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研究報告の概要	研究報告の概要			
変異型クロイツフェルト-ヤコブ病(vCJD)を発症しておらず、vCJDとは関係ない疾患により死亡した血友病患者の剖検時に、脾臓よりvCJD異常プリオンタンパク質が検出された。vCJD発症患者は、当該患者は、内視鏡手術、赤血球輸血、英国の血漿由来血液凝固第VIII因子製剤頻回投与等、複数のvCJD感染ルートに暴露された。vCJDに関する治療を受けたことが判明している。また、1996年に血漿の供血を行った6か月後にvCJDの症状を発現した供血者に由来する血漿から製造された第VIII因子製剤1ロットの投与を受けている。英国の供血者の潜在的なvCJD感染リスク(有病率約1:10000)を考慮すると、患者はvCJD発症ドナーが関連していない第VIII因子製剤によってvCJDに感染した可能性が最も高いと考えられた。	使用上の注意記載状況・その他参考事項等 赤十字アルブミン20 赤十字アルブミン25 赤十字アルブミン20%静注 4g/20mL 赤十字アルブミン20%静注 10g/50mL 赤十字アルブミン25%静注 12.5g/50mL 血液を原料とすることによる感染伝播等			
報告企業の意見	今後の対応			
変異型クロイツフェルト-ヤコブ病(vCJD)を発症しておらず、vCJDとは関係ない疾患により死亡した血友病患者の剖検時に、脾臓よりvCJD異常プリオンタンパク質が検出され、vCJD発症ドナーが関連していない第VIII因子製剤によって感染した可能性が最も高いと考えられたとの報告である。	プリオン病の原因とされる異常プリオンが分画製剤製造工程で効果的に除去されるとの成績と併せて、これまでの疫学研究では如何なるプリオン病も、血漿分画製剤を介して伝播するという証拠は無かった。しかし、原因が特定されていないものの、本報告で初めて、第VIII因子製剤を介してvCJDに感染する可能性が示唆された。引き続きプリオン病に関する新たな知見及び情報収集するとともに、血漿分画製剤の製造工程における病原因子の除去・不活化技術の向上に努める。なお、日本赤十字社は、CJD、vCJDの血液を介する感染防止の目的から、献血時に過去の海外渡航歴(旅行及び居住)、CJDの既往歴(本人、血縁者)、hGH製剤投与の有無を確認し、該当するドナーを無期限に献血延期としている。			

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vCJD Risk Assessment Calculations for a Patient with Multiple Routes of Exposure

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Preface

This paper was developed in response to a request from the CJD Incidents Panel following the finding of abnormal prion protein in the spleen of a patient with haemophilia. Assuming that the abnormal protein represents a marker of vCJD infection, the paper sets the various possible routes through which such infection could have occurred, and considers their relative likelihood in various scenarios. As well as dealing with this specific "incident", the paper sets out a more general methodology for assessing multiple possible infection routes. The analysis was considered by the Panel at its meeting on 20<sup>th</sup> May 2009, and informed the advice subsequently issued. This version of the paper repeats the analysis presented to the Panel, while giving slightly more background information for other readers, and is placed here for public record.

## Introduction

1. This paper offers an analysis of the recent finding of abnormal prion protein in the spleen of a haemophilic. This involves a patient exposed to a large number of potential vCJD infection routes (including multiple blood component transfusions, repeated receipt of UK-sourced fractionated plasma products including some units linked to a donor who later went on to develop clinical vCJD, and several invasive biopsies) who was found post mortem to have abnormal prion protein in a spleen sample.
2. If this finding is interpreted as an instance of asymptomatic vCJD infection, this raises questions as to the operational meaning of the "prevalence" of infection. The discovery of abnormal protein in a single spleen sample was the only positive result after exhaustive investigation of tissues taken at autopsy of an elderly haemophilia patient who died of other causes with no symptoms of vCJD or other neurological condition. All other tissues from this patient tested for the presence of abnormal prion protein – fixed samples of brain, heart, liver, blood vessel, appendix, spleen and lymph node and frozen samples of frontal lobe, occipital lobe, cerebellum, lymph node and 23 other samples from the spleen – were negative. This individual would not have tested "positive" on any of the vCJD prevalence tests conducted so far, and possibly not even in a post mortem spleen survey (depending on the size of spleen sample used). Nor do we know whether someone with this limited distribution of abnormal prion protein would be infective - and if so, by what routes of transmission.
3. For present purposes, however, these issues of interpretation are ignored. We simply assume that the abnormal prion protein found in this patient is a marker for asymptomatic vCJD infection: the task is then to investigate the relative likelihood of the infection having come from the various possible routes. This is done in order to inform discussion by the CJD Incidents Panel ("the Panel") as to the implications of the finding, and in particular whether the new evidence warrants any change to the "at risk" status of any individuals or groups.
4. The ideal would be to quantify these likelihoods in a robust way. However, this is not possible due to the multiple uncertainties involved. These are well-rehearsed. We do not know the prevalence of infectious donors – and in this instance, some of the potential routes are dependent on prevalence while others are not, so the relativities change. The probability of an infected blood component transmitting infection is uncertain - though on the precautionary approach adopted by the Panel, it is presumed to be substantial. The risks of an implicated plasma derivatives transmitting infection are even more uncertain. However, they can be estimated using methods suggested in an existing assessment by independent consultants DNV (DNV, 2003), which have been used in drawing up Panel recommendations to date. These calculations have also been regarded as "precautionary", i.e. giving a pessimistic view of the levels of infectivity likely to be present.
5. Given these unknowns, we make no attempt at definitive probability calculations, though illustrative examples are provided. Instead, we concentrate on the more limited task of determining whether different groups in the complex chain of contacts associated with the index patient can be robustly placed under or above

the additional 1% (over the UK population risk derived from consumption of beef and beef products) "risk threshold" used by the CJD Incidents Panel to trigger decisions on notification of increased risk status. We also consider the wider implications for groups that are or might be classed as "at risk". Although the analysis does throw some light on these questions, it also highlights some conundrums for our understanding of vCJD prevalence and transmissibility.

## Summary of findings

6. Specifically, we conclude that on the evidence available:
  - (i) **The chance of the patient having been infected via an endoscopic procedure is very small**, probably comparable to that of having been infected via primary (dietary) exposure. The potential risk associated with the endoscopies can be disregarded in assessing the risks associated with the possible blood-borne transmission routes, and no specific action is called for with regard to other patients on whom those endoscopes may have been used.
  - (ii) **Comparing the blood-borne routes, the patient is much more likely to have been infected through receipt of plasma products, rather than any of the 14 units of red cells known to have been received.** The implied risk of each of these 14 donors being infected appears to lie below the 1% threshold that would trigger "at risk" status.
  - (iii) **Given the large pool sizes involved (of the order of 20,000 donations per pool), the risk differential between "implicated" and "non-implicated" batches of blood product is not marked.** Unless the prevalence of infection is very low, there is a strong possibility of *any* given batch of blood products prepared from large pools sourced from UK donors in the period 1980-2001 containing at least one infected donation. This reinforces the logic of the CJD Incidents Panel's 2004 decision to consider all haemophilia and blood disorder patients exposed to such UK-sourced plasma products as an "at risk" group. There is no strong case for differentiating between sub-groups.
  - (iv) **Given the precautionary assumptions in the DNV risk assessment, any patient exposed to substantial quantities of UK plasma product (as this haemophilia patient was) would almost certainly have received a substantial infective dose, whether or not any of the batches were "implicated" (i.e. traceable to a donor who later went on to develop clinical vCJD).** In fact, this patient may have been more likely to have been infected by receipt of large quantities of "non-implicated" plasma, than by the smaller quantities of "implicated".
  - (v) **The lack of any clinical vCJD cases to date amongst patients with haemophilia may suggest that the DNV infectivity scenario is overly-pessimistic.** Risk assessments carried out elsewhere assume that a greater proportion of the infectivity would be removed during the manufacturing processes. This raises issues beyond the scope of this paper. Nevertheless, we have re-run the analysis using a markedly lower infectivity assumption with regard to plasma products, and the conclusions listed in (ii) – (iv) above still hold.

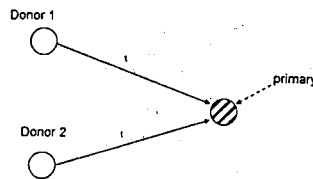
## Method

7. The following analysis starts from the "reverse risk assessment" previously used by the Panel to assess the implied risks of donors to vCJD clinical cases being infected (DH, 2005a; Bennett, Dobra and Gronlund, 2006), and extends it to deal with this much more complex incident. We start with a simple example and then build up the analysis step-by-step. This is both to demonstrate how the conclusions are reached in this case, and to show how the same approach can be used to handle other complex incidents that may arise.

### Example 1

8. We therefore start with a simple incident as shown in Figure 1(a). Here, a patient has received two single-unit Red Cell transfusions, one from each of two donors. The recipient goes on to develop vCJD, and the timing of the transfusions does not rule either of the donors out as the route of infection. What is the chance of each of these donors carrying vCJD infection?

Figure 1 (a) Two component donors, neither known to be infected



9. The answer to this depends primarily on the chance of transmission occurring if one of the donors were to be infected – i.e. the transmission probability,  $t$ . By definition, this lies between 0 and 1: if  $t = 1$ , transmission would be certain. In that case, and all else being equal<sup>1</sup>, the patient's disease would be equally likely to have come from primary infection, or from either of the two donors having been infected. So by implication, each donor would have a 1 in 3 chance of being

<sup>1</sup> "All else being equal" essentially means that there is no prior reason to suppose that donors or recipient were particularly likely or unlikely to have been infected with vCJD, e.g. through "high risk" surgery, or conversely not having lived in the UK during years of high BSE exposure.

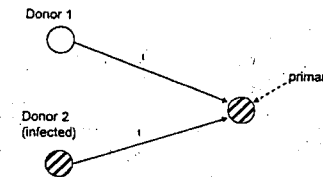
infective.<sup>2</sup> More generally, if there are  $n$  donors, the chance of each being infective would be  $1/(n+1)$ .

10. The implied risks to the donors clearly diminish if  $t < 1$ . However, the CJD Incidents Panel has used a precautionary approach, concentrating on scenarios in which  $t$  is at least 0.5. With  $t$  in this range, the implied risk to donors remains high unless the number of donors to the vCJD case is large. For example, if  $t = 0.5$ , then with two donors the chance of either being infected would be roughly 0.25. Note that none of these calculations depend on the underlying prevalence of infection, provided this is the same for donors and recipients.

### Example 2

11. The situation would clearly be very different if one of the donors was later diagnosed with vCJD, as in Figure 1(b).

Figure 1 (b) Two component donors, one known to be infected



This creates a marked asymmetry between the infection routes, dependent on the prevalence of infection in the donor population. Whilst Donor 2 is now known to be infected, Donor 1's prior probability of infection is simply the prevalence of infection ( $p$ ), unknown but assumed to be small. This situation provides an exemplar for analyses in which some routes are prevalence-dependent and others are not.

Let:

$P(D1)$  be the probability of the recipient's infection having come via Donor 1

<sup>2</sup> The arguments expressed here can be expressed more formally using Bayes' Theorem to update probabilities in the light of new information. However, this is presentationally more clumsy, especially in the more complex examples considered below.

$P(D2)$  be that of the infection having come via Donor 2  
and  $P(\text{prim})$  be the probability of the recipient having a primary infection

- For simplicity, suppose that the chance of the patient being infected by more than one route is negligible. Then (given that infection has occurred)  $P(D1)$ ,  $P(D2)$  and  $P(\text{prim})$  must add up to 1.
  - Furthermore, the “balance” between the three probabilities will be governed by  $t$  and  $p$ . Specifically:
    - $P(D1)$  will be proportional to both  $p$  (prevalence of infection) and  $t$  (transmission probability)
    - $P(D2)$  will only be proportional to  $t$
    - and  $P(\text{prim})$  will only be proportional to  $p$
12. Provided  $p$  is small (e.g.  $1/4,000$  or  $1/10,000$ ) and  $t$  is not,  $P(D2)$  will be *much* larger than either of the other two probabilities. To a very close approximation,  $P(D2) = 1$  and  $P(D1)$  and  $P(\text{prim})$  are zero. We can be virtually certain that the infection came from Donor 2. In practical terms, this new information about Donor 2 means that Donor 1 need not be considered as “at risk” according to CJD Incidents Panel criteria.

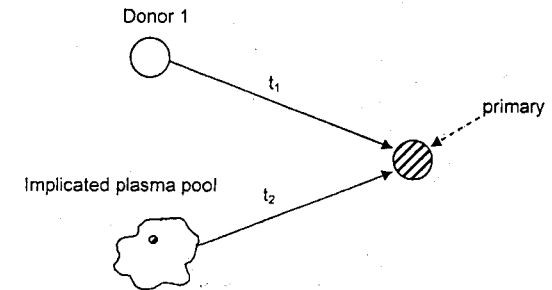
#### Example 3

13. In the last two examples, the two secondary routes had the same transmission probability,  $t$ . But suppose now that there are routes with different values of  $t$  – e.g. transfusion of blood components and receipt of fractionated blood products. Figure 2 below shows a situation in which the calculations need to balance two contrasting secondary routes:
- a blood component transfusion, associated with a high transmission probability ( $t_1$ ) if the donor (D1) is infected, but with no reason to believe that this is the case, and
  - a plasma product pool with a contributing donor (D2) now known to be infected, but with a low transmission probability ( $t_2$ )

As before, the three probabilities  $P(D1)$ ,  $P(D2)$  and  $P(\text{prim})$  must add up to 1, and now:

- $P(D1)$  will be proportional to  $p$  and  $t_1$
- $P(D2)$  will be proportional to  $t_2$
- and  $P(\text{prim})$  will be proportional to  $p$

Figure 2: One component donor, not known to be infected: plasma pool, containing an implicated donation



14. To illustrate numerically, suppose  $p$  is  $10^{-4}$  i.e. prevalence of infection is 1 in 10,000, that  $t_1 = 1$  and  $t_2 = 10^{-3}$  (that is, transmission via the product pool is less efficient than via the transfused component by a factor of 1,000).

In that case, it can be shown that:

$$P(D1) = 1/12 \quad P(D2) = 10/12 \quad \text{and} \quad P(\text{prim}) = 1/12$$

The infected plasma pool is thus clearly the most likely transmission route, by a factor of 10 over each of the other two possibilities.

15. The principles used to analyse these simple cases are now extended to consider the case of the haemophilic patient with a finding of abnormal prion protein in the spleen.

#### Analysis

16. Potential secondary transmission routes in this instance consisted of the following (where an “implicated” donor means one for which there is now evidence of having been infected with vCJD):
- 5 invasive endoscopic procedures (biopsies) and a larger number of endoscopies without biopsy.
  - exposure to 14 units of Red Cells, each from different (“non-implicated”) donors
  - exposure to just over 9,000 units of Factor VIII made from two plasma pools with an “implicated” contributing donor (8,025 units from one batch and 1,000 from the other)

- exposure to many other units of UK-sourced pooled products, including nearly 400,000 units of Factor VIII, with no *known* links to “implicated” donors

To simplify the subsequent discussion, we consider the relative risks from each of these routes in turn.

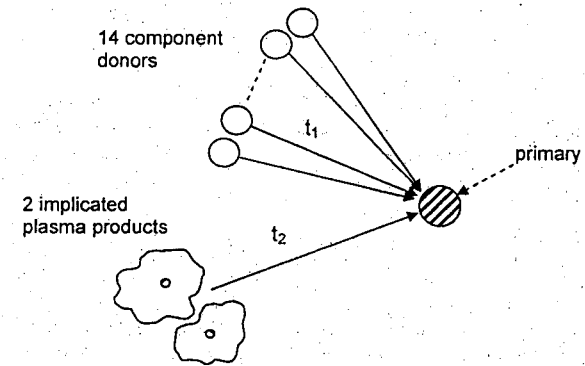
*Transmission risks from the endoscopies*

17. vCJD transmission risks from endoscopy have been examined by an ACDP TSE WG subgroup, informed by an outline risk assessment. It is important to appreciate that these procedures involve a very small instrument (head) being passed down a very long, thin, channel. The possible “mechanics” of infection therefore differs from other surgical procedures. The group considered that any significant risk of onward transfer of infective material to a receptive site would require the procedure to be invasive, as distinct from examinations that involve the instrument sliding against the wall of the gut. On that argument, the relative risk from endoscopic procedures *not* involving biopsy would be negligible.
18. So concentrating on procedures involving biopsy, the question arises of whether the heads used would have been single-use. This would reduce the transmission risks considerably, but not eliminate them (due to the possibility of the new head being contaminated on its way down the endoscopy channel. Although we do not know whether the heads involved in these procedures were single-use, let us suppose they were not.
19. For endoscopy with re-useable heads, the best existing analogy is with the current surgical risk assessment as applied to procedures encountering lymphoid tissue. Depending on assumptions on the efficacy of decontamination, the “standard” model suggests that indefinite re-use of a set of instruments might cause 1 – 10 secondary infections per operation on an infective patient. The infection risk to a random patient resulting from all previous re-uses of the instruments would be in the same range multiplied by the prevalence of infection ( $p$ ). However, the surgical model considers the transmission risks from a set of 20 instruments, rather than just one (very small) biopsy head. For the latter, it therefore seems reasonable to reduce the estimated risk by a factor of at least 10. Even on pessimistic assumptions, therefore, the risk of infection from a “random” biopsy would be in the range  $(0.1 - 1)p$ . In other words, the chance of the patient being infected via any of 5 such biopsies would be similar to the risk of having been infected through the “primary” route of dietary exposure.
20. As will be seen below, the chance of this particular patient having been infected by the primary route are very small (in all scenarios) as compared to that of infection through a blood-borne route. On the above argument, the same applies to the endoscopic route. For simplicity, this route will therefore be disregarded in the following calculations. It should be noted that even if the risks of transmission via endoscopy were much greater than suggested here, the only effect on subsequent calculations would be to reduce the probabilities associated with all the blood-borne routes slightly.

*Blood components and “implicated” plasma products*

21. We now consider the relative probability of the patient’s infection having come from the implicated plasma products, versus the 14 Red Cell transfusions. As discussed in the “methods” section, we need to balance the greater transmission probability for blood components (Red Cells in this instance) against the existence of an implicated donor contributing to the pooled plasma products. The situation is shown schematically in Figure 3, omitting for now the other “non implicated” plasma products.

Figure 3: 14 component donors, none known to be infected; 2 plasma products, each from a pool containing an implicated donation



22. The key additional variable here is  $t_2$  – the chance of transmission from an implicated pool. This can be quantified using the infectivity assumptions originally generated in DNV’s risk assessment (DNV, 2003). As discussed further below, the calculations initially use the more pessimistic of alternative infectivity scenarios considered by DNV.
23. For the present, we also suppose that the *only* infected donation in the plasma pools came from the identified infected donor – though this is reconsidered below. As detailed in the first part of Annex A, calculations then suggest that this one infected donor would have resulted in the Factor VIII received by the patient containing a total infective dose of about  $0.2 ID_{50}$  (0.16 via one pool and 0.05 via the other). Using the simple linear dose-response model that has informed Panel recommendations to date, this implies a transmission probability  $t_2$  of approximately 0.1.
24. We can then use the approach set out before to assign probabilities to the possible infection routes in different scenarios. Table 1 below shows the results, using this value for  $t_2$  and alternatives of 1 and 0.5 for  $t_1$ , and 1 in 4,000 and 1 in

10,000 for the prevalence, p. The successive rows show the probability of infection having come from the implicated plasma products, from any one of the 14 component (Red Cell) donors, and from the primary outbreak. It can be seen that in all scenarios, the first route strongly dominates. Note that these are illustrative figures, using assumptions subject to much uncertainty. Nevertheless, they do suggest that the infection is much more likely to have come from the plasma products, with the implied risk to the component donors remaining clearly below 1%.

**Table 1: Relative probabilities of potential infection routes (omitting "non-implicated plasma" products)**

Prevalence, p	1 in 4,000		1 in 10,000	
	0.5	1	0.5	1
Transmission probability, t1	0.5	1	0.5	1
Probability implicated plasma products	98%	97%	99%	99%
Probability of each of the 14 component donors	<0.3%	<0.3%	<0.1%	<0.1%
Probability primary	<0.3%	<0.3%	<0.1%	<0.1%

Note: these are illustrative calculations only. All figures are rounded to the nearest %, or (for small probabilities) indicate an upper bound.

*Implicated and "Non-implicated" plasma products*

25. Although the above analysis provides some robust conclusions about the infection routes considered so far, the calculations ignore one further factor: the chance of the infection having come from the "non-implicated" plasma products – i.e. those manufactured from plasma pools not known to have an infected contributing donor. The problem here is that because the pool sizes are so large (of the order of 20,000 donations each), there is a high probability that many of them did, in fact, contain infective donors even if one has not been identified. Crudely, if the prevalence were 1 in 10,000, one would expect each pool to contain about 2 infected donations.<sup>3</sup>
26. This argument does not entirely remove the distinction between implicated and non-implicated pools. Where there is known to be an infected contributing donor (and nothing is known about the rest), the other donors to that pool also have the same probability p of being infected. So with a prevalence of 1 in 10,000 and typical pool sizes of 20,000, one would reasonably expect a "non-implicated" pool to contain 2 infected donations and an "implicated" pool to contain 3. Nevertheless, this is not a great differential. The calculation suggests that unless the prevalence of infection is very low – much lower than considered here, there is only a modest difference in the risks posed by receipt of implicated and non-implicated plasma. This observation supports the existing policy of considering recipients of UK-sourced plasma products as a group, rather than

<sup>3</sup> More strictly, the expected number of infected donations in each pool will be subject to a binomial distribution. However, the distribution is not essential to the argument, especially for patients receiving high volumes of product sourced from many different pools, when these statistical fluctuations will tend to even out.

applying additional measures to those with known exposure to implicated batches.

27. This specific haemophilia patient had received such large quantities of Factor VIII – almost 400,000 units, the majority since 1980)) – that on these calculations, the cumulative risk from the "non-implicated" batches may well have exceeded that from the smaller number of "implicated" ones. This can be illustrated by considering the expected number of ID<sub>50</sub> received via each route. This is illustrated in the second part of Annex A. In summary:
- If the two "implicated" pools contained 3 infected donations, this route would have exposed the patient to a total dose of 0.6 ID<sub>50</sub>.
  - If the other "non-implicated" pools each contained 2 infected donations, this route would have exposed the patient to an expected total of 24 ID<sub>50</sub>.
28. Simple application of the linear dose-response model would then suggest that whereas Factor VIII from the two "implicated" pools would have contained a dose liable to transmit infection with a probability of 0.3, the large number of units sourced from "non-implicated" pools would have contained more than enough infectivity to transmit. Crudely, this suggests that the "non-implicated" pools represent the more probable source of infection, by a factor of just over 3.<sup>4</sup>
29. This last calculation is reflected in Table 2 below, for prevalence scenarios of both 1 in 10,000 and 1 in 4,000. However, we stress that this is very simplistic. It rests on accepting the linear model uncritically, and assuming that doses received on successive occasions can simply be added together in calculating an overall risk of infection. Nevertheless, the comparison between "implicated" and "non-implicated" routes is instructive, in showing how the sheer number of exposures may come to dominate the presence of a known infection.

**Table 2: Relative probabilities of potential infection routes (including "non-implicated plasma" products)**

Prevalence, p	1 in 4,000		1 in 10,000	
	0.5	1	0.5	1
Transmission probability, t1	0.5	1	0.5	1
Probability implicated plasma products	38%	38%	24%	24%
Probability of each of the 14 component donors	<0.03%	<0.03%	<0.02%	<0.02%
Probability primary	<0.03%	<0.03%	<0.02%	<0.02%
Probability non-implicated plasma products	61%	61%	76%	76%

Note: these are illustrative calculations only. All figures are rounded to the nearest %, or (for small probabilities) indicate an upper bound.

<sup>4</sup> Note that the differential between infectious doses is much greater, but the practical effect is limited by infection being regarded as certain once the dose reaches 2 ID<sub>50</sub>. As seen in following paragraphs, the risk differential between routes is therefore more pronounced in lower-infectivity scenarios.

30. As can be seen, the previous conclusion about the low implied risk to each of the 14 component (red cell) donors still applies, with even greater force. However, these results also highlight something of a paradox. Combined with the infectivity scenario taken from the DNV assessment, the pool size / prevalence calculations suggest that many recipients of plasma products would have received very high infectious doses, *whether or not* they had received any "implicated" units with known linkage to an infected donor. This opens the question of why no clinical vCJD cases have been seen in the population of haemophilia / blood disorder patients designated as "at risk" because of their exposure to UK sourced blood products.<sup>5</sup> It might therefore be argued that the infectivity assumptions applied to plasma products are overly pessimistic.

31. Although this question is impossible to answer definitely, and in any case raises issues beyond the scope of this paper, it is appropriate to check that the conclusions we have already suggested about relative likelihoods would not be overturned were we to assume lower levels of infectivity in plasma derivatives. The DNV report itself suggests two possible methods for calculating the infectivity present in each plasma derivative, using different assumption about the effect of the various manufacturing steps. In line with the generally precautionary approach adopted by CJD Incidents Panel, the calculations so far use figures based on the more pessimistic of these. The less pessimistic alternative suggested by DNV (using the "highest single clearance factor" in the manufacturing process) leads to an infectivity estimate for Factor VIII that is lower by a factor of 4. However, it should also be noted that risk assessments carried out elsewhere take the clearance factors achieved at different stages to be at least partly additive, which would lead to much smaller infective loads.

32. In fact, reducing the assumed infectivity *increases* the relative chance of infection via "non-implicated" as compared to "implicated" plasma. For example, suppose the presumed infectivity in all the Factor VIII received was reduced by a factor of 100 (2 logs). Modifying the calculations in paragraph 27, this patient would then have received an expected:

- 0.006 ID<sub>50</sub> from the two "implicated" pools (representing a transmission risk of 0.003)
- 0.24 ID<sub>50</sub> from all the other "non-implicated" pools (representing an infection risk of 0.12).

33. Albeit with the same caveats as before about using the linear model to quantify the cumulative risks from successive doses, this suggests that the latter risk would outweigh the former by a factor of 40. Table 3 shows how the previous results for this patient would change, under this revised infectivity scenario. As can be

<sup>5</sup> Possible explanations include the following: that prevalence of infection amongst donors is much lower than in the scenarios considered here; that much more infectivity is removed during processing of plasma products than suggested by the DNV analysis; and/or there is a threshold dose-response effect and most recipients fall below this. Genotype effects may also be relevant (in providing resistance to infection or extending the time to clinical disease), but one would expect a substantial proportion of this group to be MM homozygotes – the most susceptible genotype.

seen, the previous conclusions still hold, in particular regarding the small implied risk to each of the 14 red cell donors.

**Table 3: Relative probabilities of potential infection routes (including "non implicated plasma" products and using lower infectivity estimates for plasma products)**

Prevalence, p	1 in 4,000		1 in 10,000	
	0.5	1	0.5	1
Transmission probability, t1	0.5	1	0.5	1
Probability implicated plasma products	2%	2%	3%	3%
Probability of each of the 14 component donors	<0.05%	<0.09%	<0.05%	<0.09%
Probability primary	<0.09%	<0.09%	<0.09%	<0.09%
Probability non-implicated plasma products	97%	97%	97%	96%

*Note: these are illustrative calculations only. All figures are rounded to the nearest %, or (for small probabilities) indicate an upper bound.*

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## Annex A: Application of DNV Risk Calculation to Factor VIII Units

### (a) Implicated Donations

#### Key points: FHB4547

- There was one implicated (presumed infective) donation in a start pool of 26,303 donations (pool size supplied by Professor Frank Hill via email)
- Factor VIII is derived from cryoprecipitate, which has an estimated infectivity of 60 ID<sub>50</sub>s / donation of infected whole blood according to the DNV model
- 70.45kg of cryoprecipitate was made from the start pool, of which 21.58kg was used in the FHB4547 batch
- This implies that (21.58kg / 70.45kg) of the 60 ID<sub>50</sub>s made its way into the FHB4547 batch (18.38 ID<sub>50</sub>s)
- 1,844 vials each of 500 units (iu) were made from the batch, which results in an estimate of 0.00997 ID<sub>50</sub>s per vial or  $1.99 \times 10^{-5}$  ID<sub>50</sub>s per iu

Professor Frank Hill's report indicates that the index case received 8,025 units from this batch, giving an estimated 0.16 ID<sub>50</sub> from the implicated donation.

#### Key points: FHC4237

- There was one implicated (presumed infective) donation in a pool of 21,330 donations (pool size again supplied by Professor Frank Hill)
- Factor VIII is derived from cryoprecipitate, which has an estimated infectivity of 60 ID<sub>50</sub> / donation of whole blood
- 67.6kg of cryoprecipitate was made from the start pool, of which all was used in the FHC4237 batch
- This implies that the full dose of 60 ID<sub>50</sub> made its way into the FHC4237 batch
- 5,074 vials each of 250 iu were made from the batch, resulting in an estimate of 0.0118 ID<sub>50</sub> per vial or  $4.73 \times 10^{-5}$  ID<sub>50</sub> per iu

Professor Frank Hill's report indicates that the index case received 1,000 units from this batch, giving an estimated dose of 0.05 ID<sub>50</sub>.

### Conclusion

In total, these calculations suggest that index case would have received an estimated 0.21 ID<sub>50</sub> from the "implicated" donor. Using a linear dose-response model (where 1 ID<sub>50</sub> translates into a transmission probability of 0.5 and 2 ID<sub>50</sub> or more translates into transmission probability of 1) this represents a transmission probability of 0.104 or 10.4%.

### (b) Non-implicated Donations

In addition to the implicated donations, we have also to consider the possibility of other donors contributing to a pool being infective. With pool sizes of the order of 20,000 donations, each pool will be likely to contain contributions from one or more infected donors by chance, unless p is very small. For implicated pools, these will be *in addition to* the "known" implicated donor.

With a prevalence of 1 in 10,000, one might therefore expect the two implicated pools to contain two *further* infected donations, taking the total from 1 to 3 per pool.

This would make the infective dose received via the implicated units three times that calculated above, i.e. a total of roughly 0.6 ID<sub>50</sub>, yielding a transmission probability of 0.3.

This patient also received approximately 391,000 iu of UK-sourced Factor VIII plasma treatment *not* known to be associated with any infected donor. In round figures, this can be visualised in terms of 20 exposures to pools of 20,000 donors, each typically containing 2 donations from infected donors. The exact infective dose passed on to the patient will vary from batch to batch. However, the two examples given in part (a) suggest an eventual dose of  $2-5 \times 10^{-5}$  ID<sub>50</sub> per unit, per infected donor. For illustration, therefore, suppose that each unit exposed the recipient to  $6 \times 10^{-5}$  ID<sub>50</sub>, 400,000 such units would therefore have exposed the recipient to 24 ID<sub>50</sub>.



医薬品  
医薬部外品 研究報告 調査報告書  
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識別番号・報告回数	報告日 年 月 日	第一報入手日 2009 年 8 月 3 日	新医薬品等の区分 該当なし	総合機構処理欄
一般的名称	研究報告の公表状況	CONCEPT PAPER ON THE NEED TO UPDATE THE CHMP POSITION STATEMENT ON CJD AND PLASMA-DERIVED AND URINE-DERIVED MEDICINAL PRODUCTS (EMEA/CPMP/BWP/2879/02 REV. 1) http://www.emea.europa.eu/pdfs/human/bwp/25324609en.pdf		
販売名 (企業名)		公表国 英国	使用上の注意記載状況・ その他参考事項等 BYL-2009-0392 http://www.emea.europa.eu/pdfs/human/bwp/47271709en.pdf	
研究報告の概要	<p>本報告では、欧州医薬品委員会 (CHMP) のクロイツフェルト・ヤコブ病 (CJD) と血漿・尿由来製剤に関する現行ガイダンスは、2004 年 6 月に発表されており、ヒト組織由来製剤と CJD および変異型 CJD (vCJD) については具体的に記載されていない。そのため、2004 年 6 月以降に得られたヒト組織中の感染性の異常プリオンを改訂する必要がある。2004 年から現在までに、白血球非除去赤血球輸血による vCJD 感染が 4 例報告されており、また、現在調査中ではあるが、vCJD に感染した供血者からの血漿製剤を投与された血友病患者 1 名の脾臓から異常プリオン蛋白が検出されたことができた。その情報を関係当局へ報告することが義務付けられているが、これらのデータに基づき必要ならばガイダンス中の提言を再検討するべきであり、また、2005 年および 2007 年に欧州医薬品審査庁 (EMA) で開催された CJD 感染リスクと血漿・尿由来製剤に関する会議での決定事項も新たなガイダンスに盛り込む必要があることと触れている (例として、献血時の vCJD スクリーニングテストの有用性について)。更新された提言は、3 ヶ月間の意見公募の後 2010 年に適用する予定である。</p>			
報告企業の意見	<p>この報告に添い、現行ガイダンスの改訂が行われることで、更なる生物由来製剤の安全性の確保が保障されるものと考えられる。なお、弊社の血漿分画製剤の製造工程におけるプリオン除去能は 4log を上回ることが確認されており、弊社製剤による vCJD 感染リスクは極めて低いと考えられる。</p>			
今後の対応	現時点で新たな安全対策上の措置を講じる必要はないと考える。			

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European Medicines Agency  
Pre-authorisation Evaluation of Medicines for Human Use

London, 23 July 2009

Doc. Ref. EMEA/CHMP/BWP/253246/2009

090673 ~ 090678  
BYL-2009-0392

COMMITTEE OF HUMAN MEDICINAL PRODUCTS  
(CHMP)

CONCEPT PAPER ON THE NEED TO UPDATE THE CHMP POSITION STATEMENT ON CJD AND PLASMA-DERIVED AND URINE-DERIVED MEDICINAL PRODUCTS  
(EMEA/CPMP/BWP/2879/02 REV. 1)

AGREED BY THE BIOLOGICS WORKING PARTY	June 2009
ADOPTION BY CHMP FOR RELEASE FOR CONSULTATION	23 July 2009
END OF CONSULTATION (DEADLINE FOR COMMENTS)	31 October 2009

The proposed document will replace the CHMP Position Statement on Creutzfeldt-Jakob Disease and Plasma-derived and Urine-derived Medicinal Products (EMEA/CPMP/BWP/2879/02 rev 1)

Comments should be provided using this [template](http://www.emea.europa.eu) to [alberto.ganan@emea.europa.eu](mailto:alberto.ganan@emea.europa.eu)

KEYWORDS	Creutzfeldt-Jakob disease, vCJD, plasma-derived medicinal products, urine-derived medicinal products, prion infectivity reduction
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## 1. INTRODUCTION

The last revision of the "CHMP position statement on CJD and plasma-derived and urine-derived medicinal products" (EMEA/CHMP/BWP/2879/02/rev.1) was published in June 2004.

The document is the current EMEA/CHMP guidance on CJD and vCJD and plasma-derived and urine-derived medicinal products. It includes recommendations for these products based on the knowledge on CJD and vCJD epidemiology, human tissue distribution of infectivity/abnormal prion protein and infectivity in blood.

## 2. PROBLEM STATEMENT

The current position statement dates from 2004. Additional information has been accrued in this field since 2004 including the finding of four cases of vCJD infection associated with blood transfusion of non-leucodepleted red blood cells.<sup>1,2</sup> TSE infectivity has also been detected in urine in some animal models<sup>3,4,5,6</sup> in the clinical phase of the disease.

The CHMP opinion and recommendations reflected in the position statement were based on the knowledge on CJD and vCJD at the time of publishing. The progress in the field during the subsequent years reinforces the need to update the content of the document and to review the recommendations for these products.

The current position statement covers plasma-derived medicinal products and urine-derived medicinal products. Currently, there is no specific guidance on CJD and vCJD and advanced therapy medicinal products based on human tissues.

## 3. DISCUSSION

The position statement needs to include the latest epidemiological data and to reflect any new findings regarding the distribution of infectivity/abnormal prion protein in human tissues and the risk of infectivity and transmissibility of vCJD by plasma-derived and urine-derived medicinal products.

The position statement should revise some of the statements, which were uncertain in June 2004 but where further evidence has now accumulated (e.g. the presence of vCJD infectivity in human blood). It should also take into account the outcome of the ongoing investigations following the detection of abnormal prion protein in the spleen of a haemophilic patient who received a plasma-derived medicinal product from a donor that later developed vCJD.<sup>7</sup>

Manufacturers of plasma-derived and urine-derived medicinal products were required to estimate the potential of their specific manufacturing processes to reduce infectivity and provide this information to the relevant Competent Authorities. Based on the experience in the evaluation of these data, the recommendations should be re-discussed and revised if necessary.

The main conclusions of the two meetings regarding CJD risk and plasma-derived and urine-derived medicinal products held at EMEA in 2005 and 2007 respectively should also be incorporated in the current revision. Additionally, there is a need to update some of the references to the additional relevant EMEA guidance published (e.g. the guidance on the Investigation of Manufacturing Processes for Plasma-Derived Medicinal Products with Regard to vCJD Risk).

Furthermore, the updated position statement should also consider possible future situations which may have an impact on the risk assessment of plasma-derived medicinal products (e.g. the availability of a possible screening test for vCJD in blood donations).

The vCJD risk of medicinal products based on human cells and tissues will also be considered for discussion. A decision on whether the guidance and recommendations of the Position Statement should also cover these products will be discussed during the revision.

## 4. RECOMMENDATION

As already announced in the Biologics Working Party (BWP) work programme, an update of the CHMP position statement on CJD and plasma-derived and urine-derived medicinal products is recommended.

## 5. PROPOSED TIMETABLE

The appointment of the drafting group members and chairperson took place during the June BWP meeting. The updated CHMP Position Statement is intended to be adopted in 2010 following a 3-months' public consultation.

## 6. RESOURCE REQUIREMENTS FOR PREPARATION

A dedicated drafting group will be involved in the preparation of the revision of the CHMP position statement. Initially, the drafting group will meet by teleconference or virtual meeting system. Meetings at the EMEA involving the drafting group members and some co-opted members for specific topics may be needed at a later stage. A meeting with interested parties may be needed.

## 7. IMPACT ASSESSMENT (ANTICIPATED)

The updated position statement will have an impact on the recommended measures for human plasma-derived and urine-derived medicinal products.

## 8. INTERESTED PARTIES

Other EMEA Committees and Working Parties (including the Committee on Advanced Therapies (CAT), the Working Parties on Blood Products (BPWP), Cell-Based Products (CPWP) and on Gene Therapy Products (GTWP)) will be involved during the preparation. There will be liaison with the European Commission (DG Sanco) and ECDC. Internationally, there will be liaison with the WHO and with regulatory authorities in other regions. Interested parties with specific interest in this topic will be consulted, including EHC, EPPIC, IPFA and PPTA.

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[http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb\\_C/1195733818681?p=1225960597236](http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1195733818681?p=1225960597236)

\* EHC: European Haemophilia Consortium  
EPPIC: European Patients Primary Immunodeficiency Collaboration  
IPFA: International Plasma Fractionation Association  
PPTA: Plasma Protein Therapeutics Association

医薬品  
医薬部外品 研究報告 調査報告書  
化粧品

識別番号・報告回数		報告日	第一報入手日 2009年6月18日	新医薬品等の区分	厚生労働省処理欄
一般的名称	①②③④人血清アルブミン ⑤乾燥濃縮人血液凝固第Ⅷ因子 ⑥⑦乾燥濃縮人血液凝固第Ⅸ因子	研究報告の 公表状況	FDA (Advisory Committee)/2009/06/16	公表国 アメリカ	
販売名 (企業名)	①献血アルブミン25%静注 5g/20mL「ベネシス」 (ベネシス) ②献血アルブミン25%静注 12.5g/50mL「ベネシス」 (ベネシス) ③献血アルブミン5%静注 5g/100mL「ベネシス」 (ベネシス) ④献血アルブミン5%静注 12.5g/250mL「ベネシス」 (ベネシス) ⑤コンコエイト-HT (ベネシス) ⑥クリスマシンM 静注用 400単位 (ベネシス) ⑦クリスマシンM 静注用 1000単位 (ベネシス)				
221 研究報告の概要	<p>vCJDに関連した凝固Ⅷ因子製剤で11年前に治療を受けた英国の血友病患者のvCJD感染についての最新の報告により、FDAは米国で承認されている凝固Ⅷ因子製剤のレシピエントのリスクと、それら製剤のリスク管理戦略を再評価した。FDAは2006/12/15のTSEACの会議で「米国で採血された血漿から製造された米国承認の人血漿由来凝固Ⅷ因子製剤に関連した潜在性vCJDリスク評価の素案」の前回版を公表した。2006年以降、新しい情報が現れ、我々をリスク評価の更新へと刺激した。結果は、米国許可施設で製造された血液凝固第Ⅷ因子製剤を使用した重症型血友病Aあるいは重症フォン・ウィルブラント病(3型vWD)患者における、vCJD原因因子への曝露確率、曝露レベル及びvCJD感染の可能性のあるリスクの見積りの修正である。2006年のFDAのリスク評価は、英国でのvCJD保有率予想は1.8人/100万であり、2009年の英国でのvCJD保有率の予想は4.5人/100万であった。</p> <p>最新のリスク評価の結果：年当りの曝露とvCJDリスクについてのFDAの2009年の最新リスク評価の結果は、第Ⅷ因子インヒビターがなく、出血の治療を受けている血友病患者では、おおよそは<math>1.7 \times 10^{-7}</math> ivID50 /人/年(1/1200万のリスク)と低く、第Ⅷ因子インヒビターがあり、免疫寛容療法の治療を受けていて予防的治療レジメに従っている血友病患者では、おおよそは<math>1.6 \times 10^{-4}</math> ivID50/人/年(1/12000のリスク)と潜在的な曝露量はより高い。これはvCJD感染因子を合計4-6 Log低減させる工程で製造された凝固Ⅷ因子製剤を使用した全ての血友病A患者の年当たりの潜在曝露推定値の比較である。推定値(2009年 vs 2006年)の最も大きい差はⅧ因子インヒビターがあり、免疫寛容療法を必要とする予防療法を受ける患者においてであり、年当たりの曝露リスクは約4.5倍違った(<math>7.3 \times 10^{-4}</math> vs <math>1.6 \times 10^{-4}</math>)。2009年のFDAのvCJD血液由来Ⅷ因子製剤リスト評価モデルの結果は、米国で承認されている凝固Ⅷ因子製剤からのvCJD感染のリスクはおそらく非常に小さいだろうが、ゼロではないだろうというものであった。</p> <p>英国 Health Protection Agencyからの最近の報告を受けての再評価においても、FDAはリスクは極めて小さいと信じているとし、以下の点についてTSEAC(海綿性脳症諮問委員会)に諮問した。1) FDAはこのリスク評価を変更すべきか? 2) FDAは製剤のリスク低減のための手段の追加の推奨を考慮すべきか?、血漿分画製剤の警告ラベルを変更の推奨を考慮すべきか?、FDAが承認した血漿分画製剤を使用した患者のvCJDリスクに関連したFDAの広報(例えば、Gp)の変更の推奨を考慮すべきか?</p>				使用上の注意記載状況・ その他参考事項等
					<p>代表として献血アルブミン 25%静注 5g/20mL「ベネシス」の記載を示す。</p> <p>2. 重要な基本的注意</p> <p>(1) 略</p> <p>1) 略</p> <p>2) 現在までに本剤の投与により変異型クロイツフェルト・ヤコブ病(vCJD)等が伝播したとの報告はない。しかしながら、製造工程において異常プリオンを低減し得るとの報告があるものの、理論的なvCJD等の伝播のリスクを完全には排除できないので、投与の際には患者への説明を十分行い、治療上の必要性を十分検討の上投与すること。</p>

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報告企業の意見	今後の対応
<p>英国Health Protection Agencyからの最近の報告を受けてFDAが行ったvCJD感染リスクの再評価についての報告である。</p> <p>血漿分画製剤は理論的なvCJD伝播リスクを完全には排除できないため、投与の際には患者への説明が必要である旨を2003年5月から添付文書に記載している。2009年2月17日、英国健康保護庁(HPA)はvCJDに感染した供血者の血漿が含まれる原料から製造された第Ⅷ因子製剤の投与経験のある血友病患者一名から、vCJD異常プリオン蛋白が検出されたと発表した。弊社の原料血漿採取国である日本及び米国では、欧州滞在歴のある献(供)血希望者を一定の基準で除外し、また国内でのBSEの発生数も少数であるため、原料血漿中に異常型プリオン蛋白が混入するリスクは1999年以前の英国に比べて極めて低いと考える。また、製造工程においてプリオンが低減される可能性を検討するための実験を継続して進めているところである。</p>	<p>本報告は本剤の安全性に影響を与えるものではないと考えるので、特段の措置はとらない。</p>

Transmissible Spongiform Encephalopathies Advisory Committee  
21<sup>st</sup> Meeting, June 12, 2009

Holiday Inn  
2 Montgomery Village Avenue  
Gaithersburg, MD 20879

**Topic I:**

Modified FDA Risk Assessment for Potential Exposure to the Infectious Agent of Variant Creutzfeldt-Jakob Disease (vCJD) in US-licensed Plasma-Derived Factor VIII (pdFVIII)

**ISSUE:**

Plasma-derived Factor VIII (pdFVIII) products are used by blood clotting disorder patients with von Willebrand disease and some patients with hemophilia A. The announcement in February 2009 by health authorities in the United Kingdom that a vCJD infection had been recognized in a person with hemophilia treated with a UK manufactured "vCJD-implicated" pdFVIII 11 years earlier has prompted FDA to review the potential vCJD risk for US users of US-licensed pdFVIII products and current risk management strategies for such products.

Results from an updated FDA risk assessment model continue to indicate that the estimated risk of the potential for US-licensed pdFVIII products to transmit the agent of vCJD, the human form of "Mad Cow Disease," is highly uncertain but is most likely to be extremely small.

FDA seeks the advice of the Committee on whether additional risk reducing measures are needed (e.g. modifications to current donor deferral policies) to maintain the safety of plasma-derived biologic products and whether FDA should change its communications concerning the risks of vCJD associated with plasma derivatives.

**BACKGROUND:**

In February 2009 the Health Protection Agency of the United Kingdom (UK) reported a probable case of pre-clinical variant Creutzfeldt-Jakob Disease (vCJD) infection in a man over 70 years of age with hemophilia ([http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb\\_C/1195733818681](http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1195733818681)). Post-mortem examination of the brain found no neuropathological changes suggestive of vCJD, however, examination of the spleen revealed abnormal accumulations of prion protein (PrP) typical of vCJD and not of other forms of CJD. The man, who was in his 70s at death, had been treated 11 years earlier with UK-sourced plasma-derived Factor VIII (pdFVIII) from a "vCJD-implicated" lot, i.e., a lot of pdFVIII manufactured from pooled plasma containing at least one donation from a person who later died of confirmed or probable vCJD.

Variant CJD is a fatal human neurodegenerative disease acquired through infection with the agent that causes bovine spongiform encephalopathy (BSE). vCJD infection is most often acquired by consumption of beef products from infected cattle. The first human cases of vCJD were reported in the UK in 1996 (Will 1996); as of May 2009, 211 definite or probable clinical cases of vCJD have been reported worldwide, 168 of them in the UK (<http://www.cjd.ed.ac.uk/>). In addition to food-borne cases, four presumptive "secondary" transfusion-transmitted infections with the vCJD agent have also been reported in the UK since 2003 (Llewelyn 2004, Peden 2005, Hewitt 2006, [http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb\\_C/1195733711457?p=1171991026241](http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1195733711457?p=1171991026241)). Three of the transfusion recipients died of vCJD, while one had vCJD infection detected after death from an unrelated cause. Each person with a secondary vCJD infection had been transfused with red blood cells from donors who were asymptomatic at the time of donation but who later died from vCJD. The probable transmission of vCJD via transfusion of red blood cells in the UK increased the concern that products manufactured from the plasma component of human blood might also pose a risk of vCJD transmission. (Plasma of animals with scrapie—a transmissible spongiform encephalopathy [TSE] used to model vCJD—contains approximately 50% of the total infectious agent present in blood [Gregori 2004].)

After the first descriptions of vCJD, UK authorities, recognizing a possible risk of transmitting vCJD by products derived from human plasma, stopped using UK plasma in their manufacture and began to obtain plasma from the US ([http://www.transfusionguidelines.org.uk/docs/pdfs/dl\\_ps\\_vcjd\\_2008-09.pdf](http://www.transfusionguidelines.org.uk/docs/pdfs/dl_ps_vcjd_2008-09.pdf)). After the first reports of transfusion-transmitted vCJD, UK authorities took the additional step of notifying recipients of a number of plasma derivatives, such as coagulation factors VIII, IX, and XI, as well as antithrombin and intravenous immune globulins, that they might be at increased risk of vCJD and reminded surgeons and dentists to take reasonable precautions to prevent iatrogenic transmission of vCJD ([http://www.advisorybodies.doh.gov.uk/acdp/tseguidance/tseguidance\\_annexj.pdf](http://www.advisorybodies.doh.gov.uk/acdp/tseguidance/tseguidance_annexj.pdf) [http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_081170?IdcService=GET\\_FILE&dID=155914&Rendition=Web](http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_081170?IdcService=GET_FILE&dID=155914&Rendition=Web)).

In 1999, prior to the identification of transfusion-transmitted vCJD, FDA recognized a potential though unknown risk of transmitting vCJD by contaminated blood products. Therefore, consistent with advice from TSEAC, FDA recommended precautionary deferrals of blood and plasma donors who had traveled or lived for six months or longer in the UK from the presumed start of the BSE outbreak in the UK in 1980 until the end of 1996, when the UK had fully implemented a full range of measures to protect animal feed and human food from contamination with the infectious agent causing BSE. In January 2002, FDA recommended enhancing the vCJD geographical donor deferral policy by reducing the time that an otherwise suitable blood donor might have spent in the UK from six to three months. FDA also recommended deferring donors who had spent five or more years in France or cumulatively in any European country listed by the USDA as either having had BSE or having a significant risk of BSE. FDA added certain other measures to reduce potential risk, such as deferring any donor with a history of blood transfusion in the UK after 1979 (<http://www.fda.gov/BiologicsBloodVaccines/SafetyAvailability/BloodSafety/ucm095138.htm>).

m;  
<http://www.fda.gov/BiologicsBloodVaccines/SafetyAvailability/BloodSafety/ucm095143.htm>). Taken together, these steps were estimated to have excluded donors representing slightly more than 90% of the potential vCJD risk while deferring about 7% of otherwise suitable donors. Since 2002, TSEAC has several times reviewed FDA vCJD/CJD blood donor deferral policies, most recently advising FDA to recommend deferral of blood donors transfused in France since 1980. FDA has issued draft guidance containing such recommendations (FDA 2006).

Because BSE has been detected in so few US cattle (only three reported cases: two in US-born cattle and one in a cow imported from Canada [[http://www.ars.usda.gov/research/publications/publications.htm?SEQ\\_NO\\_115=197033](http://www.ars.usda.gov/research/publications/publications.htm?SEQ_NO_115=197033)]), and because none of the three cases of vCJD recognized in the US appears likely to have resulted from exposure here (two cases in long-time UK residents and a third in a recent immigrant from Saudi Arabia), the risk that US plasma donors might have acquired vCJD infection from US beef is thought to be extremely low. (Because the likelihood of exposure of US donors to the BSE agent in US beef products was judged to be so much lower than likelihood of exposure in UK, its estimated contribution to overall risk seems negligible and—while not ignored in developing FDA Risk Assessments—was not included in the model summarized here.) However, it is possible that a few US donors might have been exposed to the BSE agent during travel or residence in the UK, France, or certain other countries of Europe; such donors are at an uncertain but increased risk for vCJD. A subset of such vCJD-infected donors might have contributed to plasma pools used to manufacture pdFVIII in the US. The FDA-recommended donor deferral policy probably eliminates most of the risk associated with vCJD-infected individuals; however, there could be residual risk from eligible donors who were nonetheless infected during brief stays in foreign countries (Yamada 2006) or from donors who should have been deferred by the screening process, but, for an unknown reason, were not.

#### FDA Risk Assessment for vCJD and pdFVIII

The recent report from the UK attributing vCJD infection in a person with hemophilia to treatment 11 years earlier with pdFVIII from an implicated batch prompted FDA to re-examine the potential vCJD risk for recipients of US-sourced pdFVIII. FDA presented a previous version of a "Draft Quantitative Risk Assessment of vCJD Risk Potentially Associated with the Use of Human Plasma-Derived Factor VIII Manufactured Under United States (US) License From Plasma Collected in the US" at the December 15, 2006 meeting of the TSEAC.

Since 2006, new information has emerged, prompting us to update the risk assessment. FDA is presenting an update of its 2006 computer-based simulation model to estimate the potential risk, to elucidate the most important factors determining the risk, and to identify feasible actions that might reduce the risk. The results are modified estimates of the probability of exposure, possible levels of exposure to the vCJD agent and the possible risk of vCJD infection in several types of patients with severe hemophilia A (HA) or with a severe form of von Willebrand disease (type-3 vWD) who have used pdFVIII product manufactured in US-

licensed facilities. The following overview briefly describes key elements of the FDA risk assessment for vCJD and pdFVIII as first presented and posted online in 2006 (FDA, 2006).

### I. Overview of FDA 2006 Risk Assessment Model for vCJD and pdFVIII

#### Module 1. Estimates of vCJD Prevalence in UK

In our 2006 model, we used the possible UK prevalence of vCJD to estimate the possible prevalence in US plasma donors. The model assumed that the major source of vCJD infection in the US would probably be from plasma donors who traveled or lived in the UK, France or elsewhere in Europe since 1980 and were infected with the BSE agent during their stays.

Two different sources of information were used to estimate possible prevalence of UK vCJD:

- One estimate was based on epidemiological modeling predictions of the number of vCJD cases diagnosed in the UK and a number of assumptions (e.g., incubation period, time of infection, effectiveness of feed ban). The model estimated a prevalence of approximately ~1.8 cases per million persons of the genetically most susceptible genotype (homozygous for methionine at codon 129 of the gene encoding PrP [PRNP gene]) and allowed for the possibility that some infected people might have very long asymptomatic incubation periods or never become symptomatic (Clarke and Ghani 2005). The model relied on reports of overt clinical cases of vCJD—all of which, at the time of our FDA 2006 risk assessment, had been in persons homozygous for methionine at codon 129 of the PRNP gene. The number of expected cases was therefore restricted to the approximately 40% of the UK population having that genotype; no prediction was offered for the rest of the population.
- A second estimate for UK vCJD infection prevalence was generated using data from a survey of abnormal TSE-associated PrP (recently designated as PrP<sup>TSE</sup> by a WHO Consultation (<http://www.who.int/bloodproducts/cs/TSEPUBLISHEDREPORT.pdf>)) in lymphoid tissues reported in 2004 (Hilton 2004), yielding a mean estimate of 1 case per 4,225 persons. The prevalence estimate was further adjusted to account for the difference in age distributions of patients whose tissues were surveyed and of blood donors.

#### Module 2. Estimates of vCJD Prevalence in US Donors and US Plasma Pools

This module estimated the number of US plasma donors potentially infected with the agent that is responsible for vCJD and, from that, the number and percentage of plasma pools potentially including donations containing the vCJD agent. This module used results of a travel survey of US donors to determine numbers of US plasma donors expected to be at increased risk for vCJD, including those with history of:

- Dietary exposure to BSE-contaminated beef during long-term travel or residence in UK, France and other European countries (since 1980);
- US military service in European countries where beef was obtained from the UK, including US military personnel and associated civilian employees and dependents posted on or residing near military facilities in Europe during certain years; and
- Transfusion with blood collected in Europe ("EuroBlood").

US plasma donors potentially at increased risk for vCJD were further characterized by their:

- Country of travel or residence,
- Specific duration of travel or residence,
- Years of travel or residence,
- Age of donor,
- Rate and frequency of plasma donation,
- Number of donations per pool, and type of plasma pool (Source Plasma or recovered plasma), and
- Effectiveness of donor deferral policies.

### Module 3. pdFVIII Manufacturing and Processing

This part of the model calculated the likelihood and number of plasma pools potentially containing vCJD agent and the quantity of agent per plasma pool and FVIII vial based on:

- Probability of and predicted quantities of vCJD infectivity (as animal intravenous 50%-infecting doses [i.v. ID<sub>50</sub>]) per donation and per pool,
- Reduction in quantity of vCJD agent during manufacture, and
- Total yield or quantity of pdFVIII produced from the plasma pool.

### Module 4. Utilization of pdFVIII by Hemophilia A Patients

The potential exposure of an individual with hemophilia A to vCJD agent in pdFVIII was estimated in the model based on:

- Total quantity of pdFVIII used per year, and
- Estimated potential quantity of vCJD agent predicted to be present in the pdFVIII product.

The quantity of pdFVIII utilized by an individual patient depends on the severity of hemophilia and the treatment regimen employed. Those were estimated using data from a study sponsored by the US Centers for Disease Control (CDC) involving patients with hemophilia A in six states from 1993 through 1998. The FDA 2006 Risk Assessment provided outputs that estimated the annual exposures for several subpopulations of patients with severe hemophilia A in the following five clinical treatment groups:

- Patients requiring FVIII prophylaxis but having no FVIII inhibitor and no immune-tolerance treatment;
- Patients requiring FVIII prophylaxis but having FVIII inhibitor (i.e., needing more FVIII to maintain desired coagulation status);
- Patients requiring prophylaxis and having both inhibitor and immune-tolerance treatment;
- Patients requiring only episodic treatments and having no inhibitor; and
- Patients requiring only episodic treatments but having FVIII inhibitor.

### Additional Module. VonWillebrand disease (vWD) in Adults (>15 yrs of age) and Young Persons (≤15 yrs of age)

We estimated risk for adult and juvenile patients with vWD in two clinical treatment groups, those requiring:

- Prophylaxis or
- Episodic treatments only.

### II. FDA Modified Risk Assessment Model for vCJD and pdFVIII: Updates and Changes in Model Inputs of June 2009

Recently, new scientific information has emerged concerning susceptibility to infection with the vCJD agent. To date, only persons homozygous for methionine at codon 129 of the *PRNP* gene have developed symptomatic vCJD illness that meets the case definition for vCJD. Successful sequencing of the *PRNP* genes from two of the three PrP<sup>TSE</sup>-positive appendix samples detected during the survey described above (Hilton 2004) found them to be from persons homozygous for valine (VV) at codon 129 (Ironside 2006). The fate of these two persons with *PRNP* codon-129 VV genotypes is not known, although no definite or probable cases of vCJD in persons with that genotype have been reported. One of the four transfusion-transmitted vCJD infections reported since 2003 was in a patient heterozygous for methionine and valine (MV) at that codon (Peden 2004). Furthermore, one individual with the *PRNP* codon-129 MV genotype—apparently not a transfusion recipient—was reported in the UK popular press (Telegraph, December 18, 2008) to have died with CJD suspected "... on a clinical basis only... [but] it does look more likely to be variant CJD than another form of prion disease." (<http://www.telegraph.co.uk/health/healthnews/3815384/Hundreds-could-die-as-scientists-identify-first-case-of-second-wave-vCJD.html>).

Taken together, these recent findings suggest that it is now more reasonable to assume that the entire general UK population is at risk for vCJD infection, and this assumption has been incorporated throughout the FDA 2009 updated Risk Assessment. Unfortunately, there is still little information available on the duration of the incubation periods for vCJD-infected persons with *PRNP*-129 non-MM genotypes. We assumed that the incubation periods and duration of that part of the incubation period in which vCJD agent is present in blood of infected *PRNP*-129 non-MM individuals is potentially much longer than for *PRNP*-129 MM individuals.

Several inputs have been updated or added to modules 1 and 2 of the model since 2006. Three input parameters, listed below, have been updated since 2006, and three new inputs were recently added to the model to improve assumptions for susceptibility of recipients to vCJD infection.

#### Updated Inputs:

1. Prevalence estimation of UK vCJD infection
2. Prevalence of UK vCJD infection: Age of susceptible population
3. Time during incubation period when infectivity is present in blood

#### New Inputs:

4. *PRNP*-129 genotype susceptibility and genotype proportions in US population
5. Distributions of vCJD incubation periods for persons of different *PRNP*-129 genotypes
6. Age distribution of persons with asymptomatic vCJD infections

### 1. Prevalence Estimation of UK vCJD Infection (updated input)

A key assumption of the FDA vCJD Risk Assessment Model is that most infected donors in the US would probably have become infected through exposure to the BSE agent from consumption of BSE-contaminated beef products during travel to the UK, France and other countries in Europe since 1980. Because prevalence of vCJD infection is highest in the UK, the model used prevalence in the UK population and a relative-risk approach to estimate vCJD exposure, and therefore prevalence of vCJD infection, for US donors who traveled to the UK, France and other European countries. The actual prevalence of vCJD infection in the UK remains unknown and difficult to estimate because of the long incubation periods and because clinical illness appears only during the last few months or years of infection. Because of the uncertainties, the FDA 2006 Risk Assessment used the two different sources of information described above for estimating possible UK prevalence of vCJD infection: a high estimate based on a lymphoid-tissue survey (infection prevalence) and a lower vCJD case prevalence estimate based on registered overt vCJD cases. We still do not know which of the two estimates of UK prevalence of vCJD is better to estimate the possible prevalence of US donors having vCJD agent in their blood at the time of donation. We modified the lower vCJD prevalence estimate (Clarke-Ghani case-based estimate) for this 2009 update of the FDA Risk Assessment to assume that the entire population is susceptible to vCJD infection, including persons with all three possible *PRNP*-129 genotypes: MM, MV and VV. As noted above, the lower vCJD case prevalence estimate was derived using epidemiological modeling of actual reported cases to estimate probable future clinical vCJD cases in the UK (Clarke and Ghani 2005). This estimate of approximately 1.8 vCJD cases per million was used by FDA for the 2006 Risk Assessment. It had a number of limitations associated with its simplifying assumptions; those contributed to considerable uncertainty in final case estimates. Those simplifying assumptions included the intensity of human exposure to the BSE agent, influence of genetics and other factors on susceptibility to infection with BSE agent, length of vCJD incubation periods, and influence of age on exposure to the agent. An

additional limitation is the possibility that the prevalence of vCJD infection in the UK is higher than this estimate if there are people infected but who never develop the disease while still potentially spreading the infection, or—as seems increasingly likely—if some infected individuals become ill but only after an extremely long time.

The higher vCJD infection prevalence was estimated from testing results of a relatively small survey of tonsil and appendix tissue samples saved from UK patients; the samples were examined by immunohistochemistry, seeking accumulations of abnormal PrP<sup>TSE</sup>. (Such accumulations of abnormal PrP<sup>TSE</sup> were previously found at autopsies of patients who died with vCJD and in tissue fortuitously saved from surgery during the last two years of incubation period [Hilton 2002]). This approach yielded an unadjusted estimate of 1 vCJD-infected person in 4,225 (237 infections per million [Hilton 2004]) that was then adjusted for patient age and the distribution of reported age-specific vCJD rates. A limitation to this study, contributing to uncertainty of the estimate, was its lack of control by testing a statistically adequate number of similar tissues from non-BSE exposed populations, so that false-positive reactions cannot be ruled out, and specificity and positive-predictive values cannot be evaluated. It also remains unknown whether the finding of PrP<sup>TSE</sup> in lymphoid tissues by immunohistochemistry, assuming reliability of the method for identifying sub-clinical or pre-clinical vCJD infections, accurately predicts the presence of vCJD agent in blood in a quantity sufficient to transmit infection by transfusion—now repeatedly demonstrated for blood during the last one to three years of incubation period for three donors who later became ill with typical vCJD. (This limitation also applies to the lower prevalence estimate.)

After accounting for the age distribution, incubation period, country, year and duration of travel, we used both prevalence estimates to predict the number of vCJD donations that might make their way into US plasma pools of various sizes. A brief summary comparing changes in the UK vCJD infection prevalence estimates between the FDA December 2006 Risk Assessment Model and the FDA June 2009 updated Model is provided in Table 1 below. The lower vCJD prevalence estimate used for the FDA 2006 Risk Assessment Model was ~1.8 per million; it assumed that vCJD-infected individuals would develop clinically overt vCJD only if they had the *PRNP* codon-129 MM (approximately 40% of the total population). The FDA 2009 Risk Assessment Model now assumes 100% of the population to be susceptible to vCJD infection, yielding a higher prevalence of ~4.5 per million (~1.8 per million x 100% / 40% = ~4.5 per million).

Table 1: Changes in UK vCJD infection prevalence estimates between the FDA December 2006 Risk Assessment Model and FDA June 2009 Updated Model

Input Parameter Name and Description	FDA Model December 2006	FDA Updated Model June 2009
UK vCJD Prevalence Estimates	<p>1) LOWER vCJD Case Prevalence estimate: Predictive modeling estimates; implies initial prevalence <b>~1.8 per million*</b></p> <p>*Estimate based on Clarke and Ghani (2005), assumed only persons homozygous for methionine (MM) at codon 129 of PRNP gene would progress to develop clinically overt vCJD</p>	<p>1) LOWER vCJD Case Prevalence estimate: Predictive modeling estimates; implies initial prevalence <b>~4.5 per million*</b></p> <p>*Estimate based Clarke and Ghani (2005), assumes persons of all 3 PRNP genotypes to be equally susceptible to vCJD infection and that some might progress to develop clinically overt vCJD</p>
	<p>2) HIGHER vCJD Infection Prevalence estimate: starting prevalence based on PrP<sup>TSE</sup> immunohistochemical surveillance study of tonsils and appendices of <b>~1 in 4,225*</b></p> <p>*Estimate based on Hilton et al (2004); assumed persons of all three PRNP-129 genotypes (i.e., entire general population) to be susceptible to vCJD infection</p>	<p>2) HIGHER vCJD Infection Prevalence estimate: starting prevalence based on PrP<sup>TSE</sup> immunohistochemical surveillance study of tonsils and appendices of <b>~1 in 4,225*</b></p> <p>*Estimate based on Hilton et al (2004); assumed persons of all three PRNP-129 genotypes (i.e., entire general population) to be susceptible to vCJD infection</p>

## 2. Prevalence of UK vCJD Infection: Age of Susceptible Population (updated input)

In the UK, vCJD has most often occurred in relatively young persons; the median age at onset of clinical signs is approximately 30 years. Because of this tendency for infection and clinical disease to occur in the relatively young, the FDA December 2006 Risk Assessment Model adjusted prevalence estimates to account for the age-specific rates of observed clinical cases in the UK, where "age" was the age at the onset of symptoms as described in Hilton (Hilton 2004).

The updated FDA June 2009 Risk Assessment Model incorporates an estimate of the age distribution of the population of persons at risk for or susceptible to vCJD infection. The approach further adjusts the age-specific rates of observed clinical cases in the UK at the onset of symptoms (Hilton 2004) that were used in our previous model (<http://www.fda.gov/ohrms/dockets/ac/06/briefing/2006-4271b1-index.htm>) by subtracting the median incubation period, which is assumed to have a median duration of approximately 12 years (90% CI= 5-35). The resulting mathematical function effectively shifts the age distribution curve at the time of clinical onset left by approximately 12 years to produce a new distribution that represents the population of persons who are at risk or susceptible to vCJD infection (see Figure 1 below). This overall younger population (a median of

approximately 12 years younger) probably provides a better representation of the age distribution of the UK population most susceptible to vCJD infection.

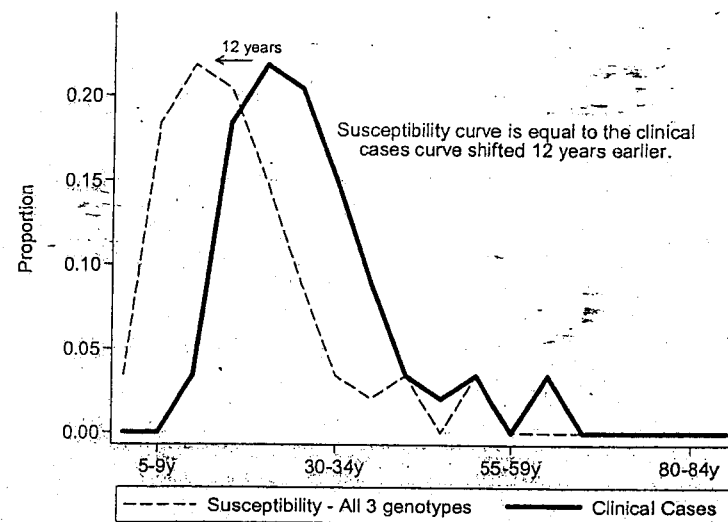


Figure 1. UK vCJD Prevalence: Age of susceptible population. Age of the susceptible population was derived using the distribution for age of persons at the time of clinical onset of vCJD in observed cases (Hilton 2004) and subtracting the median incubation period of approximately 12 years.

## 3. Time During Incubation Period when vCJD Infectivity Present in Blood (updated input)

The FDA December 2006 Risk Assessment Model assumed that infectious vCJD agent was present in blood of infected persons only during the last half of the incubation period. This assumption was based on a discussion at the October 31, 2005 TSEAC Meeting addressing vCJD risk for plasma derivatives. The updated FDA June 2009 Risk Assessment Model now assumes that infectious vCJD agent is most likely to be present in blood longer—during the last 75% of the incubation period (minimum=50%, maximum=90%). This assumption was updated to reflect results from recent findings from studies in animal models which suggest that TSE agents might appear in blood during the first third of the incubation period (Brown 2007).

## 4. PRNP-129 Genotype Susceptibility and Genotype Proportions in US Population (new input)



The FDA December 2006 Risk Assessment Model assumed that the genetic background of individuals in the population is one factor likely to be associated with susceptibility to vCJD infection. At that time, all known cases of overt vCJD (symptomatic individuals who met the WHO case definition of vCJD) had occurred in individuals with the homozygous *PRNP*-129-MM genotype. Research had revealed presumptive evidence of latent infection in two individuals homozygous for valine at that locus (*PRNP*-129-VV) (Ironsides 2006) among the three samples of appendix containing accumulations of PrP<sup>TSE</sup> reported by Hilton (Hilton 2004). (The third PrP<sup>TSE</sup>-positive appendix tissue could not be genotyped.) However, because clinical vCJD had never been identified in any individual with a *PRNP*-129-non-MM genotype (*PRNP*-129-MV or *PRNP*-129-VV genotypes), it was impossible to estimate incubation periods for non-MM infected persons—except to conclude that they would be longer than those of *PRNP*-129-MM persons. Furthermore, it was even unclear whether these individuals would ever develop clinical illness or transmit infection. Therefore, to calculate the lower vCJD Case Prevalence estimate, the model assumed that only persons with the *PRNP*-129-MM genotype were susceptible and would—if they lived long enough—eventually develop clinical vCJD. MM persons were assumed to represent approximately 40% of the total donor population in the UK. Persons with *PRNP*-129-non-MM genotypes were not included in the calculation of the LOWER vCJD case prevalence estimate. For the higher vCJD Infection Prevalence estimate (based on the Hilton tissue survey), we assumed that persons of all *PRNP*-129 genotypes—MM, MV and VV—representing 40%, 50% and 10% of the total donor population, respectively were equally susceptible to vCJD infection.

The updated FDA June 2009 Risk Assessment Model now assumes for both the LOWER vCJD Case Prevalence estimate and the HIGHER vCJD Infection Prevalence estimate (based on the tissue survey) that all persons are equally susceptible to vCJD infection. We have also modified our 2006 assumption that only persons with the *PRNP*-129-MM genotype would develop overt vCJD, and our updated 2009 model assumes for the LOWER vCJD Case Prevalence estimate that at least some persons with *PRNP*-129-non-MM genotypes may eventually progress to develop overt vCJD but that many will probably remain asymptomatic for life. We again assume, for modeling purposes, that persons with the *PRNP*-129-MM, MV, and -VV genotypes comprise 40%, 50% and 10% of the total donor population, respectively, in both the UK and US.

#### 5. Distributions of vCJD Incubation Periods for Persons of Different *PRNP*-129 Genotypes (new input)

The FDA December 2006 Risk Assessment Model assumed a vCJD median incubation period of 13 years and mean incubation of 14 years for persons with the *PRNP*-129-MM genotype. Because little information was available on the incubation period for persons with the *PRNP*-129-MV and -VV genotypes, we assumed their incubation periods to be the same as for persons of the *PRNP*-129-MM genotype. The updated FDA June 2009 Risk Assessment Model assumes a median incubation period of 12 years (90% CI = 5-35) for persons with the *PRNP*-129-MM genotype.

Additional reports of *PRNP*-129-non-MM genotype individuals with immuno-histochemical evidence of vCJD infection detected post-mortem have been published in the literature (Peden 2004, Ironsides 2006). Although no case reports of definite or probable vCJD in such

persons have been officially announced, a prudent assumption must be that some of them will eventually develop overt disease and that their blood may contain the infectious vCJD agent for a portion of the incubation period. However, the estimation of incubation periods for people with *PRNP*-129-non-MM genotypes remains complicated and more uncertain than for persons with the *PRNP*-129-MM genotype. Given this considerable uncertainty, we made simplifying assumptions to establish a distribution for the incubation periods of vCJD-infected people with the *PRNP*-129-non-MM genotype. Our updated model assumes the distributions for the incubation periods for vCJD infection to be the same for persons with *PRNP*-129-MV and -VV genotypes with a median of 32 years (90% CI: 25-55 years) and to be normally distributed. The high value of 55 years (95<sup>th</sup> percentile) was estimated based on the maximum incubation period for kuru (Collinge 2006).

#### 6. Age distribution of persons with asymptomatic infection (new input)

The December 2006 FDA Risk Assessment Model assumed that the age distribution for persons with asymptomatic vCJD infections was the same as the distribution of ages of onset of clinical cases. The updated FDA June 2009 Risk Assessment Model calculates an "Age Distribution of Incubation Periods" (period of asymptomatic infections) by combining the "UK vCJD Prevalence: Age of susceptible population" (input #2, described above) and "Distribution of incubation periods" (input #5 described above).

#### Model Uncertainty

The ranges of uncertainty and variability in the input parameters of the risk assessment are great, resulting in very large uncertainty in the outputs that estimate potential risk. Uncertainty can result from lack of information or limited information, while variability is usually the inherent difference observed for a particular input parameter. Because scientific data regarding the level of exposure to the vCJD agent and the likelihood of certain human health outcomes, such as infection and illness, are lacking, estimates for the risk of infection generated in the assessment may not be accurate. For those reasons, it is not possible to provide an actual estimate of the vCJD risk to individual patients potentially exposed to the vCJD agent through plasma-derived products.

FDA believes it is nonetheless appropriate to share with the general public both the findings of possible risk and the uncertainties in our assessment for pdFVIII, because it is possible that the risk is not zero. We are seeking the advice of the TSEAC, meeting in June 2009, concerning the findings of the updated risk assessment and its interpretation, given the very wide range of uncertainty in the estimate of vCJD risk. We will also seek advice on steps that might help to estimate risks better and improve risk reduction.

## DISCUSSION:

### A. Risk Assessment and Interpretation

Current FDA quantitative risk assessments use probabilistic models and Monte Carlo-based methods to sample individual values from statistical distributions of model inputs to produce thousands of theoretically possible individual scenarios that are combined into a single distribution describing the range of predicted outcomes for a risk (Vose 2000). The FDA December 2006 and June 2009 Risk Assessment Models are both intended to estimate the risk of vCJD infection for users of US-licensed pdFVIII as a function of product exposure for different assumed levels of infectious vCJD agent clearance during manufacturing of pdFVIII under each of two assumed levels of prevalence of vCJD infection in the UK (<http://www.fda.gov/downloads/BiologicsBloodVaccines/SafetyAvailability/BloodSafety/UCM095104.pdf>; <http://www.fda.gov/downloads/BiologicsBloodVaccines/SafetyAvailability/BloodSafety/UCM095106.pdf>).

First, after consultations with TSEAC, we outlined the successive steps involved in the manufacture of the product of concern and the events that would need to occur in each step for an infectious agent from a donor to reach the final product. The risk assessment utilizes a probability-based computer-based simulation model to evaluate successively the impact on vCJD risk of individual processes used to produce human pdFVIII beginning with plasma donation, vCJD infection prevalence in plasma donors, manufacturing steps, and, finally, differing levels of utilization of the product by various representative patient subpopulations. Input data for parameters used in the model, such as clearance of infectious vCJD agent by various steps in the manufacturing process and pdFVIII usage, are represented as statistical distributions that express the underlying uncertainties and variability. Each run of the model randomly samples one number from the distribution for each parameter; this is done thousands of times to generate a single distribution representing the final risk estimate that expresses, where possible, the accompanying uncertainty of these risk estimates. A sensitivity analysis, conducted by varying values of key parameters within the input range of the model and observing the effect on the predicted outcomes, determined that three major factors in the model greatly influenced potential vCJD risk: reduction of the infectious agent by the manufacturing process, intensity of pdFVIII utilization by the patient, and differing estimates of disease prevalence in the UK.

One of the most influential risk assessment parameters for vCJD is the manufacturing process, which may reduce the amount of vCJD agent in the final product or even or eliminate it. Because of the uncertainty and variability in the levels of vCJD clearance afforded during the manufacturing process for any pdFVIII product, the model evaluated two separate categories of reduction in infectivity that the product may have undergone during manufacturing including 4-6  $\log_{10}$  and 7-9  $\log_{10}$  reduction. These two categories are meant to span the possible range of uncertainty and variability in reduction of vCJD agent for US-licensed pdFVIII products. Based on currently available experimental studies, FDA believes that all US-licensed pdFVIII products probably achieve at least 4  $\log_{10}$ -fold clearance of vCJD infectivity during manufacture.

Laboratory studies using model TSE agents have demonstrated reduction or elimination of TSE infectivity by certain types of manufacturing steps. Analogous to viral clearance studies, the capacity of a manufacturing process to clear TSE agents can be inferred from the results of experiments using validated scaled-down simulations of manufacturing processes and a well-characterized model TSE agent. FDA has recommended that such studies, if submitted for a labeling claim, supply the following information:

- Rationale for animal model selected to assay infectivity;
- Well-characterized bioassay for TSE infectivity;
- Rationale for selection of spiking preparation containing TSE agent;
- Characterization of spiking TSE agent;
- Demonstration of accurately scaled-down manufacturing processes (ordinarily evidenced by producing the desired active product);
- Reproducibility of experiments;
- Estimated  $\log_{10}$  of TSE clearance by processing steps (log reduction factor [LRF]);
- Demonstration of "mass balance" (accounting for fate of all input infectivity);
- Demonstration that mechanistically similar clearance steps are or are not additive; and
- Account experimentally for "conditioning" of infectivity ("matrix" effect) because a prior step in the manufacturing process may affect the physical state of TSE agent and in turn affect downstream clearance.

In December 2006, the TSEAC discussed whether a minimum level of TSE clearance (total cumulative LRF) demonstrated by laboratory studies could be defined that enhances safety of plasma-derived products. The concept of a minimum level was agreeable to TSEAC. FDA proposed a total cumulative LRF of 6 log of clearance, based upon estimation of plasma infectivity derived from animal studies, results of the FDA 2006 Risk Assessment for pdFVIII, and including a margin of safety. However, TSEAC felt that, due to insufficient scientific certainty regarding the amounts of vCJD infectivity that might be present and the physical/chemical characteristics of infectivity in human plasma, it was not wise for FDA to recommend a firm minimum LRF (as demonstrated in experimental studies) that would guarantee the safety of pdFVIII prepared by any single manufacturing scheme. In addition, TSEAC members expressed concerns regarding the major limitations of studies involving spiked brain-derived TSE agents into blood or plasma for predicting clearance of endogenous vCJD agent from blood. There was agreement that while current exogenous spiking models have utility and enhance understanding of product safety, their limitations preclude recommending a specific minimum clearance level (<http://www.fda.gov/ohrms/dockets/ac/06/transcripts/2006-4271t-unofficial.htm>).

To date, FDA has allowed TSE clearance labeling claims for five plasma-derived products.<sup>1</sup> The minimum approved labeling claim has been for products manufactured by processes that demonstrated 6  $\log_{10}$  of clearance for model TSE agents in experimental studies. FDA has encouraged industry studies of pdFVIII manufacturing processes, which were presented to TSEAC in December 2006. The range of clearance offered by single production steps was 2.28 to 4.6  $\log_{10}$ . Results of three of four studies were based on prion-protein-binding assays

<sup>1</sup> Carimune® NF, Panglobulin® NF, Privigen® Gamunex®, Thrombate III®

(detecting PrP<sup>TSE</sup>) rather than infectivity assayed in known susceptible animals; a fourth study assessed clearance by infectivity bioassay ([http://www.fda.gov/ohrms/dockets/ac/06/slides/2006-4271S1\\_00-index.htm](http://www.fda.gov/ohrms/dockets/ac/06/slides/2006-4271S1_00-index.htm)). This raises questions as to the processes used for clearance of TSE infectivity in the manufacture of the "implicated" pdFVIII product received by the UK hemophilia patient with vCJD infection. Unfortunately, results of clearance studies are not available for that product.

Another major variable affecting potential risk is the quantity of product used by patients in different treatment groups. For purposes of this model, only patients with severe hemophilia A (HA) were considered because their higher use of product puts them at higher risk than patients with mild or moderate forms of the disease. Severe HA patients account for approximately 50% of the total HA population. Approximately 25% of all US HA patients use pdFVIII products, while most others use recombinant FVIII. (Data from a CDC-sponsored epidemiological study of HA patients were used to generate the statistical distribution of pdFVIII usage by patients [<http://www.fda.gov/ohrms/dockets/ac/06/transcripts/2006-4271t1.pdf>; <http://www.fda.gov/ohrms/dockets/ac/06/transcripts/2006-4240t1.pdf>; <http://www.fda.gov/ohrms/dockets/ac/06/transcripts/2006-4240t2.pdf>]). Using these estimates, the risk assessment evaluated different treatment regimens. The five groups of patients requiring the largest amounts of product are, in increasing order of usage, (1) those treated with pdFVIII prophylaxis, (2) those treated with prophylaxis plus treatment for FVIII inhibitor, and (3) those treated with prophylaxis and having an inhibitor plus requiring induction of FVIII-immune tolerance. Patients generally requiring treatments with the smallest amounts of product are (4) those needing only episodic treatment, and (5) those needing episodic treatment plus having a FVIII inhibitor. We have also evaluated the potential risk to patients with severe von Willebrand disease (vWD), who are treated with pdFVIII containing von Willebrand Factor (vWF), because no recombinant vWF is available yet.

#### Results of the Updated Risk Assessment

Results from the updated FDA 2009 Risk Assessment Model for potential annual individual exposure and vCJD risk are shown in the Appendix in Table I. Results for potential annual individual exposure range from a low of approximately  $1.7 \times 10^{-7}$  iv ID<sub>50</sub> per person per year (risk of 1 in 12 million) for patients who receive episodic treatment and have no inhibitor, to a higher potential exposure of approximately  $1.6 \times 10^{-4}$  iv ID<sub>50</sub> per person per year (risk of 1 in 12,000) for patients on a prophylactic treatment regimen having both a FVIII inhibitor and induction of immune tolerance. A side-by-side comparison of the potential annual exposure estimates from FDA 2006 and 2009 Risk Assessments for all HA patients using a hypothetical pdFVIII product manufactured by a process that reduces the amount of infectious vCJD agent 4-6 log<sub>10</sub>-fold is shown in Appendix Table II. The comparison suggests that, even allowing for additional susceptibility of donors to vCJD, there is very little overall difference between the vCJD risk predicted by the FDA 2006 Risk Assessment Model and that generated by the updated FDA 2009 Risk Assessment Model. The biggest difference in the estimates (for 2009 versus 2006) was an approximately 4.5-fold difference ( $7.3 \times 10^{-6}$  vs  $1.57 \times 10^{-6}$ ) in annual exposure risk for patients who received a prophylactic treatment regimen and had both a FVIII inhibitor and needed treatment for immune

tolerance. However, even this difference is likely to have resulted from the large uncertainty and variability in the model inputs and probably does not represent a large increase in overall estimated vCJD risk.

A side-by-side comparison of model results from the FDA 2006 and 2009 Risk Assessments for the mean per patient risk at two levels of manufacturing process clearance of vCJD agent of 7-9 log<sub>10</sub>-fold and 4-6 log<sub>10</sub>-fold shows very little difference (Appendix Table III). As in Appendix Table II, the biggest difference in the estimates generated in 2009 versus 2006 was a less than 5-fold difference (1 in 270,000 vs 1 in 1.3 million) in annual exposure for patients who received a prophylactic treatment and additional treatment for both FVIII inhibitor and for induction of immune tolerance. Comparison of results from the FDA 2009 and 2006 Risk Assessments for vWD patients with severe disease (Appendix Table IV-A and IV-B) indicates little difference between estimates generated by each model. In some cases results in certain cells of Tables II, III, IV-A and IV-B indicate the risks for 2009 may appear lower or higher than the corresponding results for 2006. Because the results of each cell in each table are calculated independently of one another, and because of the significant uncertainty and variability in the model, one would expect this type of variation in the observed estimates of risk. Overall, even adding to a part of the FDA 2009 Risk Assessment the assumption that the entire UK population is susceptible to vCJD infection (the rest of the original FDA Risk Assessment in 2006 already assumed universal susceptibility), the results for 2009 and 2006 remain similar, supporting the same basic conclusions. Given the uncertainties of the models, it is still not possible to provide a precise estimate of the vCJD risk or to attempt to predict the actual risk to individual patients. As in 2006, the current results of the model continue to suggest that some users of pdFVIII might be exposed to the vCJD agent, so that there is a potential risk of infection, but that risk is likely to be extremely small, even for those patients using the largest amounts of product.

#### Interpretation

Results from the updated FDA 2009 vCJD pdFVIII Risk Assessment Model suggest that the risk of vCJD infection from US-licensed pdFVIII is likely to be extremely small but may not be zero. For US plasma donors, the major source of vCJD risk is dietary exposure during travel and/or residence in the UK, France, or other countries in Europe since 1980. Blood and plasma donor deferral criteria in place since 1999 have reduced the risk posed by donations from BSE-exposed and vCJD-exposed persons.

Manufacturing processes for human pdFVIII products are likely to reduce the quantity of vCJD agent, if present, but the level of reduction achieved by manufacturing steps is not precisely known. Clearance of TSE agents in manufacturing appears to vary among products, but clearance has not been measured in standardized studies that might allow more meaningful direct comparisons. Based on currently available experimental studies, it is estimated that pdFVIII products potentially undergo 4 log<sub>10</sub> (10,000-fold) or greater reduction of the vCJD agent during the manufacturing process. Assuming a 4-6 log<sub>10</sub> reduction in infectivity by the manufacturing process, modeling predicts that the potential risk per person per year for patients with severe HA using pdFVIII ranges from 1 in 12,000 for the higher vCJD infection prevalence estimate and high product usage, to as little as 1 in 12 million for the lower vCJD case prevalence estimate and low product usage. While higher levels of

clearance of vCJD infectivity by manufacturing are likely to reduce risk, it is not possible at this time to determine with certainty if a specific product may be more or less safe than another; that is due to the wide range of methods used for clearance studies, the results of clearance studies, and gaps in information. Although results of the model suggest that exposure to vCJD agent is possible, with a potential risk of infection that is likely to be extremely small, the model itself cannot provide a precise estimate either of the vCJD risk in general or of the actual risk to individual patients. Nonetheless, despite the uncertainties in the model, we believe this is information that patients and physicians might consider when making treatment decisions.

## B. Risk Management Strategy

FDA's current risk management strategy for vCJD has evolved in response to emerging epidemiologic findings and basic scientific developments pertinent to the epidemic. The overall risk management strategy for vCJD includes the following:

- Deferral of donors at increased risk of vCJD based on epidemiological data, and withdrawal of certain products at increased vCJD risk:
  - Donor deferrals: Guidance since August 1999 (most recently updated in January 2002) to defer donors with "geographic risk," e.g., donors who visited or resided in countries where BSE prevalence is higher; deferral of donors who used UK-sourced bovine insulin; deferral of donors transfused in the UK since 1980 (note also that a draft guidance published in August 2006 proposed deferral of donors transfused in France since 1980); and
  - Withdrawal of vCJD-implicated blood components and plasma derivatives is recommended if a donor is diagnosed with vCJD (which has not occurred).
- Facilitating development, validation, and information sharing (including product labeling) regarding the performance of manufacturing processes in clearance of TSE agents from blood products:
  - FDA reviews requests for TSE clearance labeling claims which may be approved if detailed, validated TSE clearance study data are provided.
  - On September 18, 2006, FDA discussed with TSEAC the feasibility and scientific value of standardized assessments of TSE clearance in the manufacturing processes for pdFVIII. The topic will be addressed again at this meeting.
- Facilitating development of candidate donor screening and diagnostic tests for vCJD and other TSEs:
  - FDA has held meetings with candidate test kit manufacturers to discuss developmental pathways.
  - A public discussion of validation for donor screening tests for vCJD and other TSEs was held with the TSEAC on September 19, 2006.
- Risk assessment and communication to inform patients and physicians about the current scientific understanding regarding vCJD risk from blood products and to help inform treatment decisions:

- FDA has engaged in periodic reassessment of TSE epidemiology and pathogenesis to determine whether guidance/policies need to be revisited in light of new information.
- FDA performed risk assessments for potential exposure to vCJD in investigational pdFXI made from plasma donated in the UK, and for US-licensed pdFVIII made from plasma donated in the US.
- FDA developed and posted risk communication materials on the FDA website.
- FDA communicates with patients organizations when new events occur regarding vCJD.
- FDA encourages physicians and patients to consider this risk in making treatment decisions.

## Questions for the Committee:

Based on an updated risk analysis, FDA continues to believe that the risk of variant Creutzfeldt-Jakob disease (vCJD) to patients who receive US-licensed plasma-derived coagulation factor VIII (pdFVIII) products is likely to be extremely small, although we do not know the risk with certainty.

1. Should the recent report from the UK Health Protection Agency, attributing a case of vCJD infection to treatment 11 years earlier with a "vCJD-implicated" pdFVIII, alter FDA's interpretation of the risk for US-licensed preparations of pdFVIII?
2. If so, should FDA consider:
  - a. Recommending additional risk-reducing steps for manufacture of plasma derivatives (e.g., modifications to current donor deferral policies)?
  - b. Recommending revised warning labels for plasma derivatives?
  - c. Recommending modifications to FDA's public communications (e.g., to Web postings) regarding the risk of vCJD associated with the use of FDA-licensed plasma derivatives?

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Appendix with Tables I through IVB

Table I. Updated FDA 2009 Model results for all hemophilia A patients with severe disease using hypothetical pdFVIII produced by process with 4-6 Log<sub>10</sub> Reduction Factor (LRF) of vCJD infectivity: Potential mean per person exposure to vCJD iv ID<sub>50</sub> and mean per person vCJD risk per year

4 - 6 Log <sub>10</sub> Reduction Factor (LRF)							
Treatment Regimen	Inhibitor Status	Est. Total Number patients in US	Mean quantity FVIII used per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Model Output for LOWER vCJD Case Prevalence of ~4.5 in 1,000,000 based on Clark and Ghani (2005)		Model Output for HIGHER vCJD Infection Prevalence based on estimate of 1 in 4,225 by Hilton et al (2004)	
				Mean exposure to vCJD iv ID <sub>50</sub> * per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean** potential vCJD risk per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean exposure to vCJD iv ID <sub>50</sub> * per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean** potential vCJD risk per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)
Prophylaxis	No Inhibitor	578	157,949 IU (21242, 382316)	4.9 x 10 <sup>-7</sup> (0-0)	1 in 4.0 million (0-0)	4.5 x 10 <sup>-5</sup> (0 - 2.1 x 10 <sup>-4</sup> )	1 in 44,000 (0 - 1 in 4,700)
	With Inhibitor - No Immune Tolerance	63	190,523 IU (26956, 447639)	7.5 x 10 <sup>-7</sup> (0-0)	1 in 2.7 million (0-0)	5.4 x 10 <sup>-5</sup> (0 - 2.6 x 10 <sup>-4</sup> )	1 in 37,000 (0 - 1 in 3,900)
	With Inhibitor - With Immune Tolerance	62	558,700 IU (33235, 1592943)	7.3 x 10 <sup>-6</sup> (0-0)	1 in 270,000 (0-0)	1.6 x 10 <sup>-4</sup> (0 - 7.4 x 10 <sup>-4</sup> )	1 in 12,000 (0 - 1 in 2,700)
Episodic	No Inhibitor	946	85,270 IU (4633, 244656)	1.7 x 10 <sup>-7</sup> (0-0)	1 in 12 million (0-0)	2.5 x 10 <sup>-5</sup> (0 - 1.1 x 10 <sup>-4</sup> )	1 in 81,000 (0 - 1 in 18,000)
	With Inhibitor	151	160,458 IU (5314, 488906)	8.6 x 10 <sup>-7</sup> (0-0)	1 in 2.3 million (0-0)	4.6 x 10 <sup>-5</sup> (0 - 2.0 x 10 <sup>-4</sup> )	1 in 43,000 (0 - 1 in 9,800)

\*iv ID<sub>50</sub> represents the probability that 50% of those exposed to 1 ID<sub>50</sub> intravenously may become infected with vCJD.

\*\*Mean potential annual vCJD risk - the risk of potential vCJD infection based on animal model dose-response information. Mean potential annual vCJD risk = Total mean quantity iv ID<sub>50</sub> per year x 0.5 (50 % chance infection from ID<sub>50</sub>)

Table II. Comparison of FDA 2006 and 2009 Risk Assessment results estimating mean potential annual exposures to vCJD iv ID<sub>50</sub> for all hemophilia A patients using hypothetical pdFVIII produced by process with 4-6 LRF of vCJD infectivity

4 - 6 Log <sub>10</sub> Reduction Factor (LRF)						
Treatment Regimen	Inhibitor Status	Total Number patients in US	Mean quantity FVIII used per person per year (from FDA 2006)	Year FDA Risk Assessment Conducted	Model Output for LOWER vCJD Case Prevalences based on Clark and Ghani (2005)	Model Output for HIGHER vCJD Infection Prevalences based on Hilton et al (2004)
					Mean exposure to vCJD iv ID <sub>50</sub> * per person per year	Mean exposure to vCJD iv ID <sub>50</sub> * per person per year
Prophylaxis	No Inhibitor	578	157,949 IU	2009	4.9 x 10 <sup>-7</sup>	4.5 x 10 <sup>-5</sup>
				2006	4.99 x 10 <sup>-7</sup>	3.67 x 10 <sup>-5</sup>
	With Inhibitor - No Immune Tolerance	63	190,523 IU	2009	7.5 x 10 <sup>-7</sup>	5.4 x 10 <sup>-5</sup>
				2006	4.21 x 10 <sup>-7</sup>	4.86 x 10 <sup>-5</sup>
	With Inhibitor - With Immune Tolerance	62	558,700 IU	2009	7.3 x 10 <sup>-6</sup>	1.6 x 10 <sup>-4</sup>
				2006	1.57 x 10 <sup>-6</sup>	1.30 x 10 <sup>-4</sup>
Episodic	No Inhibitor	946	85,270 IU	2009	1.7 x 10 <sup>-7</sup>	2.5 x 10 <sup>-5</sup>
				2006	2.12 x 10 <sup>-7</sup>	1.91 x 10 <sup>-5</sup>
	With Inhibitor	151	160,458 IU	2009	8.6 x 10 <sup>-7</sup>	4.6 x 10 <sup>-5</sup>
				2006	2.49 x 10 <sup>-7</sup>	4.19 x 10 <sup>-5</sup>

\*iv ID<sub>50</sub> represents the probability that 50% of those exposed to 1 ID<sub>50</sub> intravenously may become infected with vCJD.  
 \*\*Mean potential annual vCJD risk - the risk of potential vCJD infection based on animal model dose-response information. Mean potential annual vCJD risk = Total mean quantity iv ID<sub>50</sub> per year x 0.5 (50 % chance infection from ID<sub>50</sub>)

TABLE III. Comparison of results from FDA 2006 and 2009 Risk Assessments for mean potential per-patient vCJD risk for all hemophilia A patients using hypothetical pdFVIII at two levels of manufacturing process reduction in vCJD agent infectivity (7-9 LRF and 4-6 LRF) and assuming both LOWER and HIGHER prevalence estimates

Treatment Regimen	Inhibitor Status	Total Number of patients in US	Mean quantity FVIII used per person per year (from FDA 2006)	Year FDA Risk Assessment Conducted	7-9 Log <sub>10</sub> Reduction Factor (LRF)		4-6 Log <sub>10</sub> Reduction Factor (LRF)	
					Model Output for LOWER vCJD Case Prevalences based on Clark and Ghani (2005)	Model Output for HIGHER vCJD Infection Prevalences based on Hilton et al (2004)	Model Output for LOWER vCJD Case Prevalences based on Clark and Ghani (2005)	Model Output for HIGHER vCJD Infection Prevalences based on Hill et al (2004)
					Mean potential vCJD risk per person per year	Mean potential vCJD risk per person per year	Mean potential vCJD risk per person per year	Mean potential vCJD risk per person per year
Prophylaxis	No Inhibitor	578	157,949 IU	2009	1 in 5.4 billion	1 in 44 million	1 in 4.0 million	1 in 44,000
				2006	1 in 4.1 billion	1 in 50 million	1 in 4.0 million	1 in 54,000
	With Inhibitor - No Immune Tolerance	63	190,523 IU	2009	1 in 2.8 billion	1 in 37 million	1 in 2.7 million	1 in 37,000
				2006	1 in 3.5 billion	1 in 40 million	1 in 4.8 million	1 in 41,000
	With Inhibitor - With Immune Tolerance	62	558,700 IU	2009	1 in 200 million	1 in 12 million	1 in 270,000	1 in 12,000
				2006	1 in 551 million	1 in 15 million	1 in 1.3 million	1 in 15,000
Episodic	No Inhibitor	946	85,270 IU	2009	1 in 12 billion	1 in 81 million	1 in 12 million	1 in 81,000
				2006	1 in 3.2 billion	1 in 100 million	1 in 9.4 million	1 in 105,000
	With Inhibitor	151	160,458 IU	2009	1 in 1.8 billion	1 in 44 million	1 in 2.3 million	1 in 43,000
				2006	1 in 4 billion	1 in 50 million	1 in 8 million	1 in 23,000

Table IV-A. Comparison of results from FDA 2006 and 2009 Risk Assessments for vonWillebrand disease (vWD) patients with severe disease: Predicted potential annual exposures to vCJD agent in vID<sub>50</sub> and vCJD risk assuming 4-6 LRF by manufacturing process

YOUNG vWD (<= 15 yrs of age)

	Est. Total Number patients in US	Mean quantity product used per person per year (from FDA 2006)	Year FDA Risk Assessment Conducted	7-6 Log <sub>10</sub> Reduction Factor (LRF)			
				Model Output for LOWER vCJD Case Prevalences based on Clark and Ghani (2005)		Model Output for HIGHER vCJD Infection Prevalence based on Hilton et al (2004)	
				Mean exposure to vCJD by vID <sub>50</sub> * per person (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean** potential vCJD risk per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean exposure to vCJD by vID <sub>50</sub> * per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)	Mean** potential vCJD risk per person per year (5 <sup>th</sup> - 95 <sup>th</sup> perc)
Prophylaxis	39	165,713 IU	2009	3.6 x 10 <sup>7</sup>	1 in 5.6 million	3.4 x 10 <sup>5</sup>	1 in 59,000
			2006	4.3 x 10 <sup>7</sup>	1 in 4.7 million	3.81 x 10 <sup>5</sup>	1 in 52,000
Episodic	60	11,045 IU	2009	2.7 x 10 <sup>8</sup>	1 in 75 million	3.2 x 10 <sup>6</sup>	1 in 630,000
			2006	4.14 x 10 <sup>8</sup>	1 in 48 million	2.06 x 10 <sup>6</sup>	1 in 971,000

Table IV-B. Comparison of results from FDA 2006 and 2009 Risk Assessments for vonWillebrand disease (vWD) patients with severe disease: Predicted potential annual exposures to vCJD agent in iv ID50 and vCJD risk assuming 4-6 LRF by manufacturing process

ADULT vWD (> 15 yrs of age)

				4-6 Log <sub>10</sub> Reduction Factor (LRF)			
				Model Output for LOWER vCJD Case Prevalences based on Clark and Ghani (2005)		Model Output for HIGHER vCJD Infection Prevalences based on Hilton et al (2004)	
Prophylaxis	73	186,880 IU	2009	5.2 × 10 <sup>-7</sup>	1 in 3.9 million	4.1 × 10 <sup>-5</sup>	1 in 49,000
			2006	4.89 × 10 <sup>-7</sup>	1 in 4.7 million	4.32 × 10 <sup>-5</sup>	1 in 46,300
Episodic	78	86,923 IU	2009	2.2 × 10 <sup>-7</sup>	1 in 9.3 million	2.22 × 10 <sup>-5</sup>	1 in 75,000
			2006	1.99 × 10 <sup>-7</sup>	1 in 10 million	1.90 × 10 <sup>-5</sup>	1 in 53,000*

\*The original risk estimate for this cell in the FDA Risk Assessment of 2006 (FDA 2006) was incorrect - the corrected estimate is provided in this table

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一般的名称					
販売名(企業名)					
研究報告の概要					
異常プリオン蛋白(PrP <sup>Sc</sup> )と特異的に結合する親和性リガンドを用いた新しいアフィニティクロマトグラフィーの技術が開発された。本試験では、変異型クロイツフェルト・ヤコブ病(vCJD)伝播リスクに対する安全性を向上させる目的で、solvent/detergent処理血漿分画製剤オクタプララスの製造過程に本法を導入し、各処理段階におけるPrP <sup>Sc</sup> 除去効果を検証した。ハムスター順化スクレイピー263K株感染ハムスターより得られた10%未精製脳ホモジネート(CBH)を遠心分離し、ミクロソーム/サイトソーム画分(MIC)とCBH中のPrP <sup>Sc</sup> をウェスタンプロットにて同定・定量した結果、MICスバイクサンプルの連続した樹脂カラムに添加したところ、3個目のMICおよびCBH <sub>mic</sub> スバイクサンプルを3個の連続した樹脂カラムに添加し、ウエスタンプロットを行ったところ、3個目の0.01%に希釈したCBH <sub>mic</sub> は全く検出されなかった。PrP <sup>Sc</sup> 除去能は6.0log <sub>10</sub> ID50/mLリガンド固定樹脂カラムに添加した。分画サンプル樹脂カラムからはPrP <sup>Sc</sup> は全く検出されなかった。PrP <sup>Sc</sup> 除去能は非常に高く、7.3および6.4log <sub>10</sub> ID50/mLであった。Gerstmann-Straussler Scheinker病マウスRukuoka株由来PrP <sup>Sc</sup> に対するリガンド特異性を検討した結果、ヒト散発性CJD株、ヒト由来PrP <sup>Sc</sup> により非常に高いPrP <sup>Sc</sup> 除去効果が得られることが示された。また、本法をオクタプララスの製造過程に導入することは技術的に可能であり、vCJD感染の観点からも本法導入によるオクタプララスの安全域の拡大が期待される。	使用上の注意記載状況・その他参考事項等 BYU-2009-0387				
報告企業の意旨					
本論文では、効率的に異常プリオン蛋白(PrP <sup>Sc</sup> )除去可能なアフィニティクロマトグラフィーが開発されたことが発表されたが、この工程は血漿分画製剤の製造過程に導入することが可能であるという点で、製造工程における異常プリオン除去能力をさらに向上させることができる可能性が高く、導入が非常に期待される開発である。					
今後の対応					
現時点で新たな安全対策上の措置を講じる必要はないと考える。本稿で報告されたような、導入が可能と思われるウイルス除去法に関し、今後とも情報収集に努める。					



## Prion removal effect of a specific affinity ligand introduced into the manufacturing process of the pharmaceutical quality solvent/detergent (S/D)-treated plasma OctaplasLG®

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### Vox Sanguinis

**Background and Objectives** A new chromatographic step for the selective binding of abnormal prion protein (PrP<sup>Sc</sup>) was developed, and optimization for PrP<sup>Sc</sup> capture was achieved by binding to an affinity ligand attached to synthetic resin particles. This step was implemented into the manufacturing process of the solvent/detergent (S/D)-treated biopharmaceutical quality plasma Octaplas® to further improve the safety margin in terms of risk for variant Creutzfeldt-Jakob disease (vCJD) transmission.

**Materials and Methods** Intermediates and Octaplas® final container material, spiked with hamster brain-derived PrP<sup>Sc</sup>-containing fractions, were used for experiments to establish the feasibility of introducing this novel chromatography step. The binding capacity per millilitre of ligand gel was determined under the selected manufacturing conditions. In addition, the specificity of the ligand gel to bind PrP<sup>Sc</sup> from human sources was investigated. A validated Western blot test was used for the identification and quantification of PrP<sup>Sc</sup>.

**Results** A reduction factor of  $\geq 3.0 \log_{10}$  could be demonstrated by Western blotting, utilizing the relevant Octaplas® matrix from manufacturing. In this particular cell-free plasma solution, the PrP<sup>Sc</sup> binding capacity of the selected gel was very high ( $\geq 6 \log_{10}$  ID<sub>50</sub>/ml, equivalent to roughly 10  $\log_{10}$  ID<sub>50</sub>/column at manufacturing scale). The gel binds specifically PrP<sup>Sc</sup> from both animal (hamster and mouse) and human (sporadic and variant CJD) sources.

**Conclusion** This new single-use, disposable PrP<sup>Sc</sup>-harvesting gel ensures a very high capacity in terms of removing the pathogenic agent causing vCJD from the new generation OctaplasLG®, in the event that prions can be found in plasma from donors incubating the disease and thereby contaminating the raw material plasma used for manufacturing.

**Key words:** affinity ligand chromatography, OctaplasLG®, prion safety, PrP<sup>Sc</sup>, vCJD.

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### Introduction

In the last few years, four probable transmissions of variant Creutzfeldt-Jakob disease (vCJD) through non-leucocyte

depleted red blood cell concentrates in the UK [1–4], as well as the first probable case of vCJD through a plasma-derived factor concentrate [5], have made prion diseases a matter of concern in today's blood therapy.

A number of actions have been implemented by regulatory authorities, such as requiring that all manufacturers of plasma-derived biopharmaceuticals should perform appropriate prion safety evaluations of their product portfolio. Different

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manufacturing steps have been demonstrated to provide significant removal, either of prion infectivity or the disease-associated marker PrP<sup>Sc</sup> [6]. Specific affinity ligands designed to bind prions have previously shown a significant capacity to remove PrP<sup>Sc</sup> and associated infectivity from blood components such as red blood cell concentrates [7–9]. Such specific affinity ligands have until now not been investigated for the removal of PrP<sup>Sc</sup> in plasma-derived biopharmaceuticals such as Octaplas®.

Octaplas® is the first generation solvent/detergent (S/D)-treated, human, coagulation-active plasma. The production process is straightforward and very reproducible. Cells and cell fragments are removed by a 1.0 µm filtration step at the front-end of the process. The S/D treatment is performed utilizing 1.0% (w/w) tri-n-butyl-phosphate (TNBP) and 1.0% (w/w) Octoxynol-9. TNBP is subsequently removed by oil and Octoxynol-9 by solid phase extraction. Finally, two filtration steps are performed (0.45 and 0.2 µm) to ensure sterility of the final product.

It has already been demonstrated that the current Octaplas® manufacturing process is able to remove 2.5  $\log_{10}$  cell-bound and free PrP<sup>Sc</sup>, when using a chronically infected cell line as spike material, which in itself ensures a good safety margin for this plasma product in terms of prion transmission [10]. The implementation of an additional orthogonal prion removal step would further enhance the safety of Octaplas® in this respect. The company Pathogen Removal and Diagnostic Technologies Inc. (PRDT, NY, USA) has developed a group of ligands, coupled to a standard resin base, which have demonstrated strong affinity for the prion.

The studies reported in this paper were designed to determine the potential for prion removal by a specific affinity ligand implemented into the new generation OctaplasLG® (LG, ligand gel) manufacturing process. To prevent potential interference of the non-homogeneous plasma product (e.g. possibly containing cells and cell debris) with the binding of PrP<sup>Sc</sup> to the affinity ligand, it was decided to incorporate the new prion removal resin post-cell filtration and S/D treatment, at which point the product is clean from cells and debris that might contain or carry the pathogenic prions. The technical implementation of the ligand resin was performed by Octapharma PPGmbH, Vienna, Austria.

### Materials and methods

#### Spike material preparations

The 263K strain of hamster-adapted scrapie used in the experiments was supplied as a 10% crude brain homogenate (CBH) by the laboratory of Dr Robert G. Rohwer (Baltimore, MD, USA). A microsomal/cytosolic (MIC) fraction was prepared from the 10% CBH following the preparation procedure established for various TSE sub-cellular fractions (the CBH

was centrifuged at 10 000 g for 8 min at ambient temperature and the supernatant was separated from the pellet and harvested as the MIC fraction) [11]. For studies on the robustness of PrP<sup>Sc</sup> removal, the pellet from the above centrifugation was used as the spike [CBH<sub>(MIC)</sub>] after re-suspended at a ~10% concentration in Tris-buffered saline (TBS) or phosphate-buffered saline (PBS). The CBH<sub>(MIC)</sub> fraction contained the large membrane fragments and tissue not present in the MIC fraction, which was mostly consistent of more soluble and presumably smaller PrP<sup>Sc</sup> components.

The studies shown in Figs 2–4, as well as the supporting feasibility studies, were performed with a Sarkosyl-treated spike material. CBH was treated with 0.5% Sarkosyl for 30 min on ice. The solution was centrifuged at 13 000 g for 10 min at room temperature to remove debris. The supernatant (CBH<sub>(Sark)</sub>) was used as the spike [8].

#### Determination of PrP<sup>Sc</sup>

The proteinase K (PK) digestion and Western blot assay used for the detection of PrP<sup>Sc</sup> were either performed as described by Gregori *et al.* [8] or with some minor modifications – where Triton X-100 instead of sodium dodecyl sulphate (SDS) was used as detergent during the PK digestion step, and where the polyacrylamide gel concentration was 12% (Bio-Rad Laboratories, Vienna, Austria) instead of 14% (NuPAGE, Invitrogen Life Science, Carlsbad, CA, USA). The end-point titre of the sample used for reduction factor calculations was determined in a 0.5  $\log_{10}$  serial dilution setup and defined as the first dilution where no signal was observed on the Western blot. Samples were processed before PK digestion in order to overcome interference as detailed below.

#### Western blot validation

The Western blot assay used for determination of prion reduction factors and binding capacity in Tables 1 and 2 was subject to a formal validation following International Conference on Harmonisation (ICH) guidelines to enable an evaluation of the suitability of the assay in terms of assay variability and linearity for use in the clearance studies detailed in this report, and also an evaluation of the limit of detection (LOD) of the assay in comparison with a prion stock of known (defined) bioassay titre. The linearity of the assay is shown in Fig. 1. The regression parameters can be used to convert Western blot titres into infectious titres using the following formula:

$$\text{Titre}_{[\text{bioassay}]} = \frac{\text{Titre}_{[\text{Western blot}]} + 45867}{10667}$$

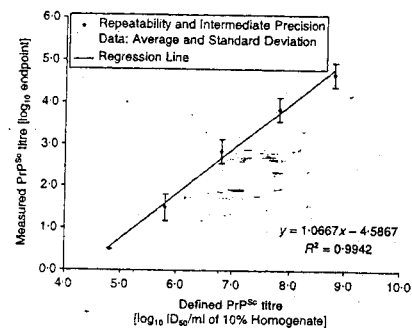
This formula was used for calculation of the resin binding capacity in terms of infectious doses.

**Table 1** PrP<sup>Sc</sup> removal during chromatography with a non-S/D-treated spike. Fifty millilitres of Octaplas<sup>®</sup> final product was spiked at the indicated spike ratio with a CBH<sub>Sark</sub> from hamsters infected with hamster-adapted scrapie 263 K strain. After withdrawal of a sample of the spiked start material, the spiked plasma was loaded onto the PRDT column and the flow-through fractions were collected. Following plasma loading and washing of the PRDT column with citrate buffer, the column was washed experimentally with 2 M NaCl, and finally the remaining resin was re-suspended in TBS and tested (column gel)

Sample	Western blot sample titre from end-point titration [log <sub>10</sub> ]	
	5% CBH <sub>Sark</sub> spike/ 3.5 ml gel	1% CBH <sub>Sark</sub> spike/ 1.9 ml gel
Spiked start material	2.5	2.0
Flow-through 0-5 ml	≤ -0.5	≤ -0.5
Flow-through 5-10 ml	≤ -0.5	≤ -0.5
Flow-through 10-20 ml	0.5	1.0
Flow-through 20-50 ml	0.5	1.5
Flow-through 50-95 ml	0.5	1.5
2 M NaCl wash	2.0	1.5
Column gel	3.5	3.0

**Table 2** PrP<sup>Sc</sup> removal during Octaplas<sup>®</sup> manufacturing with an S/D-conditioned spike. Approximately 200 ml of crude plasma was spiked at a spike ratio of 1% with the indicated spike materials from hamsters infected with hamster-adapted scrapie 263 K strain. After withdrawal of a sample of the spiked start material, the spiked plasma was processed through a downscaled model of the Octaplas<sup>®</sup> process from front-end cell and cell-debris filtration, via S/D-treatment, filtration and solid phase extraction until eventually 50 ml of the S/D-treated plasma intermediate after solid phase extraction were loaded onto the 5 ml PRDT column from which the indicated flow-through fractions were collected. Following plasma loading and washing of the PRDT column with citrate buffer, the column was washed experimentally with 2 M NaCl, and finally the remaining resin was re-suspended in TBS and tested (column gel)

Sample	Western blot sample titre from end-point titration [log <sub>10</sub> ]	
	1% MIC spike	1% CBH <sub>MIC</sub> spike
Spiked Octaplas <sup>®</sup> after 1 µm filtration	2.5	2.0
After S/D-treatment, liquid phase extraction and depth-filtration	2.5	1.0
After solid phase extraction	2.0	1.0
After PRDT gel		
Flow-through 0-0.5 ml	≤ -0.5	≤ -0.5
Flow-through 0.5-5.0 ml	≤ -0.5	≤ -0.5
Flow-through 5.0-10 ml	≤ -0.5	≤ -0.5
Flow-through 10-20 ml	0.5	≤ -0.5
Flow-through 20-50 ml	1.5	0.5
2 M NaCl wash	3.0	2.0
Column gel	2.0	1.5



**Fig. 1** Linearity of Western blot assay. A plot of Western blot end-point titres obtained from multiple determinations (at least 3) of various dilutions of a hamster-adapted scrapie 263 K prion stock of known (defined) bioassay titre. The limit of detection is 4.5 log<sub>10</sub> DU<sub>50</sub>/ml. The individual standard deviations for samples at each dilution tested was no greater than 20/25 log<sub>10</sub>.

### Interference handling

A direct Western blotting of the samples containing Octaplas<sup>®</sup> could not be conducted due to the interference from high plasma protein content. To reduce this interference and to enable assaying of the flow-through samples after adsorption by the gel ligand, spiked samples were pre-diluted 3.2-fold (0.5 log<sub>10</sub>) in TBS containing 0.1% bovine serum albumin followed by a centrifugation at 15 558 g for 60 min at ambient temperature. After centrifugation, the supernatant was carefully decanted and the pellet re-suspended in either the same volume of the original spiked sample, or in 1/10th the original volume centrifuged (i.e. 10-fold concentration), achieving an effective concentration of 0.5 log<sub>10</sub>. Recovery within 0.5 log titre as determined by serial dilution Western blot assay of low titre PrP<sup>Sc</sup> was demonstrated via this procedure in control experiments, as indicated by comparable Western blot end-point titres for the centrifuged samples when compared with a non-centrifuged sample (data not shown).

Regeneration samples containing basic high salt concentration were diluted 0.5 log<sub>10</sub> and then tested in the Western blot assays. The column gel samples were tested undiluted before analysis by Western blotting (i.e. without centrifugation). The PK digestion was performed *in situ* on the matrix. Following boiling in SDS, the PrP<sup>Sc</sup> was released from the matrix.

### Robustness of the prion reduction step with regard to different spike preparations

Octaplas<sup>®</sup> was spiked with either MIC or CBH<sub>MIC</sub> at a 1% spike ratio. The pH of the spiked material was determined and, if necessary, adjusted to a pH of 6.9-7.4.

Following removal of a sample for determination of titre in the spiked start material, the remaining spiked material was loaded onto a prepared ligand resin column (Vantage L11 X250, Millipore, Bedford, MA, USA), which had been equilibrated with water for injection, 20 mM citrate buffer, pH 7.0 containing 140 mM NaCl. The flow rate of the chromatography was adjusted to the necessary contact time (plasma with resin) of ~2 min. Collection of the flow-through began once the ultraviolet (UV) baseline had reached peak absorbance. Following loading of the sample, the column was washed with the citrate buffer used for equilibration, and collection of the flow-through continued until the UV absorbance began to drop. All chromatography steps were performed at ambient temperature. Samples (flow-through) were collected at various stages of the passage of the spiked start material through the column. An aliquot of each flow-through was stored at ≤ -60°C until tested by Western blotting as indicated above.

### Determination of the PrP<sup>Sc</sup> binding capacity per gel volume

In order to evaluate the PrP<sup>Sc</sup> binding capacity per millilitre gel, studies were performed using sequential identical columns. In these experiments, 0.01% CBH<sub>Sark</sub> (final concentration of brain homogenate) was spiked in Octaplas<sup>®</sup> harvested from routine production. Ten millilitres of this challenge was applied to the first column (0.5 ml bed volume) containing the gel in a Protein Isolation Kit mini-column (PKSL, ProMetic Life Sciences Inc., Mount Royal, Quebec, Canada). The flow-through from the first column was applied onto the second column - and from the second onto the third. The gel-bound PrP<sup>Sc</sup> was quantified by densitometric reading of the Western blot signals, and the binding capacity per column and millilitre gel was estimated in comparison to the PrP<sup>Sc</sup> input level.

### Binding of infectious prions from different sources

Leucocyte-reduced human red blood cells in residual plasma spiked with brain homogenate from different transmissible spongiform encephalopathy strains, including hamster scrapie, human vCJD, human sporadic (sp)CJD, and mouse Fukuoka strain Gerstman-Sträussler-Scheinker disease (GSS), were applied in duplicate to the ligand resin in column format.

### Calculation of reduction factors

Reduction factors (RF) were calculated as detailed in 'Note for Guidance on the Performance of Virus Clearance Studies' [CPMP/BWP/268/95 (1996)]:  $RF = (V_1 \times T_1) / (V_2 \times T_2)$ , in which  $V_1$  and  $T_1$  are the volume and titre of the start material - and  $V_2$  and  $T_2$  are the volume and titre of the product fraction, respectively. In logarithmic terms, this equation can

be expressed as:  $\log_{10} (RF) = [\log_{10} (V_1) + \log_{10} (T_1)] - [\log_{10} (V_2) + \log_{10} (T_2)]$ , and the logarithmic reduction factors (LRF) were rounded to one decimal place only after having completed the final calculation.

### Results

In preliminary studies, four of the most promising ligands among the many screened by the company PRDT [8,12] were selected for investigating their compatibility with the Octaplas<sup>®</sup> manufacturing process and its outcome. One of them did not change the biochemical profile of Octaplas<sup>®</sup> at all, whereas the other three depleted significantly both coagulation factors and inhibitors (data not shown).

Different aspects of prion binding were investigated by using different spike preparations. As unprocessed CBH probably contains all possible infectious modalities, it was used as the starting spike material for the various spike preparations. The MIC preparation has been chosen because it is enriched with the smallest and most soluble forms of PrP<sup>Sc</sup>. Where the PrP<sup>Sc</sup> concentration, as determined by Western blot, is theoretically unrelated to the size distribution of the prion aggregates, this spike with small PrP<sup>Sc</sup> sizes may represent a form of infectivity closer to that assumed to be potentially present in plasma from blood donors than the form present in spikes with large particle sizes.

The CBH from which the microsomal fraction had been removed by centrifugation [CBH<sub>MIC</sub>] was selected to investigate the binding of larger particle size distributions, i.e. those not contained in the MIC fraction. The use of the two spike preparations above provides for a more thorough investigation of the binding properties of the ligand resin than when only CBH is used.

In addition, for some experiments a sarkosyl-solubilized spike was used. Sarkosyl-solubilized prion spike agents have been utilized widely in prion spiking studies, and yield a spike preparation from which the membrane components have been removed - which may mimic very well the nature of our target Octaplas<sup>®</sup> matrix following the S/D treatment. The use of sarkosyl as opposed to other detergents is a balance between avoiding extremely strong detergents, such as SDS, which may denature the prion aggregate, and using non-ionic detergents that tend to be too weak to provide sufficient solubilization. Where the spike material was solubilized with sarkosyl before spiking, the respective abbreviation for the spike material is appended with the subscripted text 'Sark' (i.e. CBH<sub>Sark</sub>).

### Feasibility experiments

In the first set of studies, experiments were performed where a sarkosyl-solubilized spike (i.e. lacking membrane components) was spiked into Octaplas<sup>®</sup> final product and applied directly onto PRDT columns. Two PRDT columns containing

the ligand resin at two different column volumes, 1.9 ml and 9.5 ml, were challenged with two concentrations of spiked Octaplas<sup>®</sup>, 1% and 5% spike ratios, respectively. The flow-through sample was collected in fractions as indicated in Table 1 and analysed by Western blot for PrP<sup>Sc</sup>. Under a high PrP<sup>Sc</sup> loading (i.e. 5% spike ratio), with 2.5 log<sub>10</sub> as the input, a  $\leq -0.5$  log<sub>10</sub> of PrP<sup>Sc</sup> signal was recovered with a RF of  $\geq 3.0$  log<sub>10</sub> (2.5 log<sub>10</sub> minus  $\leq -0.5$  log<sub>10</sub>) could be demonstrated for the early flow-through fractions (0–10 ml), utilizing the relevant Octaplas<sup>®</sup> matrix from manufacturing. We applied the methodology described above (see Interference handling) to remove the Western blot-interfering plasma proteins by assaying the pellet after centrifugation, which resulted in a quantitative recovery of the PrP<sup>Sc</sup>. Furthermore, this centrifugation step provided 0.5 log<sub>10</sub> of PrP<sup>Sc</sup> concentration and, thus, increased the assay sensitivity. The results indicated that the binding capacity, determined by the volume at which breakthrough occurred, was dependent on the PrP<sup>Sc</sup> load vs. the amount of affinity ligand in a reproducible manner. Within the accuracy of the assay, the total bound PrP<sup>Sc</sup> loaded onto the column was quantitatively recovered – either in the experimentally applied 2 M NaCl wash or still bound to the gel.

#### PrP<sup>Sc</sup> removal under manufacturing conditions

Further experiments were performed to investigate removal of PrP<sup>Sc</sup> which had been conditioned via the S/D-treatment, filtration and solid phase extraction steps, which forms the mid-section of the standard Octaplas<sup>®</sup> manufacturing process. Crude plasma was spiked with hamster brain-derived infectivity and processed using a validated downscale of the manufacturing process, including the front-end cell and cell-debris filtration. Following the final solid phase extraction step, the product was loaded directly onto a PRDT column to investigate PrP<sup>Sc</sup> removal. Note, that the level of removal observed for the Octaplas<sup>®</sup> manufacturing process before PRDT removal cannot be compared with that reported in previous publications which used a chronically infected whole cell preparation as spike. This earlier work measured prion removal for the Octaplas<sup>®</sup> process including cell removal via 1.0 µm filtration, whereas the current studies only addressed potential removal of non-cell associated prions post-1.0 µm filtration. Irrespective of the spike's nature [MIC or CBH<sub>LMIC</sub>], an effective PrP<sup>Sc</sup> removal to below the limit of assay sensitivity was observed in the early flow-through fractions from the column (Table 2). For the CBH<sub>LMIC</sub> spike, a slightly higher loss of spike material was observed for the steps before the column. Although not significant, this finding is consistent with the nature of this spike, which probably contained larger PrP<sup>Sc</sup> aggregates or PrP<sup>Sc</sup> associated with membranes fragments large enough to be filtered out. The pattern of breakthrough also demonstrates slight differences between the two spike materials, in

which the MIC spike showed earlier breakthrough than the CBH<sub>LMIC</sub> spike. This result may reflect an earlier saturation of available PrP<sup>Sc</sup> binding sites by MIC, due to the smaller prion aggregates present in this spike preparation, or it may reflect the higher PrP<sup>Sc</sup> loading onto the column due to the lower upstream loss of PrP<sup>Sc</sup> compared to the CBH<sub>LMIC</sub> case. Again, for the early flow-through fractions (0–10 ml), the  $\geq 3.0$  log<sub>10</sub> RF for the whole process ( $\geq 2.0$ – $2.5$  log<sub>10</sub> RF by PRDT column) could be demonstrated using the MIC spike and the amount of PrP<sup>Sc</sup> recovered from the experimental 2 M NaCl wash and gel demonstrate the substantial binding capacity of the affinity ligands. Based on the input of PrP<sup>Sc</sup> and the sensitivity of the Western blot assay, it was calculated (see Materials and methods) that the PrP<sup>Sc</sup> removal capacity per millilitre gel was 7.3 and 6.4 log<sub>10</sub> 50% infectious dose (ID<sub>50</sub>/ml resin for the MIC and CBH<sub>LMIC</sub> spike, respectively.

#### Determination of PrP<sup>Sc</sup> binding capacity per gel volume

The gel binding capacity for PrP<sup>Sc</sup> was also investigated utilizing a different study design, in which the PrP<sup>Sc</sup> bound to the gel was analysed. In these studies, a fixed volume of challenge (10 ml) and a fixed volume of gel (0.5 ml) were used. The challenge concentration was 0.01% CBH<sub>LMIC</sub> (final concentration of brain homogenate). The spiked challenge solution was applied to three columns in series. The binding to each column was then evaluated independently via Western blotting. The results (Fig. 2) indicated that the vast majority of the detectable signal was concentrated in column 1. The flow-through from column 1 contained some contamination of PrP<sup>Sc</sup>, which was visualized as a very weak signal captured by the second gel ( $< 3\%$  of PrP<sup>Sc</sup> input), as shown in Fig. 2. In all tests performed, no signal was ever detected in column 3 indicating that all PrP<sup>Sc</sup> had been removed before this stage. Furthermore, this demonstrated very strong PrP<sup>Sc</sup> capture was reproducible when different batches of gel were tested (Fig. 3). The quantification by densitometry of the PrP<sup>Sc</sup> bands recovered from the resin was conducted using a Bio-Rad VersaDoc imaging system (Bio-Rad Laboratories, Hercules, CA, USA). The results indicated that practically all input PrP<sup>Sc</sup> was detected bound to the resin. We had previously determined that the total ID<sub>50</sub> in the challenge were  $5 \times 10^5$  ID<sub>50</sub> based on the infectivity titration of the spike with the bioassay. Thus, in all cases the PrP<sup>Sc</sup> binding capacity per millilitre gel was found to be in the range of  $5 \times 10^5/0.5$  ml gel, equivalent to 6.0 log<sub>10</sub> ID<sub>50</sub>/ml resin.

#### Determination of the gel ligand specificity for PrP<sup>Sc</sup> from different sources

Figure 4 shows that the resin has the ability to bind infectious prion from all the sources tested, including the human vCJD

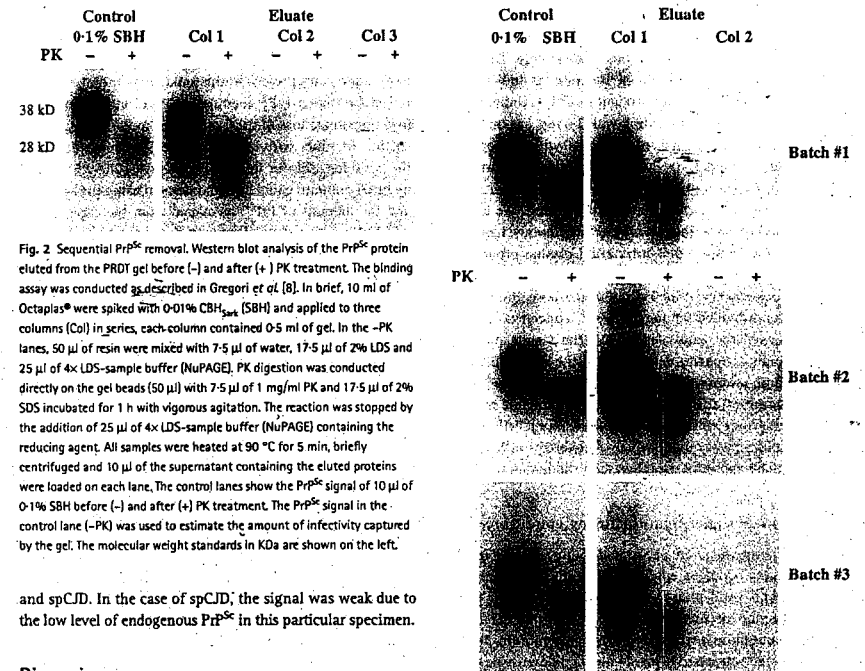


Fig. 2 Sequential PrP<sup>Sc</sup> removal. Western blot analysis of the PrP<sup>Sc</sup> protein eluted from the PRDT gel before (-) and after (+) PK treatment. The binding assay was conducted as described in Gregori et al. [8]. In brief, 10 ml of Octaplas were spiked with 0.01% CBH<sub>LMIC</sub> (SBH) and applied to three columns (Col) in series, each column contained 0.5 ml of gel. In the -PK lanes, 50 µl of resin were mixed with 7.5 µl of water, 17.5 µl of 2% LDS and 25 µl of 4x LDS-sample buffer (NuPAGE). PK digestion was conducted directly on the gel beads (50 µl) with 7.5 µl of 1 mg/ml PK and 17.5 µl of 2% SDS incubated for 1 h with vigorous agitation. The reaction was stopped by the addition of 25 µl of 4x LDS-sample buffer (NuPAGE) containing the reducing agent. All samples were heated at 90 °C for 5 min, briefly centrifuged and 10 µl of the supernatant containing the eluted proteins were loaded on each lane. The control lanes show the PrP<sup>Sc</sup> signal of 10 µl of 0.1% SBH before (-) and after (+) PK treatment. The PrP<sup>Sc</sup> signal in the control lane (-PK) was used to estimate the amount of infectivity captured by the gel. The molecular weight standards in kDa are shown on the left.

and spCJD. In the case of spCJD, the signal was weak due to the low level of endogenous PrP<sup>Sc</sup> in this particular specimen.

#### Discussion

A resin with a ligand, developed by the company PRDT, able to bind and remove PrP<sup>Sc</sup> quickly and efficiently from plasma during the industrial manufacturing of the Octaplas<sup>®</sup> product has been identified. A number of studies have been performed investigating the clearance of PrP<sup>Sc</sup> by this resin under a variety of conditions and utilizing various spike forms. The introduction of this prion binding step provides a robust and effective prion removal step dedicated to improving the prion safety profile of Octaplas<sup>®</sup> even further, without having a negative impact on the final product quality [13].

Various spike forms and study designs were used in order to evaluate the robustness of the PRDT resin. The resin challenged with CBH, detergent-soluble PrP<sup>Sc</sup> forms, or homogenates enriched with small or large PrP<sup>Sc</sup> forms all indicated several log-steps of consistent and reproducible removal ( $\geq 3.0$  log<sub>10</sub>). The PrP<sup>Sc</sup> binding capacity of the resin per millilitre gel was shown to be in the region of 6.0–7.3 log<sub>10</sub> ID<sub>50</sub>/ml resin, and effective removal was observed until the binding capacity of the column was reached. Thus, for the gel volume chosen (3.8 l) for a standard OctaplasLG<sup>®</sup>

Fig. 3 Reproducibility of PrP<sup>Sc</sup> removal in sequential set-up. Western blot comparison of PrP<sup>Sc</sup> binding to three independently manufactured batches of PRDT gel. Ten millilitres of Octaplas were spiked with 0.01% CBH<sub>LMIC</sub> (SBH) and applied to two columns (Col) in series, each column contained 0.5 ml of gel. The samples without (-) and with (+) PK were processed as described in Fig. 2. Ten microlitres of the eluted proteins were loaded on each lane. The control lanes show the PrP<sup>Sc</sup> signal of 10 µl of 0.1% SBH before (-) and after (+) PK treatment.

batch size (380 l), the total PrP<sup>Sc</sup> capture is equivalent to at least 9.6 log<sub>10</sub> ID<sub>50</sub>, which is equivalent to 9.4 log<sub>10</sub> ID (ID<sub>50</sub> × 0.69) [8]. In order to overload this removal capacity, every millilitre of such OctaplasLG<sup>®</sup> pools would need to contain more than 6900 ID PrP<sup>Sc</sup>. Up to 20 ID/ml plasma have been found in relevant rodent models at the clinical stage of disease [14]. Thus, in theory one contaminated single plasmapheresis unit of 600 ml would cause a maximum PrP<sup>Sc</sup> load of 0.03 ID/ml in the OctaplasLG<sup>®</sup> pool, i.e. the gel capacity exceeds the prion load  $\geq 218$  500 times ( $\geq 5.3$  log<sub>10</sub>). Even with as many as 10 (1.6%) contaminated plasma units out of 630 plasmapheresis bags in an OctaplasLG<sup>®</sup> batch, the affinity ligand column is able to remove the total theoretical

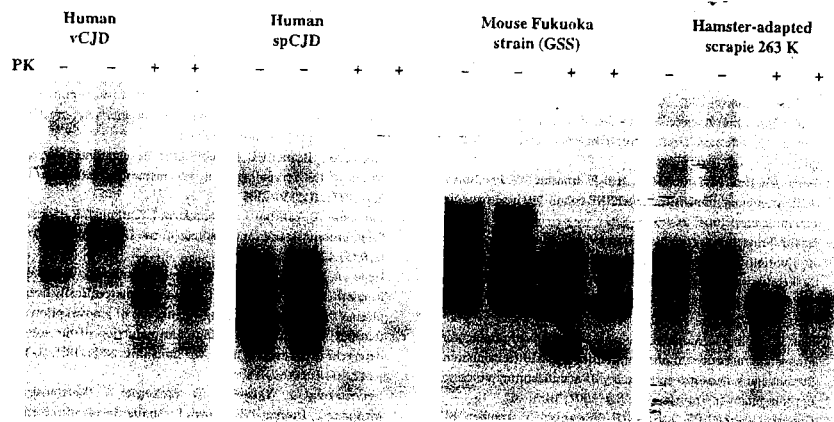


Fig. 4 Binding of PrP<sup>Sc</sup> derived from various prion diseases. Western blot analysis of PrP<sup>Sc</sup> binding to PRDT gel. Ten millilitres of human leukoreduced red blood cells in residual plasma were spiked with 1% CBH<sub>Sark</sub> from a case of variant CJD (vCJD), a case of sporadic CJD (spCJD), a brain pool from mice infected with mouse-adapted Fukuoka strain (GSS) and 0.1% CBH<sub>Sark</sub> pool from hamsters infected with hamster-adapted scrapie 263 K strain. Each sample was applied to 0.5 ml of resin in duplicate. Fifty microlitres of each resin [with (+) and without (-) PK treatment] were processed as described in Fig. 2. Ten microlitres of the eluted proteins were loaded on each lane. The exposure time of the film for each sample was adjusted to obtain equivalent signals intensity.

load of PrP<sup>Sc</sup> with a safety margin higher than 21 850-fold ( $\geq 4.3 \log_{10}$ ). It is important to confirm the PrP<sup>Sc</sup> binding demonstrated by Western blotting in these studies by animal infectivity studies. One such bioassay (hamsters) has just been completed successfully and the final result ( $3.0 \log_{10}$ ) confirmed the biochemical investigations summarized here (A. Bailey, personal communication). A second animal study is currently ongoing.

In theory, excessive amounts of PrP<sup>Sc</sup> might be able to dislodge PrP<sup>Sc</sup> that is already bound to the ligand in the gel. Thus, an experiment was performed to address this particular issue (data not shown). The normal concentration of PrP<sup>Sc</sup> in plasma is estimated to be in the order of a few nanogram per millilitre of plasma [15,16]. The study therefore tested the ability of either normal Octaplas<sup>®</sup> or a solution of commercially available recombinant PrP<sup>Sc</sup> at 2 µg/ml (i.e. close to three orders of magnitude higher than the concentration normally found in plasma) to remove gel-bound PrP<sup>Sc</sup> from a pre-loaded column. It was concluded from these experiments that the PrP<sup>Sc</sup> concentration expected to be found in the different OctaplasLG<sup>®</sup> batches would have no significant impact on the ability of the column to retain the gel-bound PrP<sup>Sc</sup>.

In conclusion, the performed studies confirm a very effective PrP<sup>Sc</sup> removal effect by the specific affinity ligand tested. The resin will be used in a chromatography step as a single-use resin, i.e. no sanitization and re-use. We have

demonstrated that the introduction of the specific prion removal column into the current Octaplas<sup>®</sup> manufacturing process is technologically possible and will further improve the safety margin of this product in terms of prion diseases such as vCJD. The new generation Octaplas<sup>®</sup> will be marketed as OctaplasLG<sup>®</sup>.

#### Acknowledgements

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B 個別症例報告概要

- 総括一覧表
- 報告リスト

個別症例報告のまとめ方について

個別症例報告が添付されているもののうち、個別症例報告の重複を除いたものを一覧表の後に添付した（国内症例については、資料3において集積報告を行っているため、添付していない）。

血製品ID	受理日	薬名	製造元	成分	原料	原産国	有効成分	添加物	製造工程	
100016	2009/9/29	90535	CSL ベーリン グ	人血清アルブミン 人血液凝固第XIII因子 フィブリノゲン追加XIII因子	人血清アルブミン	ヒト血液	米国、ドイツ、オーストリア	有効成分 添加物	あり あり	なし
100018	2009/9/29	90537	バクスター ター	乾燥凍結人血液凝固第III因子	人血清アルブミン	人血液	米国	添加物	なし	あり
100019	2009/9/29	90538	バクスター ター	乾燥凍結人血液凝固第III因子	乾燥人血液凝固第III因子	人血液	米国	有効成分	なし	あり
100027	2009/10/22	90643	CSL ベーリン グ	乾燥pH4処理人免疫グロブリン	人免疫グロブリンG	ヒト血液	ドイツ	有効成分	あり	あり
100028	2009/10/22	90644	CSL ベーリン グ	乾燥pH4処理人免疫グロブリン	ペプシン	ブタ腎臓	米国	製造工程	なし	あり
100029	2009/10/22	90645	CSL ベーリン グ	フィブリノゲン追加XIII因子 人血液凝固第XIII因子	人血液凝固第XIII因子	ヒト血液	米国、ドイツ、オーストリア	有効成分	あり	あり
100045	2009/10/28	90892	CSL ベーリン グ	-	ヒトラブリノゲン	ヒト血液	米国、ドイツ、オーストリア	有効成分	あり	あり
100046	2009/10/28	90893	CSL ベーリン グ	-	アンチトロンビンIII	ヒト血液	米国、ドイツ、オーストリア	製造工程	あり	あり
100047	2009/10/28	90894	CSL ベーリン グ	-	ヒトアルブミン	ヒト血液	米国、ドイツ、オーストリア	添加物	あり	あり
100048	2009/10/28	90895	CSL ベーリン グ	-	ウマコラーゲン	ウマ深部指状関節	フランス、ドイツ、ベルギー、イタリア、オーストリア、米国、カナダ、ブラジル	支持体	なし	あり
100049	2009/10/28	90896	CSL ベーリン グ	-	トロンボプラスミン	ウマ腎臓	ニュージーランド	製造工程	なし	あり
100050	2009/10/28	90897	CSL ベーリン グ	-	アプロチニン	ウシ肺	ウルグアイ、ニュージーランド	有効成分	なし	あり
100051	2009/10/28	90898	CSL ベーリン グ	-	トロンピン分	ウシ血液	ニュージーランド	有効成分	なし	あり
100052	2009/10/28	90899	CSL ベーリン グ	-	ペパリン	ブタ腎臓	中国	製造工程	なし	あり

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語), 発現国, 性別, 年齢, 発現時期, 転帰, 出典, 区分, 備考. Includes rows for cases 13, 12, 11, 10, 9, 8, 7, 6, 5, 4, 3, 2, 1.

100016 2009/9/29 90535 GSI ベーリン グ 人血清アルブミン 人血液凝固第Ⅲ因子 フィブリノゲン加酸素前因子 人血清アルブミン

感染症発生症例一覧

Detailed table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語), 発現国, 性別, 年齢, 発現時期, 転帰, 出典, 区分, 備考. Includes rows for cases 13, 12, 11, 10, 9, 8, 7, 6, 5, 4, 3, 2, 1 with detailed clinical notes and MedDRA codes.



感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語 (PT)), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains multiple rows of infection case data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語 (PT)), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains multiple rows of infection case data.



感染症発生症例一覧

Table with columns: 報告回, 番号, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains multiple rows of infection cases.

感染症発生症例一覧

Table with columns: 報告回, 番号, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains multiple rows of infection cases.

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, 備考. Contains 67 rows of data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, 備考. Contains 57 rows of data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 器管別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains 53 rows of infection case data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 器管別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains 101 rows of infection case data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語(PT)), 発現国, 性別, 年齢(歳), 発現時期(年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, 備考 (MedDRA (Ver.)).

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語(PT)), 発現国, 性別, 年齢(歳), 発現時期(年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, 備考 (MedDRA (Ver.)).

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感染症発生症例一覧

Table with columns: 報告回, 番号, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains 182 rows of infection case data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 器官別大分類, 基本語 (PT), 発現国, 性別, 年齢 (歳), 発現時期 (年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, MedDRA (Ver.), 備考. Contains 230 rows of infection case data.

感染症発生症例一覧

Table with columns: 報告回, 番号, 感染症の種類 (器官別大分類, 基本語(PT), 発現国), 性別, 年齢(歳), 発現時期(年/月/日), 転帰, 出典, 区分, 識別番号, 報告日, 備考 (MedDRA (Ver.)).

感染症発生症例一覧

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