EVALUATION AND CERTIFICATION OF QUALITY AND NON-CLINICAL DATA RELATING TO ATMPs DEVELOPED BY SMEs

3 April 2009

Overview

- Aim and Scope of Certification
  - Art 18 of ATMP Regulation
  - Implementing legislation
- Development of Procedural Guideline
- Development of Scientific Guideline
- Conclusions and Next Steps

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ATMP Regulation – Art 18

Small and medium-sized enterprises developing an advanced therapy medicinal product may submit to the Agency all relevant quality and, where available, non-clinical data required in accordance with modules 3 and 4 of Annex I to Directive 2001/83/EC, for scientific evaluation and certification.

DRAFT Implementing Legislation

- Scope
  - SMEs developing ATMPs
  - Incentive to conduct quality and non-clinical studies
- Procedure for evaluation and certification
  - Evaluation by CAT
  - Quality data or quality or non-clinical data
  - Minimum set of data for certification
  - 90 day timetable / clock-stop possible
- Possibility for site visits
  - When necessary to complete evaluation
  - CAT to define objectives

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- **Development of Procedural Advice**
- Development of Scientific Guideline
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Procedural Advice

- Draft prepared by EMEA, based on the draft Implementing legislation prepared by the Commission.
- Key points:
  - 90 day review procedure
  - Short clock-stops to allow applicant to prepare for oral clarification (not to submit additional data)
  - Possibility for site visits (with longer clock-stop)
  - Applicants can come back, if sufficient additional data generated (+ explanation of added value and differences)

Objective of Certification Procedure

- Stand alone evaluation procedure
- Not directly binding for future MAA or Clinical trial application (CTA)
  - ‘facilitating’ if ‘on same data’
- Certificate will not replace any data to be submitted in MAA or CTA

SCOPE

- Scientific evaluation of manufacturing / non-clinical data generated by an SME during the development of an ATMP
  - But not on a full Module 3 / 4

  CAT Evaluates → compliance with scientific and technical requirements of Annex I
- Resulting in a 'Certificate'
  - Only certification of those parts / studies that are performed/finalised (in line with scientific standards for MAA)

SCOPE

- No assessment of benefit/risk
- No statements on appropriateness to enter into clinical trials
- No prospective statements pertaining to the further development of the product
  - That is the role of Scientific Advice

Timing of submission (1)

- EC Explanatory Memo: ‘early development phase’

➔Applicant can submit at any stage of development

- Optimal timing:

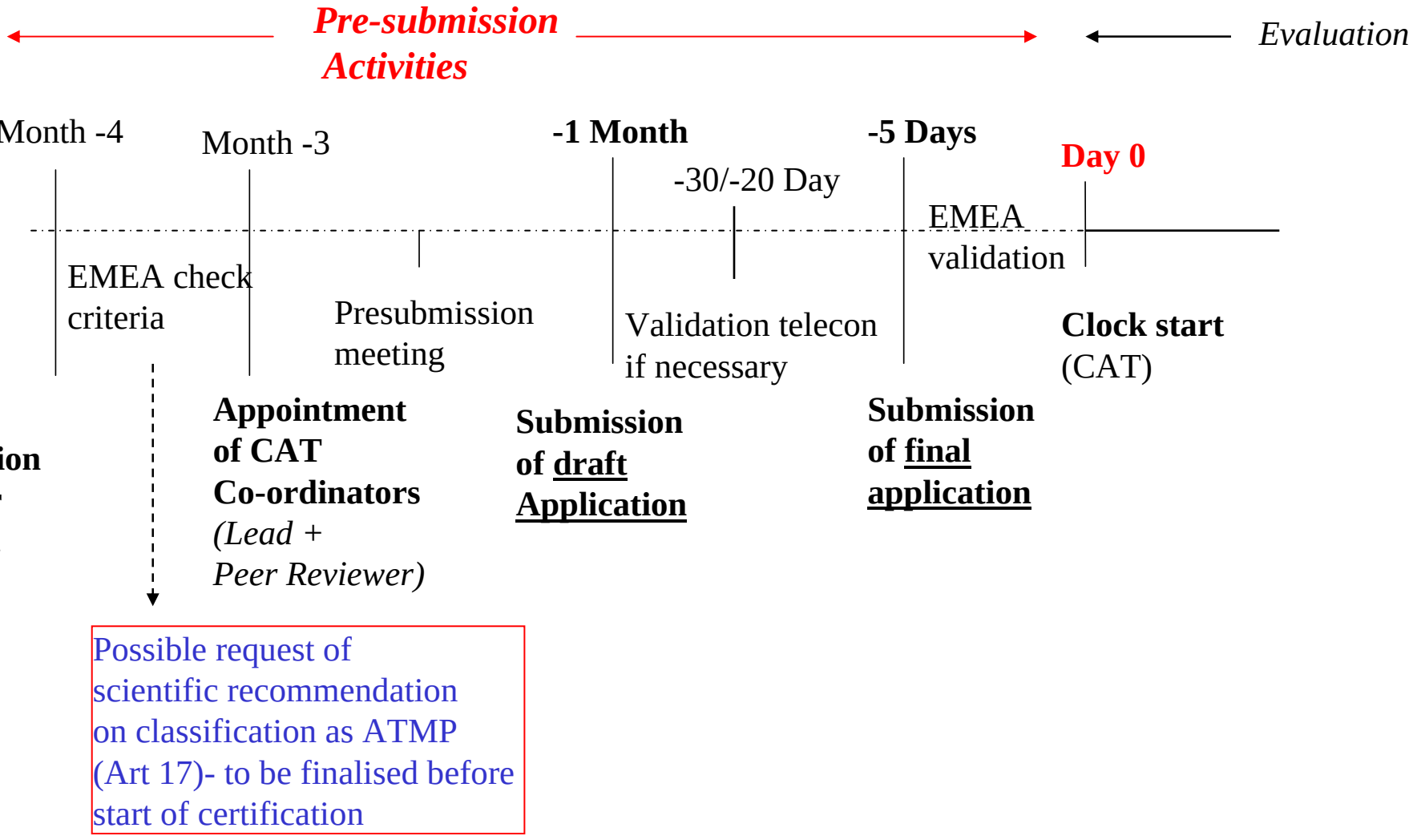
  EMEA view: before start clinical trials

  - Module 3 - sufficiently complete
  - Module 4 - (most) non-clinical studies finalised

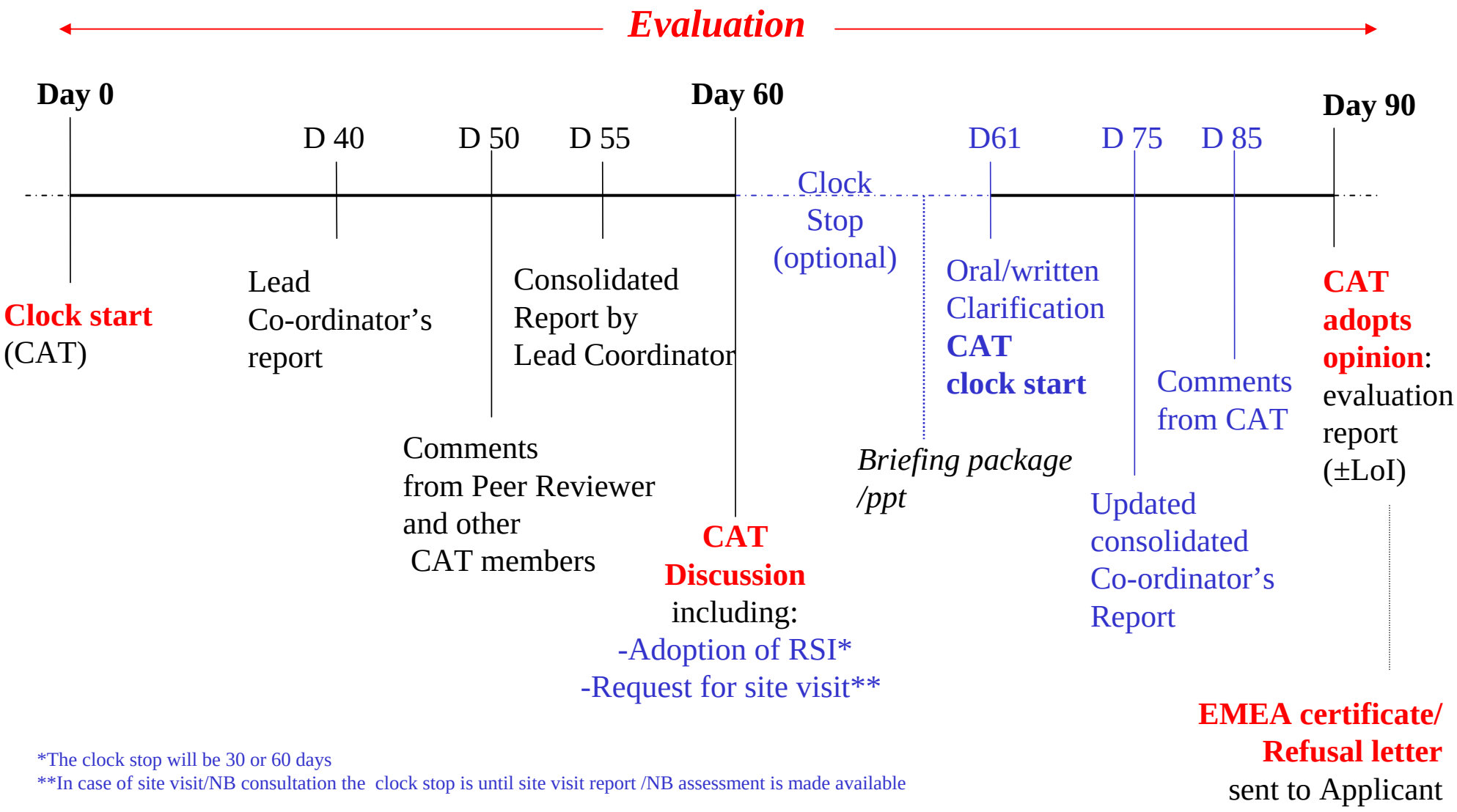
Timing of submission (2)

- At/after pivotal trial: discouraged
  - ‘Pre-assessment’
  - Undue pressure on assessors
- Stage of development will influence the completeness of data package
- Relevance / validity of certificate depends on stage of development
  - More limited if early stage development

Pre-submission Activities



Evaluation



*The clock stop will be 30 or 60 days

**In case of site visit/NB consultation the clock stop is until site visit report /NB assessment is made available

- **Positive** outcome of evaluation:

CAT **Opinion** including the **Evaluation report** →EMEA issues **Certificate** identifying the data and the corresponding testing methodologies which meet the scientific and technical requirements of Annex I to Dir. 2001/83/EC

- **Negative** outcome of evaluation:

CAT Opinion including Evaluation report

→EMEA issues **Refusal Letter** on the granting of a Certificate

If appropriate, the ER can include a **List of issues** for future consideration by the applicant, with regards to the compliance with scientific and technical requirements of Annex I of the quality and non-clinical data submitted and corresponding testing methodologies followed

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Scientific Guideline (1)

- Currently under development
- This guideline will describe the (minimum) dossier requirements to be fulfilled for before applying for Certification
- This guideline will not provide additional scientific guidance for the development, manufacturing and quality control as well as non-clinical and clinical development of advance therapy medicinal products (cross ref to existing GLs)

Scientific Guideline (2)

- Because several sections of Module 3 are interlinked and cannot be evaluated in isolation, applicants will need to submit at least minimum set of Module 3 sections.
  - It is possible that the information in some of the sections will only be supportive, and cannot yet be certified.

Scientific Guideline (3)

- The applicant may have already conducted some non-clinical studies: the results should be submitted, even if the minimum data package for certification of non-clinical data has not yet been completed.
  - In such case, these data will be supportive only and will not be part of the formal certification.

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Conclusions and Next Steps

- Implementing legislation agreed by Standing Committee on 2-3-09
- Procedural GL is updated and presented to CAT (adoption in April)
- Scientific GL to be finalised for presentation to CAT
- Start of certification procedure possible from May/June onwards

Thank you for your attention

Any Questions?