



1 21 February 2013
2 EMA/CHMP/BWP/814397/2011
3 Committee for Medicinal Products for Human use (CHMP)

4 **Guideline on the use of porcine trypsin used in the**
5 **manufacture of human biological medicinal products**
6 **Draft**

| | |
|--|----------------------|
| Draft Agreed by Biologicals Working Party | December 2012 |
| Adoption by CHMP for release for consultation | 21 February 2013 |
| Start of public consultation | 1 March 2013 |
| End of consultation (deadline for comments) | 31 August 2013 |
| Agreed by Biologicals Working Party | |
| Adoption by CHMP | |
| Date for coming into effect | |

7
8 Comments should be provided using this [template](#). The completed comments form should be sent to ana.trullas@ema.europa.eu

| | |
|-----------------|---|
| Keywords | <i>Porcine trypsin, adventitious agents, virus</i> |
|-----------------|---|



9 **Guideline on the use of porcine trypsin used in the**
10 **manufacture of human biological medicinal products**

11 **Table of contents**

12 **Executive summary 3**

13 **1. Introduction (background) 3**

14 **2. Scope..... 3**

15 **3. Legal basis 3**

16 **4. Types and source of porcine trypsin 4**

17 **5. Starting Material..... 4**

18 **6. Testing for adventitious agents 4**

19 **7. Manufacture 5**

20 **8. Validation of the virus-reducing capacity of the manufacturing process . 5**

21 **9. Quality Controls..... 6**

22 **10. Use of alternative reagents at cell culture 7**

23 **11. Risk Assessment..... 7**

24 **12. Regulatory Aspects..... 7**

25 **References 7**

26 **Executive summary**

27 This guideline describes the information to be considered by the manufacturer of human biological
28 medicinal products using porcine trypsin. Although specific guidance and specification has been given
29 for bovine sera used as cell culture reagent in manufacture of human medicinal products
30 (CPMP/BWP/1793/02, Ph. Eur 2262 Bovine Serum), to date no guidance has been given so far for
31 porcine trypsin.

32 **1. Introduction (background)**

33 Porcine trypsin is a reagent widely used during the manufacture of biological medicinal products. The
34 main application is the detachment of cells from culture vessels for passaging. During manufacture of
35 some vaccines, trypsin is added to the final culture stage of virus production for activation of a vaccine
36 virus such as influenza virus and rotavirus. In addition, for the manufacture of specific recombinant
37 proteins, e.g. insulin, trypsin is used as a protein-cleaving reagent during the downstream process.

38 Porcine trypsin, an animal derived material extracted from the pancreas of pigs, carries the risk of
39 contamination with adventitious agents. This may especially be the case for certain viruses that are
40 widespread among pigs and which are difficult to eliminate due to their high resistance to
41 physicochemical treatment.

42 Animal-derived materials in general can be contaminated with a wide range of biological agents and
43 therefore it is strongly recommended that all these materials are appropriately selected, tested and
44 treated for the inactivation and/or removal of such agents before they are used for the manufacture of
45 medicinal products. Contamination of pharmaceutical facilities with adventitious viruses may lead to a
46 shutdown of production and to supply shortfall. Contamination can also alter growth properties of
47 cultured cells and, theoretically, this could lead to altered properties of a biological product. For
48 medicinal products where no virus inactivation is possible during down-stream processing steps, e.g.
49 live vaccines, or where, in addition, testing for contaminants at the end of production is difficult, e.g.
50 some cell based medicinal products, well-controlled cell culture reagents are essential to avoid
51 exposure of patients to adventitious viruses.

52 Early in 2010 Victoria *et al.* reported the finding of DNA sequences of porcine circovirus (PCV) in a live
53 attenuated rotavirus vaccine. Further, investigation confirmed contamination of the vaccine with PCV
54 and revealed that the origin of PCV contamination could be attributed to the porcine trypsin used in the
55 manufacture of the vaccines.

56 **2. Scope**

57 This guideline applies to trypsin purified from porcine pancreatic glands for use as a reagent in the
58 manufacture of human biological medicinal products. This includes (1) trypsin used as a reagent for
59 cell culture during manufacture of vaccines, advanced therapy medicinal products or other medicinal
60 products produced from cell culture, (2) trypsin used to activate virus particles, and (3) trypsin used as
61 a protein processing reagent.

62 **3. Legal basis**

63 This guideline has to be read in conjunction with the introduction and general principles (4) and part I
64 of the Annex I to Directive 2001/83 as amended.

65 **4. Types and source of porcine trypsin**

66 Trypsin is a proteolytic enzyme obtained by activation of trypsinogen. Porcine trypsin is extracted from
67 pancreatic glands usually obtained as a by-product of the food industry. It is prepared as a powder or
68 liquid solution for use as a reagent in cell culture. The preparations may contain impurities from the
69 starting material including other pancreatic enzymes such as chymotrypsin but which do not adversely
70 affect the performance of cell cultures. Higher purified trypsin preparations are available for analytical
71 purposes and other applications in protein chemistry, e.g. as a protein processing reagent.

72 **5. Starting Material**

73 Selection of healthy pigs is the first step in minimizing the risk of pathogen contamination of the
74 starting material. The pancreatic glands shall be derived from pigs fit for human consumption following
75 ante- and post mortem inspection in accordance with European Community or equivalent (third
76 country) conditions. Batches of raw pancreatic glands should be clearly labelled allowing identification
77 of the nature of the animal tissue, their origin and date of collection. Batches of raw material should be
78 accompanied with appropriate official health certificates.

79 **6. Testing for adventitious agents**

80 Despite the application of control measures intended for food safety, there is a risk that an animal-
81 derived starting material may be contaminated with transmissible agents.

82 Testing of starting materials or appropriate intermediates for virus contamination is an important
83 safety measure for biological medicinal products. However, there are several limitations when
84 considering virus testing during production of porcine trypsin. Mainly for economic and organizational
85 reasons, it does not seem possible to test individual pancreatic glands prior to them being pooled into
86 batches; consequently, material from a single infected animal could enter a large production batch and
87 the sensitivity of subsequent tests may not be able to detect a diluted contaminant in the pooled
88 material. As a general rule, testing of the pooled starting material should be performed at a stage
89 before any virus inactivation/removal step whilst testing of the final trypsin preparation for
90 adventitious viruses is not considered appropriate. However, this is not feasible in cases where batches
91 of frozen pancreatic tissue are directly extracted with alcohol containing fluids. If heat or low pH is
92 applied during extraction/precipitation steps, this might additionally inactivate a variety of enveloped
93 and non-enveloped viruses. In addition, trypsin itself is known to inactivate many viruses, e.g.
94 retroviruses, due to its intrinsic enzymatic activity. However, this activity is dependent on the exact
95 pH and conditions of manufacture. The stage where testing is performed should be clearly defined and
96 justified. The batch size of the tested product intermediate as well as the size of samples subjected to
97 virus testing should be defined and needs to be considered when assessing the benefit of virus testing.
98 Testing of small samples from a large production pool can lead to inadequate sensitivity of the assay.

99 A comprehensive literature-based risk analysis of potential porcine viruses that may contaminate
100 porcine trypsin and could pose a risk to humans has been recently published (Marcus-Sekura et al.,
101 2011). In summary, 55 porcine virus species from 17 different families have been identified with a
102 documented or potential human host range as indicated by reports of natural human infections,
103 detection of antibodies in humans and/or ability to infect human cells in culture. Sixty percent of these
104 viruses can replicate in Vero cells and a variety can be detected in porcine cells. Therefore it is
105 recommended that a general *in vitro* test using two distinct cell lines, one of which should be of human
106 or primate origin (e.g. Vero) and the other of porcine origin. The cell lines should be capable of

107 detecting haemadsorbing viruses and cytopathic viruses. Cells should be cultivated in a manner that
108 allows detection of viral replication.

109 Specific tests for porcine viruses that are not detected by a general cell culture test should be
110 considered on a case-by-case basis following a product-specific risk analysis (see Chapter Risk
111 assessment) considering more product specific documents where relevant (e.g. WHO 2010, Ph.Eur
112 5.2.3) and taking into consideration the whole manufacturing process and use of the medicinal
113 product. For example, demonstration of highly effective virus inactivating/removing manufacturing
114 steps can justify why testing for certain viruses might be omitted. Generally, if an infectious virus
115 contaminant is detected, the trypsin batch should not be used for the manufacture of human biological
116 medicinal products unless a careful risk assessment demonstrates that the infectious virus will be
117 reliably inactivated or removed by virus reduction steps.

118 Virus testing may be performed by the trypsin supplier, by the manufacturer of the medicinal product,
119 by a contract laboratory or by more than one of these. It is the responsibility of the marketing
120 authorisation holder of the medicinal product to ensure that testing is carried out to the required
121 standard.

122 Trypsin used as reagents for cell culture or activation of virus particles should comply with EP test on
123 sterility and be free of mycoplasmas (Ph. Eur 2.6.7).

124 **7. Manufacture**

125 Trypsin is usually obtained by extraction of pools of frozen pancreatic glands with additional optional
126 purification steps such as precipitation or chromatography. Production frequently includes a prolonged
127 incubation at low pH. It has been reported that commercially available trypsin retains its activity after
128 prolonged treatment (18-24h) at a pH of 1.0 at 4°C. (Melnick and Wallis, 1977) and can be used for
129 cell culture after such treatment. In addition, a final pathogen inactivation step such as gamma
130 irradiation (45 kGy), e-beam irradiation, or UV irradiation can be applied. Given the limitations on the
131 control of raw materials and limitations on testing for viruses, it is advisable to incorporate two
132 complementary virus reduction steps, unless otherwise justified. The manufacturing process should be
133 appropriately controlled with respect to critical parameters that affect virus reduction, or the purity and
134 activity of the enzyme preparation.

135 Appropriate and validated cleaning measures should be implemented in order to minimize the risk of
136 batch-to-batch cross contamination and cross contamination with other materials of animal origin.
137 Each batch of manufactured trypsin product should be uniquely identified and a certificate of analysis
138 should be generated for each batch. Trypsin should be manufactured under a quality system such as
139 GMP, ISO, or an HACCP-compatible system.

140 **8. Validation of the virus-reducing capacity of the** 141 **manufacturing process**

142 Inactivation/removal of microbiological agents is considered as a major factor contributing to
143 adventitious agent safety of trypsin. Therefore, selected process steps should be carefully validated
144 with respect to pathogen reduction. Reference is made to the CPMP Note for Guidance on virus
145 validation studies: the design, contribution and interpretation of studies validating the inactivation and
146 removal of viruses (CPMP/BWP/268/95).

147 Although the enzymatic activity of trypsin and possibly other porcine pancreatic enzymes is likely to
148 contribute to the inactivation of many viruses, this does not apply to certain resistant viruses such as
149 the non-enveloped porcine parvovirus and circovirus. Therefore, special consideration should be given
150 to assure adequate clearance for this type of contaminant and the inclusion of more than one virus
151 inactivation or removal step is warranted.

152 As an option for an additional, dedicated virus inactivation step, gamma or UV-C irradiation should be
153 considered. These treatments have been shown to be effective in significantly reducing microbial
154 contaminants while maintaining trypsin quality. For irradiation steps and for low pH steps also, an
155 animal parvovirus, e.g. porcine parvovirus, should be included in the study as these are pH resistant
156 and have relatively low sensitivity to gamma irradiation.

157 Gamma irradiation is generally performed on the lyophilized trypsin powder or frozen liquid trypsin.
158 When performing virus validation of the irradiation process, it should be considered that it is difficult to
159 achieve a homogeneous distribution of viruses when spiking liquid virus preparations directly into the
160 hydrophobic trypsin powder. Therefore it is recommended to spike the pre-lyophilized intermediate
161 with a liquid virus preparation and to determine the virus titre after lyophilisation; this can then be
162 used as the load titre for the irradiation step.

163 As regards UV-C irradiation virus inactivation is mainly attributed to direct interaction with nucleic
164 acids, and most of the photoproducts are generated on pyrimidines. However, study data show, that
165 virus inactivation is not simply predictable by the genetic composition or type of nucleic acid genome
166 (RNA/DNA, ss/ds). It should also be considered that repair mechanisms mediated by cell based
167 infectivity assays, which are used for measuring virus inactivation, may reduce the observed lethal
168 effects, especially for viruses possessing double-stranded nucleic acids. Generally, Adenovirus is
169 considered to be rather resistant to UV-C irradiation as well as herpes virus (PRV).

170 Due to the proteolytic nature of trypsin, controls assessing the stability of a spiked virus in trypsin-
171 containing test material and controls for cytotoxicity and interference of the test matrix in a virus assay
172 are important for this product.

173 Adverse effects on trypsin quality or trypsin performance in the biological manufacturing processes
174 should be assessed when considering implementing a viral inactivation or viral removal step in an
175 existing trypsin manufacturing process.

176 **9. Quality Controls**

177 It is recommended that identity and activity testing for porcine trypsin follow the Ph Eur requirements
178 in the Trypsin monograph (Ph. Eur. 0694 Trypsin) or equivalent test. The pancreatic starting material
179 contains a variety of proteases but no general recommendation for purity of trypsin used as a cell
180 culture reagent can be given as the presence/absence of other enzymes is variable between lots of
181 trypsin and this may be tolerated in its use in cell culture. On the other hand, purity can be important
182 for other applications such as protein processing steps where specific cleavage of proteins is required.

183 **10. Use of alternative reagents at cell culture**

184 Proteolytic enzyme preparations other than porcine trypsin are available, e.g. recombinant bacterial or
185 plant-derived trypsin, enzymes from invertebrae, bovine trypsin that could be an alternative for use in
186 cell culture. The use of bacterial or plant derived recombinant trypsin minimises in principle the risk for
187 animal virus contamination and the application of such alternatives is therefore encouraged. However,
188 no general recommendation to replace porcine trypsin can currently be given considering that these
189 alternatives need a careful assessment of suitability, quality, sterility and performance characteristics

190 as well as associated risks such as other adventitious agents such as prions from bovine species or
191 viruses from invertebrae. When bovine trypsin is used, the bovine virus safety needs to be carefully
192 considered and the Note for Guidance on Minimising the Risk of Transmitting Animal Spongiform
193 Encephalopathy Agents via Human and Veterinary Medicinal Products (EMA/410/01) in its current
194 version is to be applied.

195 **11. Risk Assessment**

196 This Guideline provides a general quality specification for porcine trypsin, especially with respect to
197 viral safety, and various measures that should be applied during the production of porcine trypsin to
198 minimize the viral risk are described. No combination of the measures outlined below can guarantee
199 complete viral safety, but rather they reduce the risk involved in the use of trypsin in the manufacture
200 of medicinal products. It is therefore necessary for the manufacturer of a medicinal product to take
201 account of this when choosing the trypsin for a particular use by making a risk assessment. The risk
202 assessment should follow the general principles outlined in Ph. Eur. 5.1.7 Viral Safety. Such risk
203 analysis should consider (1) the epidemiology and control of the animals from which the starting
204 material is sourced, (2) the availability of suitable virus test methods and the stage at which such
205 testing is implemented, (3) virus inactivation by trypsin itself, (4) the virus inactivation/removal during
206 manufacture of the trypsin, (5) the stage of manufacture of the medicinal product at which trypsin is
207 used as a reagent, (6) the risk of virus replication in cell cultures used for production of the medicinal
208 product, (7) additional virus inactivation/removal steps applied during the manufacture of the
209 medicinal product, (8) the amount of trypsin to produce a dose of medicinal product, and (9) the route
210 of administration of the medicinal product.

211 **12. Regulatory Aspects**

212 The Marketing Authorisation Holder/Applicant of the medicinal product should have sufficient
213 information on the trypsin to allow a comprehensive risk assessment and provide a sufficient data
214 package to the competent authority for assessment. This should include a description of testing
215 methods and the stage at which virus testing is performed, as well as the volumes and sensitivity of
216 the virus tests. Study reports validating virus reduction steps should be provided according to
217 Guideline CHMP/BWP/268/95.

218 This guideline is for prospective implementation. Nevertheless in light of the reported contamination
219 events, it is recommended to re-assess virus safety of authorized live virus vaccines that use porcine
220 trypsin in the manufacturing process.

221 **References**

222 EMA/P/24143/2004 Rev. 1 corr. Procedure for European Union Guidelines and related documents
223 within the pharmaceutical legislative framework.

- 224 EMA/732522/2010 European Medicines Agency confirms that presence of unexpected viral DNA in live
225 attenuated vaccines does not raise public health concerns.
226 http://www.ema.europa.eu/docs/en_GB/document_library/Press_release/2010/11/WC500099132.pdf
- 227 Marcus-Sekura C, Richardson JC, Harston RK, Dane N. Sheets RL. Evaluation of the human host range
228 of bovine and porcine viruses that may contaminate bovine serum and porcine trypsin used in the
229 manufacture of biological products. *Biologicals* 39:359-369, 2011.
- 230 Melnick and Wallis. 1977. Problems related to the use of serum and trypsin in the growth of monkey
231 kidney cells. *Dev. Biol. Stand* 37:77-82.
- 232 Victoria JG, Wang C, Jones MS, Jaing C, McLoughlin K, Gardner S, Delwart EL. Viral nucleic acids in
233 live-attenuated vaccines: detection of minority variants and an adventitious virus. *J Virol.* 2010
234 Jun;84(12):6033-40
- 235 WHO recommendations for the evaluation of animal cell cultures as substrates for the manufacture of
236 biological medicinal products and for the characterization of cell banks (2010).
- 237 Note for guidance on virus validation studies: the design, contribution and interpretation of studies
238 validating the inactivation and removal of viruses (CPMP/BWP/268/95).
- 239 Note for guidance on the use of bovine serum in the manufacture of human biological medicinal
240 products (CPMP/BWP/1793/02).
- 241 European Pharmacopoeia 7.1- General text 5.2.3 on cell substrates for the production of vaccines for
242 human use.
- 243 European Pharmacopoeia Monograph 2262 Bovine Serum.
- 244 European Pharmacopoeia 2.6.7 Mycoplasmas.
- 245 European Pharmacopoeia 7.0 general text. 5.1.7 *Viral Safety*.
- 246 European Pharmacopoeia Monograph (0694) Trypsin.