EMA Veterinary Medicines
2021 InfoDay II

AnimalhealthEurope
and
Access VetMed
30 November 2021

Implementation of Regulation 2019/6 – **Industry preparedness**

Jackie Atkinson (Elanco, AnimalhealthEurope)
Patrizia Oelker (BIAH, AnimalhealthEurope)
Andreas Werner (Bela-Pharm, Access VetMed)

Contents

- Main challenges and major steps
- Telematics and UPD
- Biologicals and Specific MAAs
- Pharmacovigilance
- Major Open questions
- Concerns & future work

Main Challenges

- Volume of implementation work
- Impact on multiple functions
  - e.g. RA, PV, Manufacturing, Quality, Supply Chain, Commercial etc.
- 2022 planning decisions had to be taken, incl. running of studies
  - often in absence of even draft guidance and sometimes even the secondary legislation
- Still important questions unanswered (see later)
- Some of the answers will now be too late to allow on time implementation
- Peak of work and adaption internally based on experiences expected H1 2022 (+)

We understand it is a shared challenge with Regulators including EMA and appreciate all their efforts!

Practical Examples of Major Steps (being) Taken

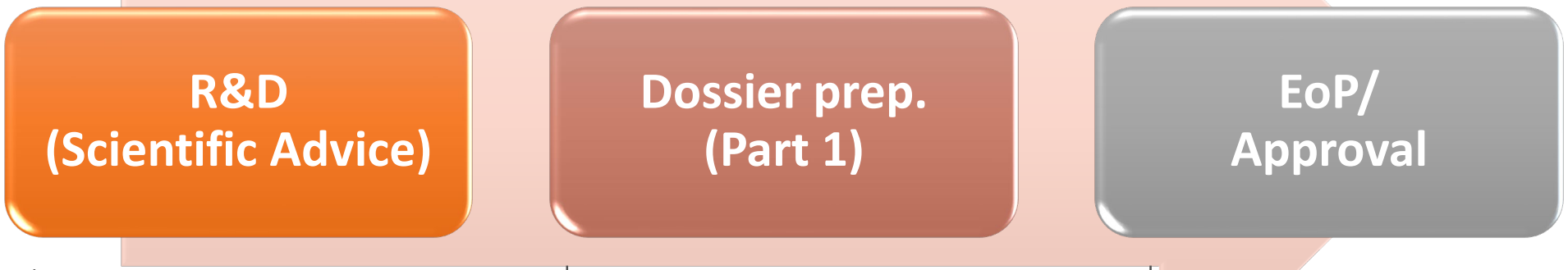
General

- Multiple and regular (weekly sometimes) within and cross functional meetings
- Multiple trainings to diverse groups across the company
- Additional people/contractors identified to manage various high demand in 2022

New Variation System

- Manufacturing & Quality – advised to avoid as far as possible changes requiring regulatory submissions in Q1
- Re-engineered processes for variations – especially VNRAs
- Greater focus on planning especially of VNRAs

Timepoints for Telematics interactions (1/2)



Account Management
IRIS account
OMS (SPOR account)
SMS (Service Desk)
Invoicing Portal

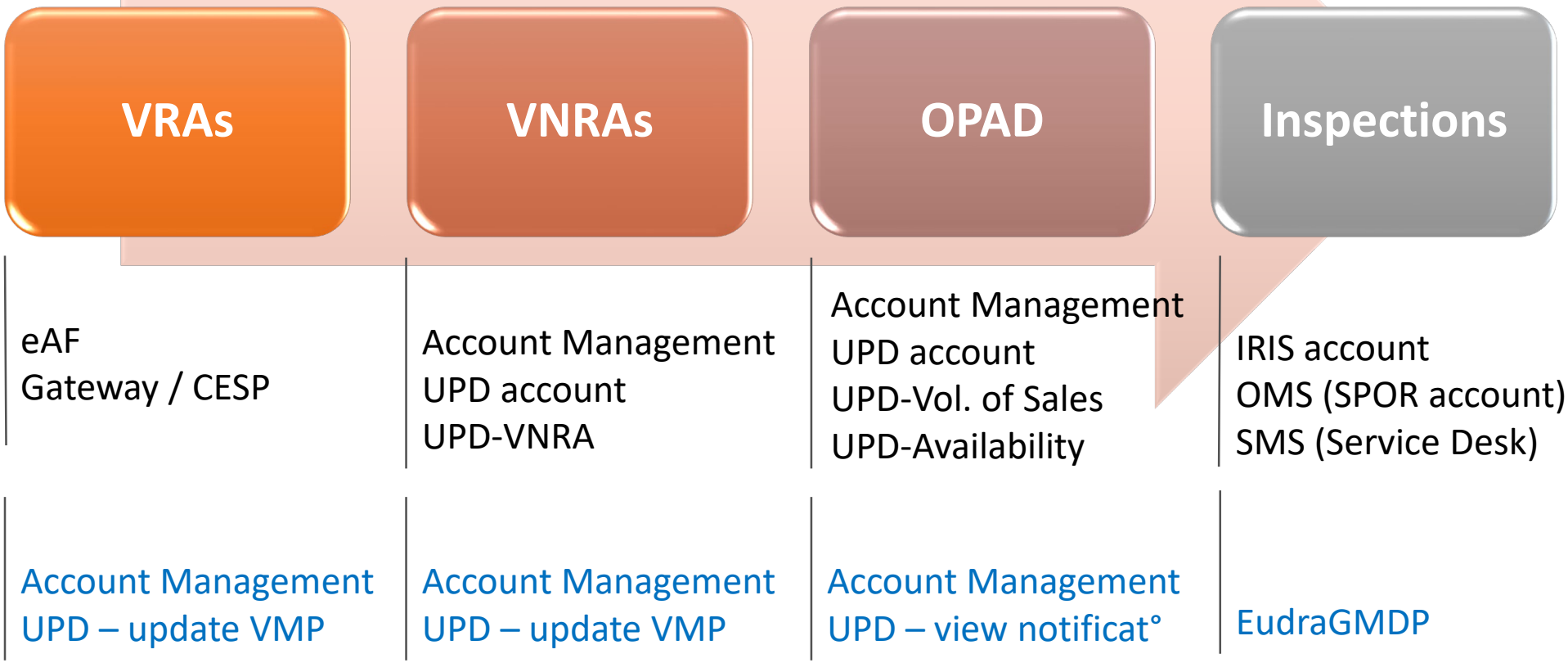
eAF
Account Management
OMS/RMS (SPOR account)
SMS (Service Desk)
Gateway / CESP

Account Management
Eudralink (ling. review)

Account Management
UPD – create VMP

Industry | EMA/NCA

Timepoints for Telematics interactions (2/2)



Concerns around UPD and other systems

Research - approval

- What is the impact of new systems on new medicines availability ?

Post-approval

- UPD is central
- Successful post-authorisation activities only possible with operational and fully populated UPD
- Unresolved fundamental bugs blocking progress
- Feedback from EMA PhV stakeholder meeting: not all national MAs in UPD by end Jan. 2022 – need for plan B
- Strategy for going forward for data correction/enrichment

Biologicals – Considerations for Development

- **GLP conditions for pre-clinical studies**
  - Major hurdle as laboratory efficacy studies currently not under GLP (2009/9/EC) and several lab safety studies were specifically exempted in final annex II draft
    - Urgent clarification needed, to avoid major impact on study costs

- **Field studies (GL on clinical trials with IVMP)**
  - Focus not on field efficacy but combining aspects of safety and laboratory efficacy trials
  - Welcomed criteria for omission of field efficacy trials mixed with unexpectedly strengthened requirements for all trials
    - (e.g. challenge, applicability of pharma GL, batches to be used)

Biologicals – Considerations for particular VMPs

Scientific guidance is generally welcomed, however

- Platform technology master file (PTMF)
  - Very detailed and complex requirements, examples annexed to guidance, changes leading to new PTMF rather than variation; not flexible enough for new technologies

- Vaccine antigen master file (VAMF)
  - Good flexibility, use of specific safety data may be envisaged, redundancy of Part 1 data
  - But: Use of 3 consecutive batches for the active substance

- Classification of biologicals (immunologicals vs. non-immunologicals)
  - Proposal: establish communication pathways rather than mandatory use of SA

Considerations for specific MAAs

- Limited markets
  - Looking forward to a smooth eligibility process
  - Proposals: data reduction not requiring justification, list of diseases to keep predictability, fee incentives, compatibility with VAMF/PTMF, no mandatory scientific advice
  - Welcome Concept paper for limited market products not eligible under article 23
- Exceptional circumstances
  - Inclusion of multi-strain in the scope, readiness in recognition of an outbreak, reduction in GMP requirements
  - Post-authorisation requirements for data to gain full MA according to Annex II should be kept proportionate and not too demanding in timelines
  - Procedural guidance (such as re-examination, timelines) will be welcome

PV, including Signal Management - Thanks

We appreciate

- The involvement of industry in stakeholder meetings
- The possibilities to provide early comments to the PV guidelines, and the respectful consideration to these
- Huge task of PV guideline development team, PV personnel and IT team acknowledged.
- Big efforts during the development of EVVet3 to ensure the database is available in time
- Your support by providing training sessions, published afterwards on the EMA homepage, so that MAHs can check the information again whenever questions arise
- The time left for authorities and industry to adapt to the new system is very short

PV, including Signal Management – Preparedness

- The final versions of the guidance documents for pharmacovigilance just came out recently, drafts of the documents (PSMF and SOPs) prepared by the MAHs have to be reviewed
- There have been considerable difficulties in the UA testing of EVVet3
  - from access issues, distribution of incorrect links to bugs in features that have already been working as well as unexpected results of new features
- Only data of CAPs will be available in UPD by January 2022
  - this will lead to issues in AE reporting and signal detection for non-CAPs in EVVet3
- Access to the real system is needed:

  a) to gain experience in AE reporting as well as in signal detection

  b) to ensure compatibility of databases to send to and receive cases from EVVet3

PV, including Signal Management – Major Steps

- PSMF drafting;
- Establishing SOPs with actual workflow;
- Work to ensure compatibility of companies databases with EVVET3;
- More time is needed to insert AE reports in the new system, therefore time out only after 30 minutes of **inactivity** and warning is highly appreciated;
- Extensive work on mapping of same/similar non EU products to EU products;
- Establishing methodology and systems to have sales volumes at the pack level;
- Updating existing internal Signal Management and Risk Management processes;
- Working out Signal Management outcome reporting to Union Database.

Indulgence and help will be needed in the phase of introduction of the new system and in pharmacovigilance inspections in the coming year

Major Open Questions – a few examples

- Contents of the list of antimicrobial substances to be reserved for human use
  - need advance warning and certain timings to prepare
- Contents of the DA on how Article 118 rules on application (impacts outside EU) –
  - third countries and producers need long lead times to change production systems without compromising animal welfare
- Biologicals - confirmation that GLP studies are only required for laboratory safety studies (and not for all pre-clinical studies).
  - studies are being run now which will be submitted post Jan 2022
- What is the EU network contingencies (PV, VNRAs, etc) in case the UPD is not ready and sufficiently populated?

Major Concerns

Admin burden

- Reduction opportunities lost via the approach to implementation at MS level

UPD and EVVET3 enhancement

- How long until it delivers full benefits and initial additional admin burden is removed?
- Assurances needed funding and resource will remain dedicated to the essential enhancements as long as needed

EMA workload

- Increase due to opening up the centralised procedure especially combined with continuing build and enhancement of systems

Medicines availability - Impact of horizontal legislation

- Creates costs, conflicts and uncertainty, e.g. Chemical Strategy, REACH, CLP, PPWD

Future Work in Companies (1/2)

Priority

- Engaging with EMA on the enhancements to UPD & EVVET3
- Closely monitoring MS implementation
  - **Seeking harmonised, pragmatic and practical approaches aligned with the VMR and its objectives**
  - **Some National legislation will not be in place on 28 January 2022**
  - **GMP/GDP, e.g. addresses in OMS for GDP, WDA and API registrations**
- Understanding and effective use of the opportunities e.g. in Art 40(5) – tech data protection; use of antigen master files, technology platforms etc.
  - **Contributing to discussions/focus groups to enable new approaches to deliver intended benefits**
  - **Flexibility important to enable adaptions in light of experience**

Future Work in Companies (2/2)

Deliver work with legally foreseen transition periods

- Enrichment of the UPD data – availability info at pack level over coming year
- Timing and approach of move into new QRD for all products over coming 5 years

Other

- Untangling the disconnects between VMP legislation and other EC legislation (e.g. Chemical Strategy, REACH (PFAS, Triton-X, DMAc), CLP, PPWD)
- Promoting outside EU e.g. UPD as verifiable source of EU registration info

Conclusions

- Implementation readiness is a massive task for: industry, CVMP, CMDv, EC, NCAs
- Appreciate all your efforts, EMA leadership and demos/trainings
- Companies are as prepared as they can be based on the available information
- Companies will continue to adapt as more information & experience is available
- Essential: a common understanding across all parties on a time period for initial operational flexibility
  - e.g. implementation of the PV requirements by companies (as the guidelines and database requirements were delivered too late for companies to be prepared in time)
- Continuing dialogue between industry and regulators is essential
  - e.g. to review progress and solve any hitches and evolve the system

In the meantime we all have to: do our best, tolerate some teething issues and remain proportionate, pragmatic and be positive!