8 September 2023
EMA/397814/2023
European Medicines Agency

CAT Stakeholder meeting

16 May 2023 from 15.00 – 18.00

Location: EMA premises, Amsterdam,

Meeting Minutes

15.00 – 15.05	**Start of the meeting**	
	Welcome, house-keeping notes	Ilona Reischl (CAT) and (EMA)
	The CAT chair welcomed the participants to the meeting.	

15.05 – 15.45	**1. ATMPs consisting of genetically modified organisms (GMO)**	**Moderator: Marcos Timon (CAT)**
	Revision of the Pharma legislation: proposal for centralised GMO/ERA evaluation in the revision of the pharmaceutical legislation	Lina Koufokotsiou (European Commission)
	Flexibilities in the current legal framework (simplified ERA, best practice document)	Marcos Timon (CAT)
	Experiences and issues: short input from the stakeholders[1]	Stuart Beattie (EFPIA/ARM) Marcello Milano (Eucope) Dolores Pérez Méndez (EUCROF)
	Following the three presentations, clarification questions were answered. During the discussion session, it was mentioned that whereas CAT is not involved in ATMP clinical trials, CAT members are often also clinical trial assessors and therefore well aware of GMO related issues and concerns. One of them is indeed the problem that CTIS is at present not allowing submission of GMO data: until that is possible, the suggestion for worksharing can only be conducted outside of CTIS and is not in the responsibility of CAT. Stakeholders were therefore encouraged to discuss this	

[1] CAT / EMA is not responsible for clinical trial authorisation; therefore, experience and issues with GMO clinical trials can be shared for awareness mainly.

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15.05 – 15.45	1. ATMPs consisting of genetically modified organisms (GMO)	Moderator: Marcos Timon (CAT)
	issue with the Clinical Trial Coordination Group, particularly in the context of the best practice documents development. In the new pharma legislation proposal, national GMO submissions for clinical trials would no longer be needed.	

15.45 – 16.15	2. Predictability of marketing authorisation application submissions	Moderator: Carla Herberts (CAT)
	Feedback on the EMA focus group actions/discussions	(EMA)
	PRIME: submission readiness meetings	(EMA)
	Input from Stakeholders: particular issues for marketing authorisation application submissions for ATMPs	Jacquelyn Awigena-Cook (EFPIA)
	EMA provided feedback on the activities of the EMA focus group on submission predictability: this group is closely monitoring the product pipeline to try to understand the root cause for delays in submissions of MAAs. The stakeholders provided the potential reasons for delayed submissions. These include slower recruitment in clinical trials (due to pandemic, rare disease indications for many ATMPs) and changing expectations for clinical follow-up. For ATMPs, a higher percentage of disruptions have been seen compared to other products (inconclusive results, resulting in the need for additional investigations/trials). CAT members indicated that the delays seem to be more prominent for ATMPs (only 1 of the 7 announced MAAs was submitted in 2023): this has serious implication on the resources (assessment teams) in the member states. The lack of timely communication between applicants and EMA was highlighted. Subsequently the submission readiness meeting pilot was presented. The stakeholders mentioned that the timing of this meeting might be difficult, i.e. 1 year to 9 months might be too early to discuss the data of the application.	

16.15– 16.40	3. Guideline on quality, non-clinical and clinical requirements for investigational ATMPs in clinical trials	Moderator: Ilona Reischl (CAT)
	Outline of the guideline following the external consultation	Ilona Reischl (CAT)
	Input from stakeholders: are further additions needed in the light of the evolution in science and products under development?; are the quality challenges with ATMPs sufficiently addressed in the guideline?	Stakeholders (short inputs)
	CAT provided a high-level feedback on the work currently ongoing to implement the many comments during the consultation period. The main issue to be clarified in the guideline is a better distinction of what is needed for the approval of exploratory trials versus development advice towards marketing authorization, which is particularly critical for academic developers. It was mentioned that CAT wants to get the guideline out as soon as possible, and that perhaps not all novel development approaches (e.g. gene editing) will be comprehensively included at this point in time: this will be part of a revision in the near future.	

16.15–16.40	3. Guideline on quality, non-clinical and clinical requirements for investigational ATMPs in clinical trials	Moderator: Ilona Reischl (CAT)
	Industry stakeholders provided some additional input, especially as the comments were made on the draft that was prepared in 2019. These include: guidance on genome editing, phages; better explanation how to apply the risk-based approach; convergence with recently published FDA guidelines and alignment to the PRIME toolbox guidance; point of care manufacture; use of platforms.	

16.40 – 17.10	4. The use of Registries for regulatory decision making	Moderator: Alessandro Aiuti (CAT)
	Long-term follow-up of patients treated with adeno-associated viral vector products	Carla Herberts (CAT)
	Experience at CAT: SMA Registry	Lisbeth Barkholt (CAT)
	Input from stakeholders	Julie Taccoen (EuropaBio)
	CAT presented their current thinking on the long-term follow-up of patients treated with AAVs and their experience with the setting up and use of registry data (SMA Registry). The stakeholders presented their proposal on the use of registries, as an effective tool for the generation of post-approval safety and efficacy data but also highlighting the regulatory challenges and limitations, e.g. difficulty to set up a EU registry because of the need for local approval of non-interventional trials. The latter also creates a significant operational burden and high financial cost to generate high-quality data that are suitable for regulatory decision making. CAT mentioned that ideally protocols for post-authorisation studies should be discussed with the agency early (scientific advice); also, if the final protocol is already included in the MAA, this will be evaluated and agreed by the time of approval of the MAA.	

17.10 - 17.40	5. Implementation of the HTA Regulation	Moderator: Lisbeth Barkholt (CAT)
	Recent experience and learnings from a bilateral between EMA and EUnetHTA21 on ATMPs	(EMA) With support from Judith Fernandez (HAS)
	Optimisation of post-licensing evidence generation (PLEG) planning: stakeholders views and proposals	Paolo Morgese (ARM) Contributions by EFPIA and EuropaBio
	EMA presented their positive experience from a recent bilateral between EMA and EUnetHTA21 on a recently approved ATMP. The topics discussed during that bilateral where the indication, indirect comparison approaches, the potential for synergy and earlier engagement on the generation of PLEG and the timing for exchange. It is currently under discussion how the collaboration will continue between Sept 2023 and the start of the application of the HTA Regulation. The stakeholders presented the ATMP specific challenges for manufacturers and HTA bodies. Key questions from HTAs on magnitude, comparison with other treatment and durability cannot be addressed by conventional means (i.e. via comparative trials), and therefore have to be addressed via registries and RWD instead.	

17.10 - 17.40	5. Implementation of the HTA Regulation	Moderator: Lisbeth Barkholt (CAT)
	It was noted that a European approach for registries would be helpful: some steps have been taken, e.g. via DARWIN®, Descarte. A targeted workshop was proposed to better understand the regulators/HTA requirement for PLEG.	

17.40 – 17.55	6. Platform approaches	Moderator: Patrick Celis (EMA)
	Platform approaches: proposal in the revision of the pharmaceutical legislation	Lina Koufokotsiou (European Commission)
	Platform approaches for ATMPs, with focus on marketing authorisation applications	Kowid Ho (EFPIA) Maren von Fritschen (Eucope)
	Following a presentation from the European Commission representative on the proposals in the pharma legislation revision, the industry stakeholders presented their approaches for the use of platform data in MAAs. Due to a lack of time, the discussion of this agenda point was more limited. It was agreed to continue this discussion in EMA-industry stakeholder meetings (taking into account that the use of platforms is not limited to ATMPs). Once the legal framework is in place (pharma legislation review), work on guidance will start. Industry stakeholders indicated their willingness to contribute.	

17.55 – 18.00	Wrap-up	Ilona Reischl (CAT)
	The CAT chair thanked the participants for their active collaboration. She mentioned that for CAT it is important to hear about all issues that could delay the development and availability of ATMPs to patients, even if they are not in the remit of CAT or EMA. The meeting was closed at 18.30.	