EMA/CHMP/284816/2021
Committee for Medicinal Products for Human Use (CHMP)

Assessment Report for the Post-Authorisation Measure REC 027

Comirnaty

International non-proprietary name: COVID-19 mRNA vaccine (nucleoside-modified)

EMEA/H/C/005735/PAM-ANX REC027

Marketing authorisation holder: BioNTech Manufacturing GmbH

Official address Domenico Scarlattilaan 6 ● 1083 HS Amsterdam ● The Netherlands
Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us
Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000 An agency of the European Union

Administrative information

Name of the Rapporteur	**Name: Filip Josephson**
Rapporteur contact person:	**Name:** [redacted] Email: [redacted]
Names of the Rapporteur's assessors	**Name:** [redacted] Email: [redacted] **Name:** [redacted] Email: [redacted]
EMA Product Lead:	**Name:** [redacted] Email: [redacted]

Table of contents

1. Introduction

This report covers the following post-authorisation commitment undertaken by the MAH:

REC7: The MAH should provide the results of the studies performed to enhance the robustness of the DNase digestion step in the active substance manufacturing process.

1.1. Steps taken for the assessment

Submission date:	30 March 2021
Start of procedure:	21 April 2021
Rapporteur's preliminary assessment report circulated on:	27 April 2021
MS comments:	10 May 2021
Rapporteur's updated assessment report circulated on:	n/a
CHMP adoption of conclusions:	20 May 2021

2. Summary of data submitted

An [redacted] in residual DNA was previously observed in the PPQ3 batch as compared to the PPQ1 and PPQ2 batches. [redacted] As a mitigation approach, studies were initiated to enhance the robustness of the DNase digestion step. As the studies were progressing, additional manufacturing experience presented a likely root cause for the [redacted] residual DNA. As outlined in the figure below, [redacted]

The likely root cause [redacted] Pfizer is implementing activity testing on incoming enzymes by the end of second quarter 2021, per Recommendation 3, which should help prevent future issues.

3. Scientific discussion

No detailed report for the studies initiated to enhance the robustness of the DNase digestion step is provided. However, the MAH shows data indicating that the likely root cause for the [redacted] residual DNA is [redacted] It is also confirmed that activity testing on incoming enzymes will be implemented by the end of second quarter 2021 as requested in Recommendation 3. It is expected that a detailed summary of the results from the studies performed to enhance the robustness of the DNase digestion step will be included in Module 3.2.S.2.5 of the dossier by the end of second quarter 2021.

Recommendation 3 requesting implementation of an in-house functional activity analytical method for release testing of enzymes used in the manufacturing process at all relevant manufacturing sites was initially expected by Q1 2021 but it was agreed with EMA by e-mail to extend the due date to Q2-2021. It is recommended that Recommendations 3 and 7 are grouped.

4. Overall conclusion

The Recommendation number 7 is only considered as partly fulfilled.

☐ **PAM fulfilled (all commitments fulfilled) - No further action required**

☒ **PAM not fulfilled (not all commitments fulfilled) and further action, as specified below, required by the end of second quarter 2021**

Recommendation number 7 to provide the results of the studies performed to enhance the robustness of the DNase digestion step has only been partly fulfilled. Further actions are required to fulfil Recommendation 7 including submission of a detailed summary of the results from the studies and inclusion of these data in Module 3.2.S.2.5 of the dossier by the end of second quarter 2021.
It also recommended that Recommendations 3 and 7 are grouped.