

Implementing non-animal testing

The Animal Health Industry Perspective on Vaccines' Release

Corinne PHILIPPE
Head of Reg Intelligence, Policy & Com
Boehringer Ingelheim



Agenda

- Non-Animal Testing for Animal Health
Turning Principles into Practice
- Driving Change Through Practical Implementation
Phasing out animals in batch release
- Regulatory convergence at stake
The key challenge

Non-Animal Testing for Veterinary Vaccines

Turning Principles into Practice

Not a new trend...

3Rs : Replacement, Reduction & Refinement concept

- Drives every study using animals: non animal method first !
- Has been widely transcribed into the laws of many regions/countries
- Is embedded in key strategic reflections of main agencies:
 - EMA Regulatory Science to 2025 – Strategic reflection
 - FDA Roadmap to Reducing Animal Testing in Preclinical Safety Studies
 - European Commission roadmap on the phase out of animal testing



**3Rs improve animal welfare, scientific quality¹ but also the care of the staff:
One welfare**



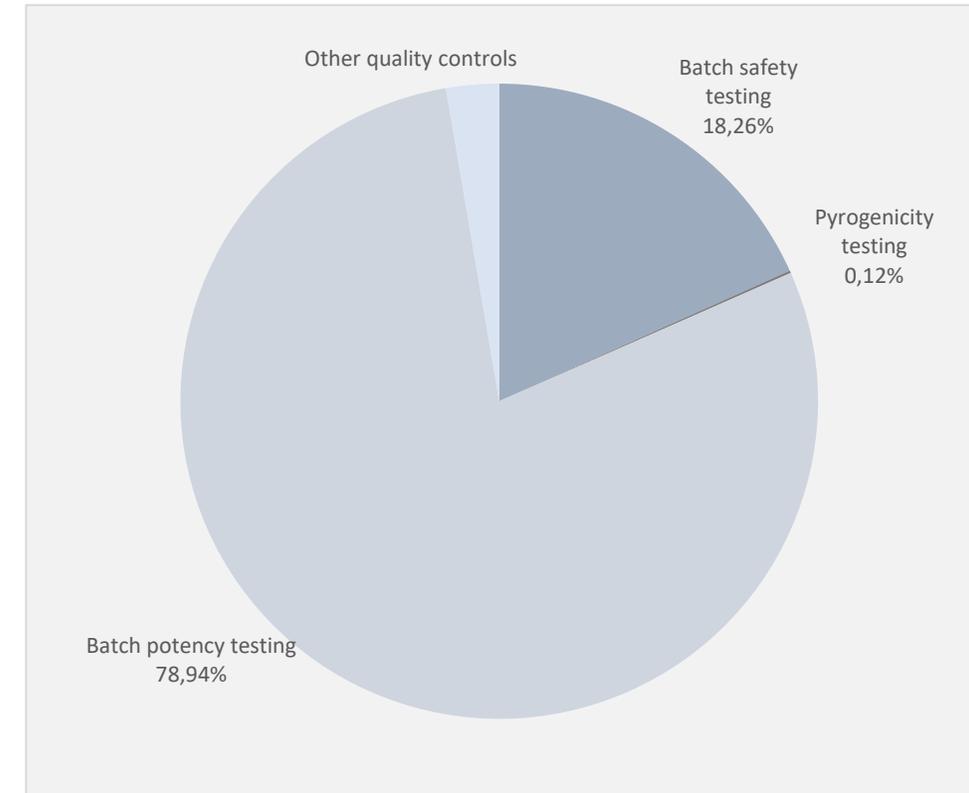
State of Play: Animal Release Tests for Veterinary Vaccines

Focus on Replacement:

Stop using animals and switch to in-vitro tests

In vaccines, focus needed today on potency testing

- Safety tests were addressed several years ago
- New Products: target *in vitro* first approach for potency test development
- Existing Products: Prioritise efforts on tests using huge numbers of animals or with severe endpoints.



Regulatory Use: Quality control (EU – 2022)

Source: ALURES published data

Replacement Strategies in Biologicals: AH Considerations

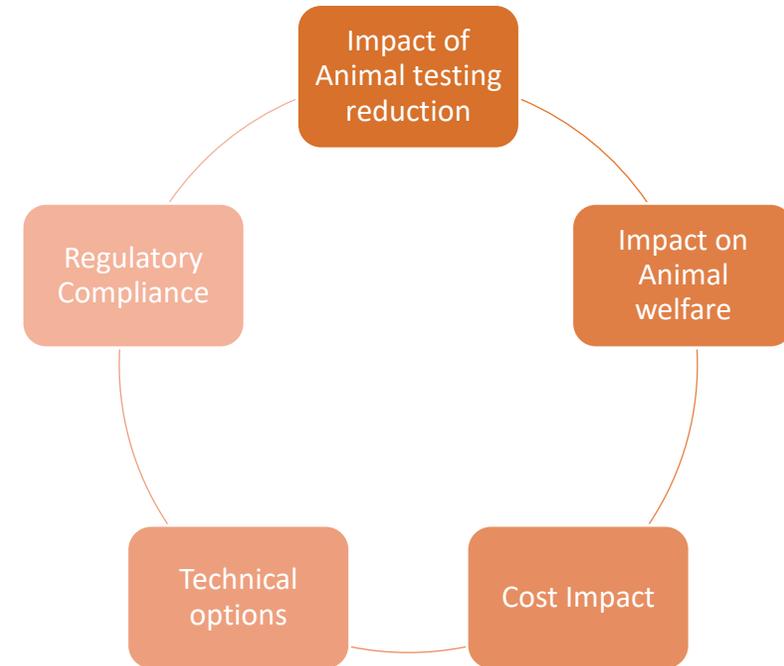
As many tests as there are vaccines, species and diseases ... and not just for potency (safety, purity, identity, inactivation...)

Unavoidable prioritisation work

Beyond release, example of improvements:

- Shifting from infectious titration or inactivation control on eggs to cell lines
- Monoclonal antibody production: over 90% are in-vitro (*internal figure*).
- Purity: Sero-neutralisation replaced by PCR

Double gain : no use of animals + no need of (Fetal) Calf Serum



Diligent review of scientific literature is the foundation to assure all alternatives are considered. Regulatory acceptance is the foundation for implementation of alternatives.

Driving Change Through Practical Implementation

Phasing out animals in batch release

In Vitro Shift: a complex journey

Industry is committed to developing alternatives & many are already used and implemented.

But :

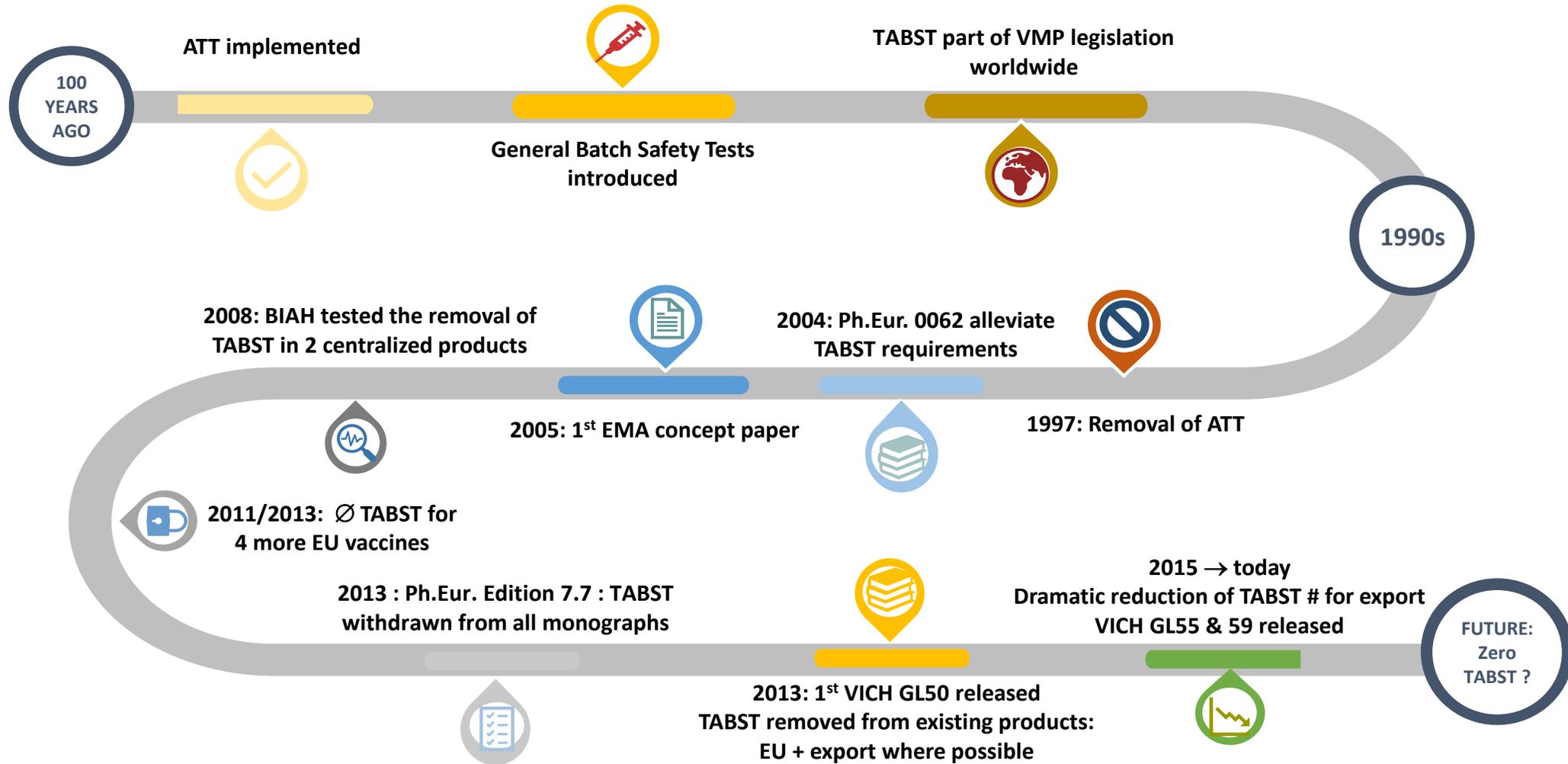
1. not all tests can be replaced: safety & efficacy on target species in development are indispensable.
2. not for all tests: technical & regulatory hurdles (incl. validation)



Do not over-promise or over-demand in such a cutting-edge field.

It will be a long journey.

Target Animal Batch Safety Test paved the path



Reduction | TABST Regulatory convergence

Extensive VICH Implementation today but not straightforward

- Data on 10 tests minimum need to be generated on commercial batches
- A proactive regulatory action from the industry is still required whereas EU has simply removed it
- Regulatory assessment takes time, conflict with other priorities for both industry (compliance) and authorities
- But little by little, it improves !



Potency Tests: A History of Scientific Progress

It's not the first-time potency tests are evolving...

- **Challenge Tests:** Rabies, Bovine and Canine Leptospira, Erysipelas, FMD, Equine Herpesvirus, some Clostridial vaccines
Historically used to demonstrate efficacy through direct exposure: rather reliable but ethically and scientifically limited.



- **Serological Methods:** Rabies, Erysipelas, FMD, Equine Herpesvirus, most avian diseases
Introduced as a less invasive alternative, measuring immune response markers: a major step forward in refinement.



- **In Vitro Assays:** Rabies, Bovine and Canine Leptospira, Clostridium (Tetanus) and more to come...
Today's direction: cell-based or biochemical tests replacing animal use aligned with 3Rs and regulatory innovation.



Science evolves and so should the standards !

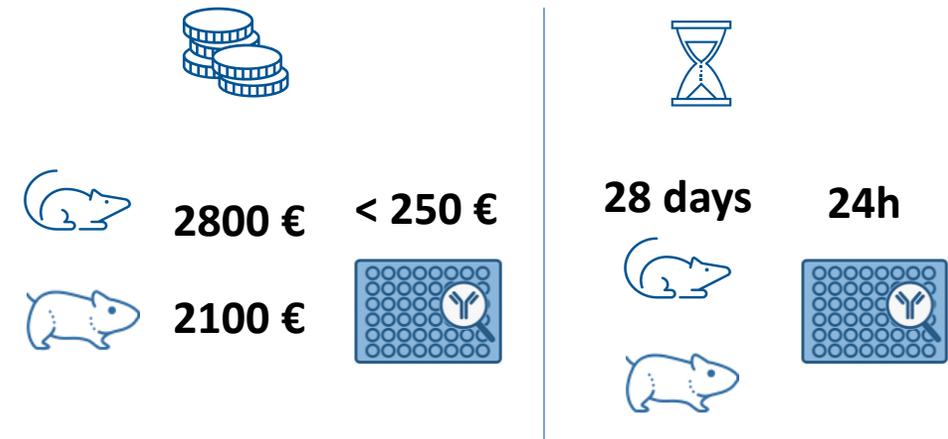
In Vitro Shift: the Momentum

Beyond ethical aspects:

- **Scientific:**
 - Eliminate the animal variability, improved discrimination
- **Economic:** Cheaper and quicker batch release
 - Improved discriminatory power
 - More consistent quality control
- **Environmental :**
 - faster batch release: longer product shelf life & less wastage
 - reduction in manufacturing infrastructure (fewer animal facilities)
 - reduction in transportation (animals, feed, disposal of carcasses).

➤ Need alignment: duplication worsens environmental impact !

Example of potency test for one inactivated Rabies or Leptospira batch



➤ Same applies to official authorities' batch release

In Vitro Potency in Practice: Key Successes

Severe potency tests : implemented alternative in some regions for some vaccines (*no universal solution*).
Require now to overcome regulatory hurdles to be fully implemented.



Short paper

Development of *Leptospira* in vitro potency assays: EU/industry experience and perspectives

H.L.B.M. Klaasen^{a,*}, M. van der Veen^a, M.J.C.H. Molkenboer^b, U. Bruderer^c

^aMicrobiological R&D, MSD Animal Health, PO Box 31, 5830 AA Boesmeer, The Netherlands
^bGlobal Regulatory Affairs Immunologicals, MSD Animal Health, PO Box 31, 5830 AA Boesmeer, The Netherlands
^cDiscovery and Technology, MSD Animal Health, PO Box 31, 5830 AA Boesmeer, The Netherlands

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ABSTRACT

Nobivac[®] Lepto (MSD Animal Health) is a non-adjuvanted canine leptospirosis vaccine containing inactivated whole cells of *Leptospira interrogans* serogroup Canicola serovar Portlandvere and *L. interrogans* serogroup Icterohaemorrhagiae serovar Copenhageni. The current standard in vivo potency test is a hamster challenge test associated with major drawbacks such as animal suffering and poor reproducibility. Here, the quantification of antigenic mass by ELISA as a new in vitro potency test is described, supporting the 3Rs concept (replacement, reduction, and refinement of animal tests) and in accordance with European Pharmacopoeia Monograph D447 (Canine Leptospirosis Vaccine [Inactivated]). The two corresponding sandwich ELISAs are based on monoclonal antibodies specific for immunodominant leptospiral lipopolysaccharide epitopes. Protection in passive immunization experiments demonstrate that these monoclonal antibodies recognize key protective antigens in currently licensed human and veterinary whole cell *Leptospira* vaccines. The high precision and robustness renders the two ELISAs much more reliable correlates of potency in dogs than the hamster potency test. The recent approval of these assays for a new canine leptospirosis vaccine is an important contribution to the 3Rs in quality control testing of *Leptospira* vaccines.

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[Leptospira](#) (2013)



A versatile in vitro ELISA test for quantification and quality testing of infectious, inactivated and formulated rabies virus used in veterinary monovalent or combination vaccine

Cécile Sigoillot-Claude^a, Myriam Battaglio, Marc Fiorucci, Delphine Gillet, Anne-Sophie Vimort, Yves Giraud, Sonia Laurent, Alain Vaganay, Hervé Poulet

^aMERIAL, R&D, 254 rue Marcel Merieux, 36-38, 69007 Lyon, France

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ABSTRACT

Regulatory potency test for rabies vaccines requires mice vaccination followed by challenge with a live virus via intracerebral route. An alternative in vitro test, consistent with the "3R's" (Reduce, Replace, Refine) was designed to quantify active glycoprotein G using seroneutralizing monoclonal antibodies. This versatile ELISA targets well conformed neutralizing epitopes. Therefore, it quantifies only the trimeric pre-fusion form of glycoprotein G known to elicits the production of viral neutralizing antibodies. The ELISA makes it possible to quantify the rabies antigen during all steps of the product cycle (i.e. viral cultivation, downstream process, formulation and product stability in the presence of aluminum gel or other vaccine valence). Moreover, the batch-to-batch consistency of our active ingredients and formulated products could be demonstrated.

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[Rabies](#) (2015)



Development of a monoclonal antibody sandwich ELISA for the quality control of human and animal tetanus vaccines

Laura Mazzali^a, Daniel Alejandro Yara, Rebecca Riches-Dutt, Peter Rigby, Alexandre Dobby, Maxime Vermuelen, Antoine Francotte, Bart Faber, Paul Stickings
(Show full text)

Abstract

Antigen identity, quantity and integrity are key factors to be evaluated as part of consistency testing of tetanus vaccines. Here we have developed a monoclonal antibody sandwich ELISA to measure the relative amount and quality of tetanus toxoid (TTx) in human and animal tetanus vaccines. The ELISA is highly specific, has good dilutional linearity, and is suitable for detecting TTx in a range of different products. We have demonstrated the ability of the assay to discriminate between batches of different content using vaccine batches that had been prepared to contain differing amounts of TTx, and of different quality, using samples of non-adjuvanted TTx that had been exposed to sonication and real lot vaccines that had been exposed to heat or oxidative stress. We have also demonstrated successful transfer of the method to other laboratories and have shown that different tetanus antigen materials may be able to serve as a reference antigen for standardization of the method. The results show this test has the potential to play a key role in a control strategy no longer including an in vitro potency test.

Plain language summary

Impact Factor 2024: 5.8
5 Year Impact Factor: 5.2

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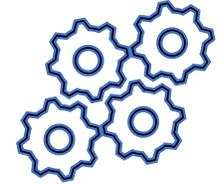
[Clostridium tetani](#) (2024)

Animal & Substance of Animal Origin supply issues

Substances largely used for vaccines: also an area to be active in !

Supply of animals and substances of animal origin is becoming more stringent, e.g.:

- Pressure on animals breeding and transport (in particular dogs)
- Supply of eggs regularly under tension
- Foetal calf serum criticized
- Endotoxins tests: Decline in horseshoe crabs' population led Ph.Eur. 2.6.32 to proposed in-vitro alternative for bacterial endotoxins test since 2021



↳ **Key parameters also to be taken into account in the replacement strategy for veterinary vaccines**

Regulatory convergence at stake

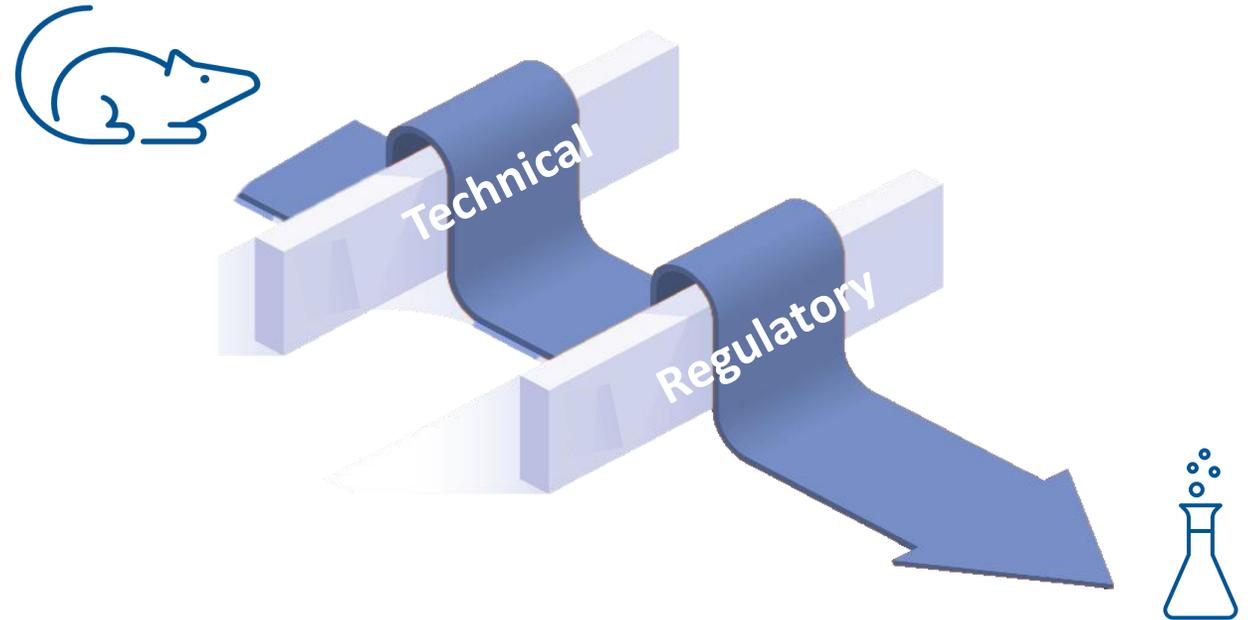
A key challenge...

A Complex Journey

Batch release tests aim to confirm the consistent quality, safety and efficacy of each batch.

Some alternatives exist for *in vivo* methods but not for all tests:

1. Overcome technical hurdles
2. Improve regulatory hurdles (incl. validation)



Overcoming technical challenges

Replacement is a challenge:

- Linked to the knowledge of the disease, mechanisms of action, immunogenicity or toxicity
- Years of experience with tests on animals globally accepted
- Direct correlation between historical and new tests not always possible (often in vaccines)



It requires:

- **A change of mind-set**
- New scientific consensus
- State-of-the-art technical capacities
- A significant amount of data



Overcoming technical hurdles to increase in-vitro release tests development:

- Active participation of industry in consortium, international forum
- Prioritise the efforts on tests that use huge numbers of animals or have severe endpoints
- Publish !

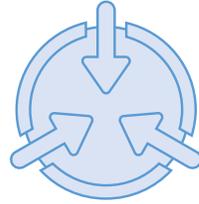


Overcoming regulatory barriers to a worldwide TABST removal



Pre-requisites

Seed lot system
Consistency of the production
Quality GMP(-like) system
Pharmacovigilance



Fair level playing for all stakeholders

Forbidden in some manufacturing countries, required in importing ones
Issue recognition & lack of willingness
Length of legislative update process & topics prioritisation



Administrative burden

Compilation of data (min. 10 batches), cost & length of approval process
Restricted scope (sometimes not all vaccines)

Unlocking Global Regulatory Adoption of in-vitro potency tests

- ✅ Some *in vitro* potency tests are already approved by authorities and used to release vaccines.
- 🌍 But inconsistent global regulations impair and even block wider adoption.
- 🧪🐭 Industry still runs both *in vitro* and animal tests, doubling time and cost of release
- ↪ Ex: Leptospira > 1 million \$ and many hamsters before the full shift (and some authorities may retest...)
- 🏠 Maintaining animal facilities and trained staff is costly while uses dramatically decrease.
- ⚠️ Alternatively, outsourcing may lead to lower animal welfare standards.
- 🔄 Harmonizing regulations globally is now urgent to scale success, benefiting regulators, industry, animal welfare, and public health.

Regulatory convergence: moving forward !

Regulatory convergence for potency tests is starting:

- Ph. Eur. 0062 (Vaccines for veterinary use) “2-4-2. Batch potency test. For inactivated vaccines, development of in-vitro methods is recommended”, Gal Chapter 5.2.14 in Ph. Eur. on substitution of *in vivo* method(s) by *in vitro* method(s) for the quality control of vaccines,
- USDA VS Memorandum No.800.112 : validation of in-vitro potency assays & No.800.102: *in vitro* Leptospira potency test,
- 9CFR § 113.8 "In vitro tests for serial release". Code of Federal Regulations.



Based on these texts → Industry has submitted a concept paper on Potency Substitution to the VICH Steering Committee adopted in 2024

- An expert Working Group led by industry is working on a draft VICH guideline (7 authorities' representatives & 6 industry's (4 experts, 2 advisors) representatives)



Conclusion



NAMs, Regulatory Convergence & One Health

High Interest & Value of the Non-Animal Methods

- **Global momentum:** Regulators, suppliers, NGOs, public opinions increasingly support replacement of animal testing
- **Industry Priority:** ethical (animals & human: One Welfare), scientific, economical & environmental reasons
- **Vaccine availability:** a tool to safeguard and increase it but depends on **regulatory convergence.**

One Health Benefits of Non-Animal Methods

- **Animal Health:** Better disease prevention, reduced antimicrobial use.
- **Human Health:** Improved food security, lower zoonotic risk.
- **Environmental Impact:** Faster release, less wastes & reduced infrastructure and transport.



➡ **Opening international legislation to NAMs in a harmonized way is essential to unlock these benefits.**

THANK YOU




Health for Animals
global animal health association