,
- 21 that's what you're seeing, and the
- 22 immunohistochemistry, the staining, the

- 1 endothelial cell supporting that blood
- 2 vessel.
- 3 In contrast, our slide on the left
- 4 is a completely disrupted vascular bed. In
- 5 fact, what has been shown and published with
- 6 the isolated limb profusion, pretreatment
- 7 with TNF causes vascular disruption of the
- 8 tumor allowing the subsequent chemotherapy to
- 9 penetrate more deeply to get to the site of
- 10 disease and this is exactly the same response
- 11 that we have now giving it a dose of 6091,
- 12 giving a sense of TMF systemically, we're
- 13 also getting vascular disruption.
- Now, one can argue, and this is,
- 15 again, the challenge in nanomedicine,
- 16 particularly as we rely on the vascular bed
- 17 as a way, a targeting site, to deliver these
- 18 nanosized materials. The question is, does
- 19 the xenographs, in these murine tumor models,
- 20 truly represent a vascular bed that's going
- 21 to happen in naturally occurring cancers?
- 22 And that is a topic of discussion.

- 1 But nonetheless, let's take a look
- 2 at -- we did have a chance back in '01 to
- 3 treat in a compassionate way -- to treat two
- 4 dogs, and we've treated a number of dogs
- 5 since then, but we treated two dogs -- these
- 6 are the first two dogs we treated with our
- 7 drug, with 6091, and we gave a dose that
- 8 exceeded the MTD for TNF alone in these tumor
- 9 burdened animals.
- 10 Elsa, the dog on our left, had a
- 11 soft tissue sarcoma about the size of a
- 12 cantaloupe that was impinging on major renal
- 13 artery and she was given about two weeks to
- 14 live because it was crushing that renal
- 15 artery. Callie, the dog on our right, had
- 16 transitional cell carcinoma of the bladder
- 17 and the tumor had migrated into her urethra
- 18 so she couldn't urinate, so clearly this dog
- 19 was in trouble as well.
- 20 The owner of both of these dogs is
- 21 a veterinarian and a Ph.D. and she asked us
- 22 to do this on a compassion use basis. We

- 1 obviously were quite reluctant to do this
- 2 initially, but she said that the dogs were
- 3 probably going to expire within two weeks and
- 4 maybe we could learn something, and we
- 5 learned an incredible amount.
- 6 What we learned is -- we gave four
- 7 times a dose that had ever been given to a
- 8 dog before. And interestingly, the tumors
- 9 were still present. We could see that on
- 10 sonography but Elsa actually lived for six
- 11 months. Eventually the tumor crushed her
- 12 renal artery and she did expire, whereas
- 13 Callie was able to urinate freely 24 hours
- 14 after treatment, was able to urinate freely
- 15 for the rest of her life, lived for a year,
- 16 and ultimately died of cardiovascular
- 17 disease.
- 18 What did we learn from the very
- 19 first injection? From the very first
- 20 injection you should know the biologic
- 21 response of TNF -- one of the biologic
- 22 responses of TNF is to cause you to have

- 1 fever. It's a pyrogen. It causes us to have
- 2 fever. And sure enough, Elsa, our first
- 3 treatment, we monitor the TNF levels by
- 4 taking blood samples periodically, but we
- 5 also monitored basal body temperature, and
- 6 you can see, she developed a very robust
- 7 fever for a dog. Basal body temperature in a
- 8 dog in Fahrenheit is about 101 degrees
- 9 Fahrenheit. The dog got to -- the maximum
- 10 fever was about 104 degrees Fahrenheit.
- 11 And this resolved itself over about
- 12 six to eight hours. But fever is a clinical
- 13 response that we can manage, and in a dog,
- 14 subsequent doses, we pretreated with
- 15 Ketoprofen so we basically eliminated the
- 16 fever response. But the bigger problem for
- 17 us was hypotension because I already shared
- 18 with you, hypotension leads to renal failure,
- 19 organ failure, complete organ failure, and
- 20 this is not good.
- 21 So one of the things we did is to
- 22 -- we had a blood pressure cuff at the same

- 1 time that we were measuring basal body
- 2 temperature, and as you can see, blood
- 3 pressure never dipped below 80 mm of mercury,
- 4 so basically she did not experience
- 5 hypotension, so we were able to separate the
- 6 clinically manageable side effect of fever
- 7 from the clinically -- the harbinger of bad
- 8 things (off mike) hypotension. And again,
- 9 this is again the promise of nanomedicine.
- 10 Another question we had -- this is
- 11 a completely different dog with bladder
- 12 cancer that we treated, and as you can see on
- the sonogram on our right that this ring of
- 14 tissue where the black arrow is pointing,
- 15 what you're looking at is the lumen of the
- 16 kidney, is the black center there, and the
- 17 ring of tissue is a combination of
- 18 inflammatory tissue and cancerous tissue.
- 19 And this dog was incontinent and after six
- 20 treatments, over a period of about five
- 21 months, you can see that the bladder resolved
- 22 itself and this dog also lived for about a

- 1 year not dying of bladder cancer.
- 2 So if you're going -- and I might
- 3 mention at this point, Boehringer Ingelheim
- 4 Vetmedica is actually taking this drug and is
- 5 going to be manufacturing it for use in
- 6 veterinary oncology to treat dogs. And
- 7 CytImmune is going forward using this in
- 8 clinical oncology.
- 9 But we all say we need to go from
- 10 the bench to the bedside. To go from the
- 11 bench to the bedside, you've got to climb
- 12 this mountain that's called manufacturing and
- 13 manufacturing in our world of nanomedicines,
- 14 is not simple because it is a complex
- 15 product. And in our case, we not only have
- 16 to use standard techniques to evaluate the
- 17 purity and quality of our drug, but we have
- 18 to use special techniques and each nano
- 19 construct is going to require somewhat
- 20 different techniques to analyze what they're
- 21 doing.
- In our case, we need to understand

- 1 the amount of gold because the ratio of gold
- 2 to PEG- Thiol and TNF is absolutely critical
- 3 to ensure that we have a properly
- 4 manufactured product. We need to evaluate
- 5 the active pharmaceutical ingredient, in this
- 6 case TNF and how are we going to do that.
- 7 Thirdly, we need to make sure that
- 8 we understand our immune avoiding molecule,
- 9 in this case, we use polyethylene glycol, and
- 10 what's happening with that, does it stay
- 11 associated with the nanoparticle?
- 12 And lastly, we also have to
- 13 understand the surface charge of our result
- 14 and product because basically this is
- 15 important on a toxicity issue. For those of
- 16 you not familiar, basically, surface charges
- 17 of negative charge tend to be toxic, whereas
- 18 neutral or negatively charged particles are
- 19 safer if not safe.
- 20 So although the ideal way to
- 21 characterize a nanoparticle of gold is
- 22 electron microscopy, that doesn't lend itself

- 1 to manufacturing very easily so we had to
- 2 find ways to correlate an accepted procedure
- 3 with those that would be applicable to the
- 4 manufacturing process. Believe it or not,
- 5 the simplest manufacturing process to
- 6 evaluate gold is simple UV absorption,
- 7 spectroscopy. Also, to evaluate size, and
- 8 size does matter as I shared with you. Size
- 9 does matter. We use differential
- 10 sedimentation by centrifugation otherwise
- 11 known as discentrifugation as a way of
- 12 separating and qualifying the size of the
- 13 nanoparticles and the distribution of the
- 14 nanoparticles. How wide is your distribution
- of particles that you make? Is it very
- 16 narrow? Is it very large? And what is the
- 17 tolerance there? You're going to have to
- 18 define those.
- 19 And lastly, you'll have to find
- 20 quantitatively how much gold we started with
- 21 and how much gold we ended with in the
- 22 process because we have to know exactly what

- 1 we do in the process.
- 2 The TNF analysis is also
- 3 interesting. Now, because our nanoparticle
- 4 -- if we go back, if you remember, the
- 5 initial formulation, that initial construct
- 6 of that blueprint that I showed you way at
- 7 the beginning of my presentation, the
- 8 nanoparticles of gold give us a unique
- 9 opportunity which again may or may not be
- 10 applicable to all nano constructs.
- We can actually, because the gold
- 12 has a significant weight, we can centrifuge
- 13 the result when we re-suspend the final drug
- 14 product, we can centrifuge the drug and the
- 15 TNF should actually stay -- if it's going to
- 16 be bound to the gold, it should be
- 17 precipitatable and we can measure what's in
- 18 the supernatant, and we call that what is
- 19 free or unbound.
- 20 So we can measure, because the TNF
- 21 is on the surface of the gold, we (off mike)
- 22 we can quantitatively measure the TNF on the

- 1 surface of this nanoparticle.
- 2 I didn't share with you that we
- 3 also know from in vitro analysis, that every
- 4 molecule of TNF retains its biological
- 5 activity and basically that we can also use
- 6 that to define our final drug product and
- 7 define the potency.
- 8 Also what I didn't share with you
- 9 is that not only can we construct the
- 10 nanoparticle using this data covalent bond,
- 11 but we can actually strip off each of the
- 12 components, the PEG-Thiol and the TNF using a
- 13 strong reducing agent, dithiothreitol.
- 14 Dithiothreitol doesn't exist in nature, so it
- doesn't necessarily, as I showed you in the
- 16 earlier studies, doesn't fall apart in vivo.
- 17 But we can use that DTT,
- 18 dithiothreitol, to strip off the TNF and then
- 19 analyze it for purity by high performance
- 20 liquid chromatography. Finally as I shared
- 21 with you, we can evaluate and define the
- 22 potency of our drug using a bioassay to

- 1 measure the final drug product in its intact
- 2 form. We do not have to break it apart to
- 3 evaluate how much active pharmaceutical
- 4 ingredient is in the final drug product.
- 5 This may be different -- I hate to use the
- 6 word unique -- but it may be different than
- 7 other nano constructs where you package that
- 8 API inside the nanoparticle and that makes
- 9 analysis like this somewhat -- much more
- 10 difficult.
- 11 Lastly, we by -- again, we can
- 12 determine how much of our immune avoiding
- 13 molecule, in this case, PEG, polyethylene
- 14 glycol, is actually bound to the nano
- 15 construct versus how much is unbound, and
- 16 again we use the ability of the
- 17 centrifugation to measure total PEG in the
- 18 construct and then when we precipitate the
- 19 gold particles, we measure that and then
- 20 strip it off with DTT, we know exactly what's
- 21 bound, so we know the relative ratios. And
- 22 lastly, we can measure surface charge by zeta

- 1 potential.
- 2 So let me just share with you how
- 3 do we make gold. And again, this is, again,
- 4 what I like about what we do is we've sort of
- 5 taken the history of science and we've
- 6 brought it back to a new and -- new
- 7 therapeutic.
- 8 This chemical strategy of making
- 9 gold nanoparticles dates back -- actually,
- 10 the first publication of this is by Michael
- 11 Faraday in 1857, and this chemistry dates
- 12 from that time and the equipment almost dates
- 13 from that time. As you can see, what you're
- 14 seeing there is a reflux apparatus and the
- 15 resultant particles are actually
- 16 nanoparticles of gold as you'd see them under
- 17 their monodisbursed nanoparticles with gold
- 18 nanoparticles.
- 19 What I'm showing you now is
- 20 actually how to make a gold nanoparticle.
- 21 Basically what we need to do is -- basically
- 22 what we're doing is boiling water, adding

- 1 gold chloride, and then you're going to add
- 2 sodium citrate. Three reactions will take
- 3 place very quickly. The solution will turn
- 4 clear as the particles become -- nucleates.
- 5 Then it will turn black as they aggregate,
- 6 and then turn red as the excess gold layers
- 7 on. In real time, that is actually 27
- 8 nanometer particles of gold.
- 9 And you can see the distribution of
- 10 that is very reproducible. Eighty-five
- 11 percent of the particles, basically, are in
- 12 size between 15 and 35 nanometers.
- We now make this at a larger scale,
- 14 150 liters of gold, and you can see this is
- 15 the procedure here and now how do we make the
- 16 actual nano construct. How do we ensure that
- 17 every nanoparticle of gold is uniformly
- 18 coated? In this video, a bench scale, we
- 19 take two reservoirs and are drawn by a single
- 20 peristaltic pump into a T-connector. That
- 21 T-connector is actually where the gold
- 22 nanoparticles meet the solution of TNF and

- 1 PEG- Thiol and that's the formation of your
- 2 colloidal gold based product, 6091. That
- 3 simple.
- 4 And again, this is on a larger
- 5 scale now. You can see the Y-connector in
- 6 the middle and that's where the drug is
- 7 actually made. The bind TNF and PEG-Thiol
- 8 bind virtually instantaneously to the gold
- 9 nanoparticles.
- 10 The lyophilized product is then
- 11 ready for clinical study and in fact this is
- 12 a study that we did at the National Cancer
- 13 Institute, and I'll go through this rather
- 14 quickly because time is running out, and
- 15 basically these are patients with advanced --
- 16 we did a phase I clinical trial in advanced
- 17 stage cancer (off mike) patients. Each
- 18 patient received only two doses and there
- 19 were three patients per group. And we
- 20 primarily wanted to establish an MTD, and
- 21 then we also want to see if the tumors
- 22 actually traffic to the site of -- that the

- 1 gold particles traffic to the site of the
- 2 tumor. Sorry.
- 3 The trial is now complete and we've
- 4 seen that it is well tolerated. Our target
- 5 dose was 1mg, we've now exceeded 1mg and
- 6 we've actually given patients 1.2mg of TNF
- 7 with no clinical -- a significant dose (off
- 8 mike) hypotension, and so no serious adverse
- 9 events that were unexpected or related to
- 10 treatment. And we did see gold nanoparticles
- 11 in the site of tumors.
- This is the number of patients.
- 13 You can see the different histologies and we
- 14 (off mike) as per the protocol from a very
- 15 low dose, and the red 200 is the previous
- 16 maximum tolerated dose of TNF alone and we
- 17 exceeded that in green, up to 600 micrograms
- 18 per meter squared, which is about 1.2mg per
- 19 dose.
- 20 This is the first patient, first
- 21 response in patient 01 the lowest dose, this
- 22 patient developed a similar, just like the

- 1 dog, a very robust fever that was completely
- 2 abrogated in the second treatment by
- 3 pretreatment with acetaminophen and
- 4 endamephosine. Everybody was then pretreated
- 5 like that, and again, looking at hypotension
- 6 in the whole of patients, none of the
- 7 patients developed clinically significant
- 8 hypotension again, systolic blood pressure
- 9 never dipped below 80mm of mercury.
- 10 The pharmacokinetics, again, very
- 11 interesting. (off mike) just to show you
- 12 that the half life and that the analysis here
- 13 compared to historical data. Interestingly
- 14 enough, the half life of TNF historically,
- 15 native TNF, is about 27 minutes which is
- 16 similar to what we saw in the rat which was
- 17 26 minutes and if you look at our drug, the
- 18 6091, the half life on average was about 191
- 19 minutes which was similar to that which we
- 20 saw in the rat.
- 21 Again, the most significant thing,
- 22 again, the promise of nanomedicines, is that

- 1 the exposure -- the exposure, which is
- 2 represented by area under the curve at
- 3 600mg/m2 is some 30 times higher -- 30 times
- 4 higher -- that that which was achieved with
- 5 TNF alone with no significant toxicity.
- 6 And again, this is a patient with
- 7 inoperable breast cancer. As you can see on
- 8 the tumor, the nanoparticles traffic to the
- 9 site of disease but not to the healthy breast
- 10 tissue.
- 11 Again, we're making -- not only are
- 12 we going to make this nano construct, but
- we're also making a combination nano
- 14 construct of an analog of taxol and TNF bound
- 15 to the same nanoparticle of PEG-olated gold
- 16 and we believe that this is, again, an
- 17 opportunity.
- 18 So let me lastly thank all the
- 19 people, these are the folks in our
- 20 laboratory, and Dr. Steven Libutti from the
- 21 NCI, and our medical staff, Dr. Gannon, Dr.
- 22 Price, and our statistician Ena Bromley.

- 1 So let me leave in closing then,
- 2 what is the ideal nanomedicine? The ideal
- 3 nanomedicine conceptually needs to avoid
- 4 uptake by the reticular endothelial system,
- 5 you need to come up with an idea how to do
- 6 that. It should target the tumor in two
- 7 independent ways -- passively and actively --
- 8 by binding to some receptors. And again,
- 9 equally as important, it has to be
- 10 manufactured to defined specifications.
- 11 Thank you for your attention.
- 12 MR. MORRIS: Thanks, Dr. Tamarkin.
- 13 That's very interesting. Does anybody have
- 14 clarifying questions? I actually have one,
- but are there any questions before we go to
- 16 break?
- MS. ROBINSON: Yes, this is Anne
- 18 Robinson speaking. I was just curious, in
- 19 the clinical trials that you showed, did you
- 20 look at (off mike) targeting of the colloidal
- 21 gold? Did it go anywhere else? Liver?
- 22 Spleen?

- DR. TAMARKIN: We looked at -- yes,
- 2 we did look -- we didn't look at liver -- I
- 3 mean, these are patients, so you're doing
- 4 core biopsies. A significant number of these
- 5 patients were very ill, so a lot of the core
- 6 biopsies are actually done of the liver. So
- 7 we did a lot of liver biopsies and in fact
- 8 you do find -- now, just you need to know,
- 9 that the samples were taken 24 hours after
- 10 administration, obviously, again, for
- 11 logistical purposes. And so we do see the
- 12 nanoparticles in the liver.
- In most of the patients there were
- 14 more nanoparticles quantitatively, just
- 15 counting dots, quantitatively in the tumor,
- 16 even in the liver, than there was in adjacent
- 17 healthy liver tissue.
- 18 MS. TOPP: Hi, this is Elizabeth
- 19 Topp speaking. I have two questions for the
- 20 speaker. The first one is a kind of general
- 21 one because I want to make sure I understand
- 22 your data. So you show a particle size

- 1 distribution. This is the particle size of
- 2 the gold core or the hydrated particles?
- 3 DR. TAMARKIN: This is the particle
- 4 size of the gold core.
- 5 MS. TOPP: Okay, do you have an
- 6 idea of the effective particle size of the
- 7 hydrated particles that are actually
- 8 administered?
- 9 DR. TAMARKIN: That's a very good
- 10 question. Thank you for asking. I think you
- 11 raise a very critical point because what is
- 12 the apparent size versus the actual size, and
- 13 the apparent size, using DSL as a way of
- 14 doing that, is 70 nanometers.
- So, I think what we're saying here
- 16 is that you need to pay attention to the
- 17 fenestration sizes that you're thinking
- 18 about. If they're between 200 and 400, a
- 19 particle that's 100 or more that may double
- 20 in size by its height by, let's say, it's
- 21 immune shielding, that could be -- it may not
- 22 end up trafficking to the site of tumor.

- 1 MS. TOPP: Or may traffic
- 2 differently.
- 3 DR. TAMARKIN: It may traffic
- 4 differently.
- 5 MS. TOPP: I have one more
- 6 question.
- 7 DR. TAMARKIN: Sure, please.
- 8 MS. TOPP: I'm quite interested in
- 9 your immobilized TNF on these particles which
- is essentially what you're doing, you're
- 11 binding these to the gold nanoparticles --
- DR. TAMARKIN: That is correct.
- MS. TOPP: -- and you mentioned
- 14 that you assay for stability of the TNF by
- 15 HPLC?
- DR. TAMARKIN: Well, we strip it
- 17 off.
- 18 MS. TOPP: Right. Do you have any
- 19 more high resolution types of assays? So do
- 20 you do any, for example, triptych mapping?
- 21 So HPLC may not be able to tell you about
- 22 local sites of changes, so oxidation at

- 1 particular groups, for example, or specific
- 2 amino acid changes, so have you kind of fine
- 3 tuned the assays to have that higher focus or
- 4 not so much so?
- DR. TAMARKIN: No. First of all,
- 6 you need to know that the API is actually
- 7 unmodified from the material that is approved
- 8 in Europe for this isolated lymph profusion.
- 9 It's prepared by Boehringer Ingelheim. It
- 10 binds to the surface of the gold because we
- 11 were taking advantage of this available
- 12 Sistine binding. And it maintains its shape
- 13 and it maintains its bioactivity on a
- 14 quantitative basis. I mean, it's a good
- 15 question, but again, there is -- from the
- 16 data that we have, there's nothing to believe
- 17 that anything has radically changed in either
- 18 the shape or the metabolism of the drug.
- MS. TOPP: Thank you.
- 20 MR. MORRIS: Are there any other
- 21 questions? If not, we'll take a short 15
- 22 minute break and again, panel members,

- 1 please, there should be no discussion of the
- 2 issue at hand during the break amongst
- 3 yourselves or with any member of the audience
- 4 and we'll resume at 10:25. Thank you.
- 5 (Recess)
- 6 MR. MORRIS: If we could resume our
- 7 seats and get going with the next session of
- 8 the meeting.
- 9 So our next speaker is Stephen
- 10 Ruddy from Elan NanoSystems. He's the senior
- 11 director of Pharmaceutical Development and we
- 12 have his talk. Here we go. He'll be
- 13 speaking on Leveraging Rapid Dissolution to
- 14 Improve Performance of Poorly Water- Soluble
- 15 Drugs.
- MR. RUDDY: Good morning, everyone.
- 17 It's a pleasure to participate in this event
- 18 this morning. I think the technology
- 19 involving nanomedicines is very significant
- in today's world.
- 21 The science underpinning a lot of
- 22 technologies is very fascinating and a lot of

- 1 the benefits, truly compelling.
- I was very pleased that Dr. Webber,
- 3 in one of his earlier slides, showed the
- 4 spectrum of nanotechnologies currently in
- 5 research and development because it helps me
- 6 to start off with the basic point, that we
- 7 have a very broad spectrum of technologies in
- 8 nanomedicine ranging on one end of the
- 9 spectrum from technologies that involve
- 10 highly complex structural particles. In many
- 11 cases these particles are truly insoluble,
- 12 and in many cases these particles have
- 13 multi-functionality such as passive or active
- 14 drug targeting and the ability to actually
- 15 penetrate into the cell body itself.
- On the other end of the spectrum,
- 17 we have technologies that are comparatively
- 18 simplistic in their design and functionality
- 19 and these are the particle systems I'd like
- 20 to describe today.
- 21 We talk about these particles as
- 22 being poorly water-soluble, but in reality

- 1 they actually are soluble particles if we
- 2 consider a larger volume of aqueous medium.
- 3 From a formulator's perspective, they're
- 4 considered poorly water soluble.
- 5 So I thought I'd begin with a
- 6 definition of the types of systems that I
- 7 wish to address this morning and I'll refer
- 8 to these as engineered drug particles,
- 9 engineered particles, or just nanoparticles,
- 10 for brevity. But in essence, these are
- 11 nano-scale particles of API characterized by
- 12 extremely high surface are to mass ratios and
- 13 these systems have extremely high surface
- 14 re-energy and to prevent them from
- 15 agglomerating, they must be stabilized by
- 16 surface modifiers.
- 17 In addition, these materials are
- 18 not naturally occurring, they're produced by
- 19 two fundamentally basic processes, one,
- 20 through molecular deposition or complexation,
- 21 which we call a "bottom up" approach to (off
- 22 mike) the particles. The other approach,

- 1 through attrition of larger non- nano-scale
- 2 material, sometimes micronized materials,
- 3 sometimes much larger than that, which we
- 4 refer to as a "top down" approach and in
- 5 general, the size range for these
- 6 applications is in the order of slightly less
- 7 than 100 nanometers up to about a micron in
- 8 mean particle size for many pharmaceutical
- 9 applications.
- 10 Now for many of these technologies,
- 11 the manufacturing process itself has the drug
- 12 particle suspended in an aqueous environment.
- 13 In the case where that is not true, we may
- 14 have a final pharmaceutical product that is a
- 15 aqueous nano- suspension and if that isn't
- 16 the case, we certainly have ultimately
- 17 contact with aqueous fluids in the body when
- 18 the nanoparticles are ultimately delivered to
- 19 humans.
- 20 And this schematic basically shows
- 21 what these particulate systems look like. We
- 22 have a drug particle and they're not really

- 1 cubic, but for the purpose of illustration it
- 2 makes it easier, and these particles, again,
- 3 have a very high surface re-energy owing to
- 4 their large surface area. As a consequence
- 5 of Van der Waals attractive forces that seek
- 6 to reduce the free energy of the system and
- 7 pull these articles together, we must
- 8 stabilize them by opposing forces.
- 9 Typically this is done through a primary
- 10 stabilizer which sometimes is polymeric, but
- 11 acts to sterically stabilize the particles
- 12 against agglomeration, and optionally, we can
- 13 employ a charged stabilizer, frequently a
- 14 surfactant, that imparts a net charge to the
- 15 particle and through electro-static forces,
- 16 helps to stabilize the particles against
- 17 agglomeration.
- 18 The stabilizers themselves are not
- 19 firmly bound but are absorbed onto the
- 20 surface of the particles.
- Now in a presentation like this, I
- 22 hate to jump into math. I promise this is

- 1 the only slide like this and I'll try to make
- 2 it as exciting as possible, but it is a very
- 3 important slide nonetheless.
- 4 The rationale for engineered
- 5 nanoparticles of this type in drug delivery
- 6 is based upon the fact that drugs that have
- 7 very poor solubility, also tend to have
- 8 characteristically slow rates of dissolution
- 9 and the only way that we can readily
- 10 counteract that is to dramatically change the
- 11 exposed surface area of the drug particles.
- Now if you look at the schematic to
- 13 the right, we see the surface of an
- 14 undissolved particle suspended in a bulk
- 15 aqueous environment and we see that the
- 16 concentration of the dissolved drug, C-S, is
- 17 highest at the interface of the solution and
- 18 the particle and that that concentration
- 19 decreases at some distance from the particle
- 20 surface which we call the aqueous diffusion
- 21 layer. It's also represented by the term "H"
- in equation 1, the Noyes-Whitney equation.

- 1 And the difference between the saturation
- 2 solubility of the drug at the surface and the
- 3 concentration in bulk is the thermodemic
- 4 driving force for the solution process which
- 5 we also express as C-S.
- 6 If we include the diffusion
- 7 coefficient for dissolved solute, the exposed
- 8 surface area, S, of the drug and V, the
- 9 volume available for dissolution, we have an
- 10 expression for the dissolution rate dC/dt,
- 11 which again, is familiar to many as the
- 12 Noyes-Whitney equation.
- 13 And we can simplify this in
- 14 equation 2 by making the basic assumption
- 15 that we have a synch, that is that the
- 16 concentration at saturation is much, much
- 17 higher than the concentration in the
- 18 surrounding bulk and so we collapse to
- 19 equation 2. We can further simplify this
- 20 term by combining the diffusion coefficient,
- 21 the volume term the aqueous diffusion term,
- 22 and the concentration term, into an effective