

1

Das kationische Lipid ALC- 0315

1. Das Lipid wurde nicht separat auf seine Toxizität hin untersucht, statt dessen verglich man mit einem komplett anderen, strukturell unterschiedlichen Lipid. [1]

N Ixi in

The toxicity of LNP formulation or the novel excipients alone was not specifically studied. In the repeat dose toxicity studies with the clinical candidate vaccine (BNT162b2 V9) and BNT162b2 VB,

SAFETY OF ALC-0315

Safety of the novel excipients was not assessed in a second study. No further data would be submitted as stated by the Sponsor. In response to the TGA enquiry regarding the toxicity assessment of the novel excipients in the LNP formulation, the Sponsor referred to the evaluation of the siRNA product Onpatro™ (patisiran) administered as a LNP formulation, which is approved in the US, Europe and Canada (not reviewed by TGA) for the treatment of hereditary transthyretin-mediated amyloidosis (hATTR amyloidosis) by IV infusion every 3 weeks. The LNP in Onpatro™ is composed of

DLin-MC3-DMA, PEG2000-C-DMG, DSPC, and cholesterol. No nonclinical safety concerns regarding excipients, impurities, or degradation products were identified in the FDA and EMA evaluations. The

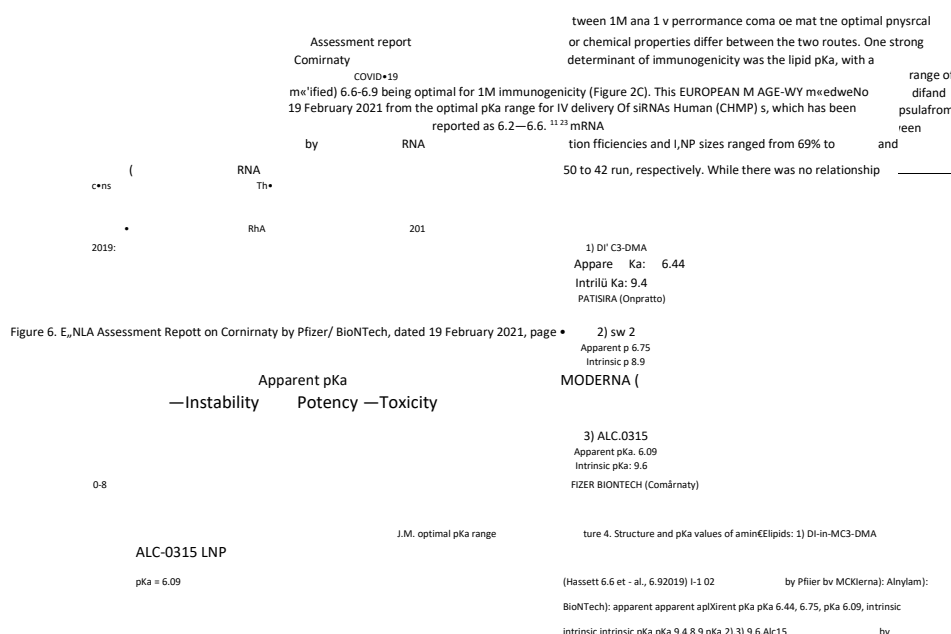
primary toxicity observed in rats and monkeys was an elevation in liver enzymes, with hepatocyte vacuolation. Therefore, the Sponsor argued that ALC-0315 and ALC-0159 would have

Nonclinical Evaluation of BNT162b2 [mRNA] COVID-19 vaccine (COMIRNATY)

Submission No. PM-2020-05461-1-2

similar toxicity profile to the lipids DLin-MC3-DMA and PEG2000-C DMG, respectively, as they were structurally and functionally similar (See Section 1.4). However, while the pegylated lipids (ALC-0159 and PEG2000-C DMG) are structurally similar, the structures of ALC-0315 and DLin-MC3-DMA are not similar. Nonetheless, given that both the novel excipients are amino or amino/PEG lipids and the potential lifetime exposure is expected to be low (see discussion below), the Sponsor's justification for not conducting repeat dose toxicity studies with the novel excipients in a second animal species is acceptable.

2. Man belog die EMA bei der Eignung des pKs von ALC-0315 [2] [3]



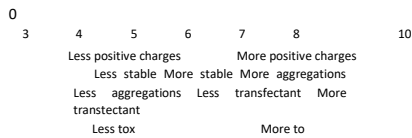


Figure S. Lipid PK.a of AI-C-0315 with regards to instability, potency and toxicity. Modified from Trends in Pharmacological Sciences, Vol. 42(6), 448—

460, Patel et al. 2021 The Importance of Apparent pKa in the Development of Nanoparticles Emulsifying mRNA, page No. 458, copyright C 2021, with permission from Elsevier Ltd.

2 Das PEGylierte Lipid ALC- 0159

1. BioNTech weiß, dass die PEG-Kettenlänge einen unterschiedlichen bei den Nebenwirkungen macht [4]

thus improving the efficacy of LNP-siRNA drug [10]. This study is in agreement with the previous study by Judge et al. where the authors found less formed anti-PEG antibodies and a substantial reduction of side effects upon repetitive dosing in mice when PEGylated liposomes containing a shorter alkyl chain (C14) PEG-lipid versus a longer alkyl chain C16 PEG-lipid were used [151]. Studies directly examining the effects of anti-PEG antibodies on the efficacy and safety of LNP-mRNA drugs containing PEG lipids are

2. Man hat die PEG-Kettenlänge NICHT per Massenspektrometrie geprüft. [5]

■ Table P.4-4. Specification for ALC-0159. ¶

Quality Attribute	Analytical Procedure	Acceptance Criteria
Appearance	Visual examination	White powder which contains no foreign matter
Identity	Infrared spectroscopy	IR spectrum of the sample corresponds to the reference spectrum
Microbial contamination	Ph. Eur. 2.6.12	TAMC NMT 100 CFU/g

a. In order to release a batch for use in the manufacture of LNP drug product, results from the supplier are also required for the following tests. For details regarding the specification and methods for these tests performed at the supplier, refer to Section 3.2.A.3.4 Control of Excipients [ALC-0159]. The drug product manufacturer intends to implement these tests as part of incoming materials testing following qualification of the methods.

1. Assay
2. Impurities
3. Residual solvents

Abbreviations: IR = infrared; NMT = not more than; LNP = lipid nanoparticle; TAMC = Total aerobic microbial count; Ph. Eur. = European Pharmacopoeia

3. Das hat die AG-Impfstoffe des Expertcouncils gemacht und massive Unterschiede in der PEG-Kettenlänge festgestellt [6]

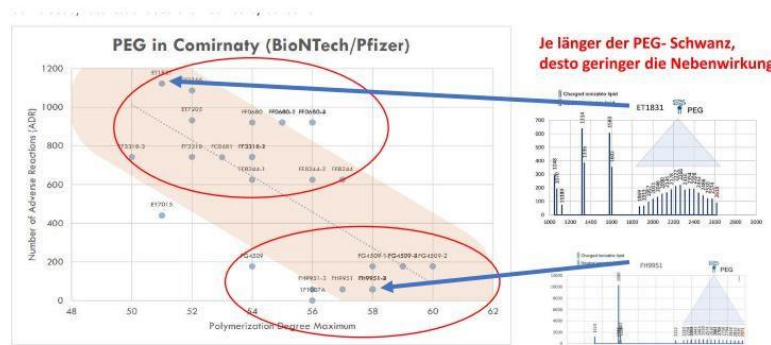


Figure 7: From the mass spectra of samples from different batches of Comirnaty vaccine (BioNTech/Pfizer), the maximum chain lengths were compared with the number of reported vaccination complications. A clear correlation can be seen. The blue dots are associated with the BioNTech/Pfizer batch numbers analysed.

3

1. Sowohl EMA als auch BioNTech wissen, dass BNT162B2 die PAM (Post-authorization measure = Maßnahme nach der Zulassung) am 20. Mai 2021 NICHT ERFÜLLT waren [7]

4. Overall conclusion

The recommendation number 7 is only considered as partly fulfilled.

C) PAM fulfilled (all commitments fulfilled) - No further action required

E PAM not fulfilled (not all commitments fulfilled) and further action, as specified
be10W, required by the end Of second quarter 2021

Recommendation 7 to provide the results of the Studies performed to enhance the robustness of DNase Step has fulfilled. Further are to fulfil Recommendation 7 including submission of a detailed Summary of the results from the Studies and inclusion of data in Module the dossier by the end Of 2021. It also that Recommendations 3 and 7 are grouped.

2. GMP NICHT bestanden wurde [8]:

		Yes	No	N/A
GMP	GMP-inspection check is satisfactory	X		
ASMF	ASMF Holder has submitted the applicant's order	X		

3. BNT162B2 mit DNA verunreinigt ist [8]

2.1.3. Post Authorisation Measure

Recommendation #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 of the dossier by the end of second quarter 2021. It is also recommended that Recommendations 3 and 7 are grouped

Response to Post Authorisation Measure

Following the increase in residual DNA observed during the ACMF PPO campaign, small scale experiments were initiated to enhance the robustness of the DNase I digestion step. Studies were conducted to better understand the impact of reaction components, process parameters, and operation parameters on levels of residual DNA template. The small-scale studies are inconclusive and no adjustments to the DNase step are recommended, therefore the data from these studies are not provided.

Type IB variation report
EMA/CHMP/429590/2021

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The root cause analysis is supported by the data previously shown in EMEA/H/C/005735/PAM-ANX REC027.

Pfizer has implemented an activity assay for incoming enzymes to monitor and identify outliers that trend with drug substance product quality until acceptance criteria for the new assay can be established. This includes [REDACTED]

Assessor's comments:

4. Die Verringerung der dsRNA-Kontaminationen im Produkt führten zu einer Erhöhung der DNAKontamination. Das wurde der EMA verschwiegen. [9]

(11) United States		(50) Pub. No.: US 2023/0183769 A1
(12) Patent Application Publication		(51) Pub. Date: Jun. 15, 2023
(10) Rabe et al.		
(54) IN VITRO TRANSCRIPTION TECHNOLOGIES		(56) Foreign Application Priority Data
(71) Applicant: BioNtech SE, Mainz (DE)		Sep. 1, 2021 (DE) 102021007410 Sep. 1, 2021 (DE) 102021007411 Sep. 1, 2021 (DE) 102021007412 Sep. 1, 2021 (DE) 102021007413 Sep. 1, 2021 (DE) 102021007414 Sep. 1, 2021 (DE) 102021007415 Sep. 1, 2021 (DE) 102021007416 Sep. 1, 2021 (DE) 102021007417 Sep. 1, 2021 (DE) 102021007418 Sep. 1, 2021 (DE) 102021007419 Sep. 1, 2021 (DE) 102021007420 Sep. 1, 2021 (DE) 102021007421 Sep. 1, 2021 (DE) 102021007422 Sep. 1, 2021 (DE) 102021007423 Sep. 1, 2021 (DE) 102021007424 Sep. 1, 2021 (DE) 102021007425 Sep. 1, 2021 (DE) 102021007426 Sep. 1, 2021 (DE) 102021007427 Sep. 1, 2021 (DE) 102021007428 Sep. 1, 2021 (DE) 102021007429 Sep. 1, 2021 (DE) 102021007430 Sep. 1, 2021 (DE) 102021007431 Sep. 1, 2021 (DE) 102021007432 Sep. 1, 2021 (DE) 102021007433 Sep. 1, 2021 (DE) 102021007434 Sep. 1, 2021 (DE) 102021007435 Sep. 1, 2021 (DE) 102021007436 Sep. 1, 2021 (DE) 102021007437 Sep. 1, 2021 (DE) 102021007438 Sep. 1, 2021 (DE) 102021007439 Sep. 1, 2021 (DE) 102021007440 Sep. 1, 2021 (DE) 102021007441 Sep. 1, 2021 (DE) 102021007442 Sep. 1, 2021 (DE) 102021007443 Sep. 1, 2021 (DE) 102021007444 Sep. 1, 2021 (DE) 102021007445 Sep. 1, 2021 (DE) 102021007446 Sep. 1, 2021 (DE) 102021007447 Sep. 1, 2021 (DE) 102021007448 Sep. 1, 2021 (DE) 102021007449 Sep. 1, 2021 (DE) 102021007450 Sep. 1, 2021 (DE) 102021007451 Sep. 1, 2021 (DE) 102021007452 Sep. 1, 2021 (DE) 102021007453 Sep. 1, 2021 (DE) 102021007454 Sep. 1, 2021 (DE) 102021007455 Sep. 1, 2021 (DE) 102021007456 Sep. 1, 2021 (DE) 102021007457 Sep. 1, 2021 (DE) 102021007458 Sep. 1, 2021 (DE) 102021007459 Sep. 1, 2021 (DE) 102021007460 Sep. 1, 2021 (DE) 102021007461 Sep. 1, 2021 (DE) 102021007462 Sep. 1, 2021 (DE) 102021007463 Sep. 1, 2021 (DE) 102021007464 Sep. 1, 2021 (DE) 102021007465 Sep. 1, 2021 (DE) 102021007466 Sep. 1, 2021 (DE) 102021007467 Sep. 1, 2021 (DE) 102021007468 Sep. 1, 2021 (DE) 102021007469 Sep. 1, 2021 (DE) 102021007470 Sep. 1, 2021 (DE) 102021007471 Sep. 1, 2021 (DE) 102021007472 Sep. 1, 2021 (DE) 102021007473 Sep. 1, 2021 (DE) 102021007474 Sep. 1, 2021 (DE) 102021007475 Sep. 1, 2021 (DE) 102021007476 Sep. 1, 2021 (DE) 102021007477 Sep. 1, 2021 (DE) 102021007478 Sep. 1, 2021 (DE) 102021007479 Sep. 1, 2021 (DE) 102021007480 Sep. 1, 2021 (DE) 102021007481 Sep. 1, 2021 (DE) 102021007482 Sep. 1, 2021 (DE) 102021007483 Sep. 1, 2021 (DE) 102021007484 Sep. 1, 2021 (DE) 102021007485 Sep. 1, 2021 (DE) 102021007486 Sep. 1, 2021 (DE) 102021007487 Sep. 1, 2021 (DE) 102021007488 Sep. 1, 2021 (DE) 102021007489 Sep. 1, 2021 (DE) 102021007490 Sep. 1, 2021 (DE) 102021007491 Sep. 1, 2021 (DE) 102021007492 Sep. 1, 2021 (DE) 102021007493 Sep. 1, 2021 (DE) 102021007494 Sep. 1, 2021 (DE) 102021007495 Sep. 1, 2021 (DE) 102021007496 Sep. 1, 2021 (DE) 102021007497 Sep. 1, 2021 (DE) 102021007498 Sep. 1, 2021 (DE) 102021007499 Sep. 1, 2021 (DE) 102021007500 Sep. 1, 2021 (DE) 102021007501 Sep. 1, 2021 (DE) 102021007502 Sep. 1, 2021 (DE) 102021007503 Sep. 1, 2021 (DE) 102021007504 Sep. 1, 2021 (DE) 102021007505 Sep. 1, 2021 (DE) 102021007506 Sep. 1, 2021 (DE) 102021007507 Sep. 1, 2021 (DE) 102021007508 Sep. 1, 2021 (DE) 102021007509 Sep. 1, 2021 (DE) 102021007510 Sep. 1, 2021 (DE) 102021007511 Sep. 1, 2021 (DE) 102021007512 Sep. 1, 2021 (DE) 102021007513 Sep. 1, 2021 (DE) 102021007514 Sep. 1, 2021 (DE) 102021007515 Sep. 1, 2021 (DE) 102021007516 Sep. 1, 2021 (DE) 102021007517 Sep. 1, 2021 (DE) 102021007518 Sep. 1, 2021 (DE) 102021007519 Sep. 1, 2021 (

Example 4: Additional Exemplary Assessment of IVT Reaction Mixtures

[0437] The present example demonstrates additional exemplary assessment of IVT reaction mixtures. FIG. 16 summarizes exemplary IVT reaction mixtures assessed and exemplary characterization of produced RNAs when CTP in the IVT reaction mixture is increased. Both RNA yield and integrity increased with higher CTP starting concentrations, while dsRNA content decreases with higher CTP concentration. Residual DNA was increased with higher CTP concentration (FIG. 16). Without wishing to be bound by any one theory, residual dsRNA was increased with higher CTP starting concentration due to activity of DNase I being decreased from, for example, lower free magnesium cation levels.

US20230183769A1 (USPTO)
<https://image-publs.uspto.gov/dsearch-public/print/downloadPdf/US20230183769>
 US20230183769A1 (Google)
<https://patents.google.com/patent/US20230183769A1/en?pg=US20230183769A1>

Rapporteur Rolling Review critical assessment report

In parallel, small scale studies were conducted to understand the impact of a wider range of CP and ATP, since ATP was identified as the next potential limiting nucleotide. Results showed that increasing the volumes of both CP and ATP not only mitigated these nucleotide limitations, as measured at the ATP/CP ratio, but also improved the overall ATP/CP ratio. The ATP/CP ratio for the 99.9% ATP and CP volumes were identified as CPAs prior to the Pfizer (P20) batch. As a result of the small scale studies, acceptable ranges for ATP and CP volumes were widened at the higher and from 99.9 to 100% ATP and CP volumes. The ATP/CP ratio was also widened from 1.2 to 1.6. The ATP/CP ratio acceptable range for both ATP and CP are listed in Table 5.2-6.3. The target volume was also increased from 90.0 to 107.9 mL/L starting IV volume for ATP and 90.0 to 133.1 mL/L starting IV volume for CP. These changes were implemented for Pfizer P202 batch onwards for the BioTech P2Q campaign. In summary, the lower end of the updated range remained the same while the updated target and upper end of range was increased based on the Pfizer study for ATP and CP addition.

P.56
A small decrease in RNA integrity was observed for the Process 2 batches, and the variability of this decrease was attributed to further up-stream process variations. CTP volume and ATP volume process parameters were adjusted prior to the manufacture of batch 2015335031. Release testing revealed batch 2015335031 RNA integrity levels consistent with the Process 2 batches. Additionally, the relative abundance of 5'-capped RNA is slightly higher in the Process 2 batches. As the 5'-capped RNA is a key attribute, it is critical to translation of the resultant proteins. Materials prepared of capped-intact RNA is used to compare the Process 1 and Process 2 materials that were tested side-by-side. The range of Process 1 capped-intact RNA is 46 to 52% as compared to 50% for Process 2. The properties of the 5'-capped RNA are similar for the two different materials. Small differences in poly(A) content, including some values reported over 100%, are attributed to method variability, as it is not practically feasible to achieve greater than 100% poly-adenylated RNA.

EMA document
<https://docs.google.com/document/d/1WwzH-glsPsg3bTfYgS1DUtEgls1wAZT5-4Z7v0v8/edit>



5. Warum DNA Verunreinigung schlecht ist:

<https://drbine.substack.com/p/integriert-die-plorre-nun-oder-nicht.pdf>

<https://www.tga.gov.au/sites/default/files/foi-2389-06.pdf>

Quellen:



[1] <https://www.tga.gov.au/sites/default/files/foi-2389-06.pdf>

[2] Apparent Cytotoxicity and Intrinsic Cytotoxicity of Lipid Nanomaterials Contained in a COVID-19 mRNA Vaccine.

(2023). International Journal of Vaccine Theory, Practice, and Research , 3(1), 957-972.

<https://doi.org/10.56098/iivtpr.v3i1.84> [3] Hassett KJ, Benenato KE, Jacquinet E, Lee A, Woods A, Yuzhakov O, Himansu S,

Deterling J, Geilich BM, Ketova T, Mihai C, Lynn A, McFadyen I, Moore MJ, Senn JJ, Stanton MG, Almarsson Ö, Ciaramella

G, Brito LA. Optimization of Lipid Nanoparticles for Intramuscular Administration of mRNA Vaccines. Mol Ther Nucleic

Acids. 2019 Apr 15;15:1-11. doi:

10.1016/j.omtn.2019.01.013. Epub 2019 Feb 7. PMID: 30785039; PMCID: PMC6383180.

<https://pubmed.ncbi.nlm.nih.gov/30785039/>

[4] Vlatkovic I. Non-Immunotherapy Application of LNP-mRNA: Maximizing Efficacy and Safety. Biomedicines. 2021 May

(5):530.doi: 10.3390/biomedicines9050530. PMID: 34068715; PMCID: PMC8151051.

<https://pubmed.ncbi.nlm.nih.gov/34068715/>

[5] Rapporteur's Rolling Review Report Quality - COVID-19 mRNA Vaccine BioNTec S. 160

[6] SAMMLUNG ERSTER ERGEBNISSE [https://expertcouncil.one/wp-content/uploads/2023/03/AG-Impfstoffe-erste-](https://expertcouncil.one/wp-content/uploads/2023/03/AG-Impfstoffe-erste-ErgebnisseJuli-2022_expertcouncil_one.pdf)

[ErgebnisseJuli-2022_expertcouncil one.pdf](https://expertcouncil.one/wp-content/uploads/2023/03/AG-Impfstoffe-erste-ErgebnisseJuli-2022_expertcouncil_one.pdf)

[7] 1251-Assessment-Report-for-the-Post-Authorization-Measure-REC-027.pdf Seite 5

[https://postvac.org/community/rechtliche-fragen/neue-erkenntnisse-starke-verunreinigung-des-biontech-mrna-](https://postvac.org/community/rechtliche-fragen/neue-erkenntnisse-starke-verunreinigung-des-biontech-mrna-impfstoffskomirnatv/paged/4/#post-39818)

[impfstoffskomirnatv/paged/4/#post-39818](https://postvac.org/community/rechtliche-fragen/neue-erkenntnisse-starke-verunreinigung-des-biontech-mrna-impfstoffskomirnatv/paged/4/#post-39818)

[8] Type 1B variation report S. 3 <https://mega.nz/file/eLoSvQvS#Y2g4VtSCUIDXg9JSTY32BQIM8Up918xtrkgOSMxIFw>

[9] Sun, P. (2024, February 1). Masterpiece of BioNTech & Pfizer. Patent's

Substack. <https://patentsun.substack.com/p/masterpiece-of-craftsmanship-and>

Autor: Dr. Sabine C. Stebel — Einmal mit Profis arbeiten (ISBN: 978-3943413434) <https://drbine.substack.com/>

4

um die weltweiten OEB-Anforderungen in der pharmazeutischen Industrie verständlicher darzustellen, vergleichen wir in dieser Tabelle die maximal erlaubte Kontaminationsmenge eines Produktes (Gewicht pro Tag) mit der Anzahl von Zuckerkrystallen denen ein Operator ausgesetzt werden darf.

<https://www.containment-technolow.com/oeb-stufen/>

	Maximale	Maximale	Max. Kontamination / Tag im Vergleich mit
	Belastung Gewicht / m ²	Belastung Gewicht / Tag	Toxisches potential Zuckerkrystallen Zuckerkrystall < 2 mg
	e 200 ng	0.01 mg	es Potential 0,003
	1 pg	0, 1 mg	ntial 0,03
	1 - 10	-1 mg	oxisches Potential 0.03 -0.3
	10-	1 — 10 mg	ittleres toxisches potential 0,3-
	100- 1.000 pg	10 — 100 mg	Geringes toxisches Potential - 33,3
	1.000-5000 pg	100 kein toxisches Potential	33,3 Sicher und Effektiv?

1. Sicherheitseinstufung ALC-0315 [1]

ALC-0315

Pfizer Occupational Exposure OEB 3 • Contact Hazards Unknown (control to the at 10ug\ma to
Band (OEE3): 100ug\m2)

2. Sicherheitseinstufung ALC-0159 [1]

ALC-OI 59

Pfizer Occupational Exposure to Band OEB 3 • Contact Hazards Unknown (control exposure to the range of 1

3. Sicherheitseinstufung BNT162B2 (Comirnaty)
[1] [2] e pfzer SAFETY DATA SHEET

date 2 Page

Section 1 : IDENTIFICATION OF THE SUBSTANCE, MIXTURE AND OF THE COMPANY UNDERTAKING

Product identifier

Ptizer•8ioNTech Covid•19 vaccine Tris•Sucroæ

Synonyms

'J':3u204 obtaining PF+D7305885 (BNV16202): Covid19 Read' to Uso Formwation; h Covid-19 vaccine for ages 5 through 11: 5 to 11. Dilute to use Orange p: Pfizer-Bio-GenTech Covid-19 vaccine for ages 12 and older: 12 years and older. Ready use Grey Cap: PF-07302048 containing PF+D7305885 (BNT162b2): corVAC Containing -07305885 (BNT162b2) COWAS Containing PF+D7305885 (BNT162b2) cov10 ine Container,g PF.073C5885 (BNT162b2); COVID.19 Vacene Containing .0730sges (BNT162b2)

Trade

t applicable
P .07302048

H 00024713; »•000024/14; H000024864; H000024E6S; H 8000025768;
OC025769;

Farn[®] Manoparticles containing PF-07305885 (BNT62b2) and Lipids

P zer

Pharmaceutical Sciences
Worldwide Research & Development

STAPOARO

PF 0730ZC48

Lot PFM302CAs-OP-RM

O atj.ml OEB S

TESTS AND RESULTS	
Fluorescence assay	
RNA Content	888 mg/mL
FOOTNOTES	
Parent drug product lot (b) (4)	
NDC: for an NDC value if sampled aseptically	

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4. Dosierung laut Fachinformation [3]

1. BEZEICHNUNG DES ARZNEIMITTELS

Comirnaty 30 Mikrogramm/Dosis Injektionsdispersion
COVID-19-mRNA-Impfstoff (Nukleosid-modifiziert)

5 $< 1 \mu\text{g}$ $< 0,1 \text{ mg}$ Hohes toxisches Potential



BioNTechs (Börsen-)Geständnisse

1. 31. März 2020 [4]

Currently, mRNA is considered a **gene therapy** product by the FDA. Unlike certain gene therapies that irreversibly alter cell DNA and may cause certain side effects, mRNA-based medicines are designed not to irreversibly change cell DNA. Side effects observed in other gene therapies, however, could negatively impact the perception of immunotherapies despite the differences in mechanism. In addition, because no mRNA-based product has been approved, the regulatory pathway in the United States and many other jurisdictions for approval is uncertain. The pathway for an individualized therapy, such as our iNeST mRNA-based immunotherapy where each patient receives a different combination of mRNAs, remains particularly unsettled. The number and design of the clinical and preclinical studies required for the approval of these types of medicines have not been established, may be different from those required for **gene therapy** products or therapies that are not individualized or may require safety testing like **gene therapy** products. Moreover, the length of time necessary to complete clinical trials and submit an application for marketing approval by a regulatory authority varies significantly from one pharmaceutical product to the next and may be difficult to predict.

Our product candidates may not work as intended, may cause undesirable side effects or may have other properties that could delay or prevent their regulatory approval, limit the commercial profile of an approved label, or result in significant negative consequences following marketing approval, if any.

Derzeit wird die mRNA von der FDA als Gentherapieprodukt betrachtet. Im Gegensatz zu bestimmten Gentherapien, die die Zell-DNA irreversibel verändern und bestimmte Nebenwirkungen verursachen können, sind mRNA-basierte Arzneimittel so konzipiert, dass sie die Zell-DNA nicht irreversibel verändern. Die bei anderen Gentherapien beobachteten Nebenwirkungen könnten sich jedoch trotz der Unterschiede im Mechanismus negativ auf die Wahrnehmung von Immuntherapien auswirken. Unter Da bisher kein mRNA-basiertes Produkt zugelassen wurde, ist der Zulassungsweg in den Vereinigten Staaten und möglicherweise auch in anderen Ländern ungewiss. Der Weg für eine individualisierte Therapie, wie wie unsere mRNA-basierte Immuntherapie iNeST, bei der jeder Patient eine andere Kombination von mRNAs erhält, ist noch besonders unsicher. Die Anzahl und das Design der klinischen und präklinischen Studien, die für die Zulassung dieser Art von Arzneimitteln erforderlich sind, stehen noch nicht fest und können sich von denen unterscheiden, die für gentherapeutische Produkte oder Therapien erforderlich sind, die nicht individualisiert sind, oder Sicherheitstests erfordern wie Gentherapieprodukte. Darüber hinaus ist die Dauer der klinischen Studien und der Einreichung eines Antrags auf Marktzulassung bei einer Aufsichtsbehörde von einem Arzneimittel zum anderen sehr unterschiedlich und kann schwierig sein. von einem Pharmaprodukt zum nächsten und kann schwer vorhersehbar sein.

2. 26. Oktober 2022 [5]

Obtain regulatory approval. We have limited experience in filing and supporting the applications necessary to gain marketing approvals and may need to rely on third-party CROs, regulatory consultants or collaborators to assist us in this process. Although we expect to submit BLAs for our mRNA-based product candidates in the United States, and in the European Union, mRNA therapies have been classified as medicinal products, and other jurisdictions may consider our mRNA based product candidates to be new drugs, not biologics or gene therapy medicinal products, and require different marketing applications. Securing regulatory approval requires the submission of extensive preclinical and clinical data and supporting information to the various regulatory authorities each therapeutic indication to establish the product candidate's safety and efficacy. Securing regulatory approval also

Obwohl wir davon ausgehen, dass wir BLAs für unsere mRNA-basierten Produktkandidaten in den Vereinigten Staaten und in der Europäischen Union einreichen werden, wurden mRNA-Therapien als Gentherapeutika eingestuft, und andere Gerichtsbarkeiten könnten unsere mRNA-basierten Produktkandidaten als neue Arzneimittel und nicht als Biologika oder Gentherapeutika betrachten und andere Zulassungsanträge erfordern.

3. 27. März 2023 [6]

We may not be able to demonstrate sufficient efficacy or safety of our COVID-19 vaccine to obtain permanent regulatory approval in jurisdictions where it has been authorized for emergency use or granted conditional marketing approval.

Es kann sein, dass wir nicht in der Lage sind, eine ausreichende Wirksamkeit oder Sicherheit unseres Impfstoffs COVID-19 nachzuweisen, um eine dauerhafte behördliche Zulassung in Ländern zu erlangen, in denen der Impfstoff für den Notfalleinsatz zugelassen ist oder eine bedingte Zulassung erhalten hat.

4. BioNTech wusste, 2021 bereits dass die natürliche Immunität besser/breiter aufgestellt ist [7]

„Während sich bei Geimpften nur Antikörper gegen das Spike-Protein detektieren lassen, sind im Serum von Genesen auch Antikörper gegen andere Proteine des SARS-CoV-2-Virus zu finden, zum Beispiel das Nukleokapsid-Protein (N-Protein).“

5. Es gibt keine Grenzwerte für viele der verwendeten Chemikalien [8]

Quelle:

- [1] Sicherheitsdatenblatt BNT162B2: <https://fragdenstaat.de/dokumente/236331-104a-pf00161-mtr-pfem-en-0021>
- [2] Reference Standard Certificate https://phmpt.org/wp-content/uploads/2023/11/125742_SII_M3_32r_pf-07302048-dprm-coa.pdf
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https://www.annualreports.com/HostedData/AnnualReportArchive/b/NASDAQ_BNTX_2019.pdf
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