

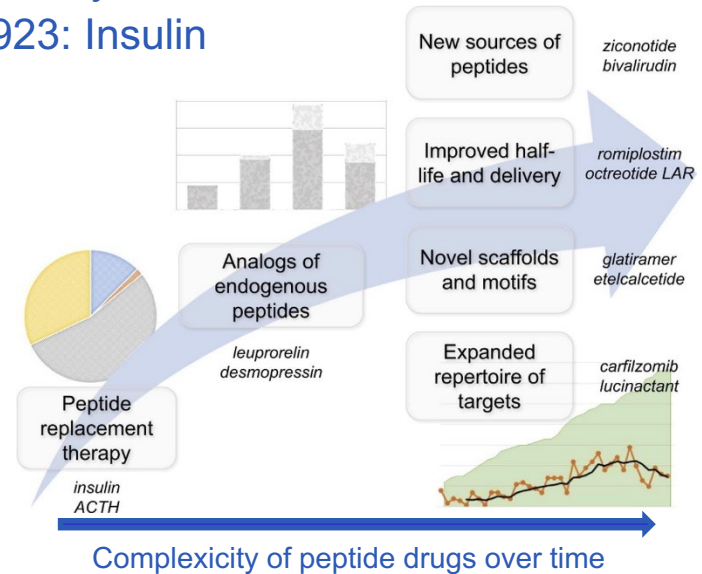


Peptides aren't neither proteins or small molecules...

Anna Laurén, on behalf of the EBF

Peptides drug are not new – but gains increasing interest

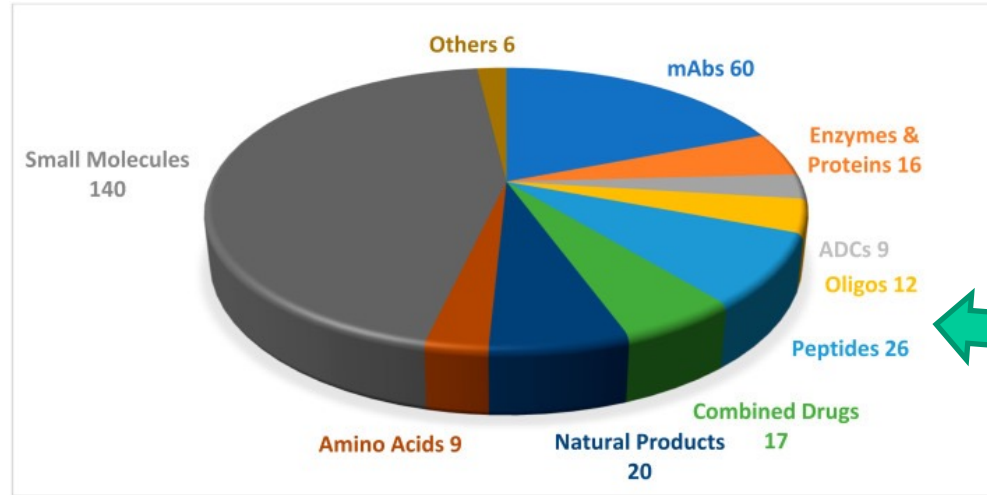
- The number of clinical trial applications and marketing authorization applications for synthetic peptides significantly increased over the last few years.
 - First commercially available peptide drug was in 1923: Insulin
 - Including high focus on Biosimilar/Generics/ANDA
- Traditionally classified as:
 - Native and natural peptides
 - Analog
 - Heterologous
- Can be manufactured:
 - Synthetic
 - Recombinant
 - Component derived from blood and tissue



TIDES: Peptides, Oligonucleotides and ADCs whose structures contain peptides.

- Oligonucleotides and peptides (TIDES) are considered chemical entities, but occupy a delimited chemical space between biologics and small molecules.

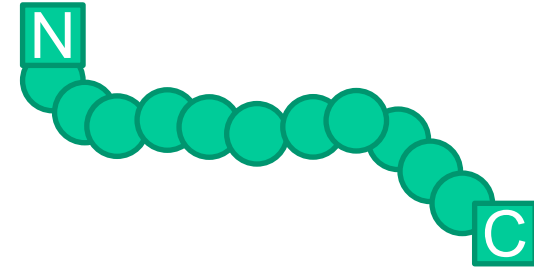
FDA Approved drugs between 2016 and 2022



Peptides vs proteins: The simple way

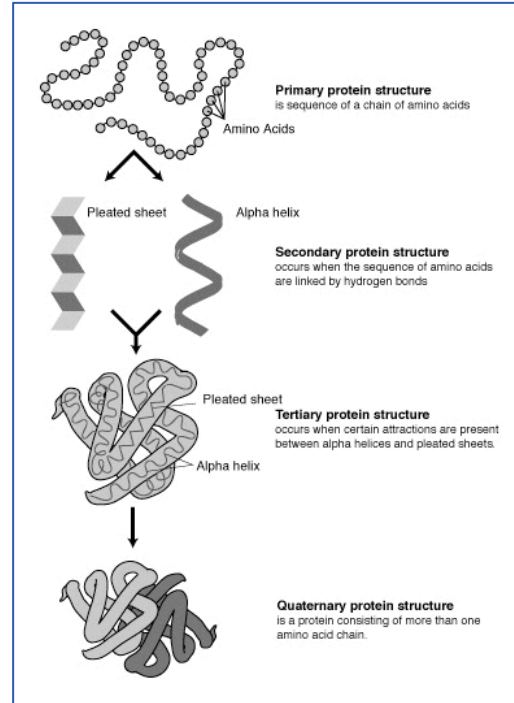
Peptides

A linear chain of amino-acids



Building blocks for peptides and proteins are the same:

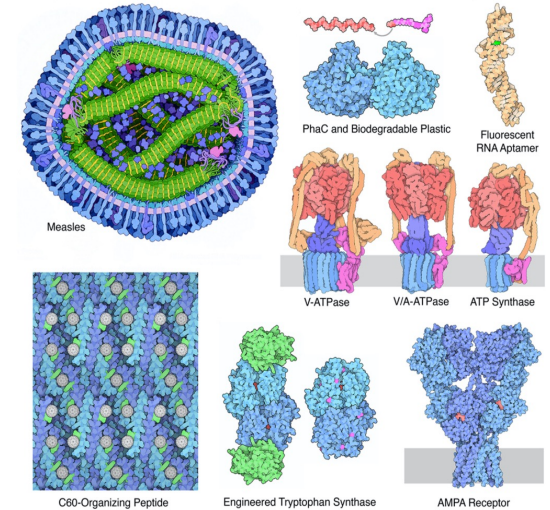
- Combination from 20 amino-acids
- N-terminus with a free amino group
- C-terminus with a free carboxyl group



[Protein structure prediction - Wikipedia](#)

Proteins

Complex multi-dimensional structures of amino-acids



Protein Data Bank (PDB): Insights from 20 years of the Molecule of the Month. *Biochem Molecular Bio Educ*, 2020

The issue with peptides– increase drugability

- Problem 1: The short half-life
- Problem 2: Oral bioavailability
- Problem 3: CYP inhibition and drug-drug interactions (DDIs).
- Problem 4: Side effects caused by off-target binding.
- Need to increase drugability:
 - Improve half-life.
 - Improve stability under physiological conditions.
 - Improve receptor and target selectivity.
 - Improve bioavailability.

Natural peptides are less drugable due to:

Peptidases

Digestive cleavage

DDI

Off target binding

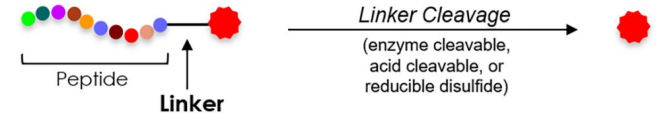
Utilisation of peptides to increase drugability

Peptide is the drug

- Increase half-life and bioavailability
- Conjugated and optimised peptides
 - Pegylation of various size and linkers
 - Fc-immunoglobulin
 - Fatty acids of various size and linkers
 - Alternative aminoacid positions
 - Chimeric peptides or cyclic peptides
 - Un-natural aminoacids

Peptide–drug conjugates

- Tumor targeting peptides (TTPs):
 - Treatment
 - Diagnosis: PET/CT and PET imaging
- Linkers: Succinic acid; Disulfide; Amide; NOTA; PEG; NODAGA



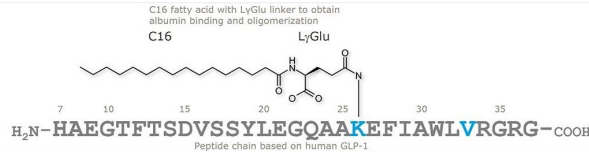
Peptide-Drug Conjugate (PDC)

Drug

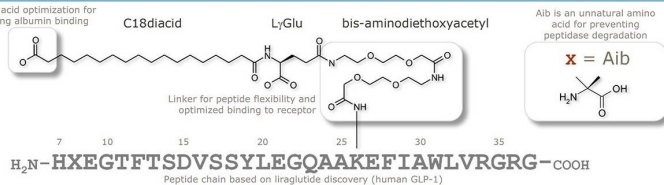
- enhanced efficacy
- higher circulation time
- lower off-target toxicity

Picture from: *Peptide–Drug Conjugates with Different Linkers for Cancer Therapy*. *J. Med. Chem.* 2021

Liraglutide
Daily s.c. injection



Semaglutide
Weekly s.c. injection
Or in combination with carrier: daily oral tablets.



Picture from: *The Discovery and Development of Liraglutide and Semaglutide*. *Front Endocrinol* 2019.

Different stakeholders may have different views on guidelines based on experience – FDA as an example

The offices

- CDER: Center for Drug Evaluation and Research
 - Over-the-counter and prescription therapeutic drugs
 - “Biological therapeutics”: monoclonal antibodies, growth factors, fusion proteins, cytokines, enzymes, therapeutic toxins
 - Generic drugs
- CBER: Center for Biologics Evaluation and Research
 - Allergens
 - Blood and blood components including clotting factors
 - Cellular and gene therapies
 - Vaccines

Regulations for filing and license

- New drug application (NDA) drug approval under the Federal Food, Drug, and Cosmetic (FD&C) Act.
- Biologics license application (BLA) required for biological products under the Public Health Service (PHS) Act.

Peptides which regulation?

- Food, Drug, and Cosmetic Act (FD&C Act)?
- Public Health Service (PHS) Act?

Confused on difference between peptide and protein?

- **A peptide is regulated as a drug under the Federal Food, Drug, and Cosmetic Act (FD&C Act) Act and as NCE**
 - High focus due to “biosimilars”/“generic drug”: depends largely on its impurity profile as compared to the impurity profile for the peptide of rDNA origin.
- March 2020: Biologicals licensed under the Federal Food, Drug, and Cosmetic Act (FD&C Act/NCE changed to license the Public Health Service Act (PHS Act)/BLA.
- Updated definitions:
 - Biological Product – “...a virus, therapeutic serum, toxin, antitoxin, vaccine, blood, blood component or derivative, allergenic product, protein (***except any chemically synthesized polypeptide***).
- Changes from NCE to BLA included:
 - Peptides produced by recombinant DNA technology: insulin analogues (51 AA) and lixisenatide (44 AA, a GLP-1 analogue)
 - Proteins/hormones/enzymes: aprotinin; chorionic gonadotropin; follitropin alfa: follitropin beta; hyaluronidase; pancrelipase; pegvisomant; somatropin.

What is a peptide? EMA and FDA considerations focus mainly on manufacturing and pricing

FDA

- New definitions due to the changes between “FD&C Act/NCE” & “PHS Act/BLA”:
- Protein – “any alpha amino acid polymer with a specific defined sequence that is greater than 40 amino acids in size....”
- Chemically Synthesized Polypeptide – “...the term chemically synthesized polypeptide mean any alpha amino acid polymer that:
 - is made entirely by chemical synthesis
 - is greater than 40 amino acids but less than 100 amino acids in size.
- Peptide – “...a polymer composed of 40 or fewer amino acids...”

*Federal Food, Drug, and Cosmetic Act (FD&C) Act.
Biologics license application (BLA) required for biological products under the Public Health Service (PHS) Act.*

EMA

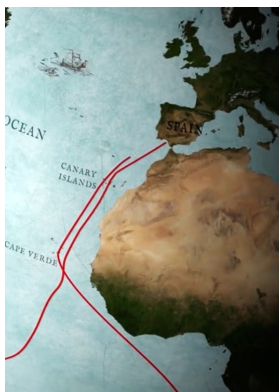
- Synthetic peptides and proteins with defined sequences, recombinant proteins and highly purified proteins extracted from biological matrices can be described as protein substances.
- Concept paper for need to establish new guidelines for development and manufacturing (2022).

*EMA Article 57(2), second subparagraph of Regulation (EC) No. 726/2004.
EMA: Concept Paper on the Establishment of a Guideline on the Development and Manufacture of Synthetic Peptides. June 2022.*

When does size matter for the Bioanalytical scientist?

- Regulatory tracks for filing is different depending on peptide manufacturing, size, impurities.
- But what about the Bioanalytical Scientists?
 - Does size matter?
 - Agonistic or antagonistic drugs?
 - Endogenous compounds?
 - Peptide–drug conjugates
 - Linkers/Conjugates
 - Metabolites?
 - Impurities?

Endogenous Molecules and ICH M10 Chapter 7



Workshop
Towards harmonised
implementation of the
ICH M10 Guideline

<< [Chapter 7, Chrom&LBA](#) >>

Anna Laurón, Iain Love,
Amanda Wilson, Stuart McDougall, Robert
Nelson, Roland Staack, and Michaela Golob
on behalf of the EBF

15 November 2022, Barcelona

- Only relevant for therapeutics drugs that are **identical to endogenous**.
- **Biomarkers are out of scope of ICH M10.**
- Chapter 7 is new but drugs identical to endogenous is not.
- Replacement therapy has been used since last century.
 - Insulin for Type 1 diabetes – First treatment in 1922 and Nobel price in 1923, first fully human recombinant in 1978.
 - Hormone replacement therapy (HRT) started in the 1960s – estrogen for menopause, osteoporosis, cardiovascular events.
- Modern drugs are often slightly modified versions of endogenous compounds and thus specific bioanalysis is possible: chapter 3 or chapter 4 .

EBF proposal for implementation:

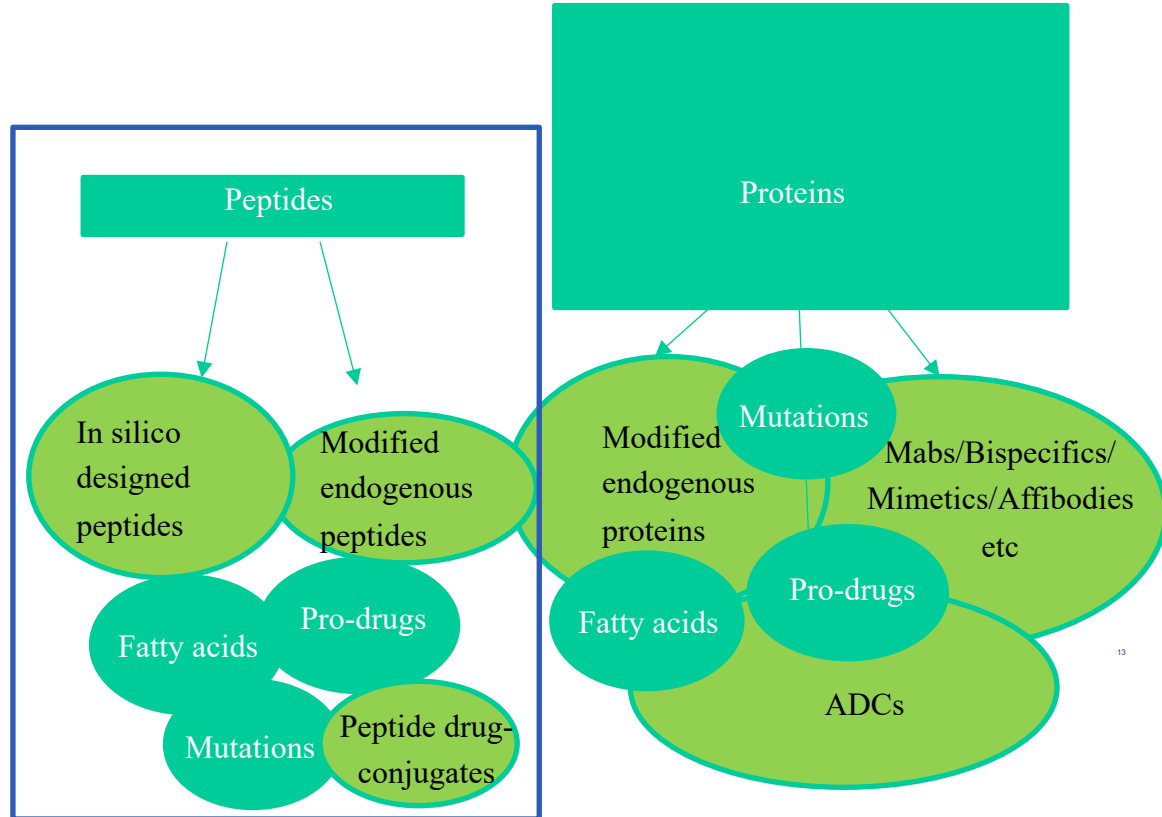
Approach adopted for each program should be scientific and driven by the bioanalytical technology.

Peptides and PD? Free and total assays?

- Do we need to develop both free and target assays when peptide drug is an inhibitor?
 - Compare to NCE drugs? PK assay is always total for NCE. Target assays?
 - Compare to Mab therapeutics? History of free vs total PK and target engagement assays.
- Peptide therapeutics may have similar or different properties/Mode of Actions as Mab therapeutics and larger proteins.
 - Is drug target a cell bound receptor or a circulating target?
 - Antagonist or agonist? I.e. “mini-binders” with similar properties as MAb drugs.
 - Do we need free target assays for small peptides?
 - Plasma binders?
 - Can we develop free target assays for small peptides?
- More in Session 2.

Peptide vs protein PK assays impurities/metabolites

- Size of peptide ie 5 amino-acids vs 40 aminoacids?
- Peptides and proteins are expected to be degraded in a similar way as that of endogenous peptides/proteins.
- Does selection of assay format for PK assay change your consideration for metabolite?
 - LBA vs Chrom?
- More in Session 6.



Peptides and Immunogenicity

- Is immunogenicity strategies different from larger proteins?
 - At what size of AA peptide is immunogenicity assays not needed?
 - Likelihood and consequence should drive immunogenicity strategy.
 - Relevance of nonclinical ADA same as for large proteins: Use EBF decision tree!
 - Consider replacement therapy/endogenous molecules for human subjects.
- Assay platforms for small peptides may still include RIA (radio immune assay) due to superior sensitivity using a “soluble phase assay”.
- Nab assays need to consider mode of action
 - Is drug target a cell bound receptor or a circulating target?
 - Antagonist or agonist?
- More in Session 4.

For future considerations

- Multiple bioanalytical strategies can be applied for peptides.
- Discussions involve NCE vs BLA consideration but should not be the driver of the BioA strategy.
- Approach adopted for each program should be scientifically driven.

Acknowledgements

EBF community and EBF teams for discussion on the topics

Contact Information

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