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ICH Q5E: Comparability of Biotechnological/Biological Products Subject to Changes in Their Manufacturing Process

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ICH Q5E: Comparability of Biotechnological/Biological Products Subject to Changes in Their Manufacturing Process

Notice to the Reader: Where reference is made to nonclinical and clinical studies, additional information and modification of these specific items will be provided by ICH Safety and Efficacy Experts.

7 1.0 Introduction

1.1 **Objectives of the Guideline**

The objective of this document is to provide principles for assessing the comparability of biotechnological/biological products before and after changes are made in the manufacturing process for the drug substance or drug product. This guideline is intended to assist in the design and conduct of studies used to collect the technical information to establish the comparability of pre-change and post-change products and, thereby, confirm that the manufacturing process changes did not have an adverse impact on the quality, safety and efficacy of the drug product.

1.2 16 Background

17 Manufacturers¹ of biotechnological/biological products frequently make changes to manufacturing processes² of products³ both during development and after approval. 18 19 Reasons for such changes include improving the manufacturing process, increasing 20 scale, improving product stability, and complying with changes in regulatory 21 requirements. When changes are made to the manufacturing process, the manufacturer 22 generally evaluates the quality attributes of the product to demonstrate that modifications 23 did not occur that would adversely impact the safety and efficacy of the drug product. 24 Such an evaluation should indicate whether or not confirmatory nonclinical or clinical 25 studies are appropriate.

26 While ICH documents have not specifically addressed considerations for demonstrating 27 comparability between pre-change and post-change products, several ICH documents 28 have provided guidance for technical information and data to be submitted in marketing 29 applications that can also be useful for assessing manufacturing process changes (see 30 References). This document builds upon the previous ICH guidelines and provides 31 additional direction regarding approaches to:

- Compare post-change product to pre-change product following manufacturing process changes and
- Assess the impact of observed differences in the quality attributes caused by the manufacturing process change for a given product as it relates to safety and efficacy.

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¹ For convenience, when the term "manufacturer" is used, it is intended to include any third party having a contractual arrangement to produce the intermediates, drug substance, or drug product on behalf of the marketing authorization holder (or the developer, if prior to market authorization).

² For convenience, when the term "manufacturing process(es)" is used, it also includes facilities and

equipment that might impact on critical processing parameters and, thereby, on product quality. ³ For convenience, when the term "product" is used without modifiers, it is intended to refer to the intermediates, drug substance, and drug product.

1.3 Scope

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The principles adopted and explained in this document apply to:

- Proteins and polypeptides, their derivatives, and products of which they are components (e.g., conjugates). These proteins and polypeptides are produced from recombinant or non-recombinant cell-culture expression systems and can be highly purified and characterised using an appropriate set of analytical procedures;
 - Products where changes are made by a single manufacturer, including those made by a contract manufacturer, who can directly compare results from the analysis of pre-change and post-change products; and
 - Products where process changes are made in development or for which a marketing authorisation has been granted.

The principles outlined in this document might also apply to other product types such as proteins and polypeptides isolated from tissues and body fluids. Manufacturers are advised to consult with the appropriate regional Regulatory Authority to determine applicability.

53 **1.4 General Principles**

The goal of the comparability exercise is to ensure the quality, safety and efficacy of the drug product produced by a changed manufacturing process through collection and evaluation of the relevant data to determine whether there is any adverse impact on the drug product due to the manufacturing process changes.

58 The demonstration of comparability does not necessarily mean that the quality attributes 59 of the pre-change and post-change products are identical; but that they are highly similar 60 and that the existing knowledge is sufficiently predictive to ensure that any differences in 61 quality attributes have no adverse impact upon safety or efficacy of the drug product.

- 62 A determination of comparability can be based on a combination of analytical testing, 63 biological assays, and, in some cases, nonclinical and clinical data. If a manufacturer 64 can provide assurance of comparability through analytical studies alone, nonclinical or 65 clinical studies with the post-change product might not be warranted. However, where 66 the relationship between specific quality attributes and safety and efficacy has not been 67 established, and differences between quality attributes of the pre- and post-change 68 products are observed, it might be appropriate to include a combination of quality, 69 nonclinical, and/or clinical studies in the comparability exercise.
- 70 To identify the impact of a manufacturing process change, a careful evaluation of all 71 potential consequences on the product, not just the obvious, should be performed. Based 72 on this evaluation, acceptance criteria to define highly similar post-change product can be 73 established. Quality data on the pre- and post-change products are generated, and a 74 comparison is performed that integrates and evaluates all data available, e.g., 75 characterisation, routine batch analyses, stability, in-process control, and process 76 validation/evaluation data. The comparison of the results to the predefined acceptance 77 criteria allows an objective assessment of whether or not the pre- and post-change 78 products are comparable.
- Following the evaluation of the quality attributes the manufacturer could be faced with one of several outcomes including:
 - Based on appropriate comparison of relevant quality attributes, pre- and postchange products are highly similar and considered comparable, i.e. no adverse impact on safety or efficacy profiles is foreseen.

- 84 Although the products appear highly similar, there is doubt concerning the 85 capability of the analytical procedures to discern relevant differences that can impact the safety and efficacy of the product. The manufacturer should consider performing additional nonclinical and/or clinical studies.
- 88 Some differences have been observed in the quality attributes of the pre-change . 89 and post-change products, but it can be justified that no adverse consequence 90 on safety or efficacy profiles is expected, based on the manufacturer's 91 accumulated experience, relevant information, and data. In these circumstances, 92 pre- and post-change products can be considered comparable.
- 93 Although the pre- and post-change products are similar, some differences have • 94 been identified in the comparison of quality attributes and possible adverse 95 consequences on safety and efficacy profiles cannot be excluded. In such 96 situations, the generation and analysis of additional data on guality attributes is 97 unlikely to be sufficient to determine if pre- and post-change products are 98 comparable. The manufacturer should consider performing nonclinical and/or 99 clinical studies to reach a definitive conclusion, taking into account characteristics 100 of the drug product such as therapeutic window, clinical usage (acute vs. chronic 101 administration), dosing characteristics, and potential for immunogenic responses.
- 102 Differences are so significant that it is determined that guality attributes for • 103 products are not comparable (i.e., they are not highly similar). This outcome is 104 not within the scope of this document and is not discussed further.

105 2.0 Guidelines

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2.1 Considerations for the Comparability Exercise

107 The goal of the comparability exercise is to ascertain that pre- and post-change drug 108 product is comparable in terms of quality, safety, and efficacy. Therefore, it might be 109 appropriate to collect data on the drug product to support the determination of 110 comparability even though all process changes occurred in the manufacture of the drug 111 substance. Comparability can be deduced from quality studies (partial or 112 comprehensive), but might sometimes need to be supported by comparability bridging 113 studies. The extent of the studies that demonstrate comparability will depend on:

- 114 The production step where the changes are introduced; •
- 115 The potential impact of the changes on the purity as well as on the • 116 physicochemical and biological properties of the product, particularly considering 117 the complexity and degree of knowledge of the product (e.g., impurities, related 118 substances):
- 119 The availability of suitable analytical techniques to detect potential product • 120 modifications and the results of these studies; and
 - The relationship between quality attributes and safety and efficacy, based on the overall nonclinical and clinical experience.

123 When considering the comparability of products, the manufacturer should evaluate, for 124 example:

- Relevant physicochemical and biological characterisation data regarding quality attributes;
- Results from analysis of relevant samples from the appropriate stages of the • manufacturing process (e.g., intermediate, drug substance, and drug product):

- 129 The need for stability data, including those generated from accelerated or stress 130 conditions, to provide insight into potential product differences in the degradation 131 pathways of the protein and, hence, potential product-related substances and 132 product-related impurities; 133 Batches used for demonstration of manufacturing consistency; • 134 Historical batch data that provide insight into potential "drift" of quality attributes 135 with respect to safety and efficacy, following either a single or a series of manufacturing process changes. That is, the manufacturer should consider the 136 137 impact of changes over time to confirm that an unacceptable impact on safety 138 and efficacy profiles has not occurred. 139 In addition to evaluating the data, manufacturers should also consider: 140 Critical control points in the manufacturing process that affect product 141 characteristics, e.g., the ability of downstream steps to accommodate material 142 from a changed cell culture process, as well as the impact of the process change 143 on the quality of downstream product; 144 Adequacy of the in-process controls including critical control points and in-• 145 process testing: In-process controls for the post-change process should be 146 confirmed, modified, or created, as appropriate, to maintain the quality of the 147 product; 148 Nonclinical or clinical characteristics of the drug product: Clinical characteristics, • 149 such as therapeutic index, clinical use (e.g., acute vs. chronic administration), 150 dosing, route of administration, and potential for immunogenic response, of the 151 drug product can be important in planning the comparability exercise; and
- 152 • Each indication for a multi-indication product: The structure-activity relationships, 153 mechanism of action, safety profile, and toxicities of the same product can vary 154 with each clinical indication and, if so, should be addressed for each clinical 155 indication.
- 2.2 Quality Considerations 156

157 2.2.1. Analytical Techniques

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The battery of tests for the comparability exercise should be carefully selected and optimised to the product to maximise the potential of detecting differences in the quality attributes that might result from the proposed manufacturing process change. To address the full range of physicochemical properties or biological activities, it might be appropriate to apply more than one analytical procedure to evaluate the same quality attribute (e.g., molecular weight, impurities, secondary/tertiary structures). In such cases, each method should employ different physicochemical or biological principles to collect data for the same parameter to maximise the possibility that differences in the product caused by a change in the manufacturing process might be detected.

- 168 It can be difficult to ensure that the chosen set of analytical procedures for the pre-169 change product will be able to detect modifications of the product due to the 170 limitations of the assays (e.g., precision, specificity, and detection limit) and the 171 complexity of some products due to molecular heterogeneity. Consequently, the 172 manufacturer should determine:
- 173 Whether or not existing tests remain valid for their intended use or should be 174 modified. For example, when the manufacturing process change gives rise to a 175 different impurity profile in the host cell proteins, manufacturers should confirm

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that the test used to quantitate these impurities is still suitable for its intended purpose. It might be appropriate to modify the existing test to detect the new impurities;

- The need to add new tests as a direct result of changes in guality attributes that the existing methods are not capable of measuring. That is, when specific changes occur in quality attributes as a result of process change (e.g., following addition of a new raw material or modification of a chromatographic purification step), it might be appropriate to develop new analytical procedures, i.e., to employ additional analytical techniques above and beyond those used previously for characterisation or to establish routine specifications.
- 186 The measurement of quality attributes does not necessarily entail the use of validated 187 assays but the assays should be scientifically sound and provide results that are 188 reliable. Those methods used for batch release should be validated in accordance 189 with ICH guidelines (ICH Q2A, Q2B, Q5C, Q6B), as appropriate.
- 190 2.2.2 Characterisation
- 191 Characterisation of a biotechnological/biological product by appropriate techniques, 192 as described in ICH Q6B, includes the determination of physicochemical properties, 193 biological activity, immunochemical properties (if any), purity, impurities, 194 contaminants, and quantity.
- 195 When a manufacturing process change has been made that has the potential to have 196 an impact on quality attributes, a complete or limited (but rationalised) repetition of 197 the characterisation activity conducted for the market application is generally 198 warranted to directly compare the pre-change and post-change products. However, 199 additional characterisation might be indicated in some cases. When process 200 changes result in a product characterisation profile that differs from that observed in 201 the material used during nonclinical and clinical studies or other appropriate 202 representative materials, the significance of these alterations should be evaluated.
- 203 Each of the following criteria should be considered as a key point in the conduct of 204 the comparability exercise.
- 205 **Physiochemical Properties**
 - The manufacturer should address the concept of the desired product (and its variants) as defined in ICH Q6B when designing and conducting a comparability exercise. The complexity of the molecular entity with respect to the degree of molecular heterogeneity should also be addressed. Following a manufacturing process change, manufacturers should attempt to determine that higher order structure (secondary, tertiary, and quaternary structure) is maintained in the If the appropriate higher order structural information cannot be product. obtained, a relevant biological activity assay (see biological activity below) could indicate a correct conformational structure.

215 **Biological Activity**

216 Biological assay results serve multiple purposes in the confirmation of product 217 quality attributes that are useful for characterisation and batch analysis, and, in 218 some cases, serve as a link to clinical activity. The manufacturer should 219 recognise the limitations of biological assays, such as high variability, that might 220 prevent detection of differences that occur as a result of a manufacturing process 221 change.

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In cases where the biological assay also serves as a complement to physicochemical analysis, e.g., as a surrogate assay for higher order structure, the use of a relevant biological assay with appropriate precision and accuracy might provide a suitable approach to confirm that change in specific higher order structure has not occurred following manufacturing process changes. Where physicochemical or biological assays are not considered adequate to confirm that the higher order structure is maintained, it might be appropriate to conduct a nonclinical or clinical study.

- 230 When changes are made to a product with multiple biological activities, 231 manufacturers should consider performing a set of relevant functional assays 232 designed to evaluate the range of activities. For example, certain proteins 233 possess multiple functional domains that express enzymatic and receptor 234 mediated activities. In such situations, manufacturers should consider evaluating 235 all relevant functional activities.
- 236 Where one or more of the multiple activities are not completely correlated with 237 clinical safety or efficacy or if the mechanism of action is not understood, the 238 manufacturer should confirm that nonclinical or clinical activity is not 239 compromised in the post-change product.

240 **Immunochemical Properties:**

241 When immunochemical properties are part of the characterisation (e.g., for 242 antibodies or antibody-based products), the manufacturer should confirm that 243 post-change product is comparable in terms of the specific properties.

244 Purity, Impurities, and Contaminants:

- The combination of analytical procedures selected should provide data to evaluate the change in purity profile in terms of the desired product.
- 247 If differences are observed in the purity and impurity profiles of the post-change 248 product relative to the pre-change product, the differences should be evaluated 249 to determine their impact on safety and efficacy. Where the change results in the 250 appearance of new impurities, it might be appropriate to characterise the new 251 impurities, and in some cases, to conduct appropriate nonclinical or clinical 252 studies to confirm that there is no adverse impact on safety or efficacy of the 253 drug product.
- 254 Contaminants should be strictly avoided and/or suitably controlled with 255 appropriate in-process acceptance criteria or action limits for drug substance or 256 drug product.

257 2.2.3 **Specifications**

258 The tests and analytical procedures chosen to define drug substance or drug product 259 specifications alone are generally not considered adequate to assess the impact of 260 manufacturing process changes since they are chosen to confirm the routine quality of 261 the product rather than to fully characterise it. The manufacturer should confirm that the 262 specifications after the process change are appropriate to ensure product quality. Results 263 within the established acceptance criteria, but outside historical manufacturing control 264 trends, might suggest product differences that warrant additional study or analysis. 265 Modification, elimination, or addition of a test (i.e., in the specification) might be indicated 266 where data suggest that the previous test is no longer relevant for routine batch analysis 267 of the post-change product. For example, the elimination of bovine serum from the cell 268culture process would remove the need for related analyses. However, a widening of the 269 acceptance criteria is generally not considered appropriate and should be justified. In some cases, additional tests and acceptance criteria on the relative abundance of specific new impurities might be appropriate if the impurity profile is different following the manufacturing process changes. When evaluating both the test methods and acceptance criteria for the post-change product, it is important to consider the general principles for setting specifications as defined in Q6B, i.e., the impact of the changes on the validated manufacturing process, characterisation studies, batch analysis data, stability data, and nonclinical and clinical experience.

277 **2.2.4 Stability**

- 278 For many manufacturing process changes even slight modifications of the production 279 procedures, including those made early in the manufacturing process for the drug 280 substance, might cause changes in the stability of the post-change product. Any change 281 with the potential to alter protein structure or purity and impurity profiles should be 282 evaluated for its impact on stability, since proteins are frequently sensitive to changes, 283 such as those to buffer composition, processing and holding conditions, and use of 284 organic solvents. Furthermore, stability studies might be able to detect subtle differences 285 that are not readily detectable by the characterisation studies. For example, the 286 presence of trace amounts of a protease might only be detected by product degradation 287 that occurs over an extended time period; and, in some cases, divalent ions leached from 288 container closure might change the stability profile because of the activation of trace 289 proteases not detected in stability studies of the pre-change product. Generally, 290 therefore, real-time concurrent stability studies on the product potentially affected by the 291 change should be conducted, as appropriate.
- Accelerated and stress stability studies are often useful tools to establish degradation profiles and provide a further direct comparison of pre-change and post-change products. The results thus obtained might show product differences that warrant additional evaluation and also identify conditions indicating that additional controls should be employed in the manufacturing process and during storage to eliminate these unexpected differences. Appropriate studies should be considered to confirm that suitable storage conditions and controls are selected.
- 299ICH Q5C and Q1A(R) should be consulted to determine the conditions for stability300studies that provide relevant data to be compared before and after a change.

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2.3 Manufacturing Process Considerations

A well-defined manufacturing process with its associated process controls is necessary to assure that acceptable product is produced on a consistent basis. Approaches to determining the impact of any process change will vary with respect to the specific process, the product, the extent of the manufacturer's knowledge of and experience with the process, and development data generated. The manufacturer should confirm that the process controls in the modified process provide similar or more effective control of the product quality, compared to those of the original process.

309 A careful consideration of potential effects of the planned change on steps downstream 310 and quality parameters related to these steps is extremely important (e.g., for acceptance 311 criteria. in-process specification. in-process tests. operating limits. and 312 validation/evaluation, if appropriate). This analysis will help identify which tests should be 313 performed during the comparability exercise, which in-process or batch release 314 acceptance criteria or analytical procedures should be re-evaluated and which steps will 315 not need to be considered. For example, analysis of process intermediates might 316 suggest potential differences that should be evaluated to determine the suitability of 317 existing tests to detect these differences in the product. The rationale for excluding parts 318 of the process from this consideration should be justified.

While the process will change and the associated controls might be redefined, the manufacturer should confirm that pre-change and post-change products are comparable. To support the comparison it is often useful to demonstrate, for example, that specific intermediates are comparable or that the modified process has the capability to provide appropriate levels of removal for process- and product-related impurities, including those newly introduced by the process change. To support process changes for approved products, data from commercial-scale batches are generally indicated.

- 326 The process assessment should consider such factors as the criticality of the process 327 step and proposed change, the location of the change and potential for effects on other 328 process steps, and the type and extent of change. Information that can aid this 329 assessment is generally available from several sources. The sources can include 330 knowledge from process development studies, small scale evaluation/validation studies, 331 experience with earlier process changes, experience with equipment in similar 332 operations, changes in similar manufacturing processes with similar products, and 333 literature. Although information from external sources is useful to some extent, it is within 334 the context of the specific manufacturing process and specific product that the change 335 should be assessed.
- 336 When changes are made to a process, the manufacturer should demonstrate that the 337 associated process controls, including any new ones, provide assurance that the 338 modified process will also be capable of providing comparable product. The modified 339 process steps should be re-evaluated and/or re-validated, as appropriate. The in-340 process controls, including critical control points and in-process testing, should ensure 341 that the post-change process is well controlled and maintains the quality of the product. 342 Typically, re-evaluation/re-validation activities for a simple change might be limited to the 343 affected process step, if there is no evidence to indicate that there is impact on the 344 performance of subsequent (downstream) process steps, or on the quality of the 345 intermediates resulting from the subsequent steps. When the change considered affects 346 more than a single step, more extensive analysis of the change and resultant validation 347 might be appropriate.
- 348 Demonstration of state of control with the modified/changed manufacturing process might 349 include, but is not limited to, such items as:
 - Establishment of modified specifications for raw, source and starting materials, and reagents;
 - Appropriate bioburden and/or viral safety testing of the post-change cell banks and end-of-production cells;
 - Adventitious agent clearance;
 - Removal of product- or process-related impurities, such as residual host cell DNA and proteins; and
 - Maintenance of the purity level.

358 For approved products, an appropriate number of post-change batches should be 359 analysed to demonstrate consistent performance of the process.

- To support the analysis of the changes and the control strategy, the manufacturer should prepare a description of the change that summarises the manufacturing process of the pre-change process and the post-change process and that clearly highlights modifications of the process and changes in controls in a side-by-side format.
- **2.4 Demonstration of Comparability during Development**
- 365 During product development, it is expected that multiple changes in the manufacturing 366 process will occur that could impact drug product quality, safety, and efficacy.

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Comparability exercises are generally performed to bridge nonclinical and clinical data generated with pre-change to post-change product in order to facilitate further development and, ultimately, to support the marketing authorisation. Comparability studies conducted for products in development are influenced by factors such as the stage of product development, the availability of validated analytical procedures, and the extent of product and process knowledge, which are limited at times due to the available experience that the manufacturer has with the process.

- 374 Where changes are introduced in development before nonclinical studies, the issue of 375 assessing comparability is not generally raised because the manufacturer subsequently 376 conducts nonclinical and clinical studies using the post-change product as part of the During early phases of nonclinical and clinical studies, 377 development process. 378 comparability testing is generally not as extensive as for an approved product. As 379 knowledge and information accumulates, and the analytical tools develop, the 380 comparability exercise should utilise available information and will generally become 381 more comprehensive. Where process changes are introduced in late stages of 382 development and no additional clinical studies are planned to support the marketing 383 authorisation, the comparability exercise should be as comprehensive and thorough as one conducted for an approved product. Some outcomes of the comparability studies on 384 385 quality attributes can lead to additional nonclinical or clinical studies.
- In order for a comparability exercise to occur during development, appropriate assessment tools should be used. It should be recognised that during development, analytical procedures might not be validated, but should always be scientifically sound and provide results that are reliable and reproducible. Due to the limitations of the analytical tools in early development, physicochemical and biological tests alone might be considered inadequate to determine comparability, and therefore, repeating elements of the nonclinical or clinical studies already performed would be considered appropriate.

393 **3.0 Nonclinical and Clinical Considerations**

- 394Notice to the Reader: Where reference is made to nonclinical and clinical studies,395additional information and modification of these specific items will be provided by ICH396Safety and Efficacy Experts.
- 397Determinations of product comparability can be based solely on quality considerations398(see section 2.2) if the manufacturer can provide assurance of comparability through399analytical studies as outlined in this document. Additional evidence from nonclinical or400clinical studies is appropriate when quality data are insufficient to establish comparability.401The extent and nature of nonclinical and clinical studies should be determined on a case-402by-case basis in consideration of various factors, which include:
- Quality findings, e.g.,

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- The type, nature, and extent of differences between the post-change product and the pre-change product with respect to quality attributes including product-related substances and the impurity profile;
- The results of the evaluation/validation studies on the new process including the results of relevant in-process tests; and
- The capabilities and limitations of tests used for any comparability studies.
- The nature of the product, e.g., product complexity, therapeutic class;
- Dosing regimen;
- Route of administration;
- The therapeutic window based upon dose ranging studies;

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 Chronic vs. acute use;
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 Extent of knowledge regarding structure-activity relationships;
- Previous experience with immunogenic events or responses in patients;
- Mechanism of action;
- Patient population;
- Availability of existing nonclinical and clinical data; and
- Knowledge of how a difference in quality attributes might impact on safety and efficacy.

422 **4.0 Glossary**

- 423 **Comparability Bridging Study**:
- 424 A study performed to provide nonclinical or clinical data that allows extrapolation of the 425 existing data from the drug product produced by the current process to the drug product 426 from the changed process.

427 **Comparable**:

428A conclusion that products are highly similar before and after manufacturing process429changes and that no adverse impact on the quality, safety, or efficacy of the drug product430occurred. This conclusion can be based on an analysis of product quality attributes. In431some cases, nonclinical or clinical data might be indicated.

432 **Comparability Exercise:**

433 The activities, including study design, conduct of studies, and evaluation of data, that are 434 designed to investigate whether the products are comparable.

435 **Quality Attribute:**

A molecular or product characteristic that is selected for its ability to help indicate the
quality of the product. Collectively, the quality attributes define the adventitious agent
safety, purity, potency, identity, and stability of the product. Specifications measure a
selected subset of the quality attributes.

440 **5.0 References**

- 441Viral Safety Evaluation of Biotechnology Products Derived From Cell Lines of Human or442Animal Origin (Q5A)
- 443 Analysis of the Expression Construct in Cells Used for Production of r-DNA Derived 444 Protein Products (Q5B),
- 445 Stability Testing of Biotechnological/Biological Products (Q5C)
- 446Derivation and Characterisation of Cell Substrates Used for Production of
Biotechnological/Biological Products (Q5D)
- 448Specifications: Test Procedures and Acceptance Criteria for Biotechnological/Biological449Products (Q6B)
- 450 Good Manufacturing Practice Guidance for Active Pharmaceutical Ingredients (Q7A)
- 451 Text on Validation of Analytical Procedures (Q2A)
- 452 Validation of Analytical Procedures: Methodology (Q2B)
- 453 The Common Technical Document (M4Q)
- 454 Stability Testing of New Drug Substances and Products Q1A(R)