



CHALLENGES IN DEVELOPING NOVEL-(NOVEL) COMBINATIONS Regulatory Perspective

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Combinations with targeted or immunotherapy in oncology

Rationale for combination of IMPs

- Combinations could improve treatment outcomes and result in superior therapeutic effects, especially when a synergistic anticancer activity is achieved
- The combinational approach can overcome clonal heterogeneity
- Could reduce the emergence of drug resistance

Identifying which combinations are appropriate and in which subpopulations are among the most difficult questions

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Challenges for development of combinations

Tolerability

- Contribution of components (CoC)
- Targeted or Immunotherapies: (Novel IMP- Novel predictive ? biomarke

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Tolerability

- The conventional maximum tolerated dose (MTD) based dose-finding paradigm is not suitable for the development of targeted or immunotherapy agents
 - The dose-response relationship has not been established for the majority of the anticancer agents
 - The combinations could be poorly tolerable, reflected by the high discontinuation and dose reduction rates
- Dose optimization (for the combination) in early phases is essential

Information from Preclinic and Phase I Optimal biological dose (OBD)?

Phase II dose optimization (RCT) Information on exposure-response

Phase III dose selection

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Contribution of Components (CoC)

Requirement for demonstrating the contribution of each agent to the activity of the combination

(Early Development Considerations for Innovative Combination Products (FDA)/ Guideline on the evaluation of anticancer medicinal products in man (EMA))

Depends on the level of enhanced activity expected with the combination vs individual monotherapy components

Different scenarios are foreseeable:

- Scenario A: If the experimental agent (A) is added to an established regimen (B)
- Scenario B: If both combination partners demonstrate anti-tumour activity individually
 Scenario C: If one or both combination partners have no or minimal anti-tumour activity per se as monotherapy

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Conference **Contribution of Components (CoC)/ Scenario A** Experimental agent (A) is added to an established regimen (B)

Superiority of AB vs. B should be demonstrated.

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- A discussion is expected based on available data as regards treatment effect of A
- Often, this type of studies does not include an A alone third arm (should be justified..)





Contribution of Components (CoC)/Scenario A

CheckMate 067 phase III study in 1L unresectable or advanced melanoma

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Conference **Contribution of Components (CoC)/Scenario A**



B/R negative for the PD-L1 positive patients – Subgroup analysis essential

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Contribution of Components (CoC)/Scenario B

both combination partners demonstrate anti-tumour activity individually



Data could be generated in Phase 2 trial/ smaller arms or early futility utility analysis possible CDDF CDDF

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Contribution of Components (CoC)/Scenario C

Study POSEIDON: phase III study in 1L NSCLC

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External/ Preclinical Data: Tremelimumab Monotherapy not sufficiently active ;Durvalumab +CT included





Contribution of Components (CoC)/Scenario C



From Johnson et al. JCO, Nov 2023

D + CT significantly improved PFS and T + D + CT significantly improved OS and PFS versus CT.

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Contribution of Components (CoC)/Scenario C

Subgroup analysis/predictive biomarker



- > The inclusion of the D + CT arm allowed approximate assessment of the contribution of tremelimumab
- > No formal comparison of both arms

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Overall survival in the PD-L1 TC<1% population





Novel IMP-Novel biomarker

- Early evaluation of the predictive value of the target/biomarker
 - Biomarker assay (analytically fully validated)/ prototype before FIM
 Pivotal study: confirmatory prospective randomized controlled trial
 - Stratification (if applicable for different cut-offs)
 - Prespecified cut-offs
 - Adequate tumor material / central assessment
 - Biomarker assessment for all study patients







Novel/ Novel Combinations

- Combination therapies are rationale, but challenging
- Randomized trials (large!) to demonstrate contribution of components important; however, monotherapy arms may be omitted in case of evidence for limited activity (as monotherapy)
- Careful dose-selection und evaluation of efficacy in relevant biomarker subgroups essential to optimize B/R balance of combination treatment

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Relevant guidance/publications

- Guideline on the clinical evaluation of anticancer medicinal products EMA/CHMP/205/95 Rev.6 (draft) Revision section 5 Biomarkers
- FDA Guidance Codevelopment of Two or More New Investigational Drugs for Use in Combination
- Questions & Answers on the interface between Regulation (EU) 536/2014 on clinical trials for medicinal products for human use (CTR) and Regulation (EU) 2017/746 on in vitro diagnostic medical devices (IVDR)

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