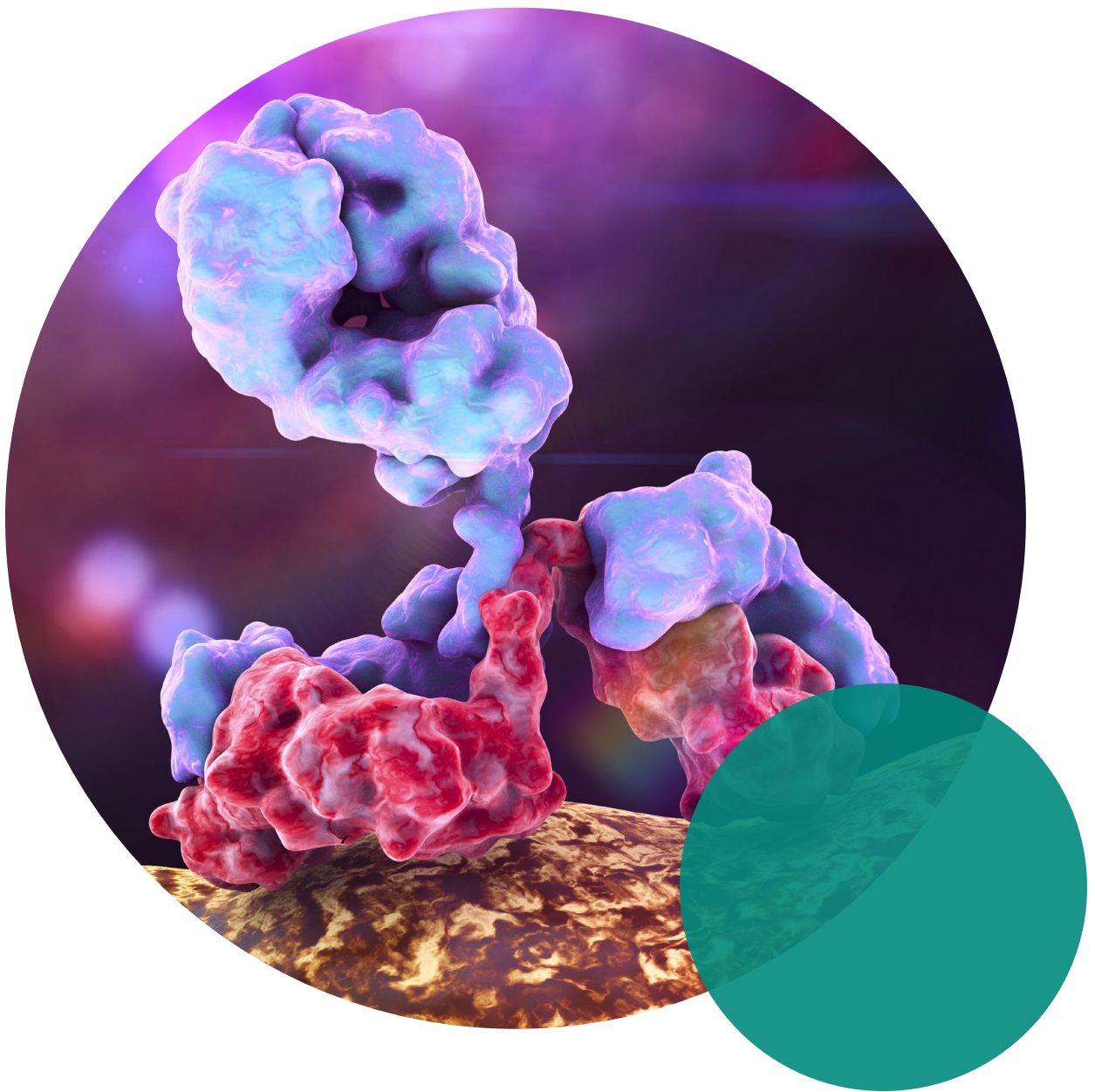


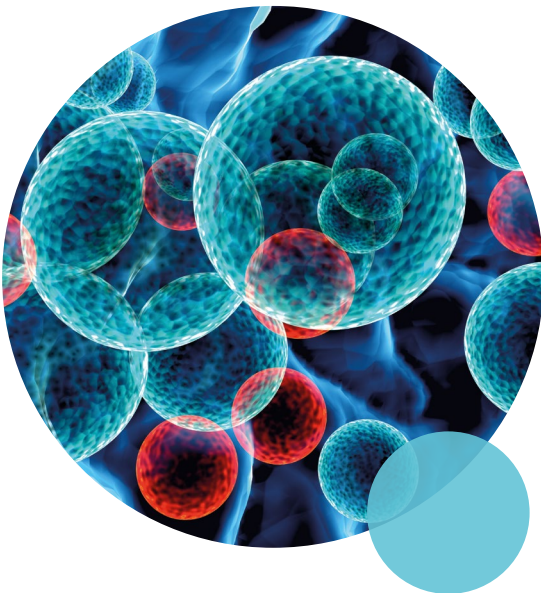
Making Sense of the Biosimilars Market

Strategies and Recommendations to Achieve
Optimal Market Access



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Introduction

Biosimilars are generally expected to offer a competitive price advantage to appeal to healthcare organisations and payers which make them an attractive business opportunity. A critical component of market access planning is the ability to communicate an integrated proposition that will alleviate any potential concerns and optimise perceptions of value. Biosimilar developers need to prepare a comprehensive market access strategy. It is important that commercialisation success factors are integrated into the strategy at an early stage and are revisited often during development decision making. In preparation for market entry, biosimilar developers must offer a value proposition for their product that resonates with payers and other stakeholders who are influential in access and reimbursement related decisions. This whitepaper provides an introduction into key regulatory and development concerns for sponsors, including a discussion of the factors that affect biosimilar uptake for the United States and Europe and recommendations to address these issues.

What Are Biosimilars?

A biosimilar is a highly similar version of an already authorised original biological medicinal product (reference medicine). Because biosimilars are made in living organisms, minor structural differences may exist between a biosimilar and its reference medicine, but these differences are not clinically meaningful ^(1, 2). Biosimilars are important because they encourage competition and lower prices, thereby enhancing patient access to biologic treatments and relieving pressure on healthcare budgets ^(3, 4).

Regulatory Approvals in Major Markets

Since the European Medicines Agency (EMA) approved the first biosimilar, Sandoz's Omnitrope (somatropin) in 2006, the EU has pioneered the regulation of biosimilars. Over the last decade, the EU has approved the highest number of biosimilars worldwide, amassing considerable experience of their use and safety (Table 1) ⁽¹⁾. Japan has also embraced biosimilars relatively quickly – in March 2009, the Ministry of Health, Labour and Welfare published biosimilar guidelines based on those of the EMA, and the Pharmaceuticals and Medical Devices Agency (PMDA) approved Japan's first biosimilar, Sandoz's Somatropin BS, only three months later ⁽⁵⁾.

The US, on the other hand, has lagged with respect to biosimilar adoption. An abbreviated pathway for biosimilars was not established in the US until March 2010 with the passage of the Biologics Price Competition and Innovation Act of 2009 ⁽⁶⁾. For this reason, and because the Food and Drug Administration (FDA) did not release finalized biosimilar guidance until April 2015, the first US biosimilar, Sandoz's Zarxio (filgrastim-sndz), did not launch until September 2015 ⁽⁷⁾. Despite a slow start, the US has caught up with Japan in terms of the number of approved biosimilars, and the FDA has released additional guidance on a range of topics related to biosimilar development.

Table 1. Biosimilars approved in major markets, by class (as of November 2018)

| Class of Biosimilar | Europe (EMA) | Japan (PMDA) | USA (FDA) |
|---|--------------|--------------|-----------|
| Anti-TNF (e.g. infliximab) | 14 | 4 | 7 |
| Erythropoietin-stimulating agent (e.g. epoetin alfa) | 5 | 2 | 1 |
| Granulocyte colony-stimulating factor (e.g. filgrastim) | 9 | 3 | 4 |
| Human growth hormone (e.g. somatropin) | 1 | 1 | 0* |
| Immune biologic (e.g. rituximab**) | 6 | 0 | 0 |
| Insulin (e.g. insulin glargine) | 4 | 2 | 0* |
| Oncology monoclonal antibody (e.g. bevacizumab) | 11 | 2 | 2 |
| Other (e.g. follitropin alfa) | 6 | 0 | 0 |
| Total number of approved biosimilars | 50** | 14 | 14 |

*In the US, hormones are regulated as drugs under the Food, Drug, and Cosmetic Act, not biological products under the Public Health Service Act; as a result, non-originator insulins are not biosimilars (8). **Rituximab is an immune biologic and an oncology monoclonal antibody; as such, the total number of approved biosimilars may not equal the sum of approvals across classes EMA, European Medicines Agency; FDA, Food and Drug Administration; PMDA, Pharmaceuticals and Medical Devices Agency

Biosimilar Development

The aim of biosimilar development is to demonstrate biosimilarity – high similarity in terms of structure, biological activity, efficacy, safety and immunogenicity – based on comprehensive comparability studies with the reference medicine. By demonstrating biosimilarity, a biosimilar can rely on experience gained with the reference medicine, thereby avoiding repetition of clinical trials (i.e. if a biosimilar is highly similar to a reference medicine in one therapeutic indication, safety and efficacy data may be extrapolated to other indications for which the reference medicine is already approved) ^(1,2).

Health Technology Assessment for Biosimilars in Europe

In the EU and the European Economic Area, health technology assessment (HTA) is the responsibility of individual member states. In most cases, EMA-approved biosimilars are not appraised by HTA bodies (Table 2), and automatically receive the same level of reimbursement as the reference medicine (provided they are less expensive). Depending on the market in question, sponsors may have to submit a cost-minimisation model to demonstrate the level of saving that could potentially be realised through use of their biosimilar. If the reference medicine is not reimbursed, biosimilar sponsors may have to submit a full submission to an HTA body, which may involve a cost-effectiveness analysis ⁽⁹⁾.

Table 2. UK HTA bodies' positions on biosimilars (as of November 2018)

| HTA Body | Position on Biosimilars |
|---|--|
| All Wales Medicines Strategy Group (AWMSG) (10) | <ul style="list-style-type: none"> – AWMSG does not normally appraise biosimilars. – Existing HTA advice for reference medicines published by AWMSG or the National Institute for Health and Care Excellence (NICE) automatically applies for biosimilar medicines licensed for the same indication and in the same population as the reference medicine. – In the absence of advice for the reference medicine, the biosimilar is not endorsed for use within NHS Wales. |
| National Institute for Health and Care Excellence (NICE) | <ul style="list-style-type: none"> – NICE assesses biosimilars alongside their reference medicines in multiple technology appraisal guidance; to date, it has published guidance for human growth hormone ⁽¹¹⁾, erythropoiesis-stimulating agents ⁽¹²⁾, and TNF-alpha inhibitors ⁽¹³⁻¹⁶⁾. – All relevant published guidance that includes the reference medicine also applies to biosimilars at the time they are made available for use in the NHS. A funding direction will apply to a new biosimilar if the active drug substance has already been recommended by NICE ⁽¹⁷⁾. – NICE can decide to apply guidance to other relevant licensed biosimilars that are subsequently approved. – For biosimilars that are not included in a technology appraisal, if NICE thinks there needs to be a review of the evidence, it may produce an 'evidence summary: new medicine' ⁽¹⁷⁾. |
| Scottish Medicines Consortium (SMC) | <ul style="list-style-type: none"> – Since May 2015, the SMC has not routinely assessed biosimilars on the basis of a full submission (i.e. biosimilars are considered 'out of remit' where the reference medicine has been accepted by SMC/Healthcare Improvement Scotland [HIS] for the same indications and in the same population or was initially licensed and available prior to 31 January 2002) ⁽¹⁸⁾. – Full submissions are required for indications/populations where the reference medicine is not recommended by SMC/HIS ⁽¹⁸⁾. |

Factors Affecting Biosimilar Uptake

For payers, the key factor affecting biosimilar uptake is the level of discount between a biosimilar and its reference medicine. According to research conducted by the Patented Medicine Prices Review Board in 2017, median list price discounts for biosimilars in OECD markets range from 13% to 34%, which is relatively modest in comparison to generic drugs ⁽¹⁹⁾. It is worth noting, however, that this estimate excludes procurement discounts agreed at national and/or regional levels which can significantly increase a biosimilar's overall discount ⁽²⁰⁾.

Physicians, on the other hand, are mainly concerned about the efficacy, safety and tolerability of biosimilars ⁽²¹⁻²³⁾. Immunogenicity is a key safety concern, as evidenced by the fact that, in rare cases, antibodies generated against exogenous erythropoietin may elicit hypersensitivity reactions which can lead to pure red cell aplasia ^(24, 25). Efficacy, safety and tolerability are also key concerns for patients, particularly in markets where medicines are fully reimbursed. As a result, in settings where incentives do not exist for prescribers, biosimilars (particularly those that are first-in-class) are disproportionately prescribed to patients who are initiating treatment. This is an important barrier to biosimilar uptake, and is exacerbated by the fact that automatic pharmacy-level substitution (the practice of dispensing a biosimilar instead of the reference medicine by a pharmacist without consultation from a prescribing physician) is currently prohibited in most markets (the FDA has issued draft guidance on biosimilar interchangeability ⁽²⁶⁾, but as of November 2018, no FDA-approved biosimilars have achieved this designation). To address these concerns, regulatory bodies and payer organisations have published educational materials for patients and healthcare professionals ^(1-3, 27, 28), and biosimilar marketers have made stakeholder education a key element of their promotional campaigns ^(29, 30).

Payer Strategies To Drive Biosimilar Uptake

Europe

In Europe, biologics are often procured through tenders, and biosimilar companies are often the winners because they offer the lowest prices. Many European markets conduct regional tenders using a non-exclusive approach whereby the reference medicine is procured alongside the winning biosimilar. Under this system, the winning biosimilar is typically prescribed to new patients, and the reference medicine is reserved for patients who are continuing treatment. Biosimilar uptake is generally much higher in markets which conduct national tenders using an exclusive approach, as is the case in some of the Nordic countries. In Norway, for example, biosimilars represent more than 90% of infliximab and etanercept sales ⁽⁴⁾. Unsurprisingly, this approach to tendering is also associated with the greatest discounts; for example, in 2016, the winner of the Norwegian

infliximab tender, Hospira, offered a 61% discount relative to the reference medicine, Remicade. More recently, AbbVie is rumoured to have won the 2018 Danish national tender for adalimumab by offering an 80% discount on the list price of its reference medicine, Humira ⁽³¹⁾.

Financial incentives and penalties for physicians are important strategies used by European payers to increase biosimilar uptake. For example, some hospital trusts in London have implemented gain-share agreements which allow clinical commissioning groups to share 50% of the cost-savings attributed to biosimilars ⁽³²⁻³⁵⁾, a strategy which has resulted in high rates of switching ⁽³⁵⁾. In Germany, regional prescribing quotas for erythropoietin-stimulating agents, infliximab, and etanercept biosimilars have been agreed between the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband) and the National Association of Statutory Health Insurance Physicians (Kassenärztliche Bundesvereinigung). Quotas increase each year and physicians who fail to meet a quota receive a financial penalty (the average quota for 2018 is 40%) ⁽³⁶⁾.

United States

In the US, biosimilar uptake is determined by the formulary status of biosimilars and reference medicines. In 2016, UnitedHealth and CVS Health announced that they were excluding branded versions of insulin glargine and Neupogen (filgrastim) from their 2017 formularies in favour of Basaglar (insulin glargine) and Zarxio, respectively (Basaglar is not classed as a biosimilar because in the US, hormones are regulated as drugs under the Federal Food, Drug, and Cosmetic Act, not biological products under the Public Health Service Act) ^(8, 37, 38). Despite these changes, biosimilar uptake in the US has lagged behind that of Europe. FDA Commissioner Scott Gottlieb has attributed poor biosimilar uptake in the US to misalignment of incentives and lack of competition within the drug supply chain, obscure pricing, and failure to pass savings from rebates back to patients ⁽³⁹⁾.

Originator Company Strategies to Defend Against Biosimilar Uptake

In general, an originator company has three options to defend itself against biosimilar competition:

1. Develop a next-generation branded medicine to supersede the reference medicine;
2. Alter the reference medicine to differentiate it from competing biosimilars, and;
3. Make the market access environment unfavourable for competing biosimilars (e.g. through price cuts, supply deals, and/or legal protections).

Development of a next-generation branded medicine can involve molecular modification of the reference medicine to improve its clinical profile and/or dosing. Examples of this approach include Amgen's Neulasta, a pegylated version of filgrastim which is longer-lasting due to decreased renal clearance ⁽⁴⁰⁾, and Roche's Gazyva, a glycoengineered monoclonal antibody which induces antibody-dependent cell-mediated cytotoxicity more effectively than Rituxan/MabThera (rituximab) ⁽⁴¹⁾. Originator companies can also develop an innovative delivery device or system for their reference medicine. For Neulasta, Amgen has developed the Onpro on-body injector which eliminates the need for patients to revisit the clinic and improves treatment adherence ⁽⁴²⁾.

A less risky but potentially effective strategy for defending against biosimilar uptake is to modify the reference medicine to differentiate it from competing biosimilars and/or increase its cost-effectiveness. This approach has been utilised by Roche for the development of subcutaneous (SC) formulations of MabThera and Herceptin (trastuzumab). These formulations can be administered rapidly (SC MabThera is administered over five minutes whereas the IV formulation is administered over two and a half hours) resulting in reduced utilisation of hospital resources and greater convenience for patients. SC Herceptin is also covered by a new patent which extends exclusivity until 2030 ⁽⁴³⁾.

A more common strategy, however, is to offer discounts and/or rebates for the reference medicine. Price cuts typically supersede biosimilar entry but may precede loss of exclusivity if, for example, an originator company enters into a long-term supply deal. This was the case for Janssen-Cilag in New Zealand: in exchange for a 34% reduction in Remicade's ex-manufacturer price, plus an additional confidential rebate, Remicade became the only available infliximab in District Health Board hospitals from March 2015 until February 2020 ⁽⁴⁴⁾.

Last but not least, an originator company can leverage intellectual property and legal protections to delay biosimilar entry. AbbVie has used this approach to great effect to protect its highest selling drug, Humira (adalimumab); through a series of settlements, it has delayed biosimilar entry in the US to 2023 ⁽⁴⁵⁻⁴⁸⁾. Amgen has also used this approach to protect its rheumatoid arthritis drug, Enbrel (etanercept), which was due to undergo patent expiry in October 2012; Enbrel is now protected until 2028 thanks to U.S. Patent No. 8,063,182 which was issued in November

2011 despite having been filed more than a decade earlier ⁽⁴⁹⁾. Sanofi also used legislation to defend Lantus (insulin glargine) against Basaglar: by filing a patent infringement lawsuit against Eli Lilly and Boehringer Ingelheim in January 2014, Sanofi was able to trigger an automatic 30-month stay under the Hatch-Waxman act ⁽⁵⁰⁾ which, coupled with a subsequent patent settlement agreed in September 2015, delayed Basaglar's launch until December 2016. This gave Sanofi extra time to promote Toujeo, its next-generation insulin glargine ⁽⁵¹⁾.

Recommendations for Biosimilar Developers

To achieve optimal market access, it is imperative that biosimilar developers have the resources to develop and manufacture biosimilars at scale, with sufficient throughput, and at a competitive price (this is particularly important for companies that will participate in European tenders where pricing pressure is generally highest). In terms of clinical development, studies must be designed to support regulatory assessments in target markets (e.g. evaluation against locally-sourced reference medicines in appropriate indications and populations). Guidelines covering biosimilar development are available in major markets and many emerging markets, but companies will need to stay abreast of updates as the industry matures.

Biosimilar developers must also have a strong grasp of competitive, patent, and regulatory landscapes to ensure that they fully understand the size of the opportunity and potential barriers to uptake. Companies that can anticipate and respond dynamically to developments will have a competitive advantage over 'laggards'. Biosimilar developers with insufficient expertise and/or resources should consider forming strategically-favourable partnerships, as has been the case for companies such as Samsung Bioepis, a joint venture between Samsung Biologics and Biogen, and Celltrion, the latter of which has partnered with an array of companies to streamline distribution and marketing of its biosimilars.

Finally, biosimilar developers should, where possible, aim to achieve a first-mover advantage over their competitors. The biosimilar market is still relatively young and many high-selling biologic brands have yet to undergo loss of exclusivity; as such, a tremendous opportunity still exists for biosimilar developers to gain a share of the global biologic market which is currently valued at over \$240 billion ⁽⁵²⁾.

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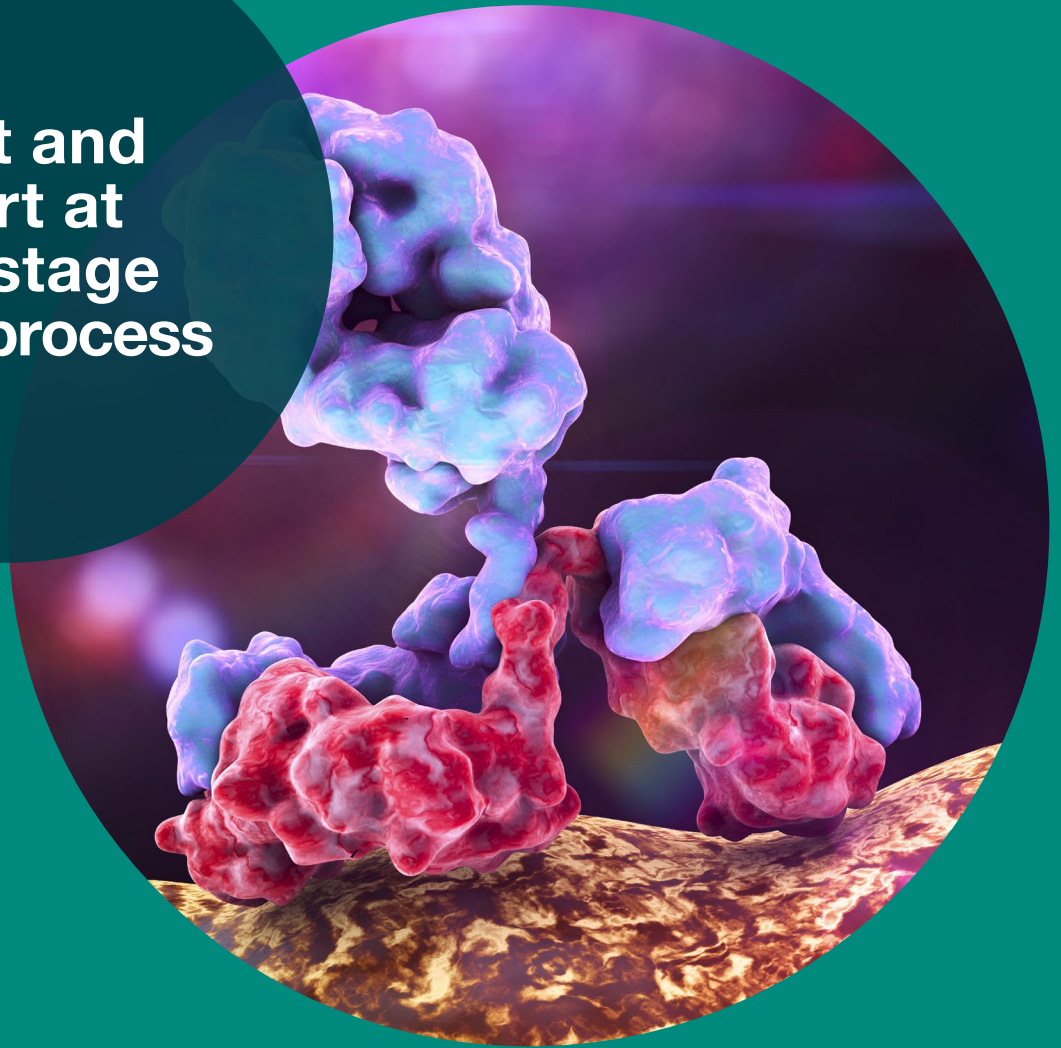
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