animalhealth europe
THE VOICE OF THE ANIMAL MEDICINES INDUSTRY

Industry View on the draft RP on dose optimisation of established veterinary antibiotics in the context of SPC harmonisation (EMA/CVMP/849775/2017)

EMA, 12th October 2018

@animalhealthEU
WeCare.petsEurope

www.animalhealtheurope.eu

Outline

1. Introduction
2. PK/PD
3. WP – ERA – TAS
4. Regulatory framework
5. Concluding remarks

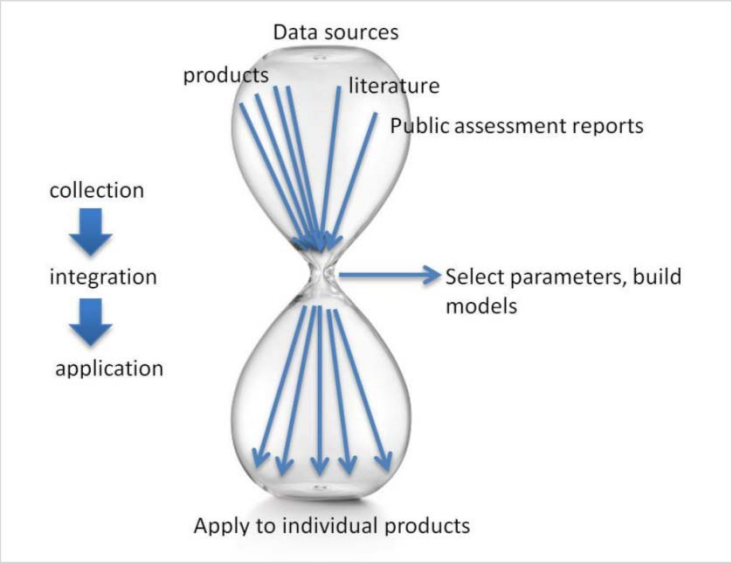
1. Introduction

- **AnimalhealthEurope welcomes the initiative by CVMP to seek a pragmatic solution to updating the dose of established veterinary antibiotics, where needed**
  - Continued availability of established veterinary antibiotics is key for all stakeholders in the veterinary sector since likely only very few new antibiotics will be developed for use in veterinary medicine
  - For certain authorised products, a review of the current posology might be beneficial but the current regulatory environment does not provide incentives for MAHs to commit to major investments
  - Change in posology can impact TAS, WP and ERA → expensive studies!
  - If non-experimental scientific approaches (such as modelling) could address all of the above, costs would be significantly reduced

- **Industry was happy to provide relevant data and support to both case studies**

1. Introduction

- It is recognised that CVMP took great efforts in testing the feasibility of the methodology for dose optimisation with two examples rather than just describing theoretical options
- Optimisation and harmonisation at the VMP level (product-by-product) is key!
- The hour glass approach is therefore fully supported



2. PK/PD

- **The PK/PD approach is supported in principle**
- **There are certain limitations with this approach:**
  - Inability of the model to determine optimal duration of dosing
  - The preferred PK/PD index and it's target (PDT) is not necessarily clear for all antibiotic classes
  - Acceptable level of PTA is not clear-cut and subject to expert opinion
  - All PK/PD indices are based on an MIC – which will be more challenging for certain classes (*e.g.* macrolides)
- **Despite these limitations, an acceptable way forward was identified in both case studies**
- **Flexibility in methodology will be needed depending on the data available and the molecule**
- **Training to use PK/ PD software (*e.g.* Monte-Carlo simulations) and assess the quality of MIC data will be important**

3. WP – ERA - TAS

- **Approaches are supported in principle**
- **WP:**
  - Whilst the maintenance of differing WPs for different products can be justified scientifically, further thought should be given to the harmonisation of national differences in the WP of the same product.
  - Further reflection will be needed on the handling of non-linear kinetics where these occur.
- **ERA:**
  - As stated a pragmatic approach to handling ERA-related data gaps in the context of dose optimisation will be necessary.
  - Use in aquaculture is not covered, whilst the principles are applicable the starting point will be the $EIC_{aquatic}$ (environmental introduction concentration).
- **TAS:**
  - Relatively few data were available – Additional risk management measures might need to be applied in cases of greater uncertainty in order to not jeopardise animal health and welfare.

4. Regulatory Framework – When, Who and How?

- **AnimalhealthEurope would requires more time for internal discussions before a position on the ideal regulatory framework, but some initial thoughts are provided below.**
- **What workload is sustainable for regulators and industry?**
- **Best performed centrally by the same expert group for all of Europe**
  - Gain and retain experience with the models
  - Consistency in the implementation
  - Draw on wider pool of experience from across Europe
- **Industry to provide data for the regulators to review, assess and model?**

  → Consultation phase would be required for Industry to review the proposed outcome before implementation (and with the possibility to exchange expert opinions)

4. Regulatory Framework – When, Who and How?

- **Prior to the introduction of the new regulation?**
  - Should any process start under the existing legislation?
  - Article 35 Referrals?
- **As part of SPC harmonisation under Article 70 of the new regulation?**
  - Possible,
  - Governed by CMDv, so not centralised.
  - Other types of VMP involved, so issues with timing and procedures.
- **During a Community interest referral under the new regulation?**
  - No predictability on timing and priorities.
- **Agreed scheme between Regulators and Industry?**
  - Would need agreement of all concerned companies.
  - Would be better for prioritisation and timing, balance workload for industry and regulators.
  - Legal basis?

5. Concluding Remarks

- AnimalhealthEurope fully supports this initiative from CVMP.
- The RP already provides a very useful toolkit, but changes in methods will be needed depending on the data available and the molecule - The methods described may not be applicable to all molecules.
- Optimisation and harmonisation at the VMP level is key.
- Further discussion required on application.

animalhealth europe | THE VOICE OF THE ANIMAL MEDICINES INDUSTRY

visit us on www.animalhealtheurope.eu

Thank you!