Submission of Comments on the Consultation Document:

Good Manufacturing Practice for Advanced Therapy Medicinal Products

Co-ACT is happy to respond to the Commission Consultation on Good Manufacturing Practice (GMP) for Advanced Therapy Medicinal Products (ATMPs).

Co-ACT is an association grouping together the main biopharmaceutical companies established in Belgium developing Advanced Therapy Medicinal Products (ATMPs).
The objective of Co-ACT is to protect and stimulate the R&D activities, production and export activities in order to consolidate Belgium's status as an investment location for ATMP companies.
Its members include Bone Therapeutics, Celyad, Novadip Biosciences, Promethera Biosciences, and TiGenix. All these companies are Small and Medium-sized Enterprises (SMEs).

Co-ACT welcomes the initiative of the European Commission and in particular the openness of the Commission to envisage greater flexibility in applying GMP for ATMPs taking into account their specific characteristics.

Co-ACT member companies are also members of organisations such as the Alliance for Regenerative Medicine (ARM), European Biopharmaceutical Enterprises (EBE) or bio.be, the Belgian national biotech organisation, part of EuropaBio, and several of them have interacted with these organisations in the context of this consultation.

Co-ACT generally supports the comments provided by ARM, EBE and EuropaBio.

More specifically, Co-ACT considers the following elements as particularly important to address in order to facilitate the development and deployment of ATMPs in Europe:

- GMP for ATMPs should not be a stand-alone document but should be incorporated as an annex to the Volume 4 of EudraLex. Several key aspects of GMP are missing or insufficiently developed in the consultation document. Completing this document to meet the standards of GMP would mean a significant expansion of this document and a lot of duplication of other existing documents in Volume 4. Having two sets of standards with distinct QMS for ATMPs and all other pharmaceuticals will indeed be confusing for companies manufacturing more products than just ATMPs and could raise difficulties at time of inspections. We believe the disadvantages and risks of this approach would actually exceed the benefit of having a single reference document for ATMPs.

- GMP should be applicable to all ATMP manufacturers irrespective of the location where these are made. The overarching objective of GMP requirements is to ensure product quality and thereby the safety of patients who will receive medicinal products, whether in clinical trials or in commercialisation stages. Hospitals and academic settings are major stakeholders and should be consulted. It is difficult to understand why hospitals and academic settings engaged in the manufacturing of ATMPs would be exempted from applying the same GMP principles which aim to protect patient safety.

- Expectations and requirements should differ depending on stage of development and the specific characteristics of the product (such as autologous versus allogeneic for instance). Applying a risk analysis based on the product characteristics and the potential benefit for the patient, more flexibility should be allowed in early stages of development, especially the early product development stages.

- Responsibilities of ATMP manufacturers from other stakeholders upstream and downstream to the actual manufacturing steps should be clearly delineated:

  - As the quality of the starting materials is critical to the quality of the final ATMP, the responsibilities of blood, tissues & cells establishments and of the ATMP manufacturer should be further clarified, in particular the role and responsibility of the QP for the final quality and safety of the product.
  - the handling, preparation, reconstitution, use of the product prior to administration should not be regarded as manufacturing steps and the manufacturer's responsibility should be limited to the qualification/validation of these steps with transmission of detailed instructions to the final users. It is critically important to consider that steps such as washing of cells in case of cryopreserved ATMP are included in these handling steps before use and excluded from GMP requirements.

Finally we encourage the Commission to organise a second consultation and engage in further dialogue with manufacturer before the finalisation of GMP for ATMPs.

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