Presentation of the new regulatory support toolbox for early (clinical) development and beyond

WG SNSA – Working Group of the EU-Innovation Network (EU-IN) on Simultaneous National Scientific Advice
Co-Chairs: Christophe Lahorte, FAMHP & Bettina Ziegele, PEI (presenter)

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Disclaimer

The views expressed in this presentation are the views of the author.

Decisions are made while considering individual cases on scientific grounds.

Neither the Paul-Ehrlich-Institut nor its experts obtain any finances from industry developing medicinal products.

Research at the Paul-Ehrlich-Institut is financed by public money including peer-reviewed research grants.

Presentation outline

The Simultaneous National Scientific Advice (SNSA)

Background information

Pilot concept & development

Pilot phase 2 – the way to optimization

Target groups, scope, timeline & NCAs

Figures & facts

A look to the (near) future

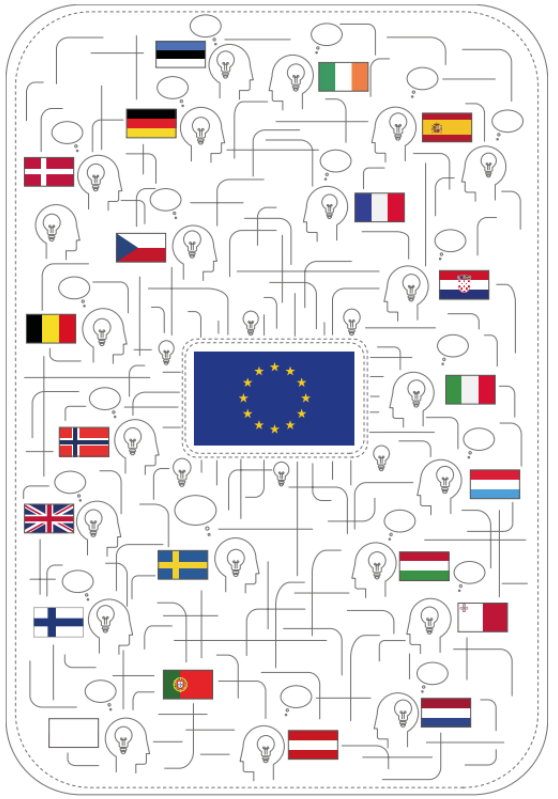
The multipurpose perspective

All's well that ends well

EU-IN background

- EMA (ITF) + HMA + National innovation offices/contact points (NCA's); founded: 2016

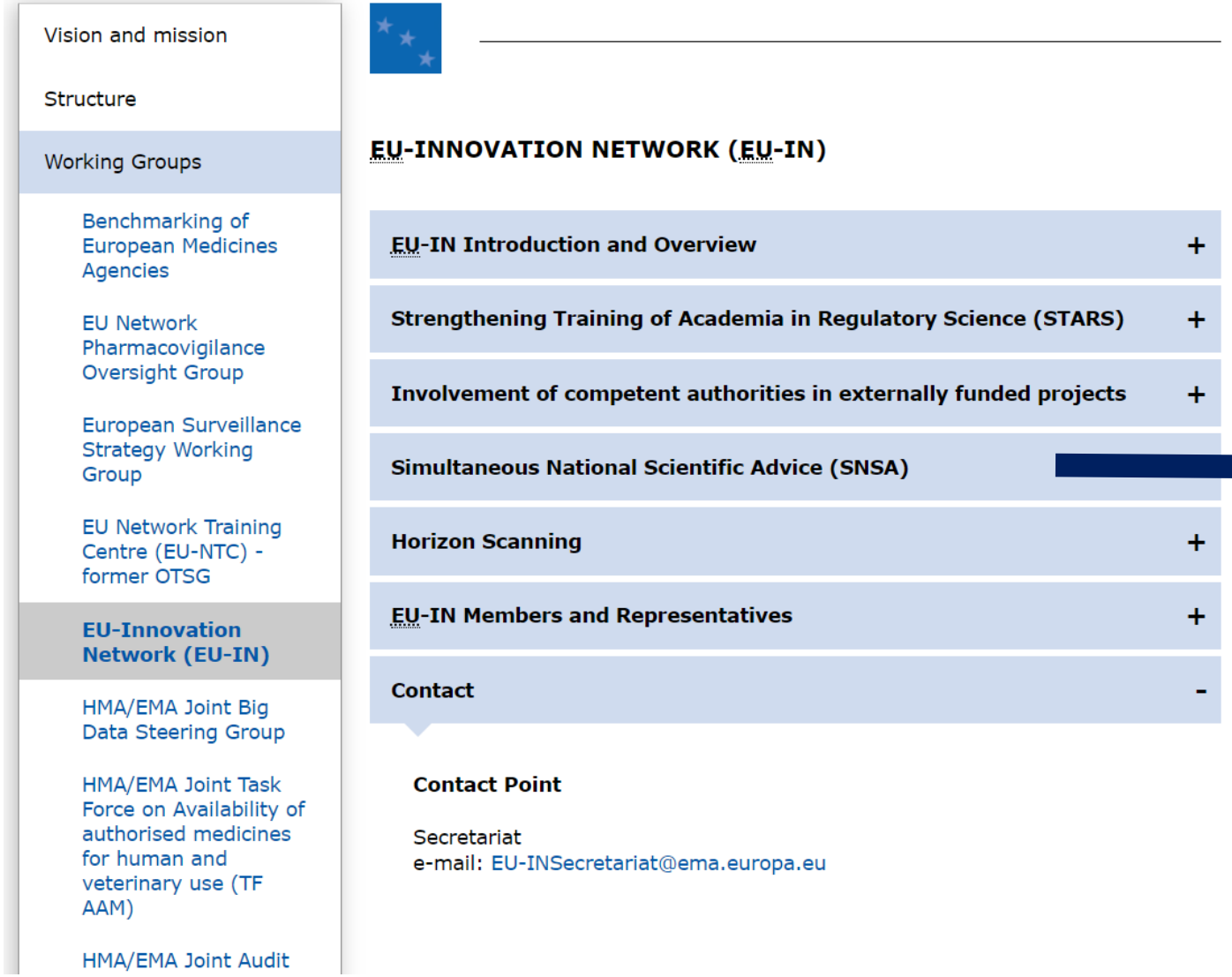
- Aim:
  - share information & knowledge
  - undertake common initiatives related to innovative drug development support
  - initiate early dialogue with developers
  - create regulatory awareness



Overall Mission:

Support the EU Regulatory Network strategy in facilitating the development of innovative medicines and technologies for drug development across Europe by addressing gaps in early regulatory support to innovation

EU-IN framework



SNSA WG:

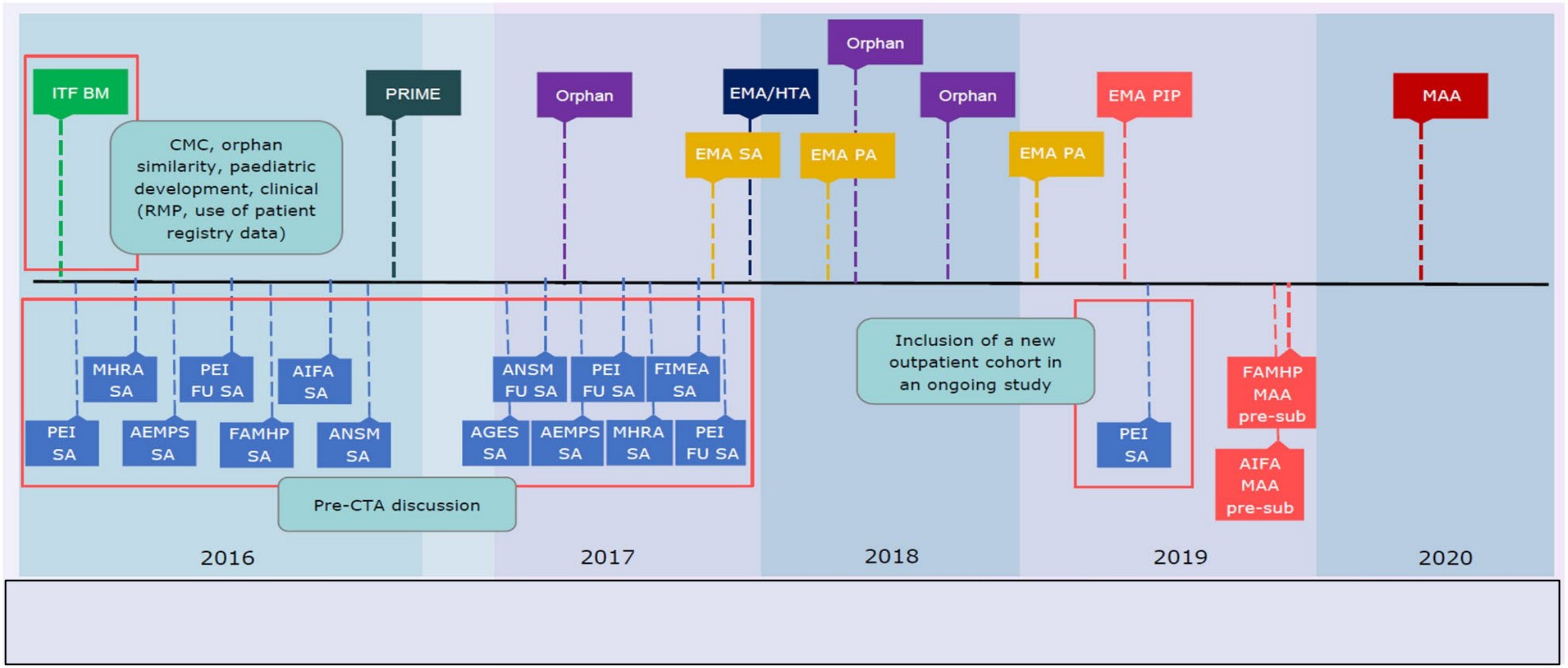
- Founded: Q1 2019
- Co-chairs: FAMHP + PEI
- Monthly meetings + annual F2F meeting
- Collaborations & interactions:
  - Other EU-IN WG's (BLCG WG)
  - CTCG (pre-CTA* advice)
  - SAWP
  - ACT-EU Initiative: PA7 on Scientific advice (+ PA5, PA1)
  - HMA
  - Annual INNO meetings: (EU-IN, CTCG, SAWP, EUnetHTA)
  - Industry (eg. EFPIA, EUCOPE,..)

https://www.hma.eu/about-hma/working-groups/eu-innovation-network-eu-in.html

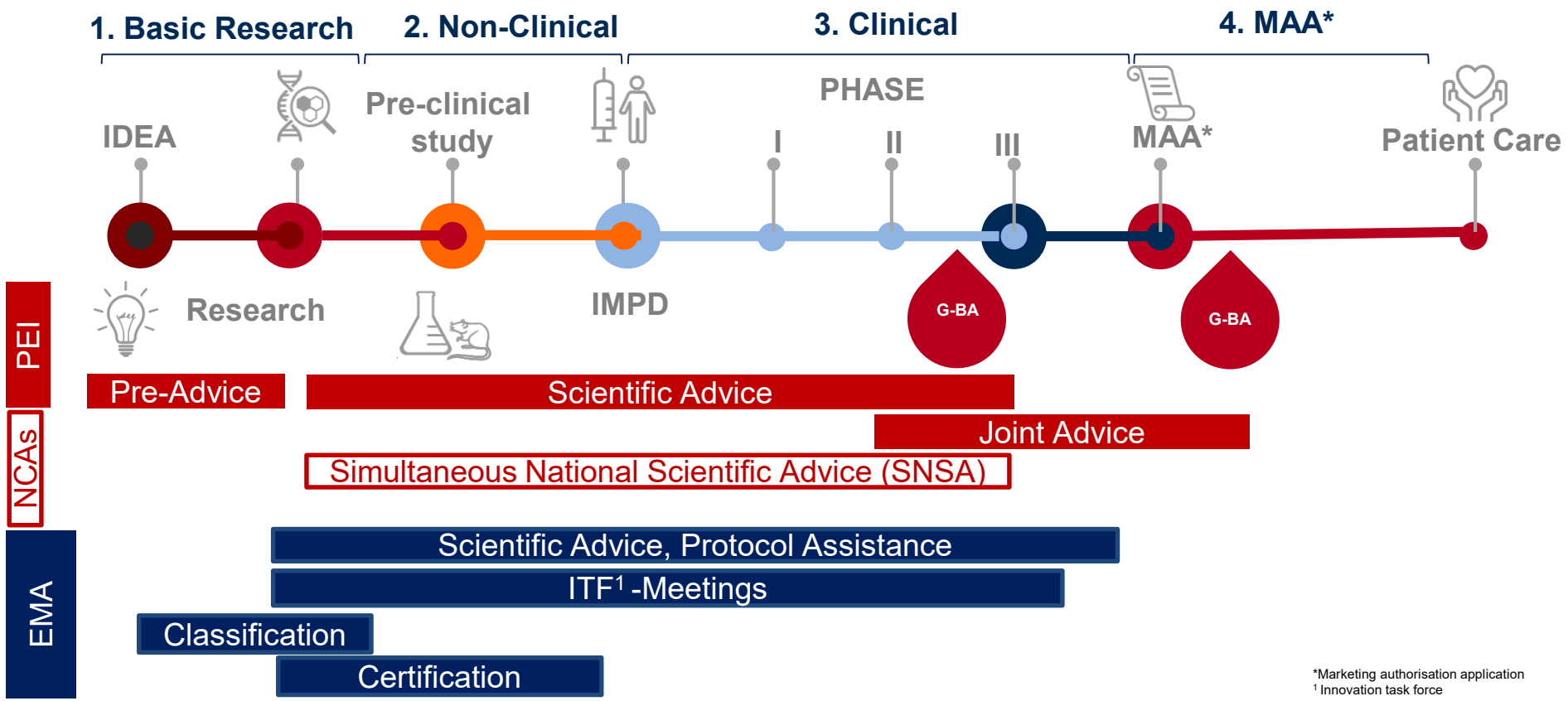
* Clinical trial application

The „journey of advice" – an example

Case study on an innovative pharmaceutical product development



Regulatory development and support



*Marketing authorisation application
[1] Innovation task force

SNSA – the concept

simultaneously interacting experts

across selected EU-Member States

easily accessible | (very) early | tailor-made

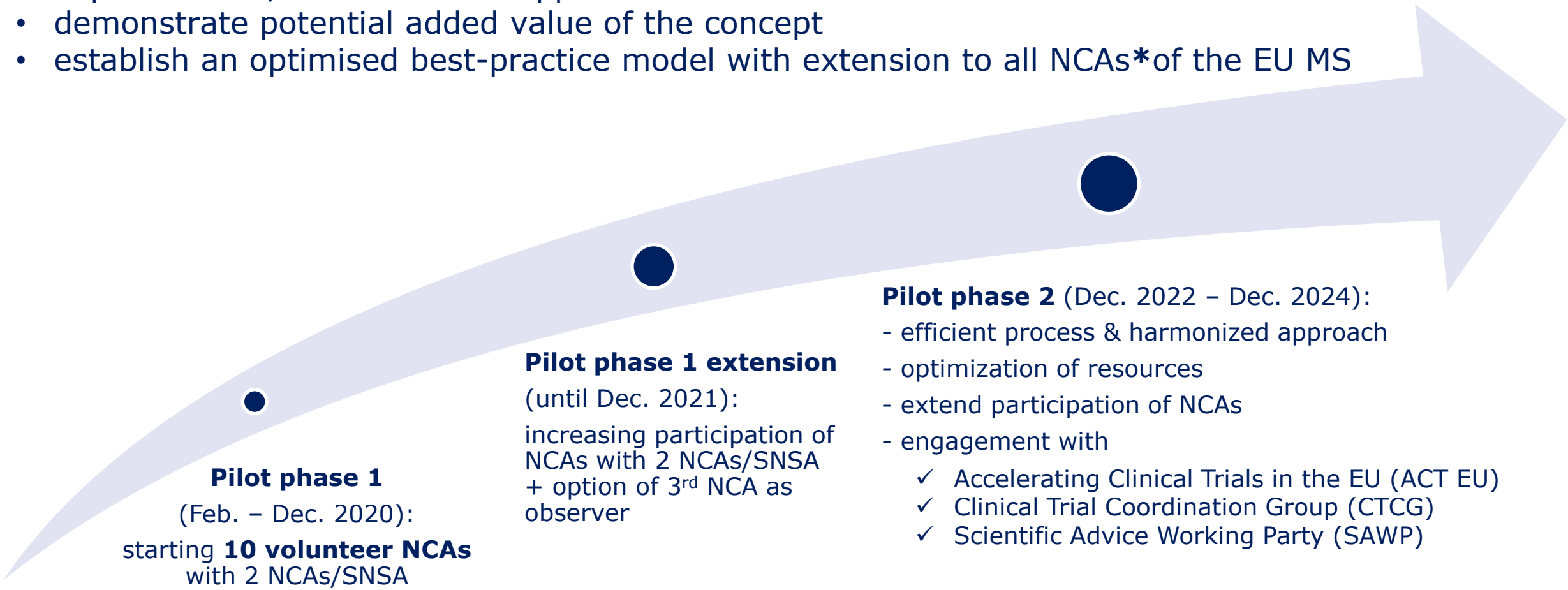
… to improve efficiency and consistency of advice

*National Competent Authorities

SNSA pilot – the development

Key objectives:

- explore needs/demands from applicants
- demonstrate potential added value of the concept
- establish an optimised best-practice model with extension to all NCAs*of the EU MS



Pilot phase 1

(Feb. – Dec. 2020):

starting **10 volunteer NCAs** with 2 NCAs/SNSA

Pilot phase 1 extension

(until Dec. 2021):

increasing participation of NCAs with 2 NCAs/SNSA + option of 3rd NCA as observer

Pilot phase 2 (Dec. 2022 – Dec. 2024):

- efficient process & harmonized approach
- optimization of resources
- extend participation of NCAs
- engagement with
  - ✓ Accelerating Clinical Trials in the EU (ACT EU)
  - ✓ Clinical Trial Coordination Group (CTCG)
  - ✓ Scientific Advice Working Party (SAWP)

participation of NCAs on a voluntary opt-in basis: increased to 17

*National Competent Authority

SNSA pilot phase 2 – the way to optimization

1st NCA coordinating

2nd NCA participating

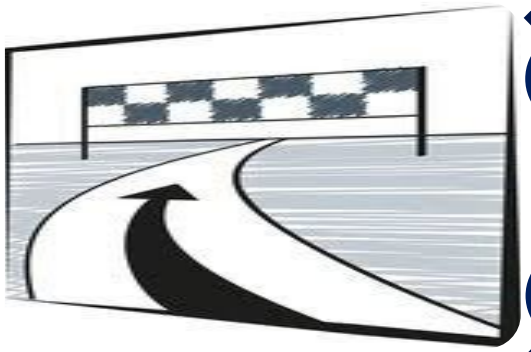
+ optional in *observing role:*

Additional NCA

3rd NCA participating

CTCG Representative of CTCG and/or ethics committee

Applicant



- Single entry point @: SNSA@pei.de, common application form & briefing book
- Harmonised process based on procedure specific opt-in and predictable timetable: (fixed timelines at start of procedure & flexibility under special circumstances)
- Clearly documented outcome of position of each NCA in meeting report

SNSA – the addressees & the topics

Target groups

-**no restrictions**:
all types of applicants can apply

- Focus on **innovative developments**, but not only…
- especially requests for
advice in early stage of development +
- special guidance for **SME**[+] **and academia**

N.B. EMA scientific advice should continue to be used for scientific advice related to the suitability of the proposed clinical development to support a centralized marketing authorisation application.

Scope

Scientific & regulatory advice

Questions on e.g. **quality, safety and efficacy**
- focusing on **early stage of product development**
- including, but not restricted to clinical trial applications/concepts, e.g. multinational trials in small (patient) populations

Restrictions:
- Requests for **combination products** for human use only accepted if within remit of participating NCAs
- **HTA*** and reimbursement aspects **currently excluded**
- Limitation of SNSA to the **scope and questions** raised in the **briefing documents**

[+] Small and Medium Size Enterprise

*Health Technology Assessment

SNSA – the timeline

EXPECTED TIMELINE* SNSA

***max. days**

Role of PEI (Paul-Ehrlich-Institut), AEMPS (Spanish Agency of Medicines and Medical Devices) and FAGG-AFMPS (Belgium federal Agency for medicines and health products) as Coordination Unit

Role of the Applicant

Roles of the Lead National Competent Authority (NCA), the participating NCA(s) and the Observer

Applicant:
Submission of the application to the central entry point coordinated by PEI, AEMPS and FAGG-AFMPS at: SNSA@pei.de

Day -30

0 –20 days

Coordinating unit:
validation of application and sub-sequent inquiry with the NCAs requested to confirm participation.

Coordination unit:
Information about participation of NCAs and lead to NCAs and to the Applicant.

Day -10

0 – 5 days

Day 0

START OF THE PROCEDURE

Lead NCA:
Send link for the virtual SNSA meeting and the template for the meeting minutes to the participating NCAs and the Applicant.

Applicant:
Deadline to submit the Briefing Documents to the NCAs (and payment of fees to NCAs where payment in advance is requested)

0 – 20 days

0 – 35 days

NCAs:
Validation of the Briefing Documents
&
exchange between NCAs to prepare SNSA meeting with the applicant

Day 55

NCAs and Applicant SNSA MEETING

0-10 days

Day 65

Applicant:
Send the draft minutes to the NCAs using the template provided.

0-15 days

Day 80

Lead NCA:
add any necessary changes to ensure accurate reflection of the NCAs positions and send the reviewed draft minutes to the participating NCAs for final review.

0 – 5 days

Day 85

Participating NCAs:
send comments on the draft minutes to the lead NCA

0 – 5 days

Day 90

END OF THE PROCEDURE

Lead NCA:
send the final meeting report* to the Applicant and the participating NCAs and in addition a the feedback survey to the Applicant.

* Applicant: option to send request for clarification

SNSA – the participating NCAs

No.	Member State*	National Competent Authority	Leading/ participating NCA	Observer Role
1	Austria	AGES	X	
2	Belgium	FAMHP	X	
3	Czech Republic	SUKL – Czech Republic	X	
4	Denmark	DKMA	X	
5	Finland	FIMEA	X	
6	France	ANSM	X	
7	Germany	PEI	X	
8	Hungary	OGYEI	X	
9	Ireland	HPRA	X	
10	Italy	AIFA		X
11	Netherlands	MEB+	X	
12	Netherlands	CCMO+		X
13	Norway	NOMA	X	
14	Poland	URPL	X	
15	Portugal	INFARMED	X	
16	Sweden	MPA	X	
17	Spain	AEMPS	X	

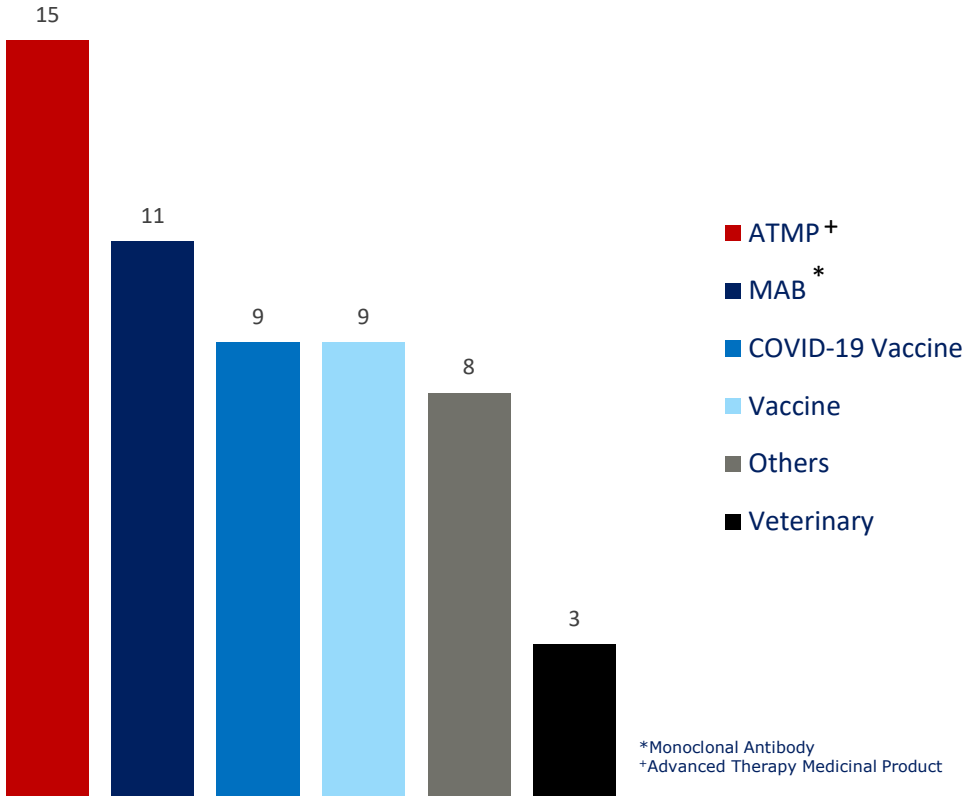
*Basis=EEA;
+The Medicines Evaluation Board (MEB) is the Dutch competent authority responsible for assessing medicinal products (eg. scientific advice, marketing authorisation applications) and for monitoring the risk of medicines for human use, and for promoting the proper use of medicines. The MEB is however not responsible for the evaluation of clinical trials applications.
The Central Committee on Research Involving Human Subjects (CCMO) is the Dutch competent authority responsible for the evaluation of clinical trial applications.

The pilot is open to invite NCAs not yet participating in the SNSA upon applicant´s request

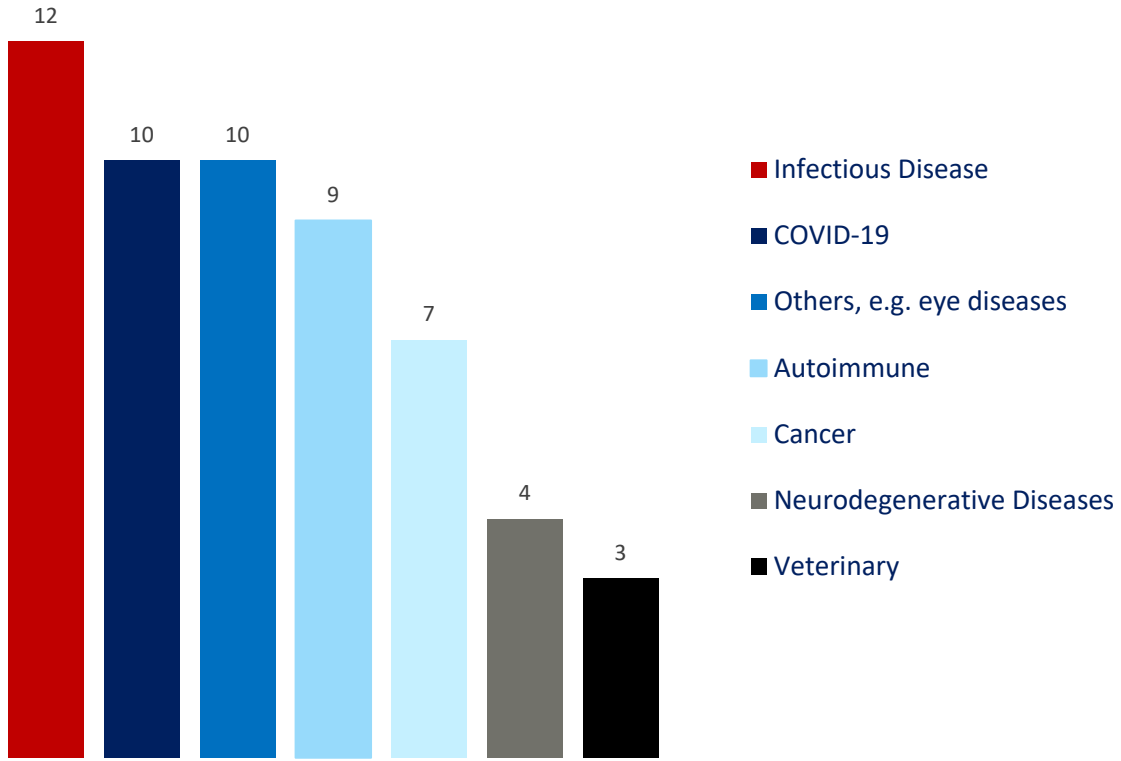
Evaluation SNSA: medicinal products & disease areas

Total up to date: 55 procedures

Medicinal Products



Disease Areas

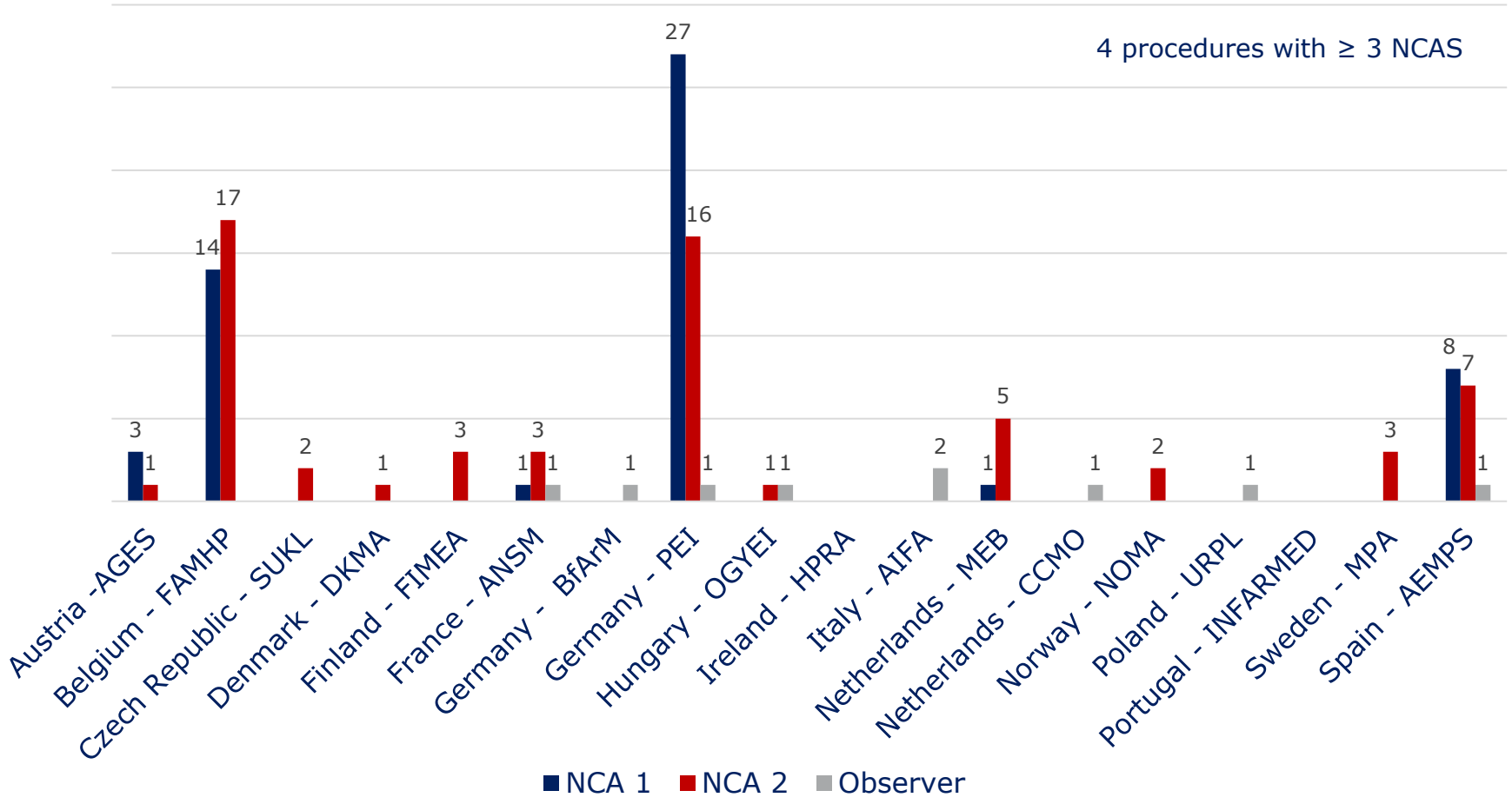


Focus of advice: mainly (early) clinical stage

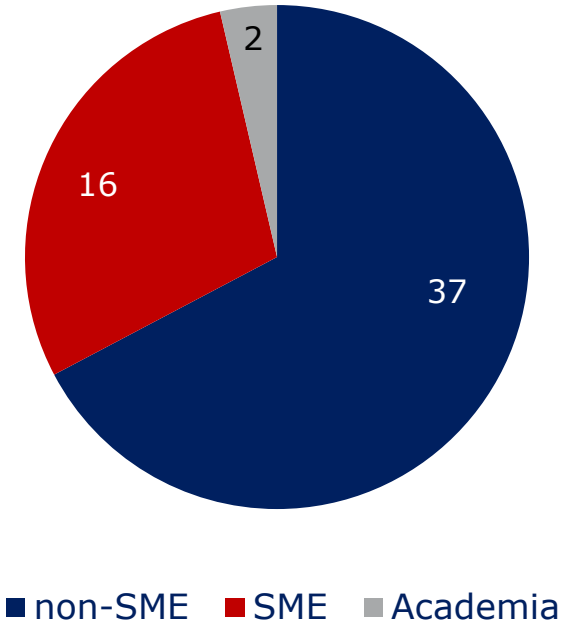
Evaluation SNSA: NCA participation and applicants

Total up to date: 55 procedures

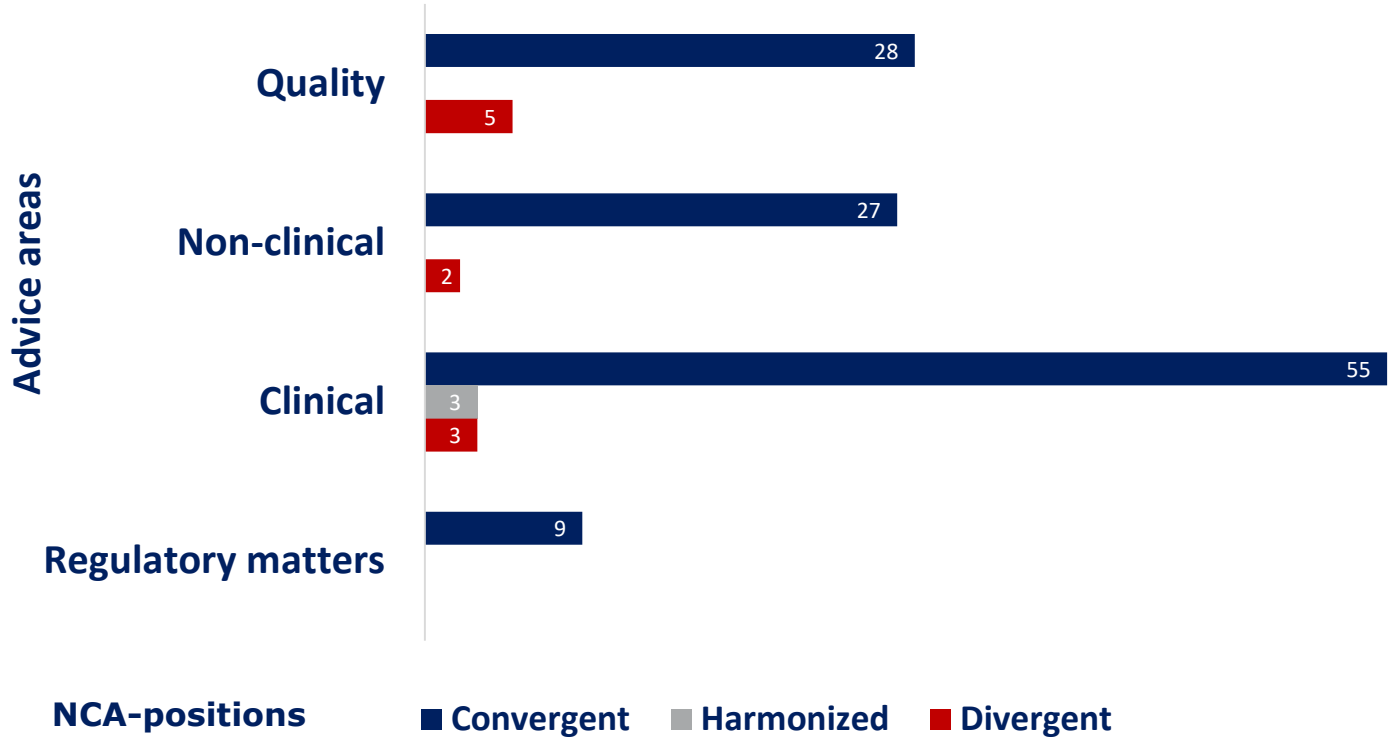
Participating NCAs



Applicants



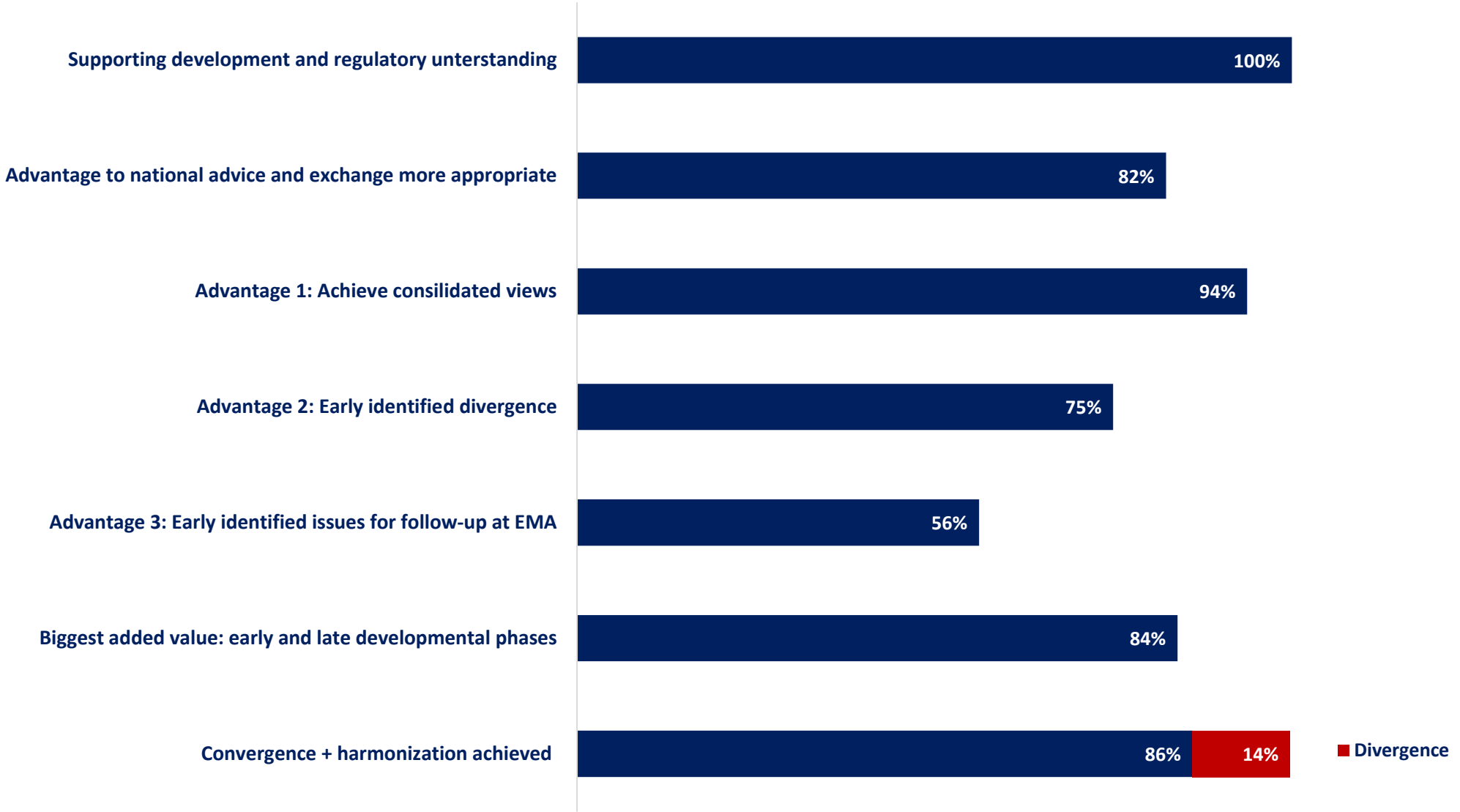
Evaluation SNSA: the meeting result of pilot phase 1



n= 27 out of 33 SNSA

approx. 50% issues challenging and/or to be followed-up at EU level, e.g. at EU-IN, CTCG, SAWP

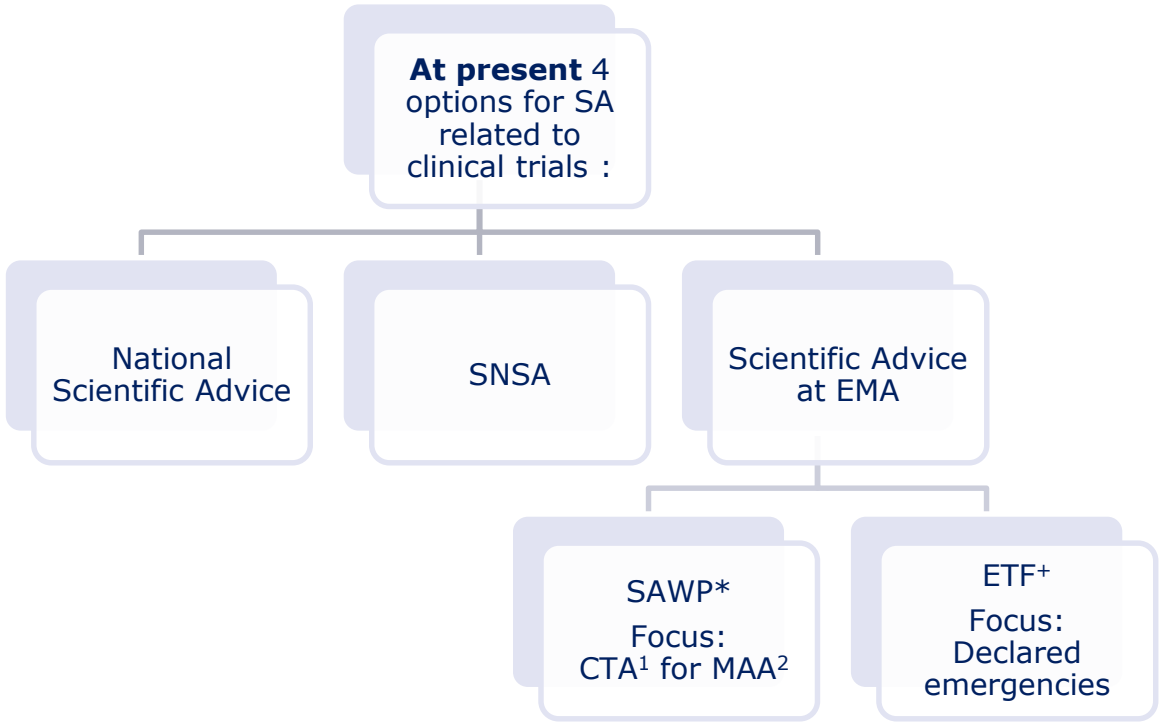
Feedback from applicants on SNSA concept



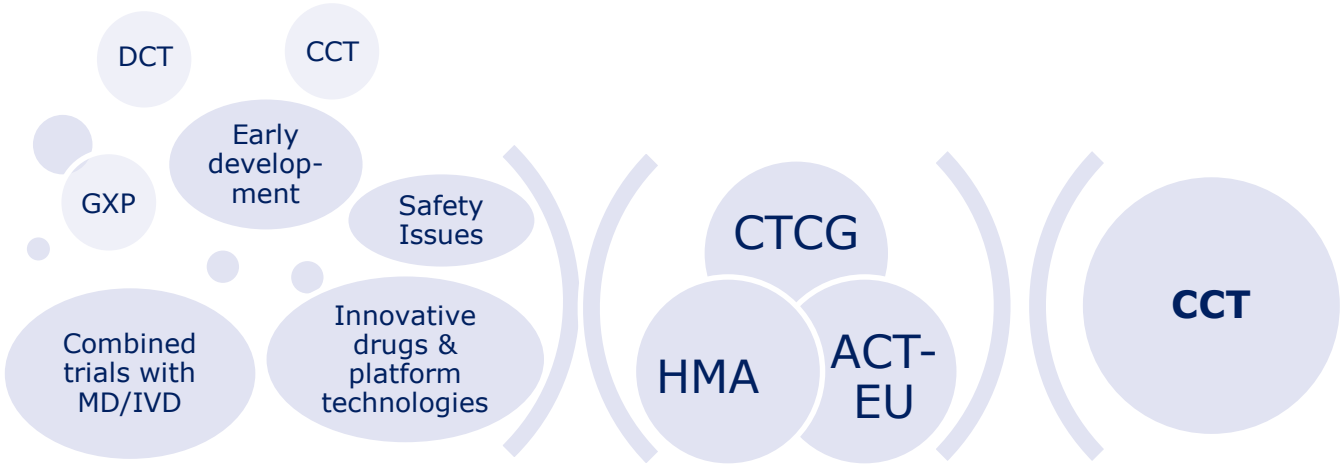
SNSA – upcoming updates & future perspectives

- Detailed procedural timetable
- Updated Guidance for Applicants
- List of NCA-specific SA fee incentives/benefits
- Development of common IT/data sharing platform for NCA's
- Communication & dissemination activities
- Pre-CTA advice pilot procedure
- EU4Health Joint Action on capacity building (WP8: "Innovation")

SNSA as format for pre-CTA advice



Scope of future concept



Areas of interest

Setting the scene to start a pilot within the SNSA pilot

The winner is

* Scientific Advice Working Party
\+ Emergency Task Force
[1] Clinical Trial Application
[2] Marketing Authorisation Application

SNSA as format for pre-CTA advice

format

SNSA pilot:

extension for coordination of pre-CTA advice on multi-national trials

concept

- Participation of > 3 NCAs possible
- Active role of CTCG:
  RMS liases with member:
  Focus on:
  * Regulatory, procedural & CTR aspects
  * Facilitating CTA under Regulation EU No 536/2014
  * Pro-active sharing of information & knowledge @ CTCG level
- Involvement of ethics committees Possible
- Future option to involve patient representatives

procedure

- Feasible timelines
- Possible identification of RMS & MSc's by applicants (Lead NCA = RMS CTA)
- Fees based on national regulations (NCA specific fee reductions & exemptions for SA normally also apply for SNSA)

Aim: Maximise support for clinical trial applications and minimise the impact on resources CT of assessors and regulatory experts

SNSA – the fit for purpose advice concept

Advantages

avoid delays for the submission & approval of CTA with view to CTR

efficient procedure of added value: maximising consistency of advice by sharing expertise between NCAs

follow-up of crucial/critical issues at EMA level (eg. CTCG, SAWP, etc.) to leverage the key learnings / outcomes from SNSA*

flexible format for adaption to future demands within changing regulatory frameworks & environment

Opportunities

faster adaption of product development by shared knowledge & early alignment, esp. for innovative developments

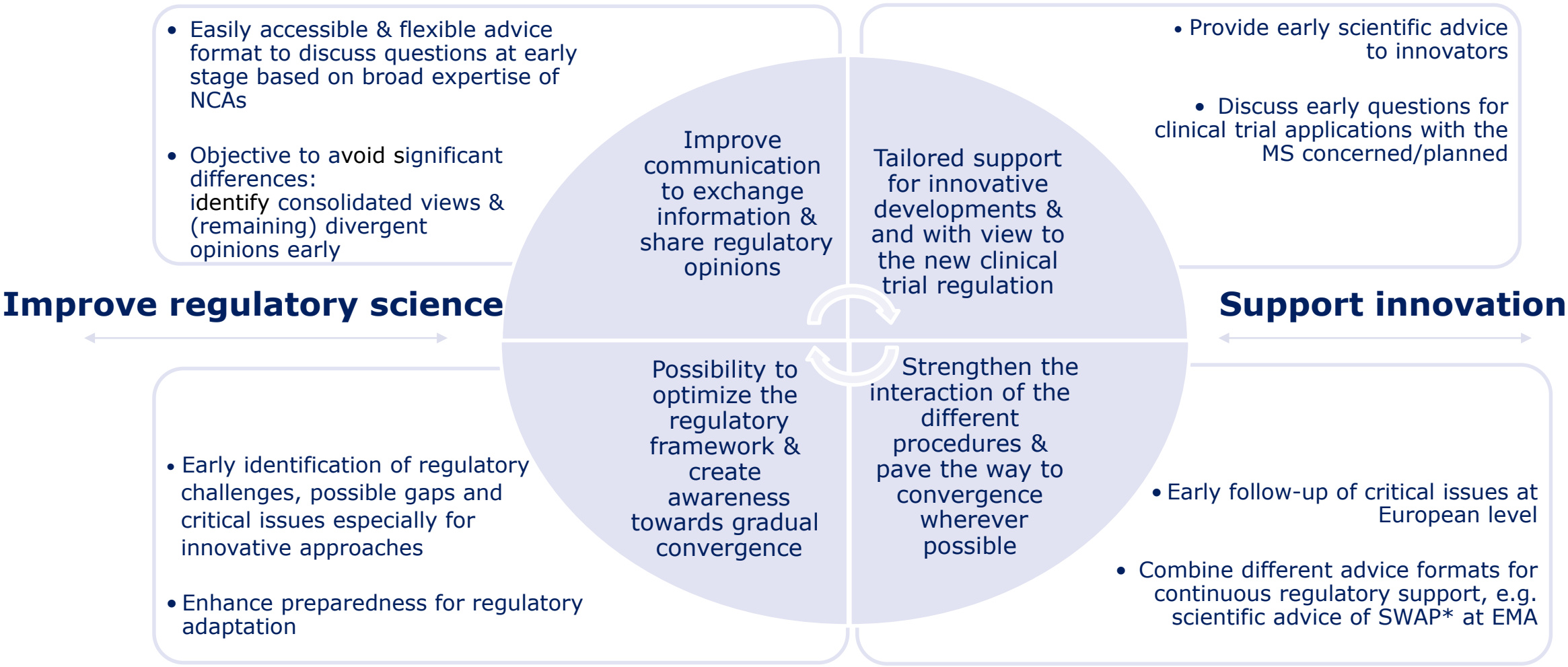
clarification of NCA requirements for complex issues (e.g. complex trial designs)

anticipate challenging issues for mutually agreeable CTAs & adjust package to prepare review for SAWP/MAA early

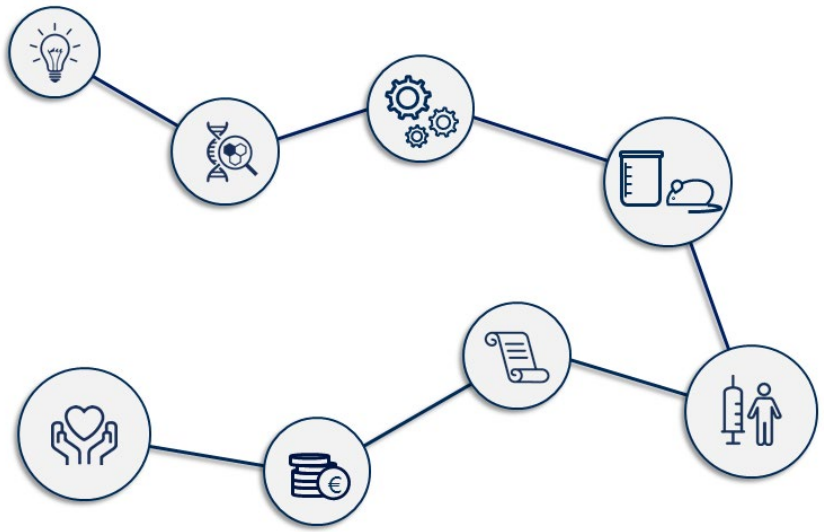
early identification of regulatory challenges, possible gaps and critical issues

*after consultation with the applicant

SNSA – the wider perspective



SNSA – message to go



Offer

- Optimized concept for the whole medicine lifecycle
- Focus on scientific aspects within the relevant regulatory frame
- Complementary format to national SA and EMA SA
- Tailor-made procedures: option for stepwise advice
- Opportunity to early address critical issues for innovative/ATMP medicines developments
- Pilot within the pilot to for pre-CTA advice
- Transition to EMA for further regulatory support at EU-level

Recommendations

- use SNSA early onwards in product development & timely plan the application(s)
- consider the stepwise approach for detailed focused advice at crucial points of development
- combine different advice formats for continuous regulatory support, but do not overlap advice
- use SNSA for further regulatory support at EMA & to timely apply for EMA advice
- remember the added value of SNSA involving affiliated important areas, such as CTCG, ethics committees

Thank you for your attention…

… to our support in bridging regulatory gaps!

The floor is yours for any questions

More information available at:
HMA: https://www.hma.eu/about-hma/recently-published.html
EMA: https://www.ema.europa.eu/en/human-regulatory/research-development/innovation-medicines#eu-innovation-network-section

For any queries please contact:
SNSA@pei.de, christophe.lahorte@fagg-afmps.be or Bettina.Ziegele@pei.de