EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

PRIME

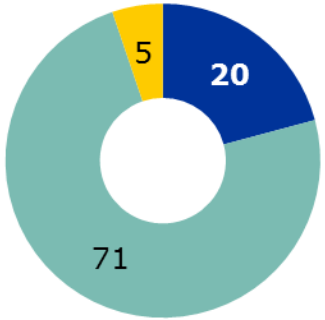
7th STAMP meeting – Brussels, 27th June 2017

Presented by Sonia Ribeiro
Head of Regulatory Affairs Office, Human Medicines Evaluation Division

Overview of one-year experience of PRIME eligibility assessment

April 2016 – April 2017

One year of PRIME



■ Granted ■ Denied ■ Out of scope*

22% success rate

108 requests received

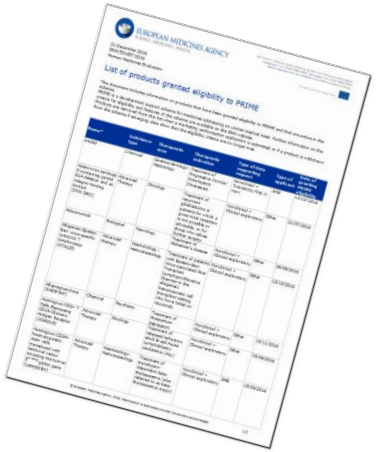
> 90 eligibility requests assessed

> 50% from SMEs

20 granted*

+

Publication of report and list of products on EMA website



PRIME over time

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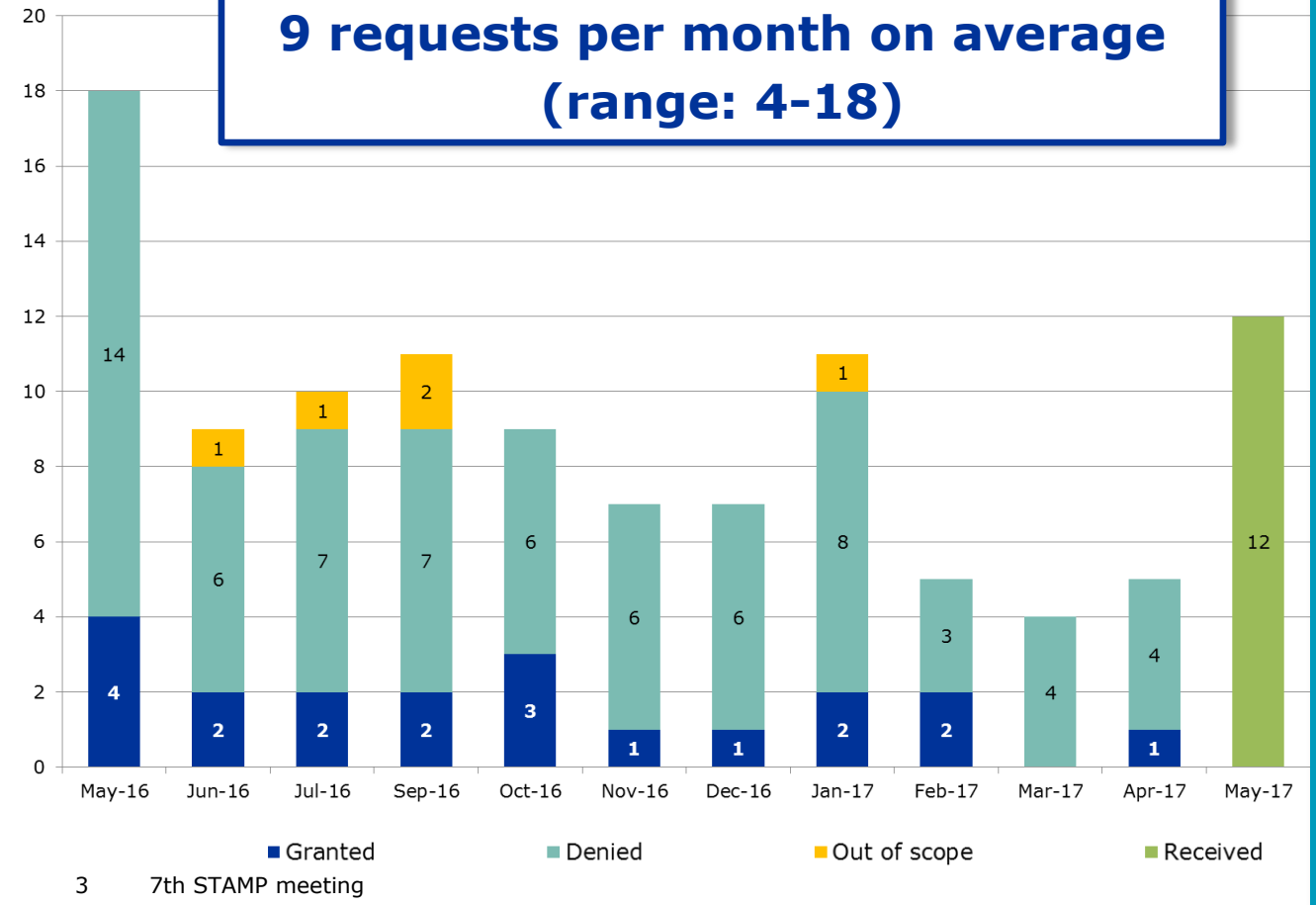
9 requests per month on average (range: 4-18)



Good quality of applications

Few 'out of scope' applications

- Academic or SME with no FIM data
- Non-SME with no exploratory data
- Issue with definition as medicinal product
- Resubmission with no new data

Requests covering wide range of therapeutic areas and product type

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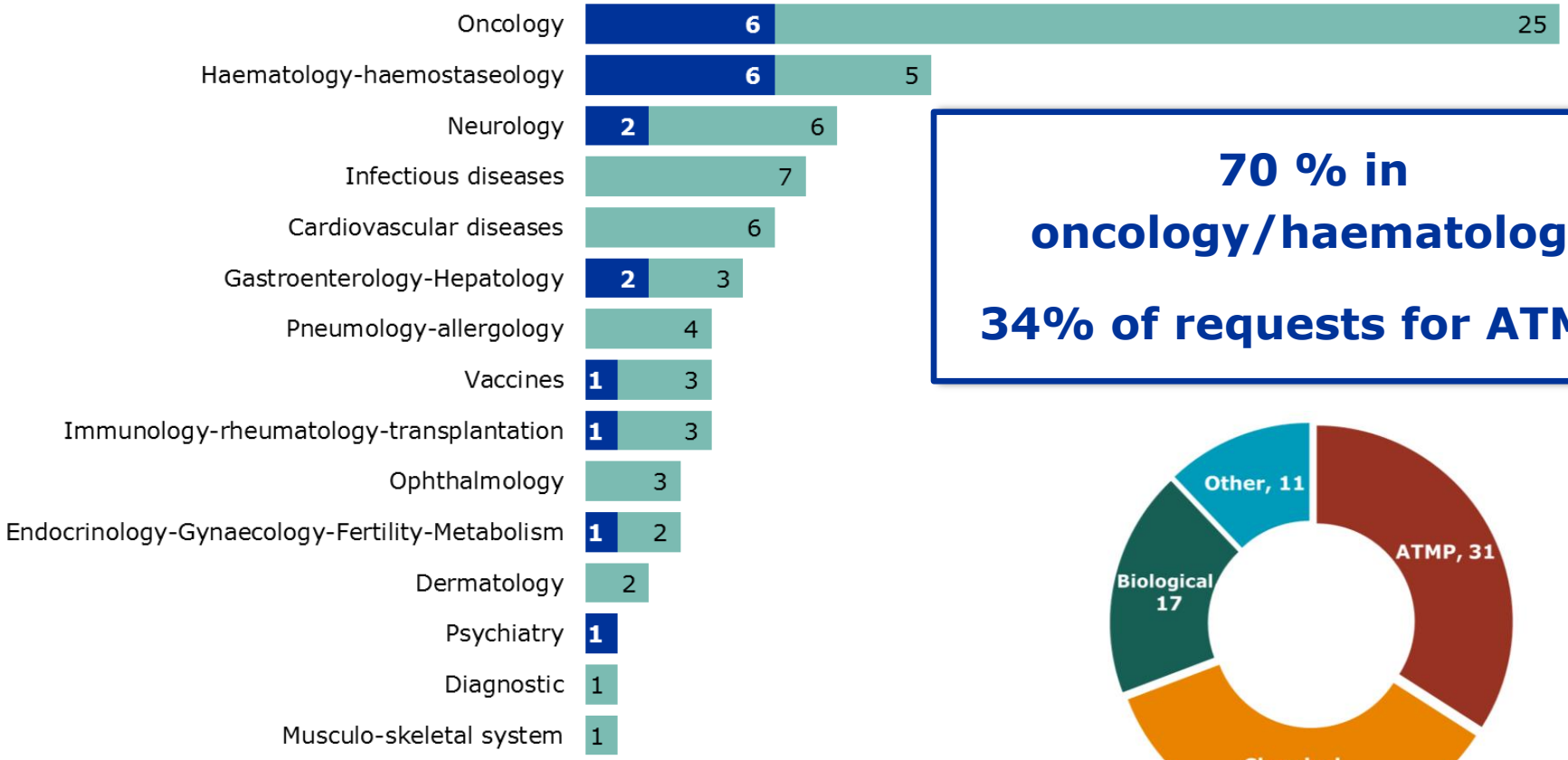
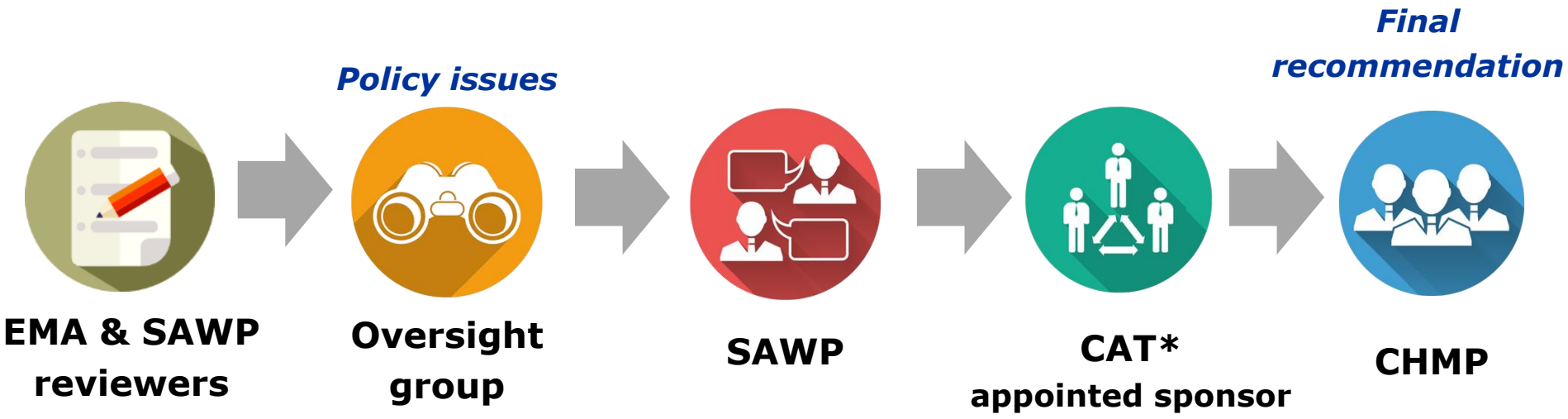


70 % in oncology/haematology

34% of requests for ATMPs

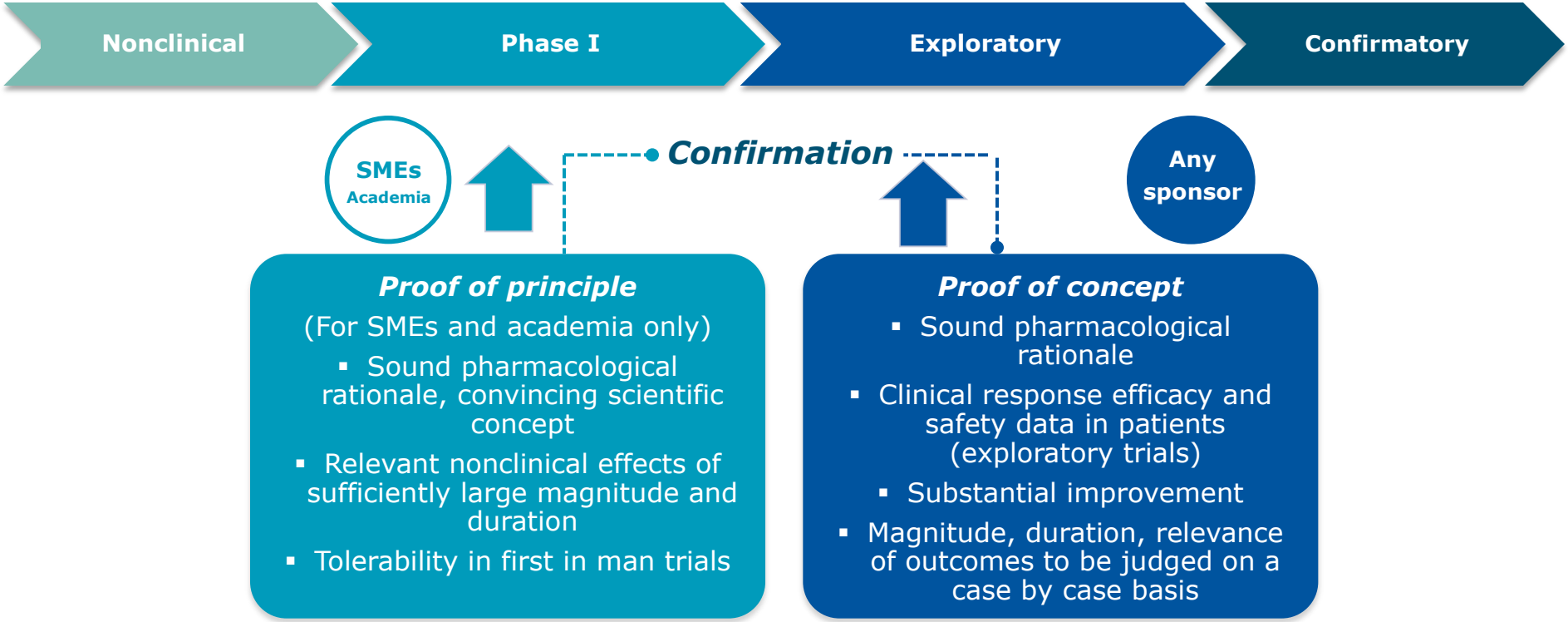
Assessment of eligibility requests: 40-day procedure



Short, lean process, involving multiple committees for robust assessment

*For advanced therapies

Entry points of PRIME eligibility requests



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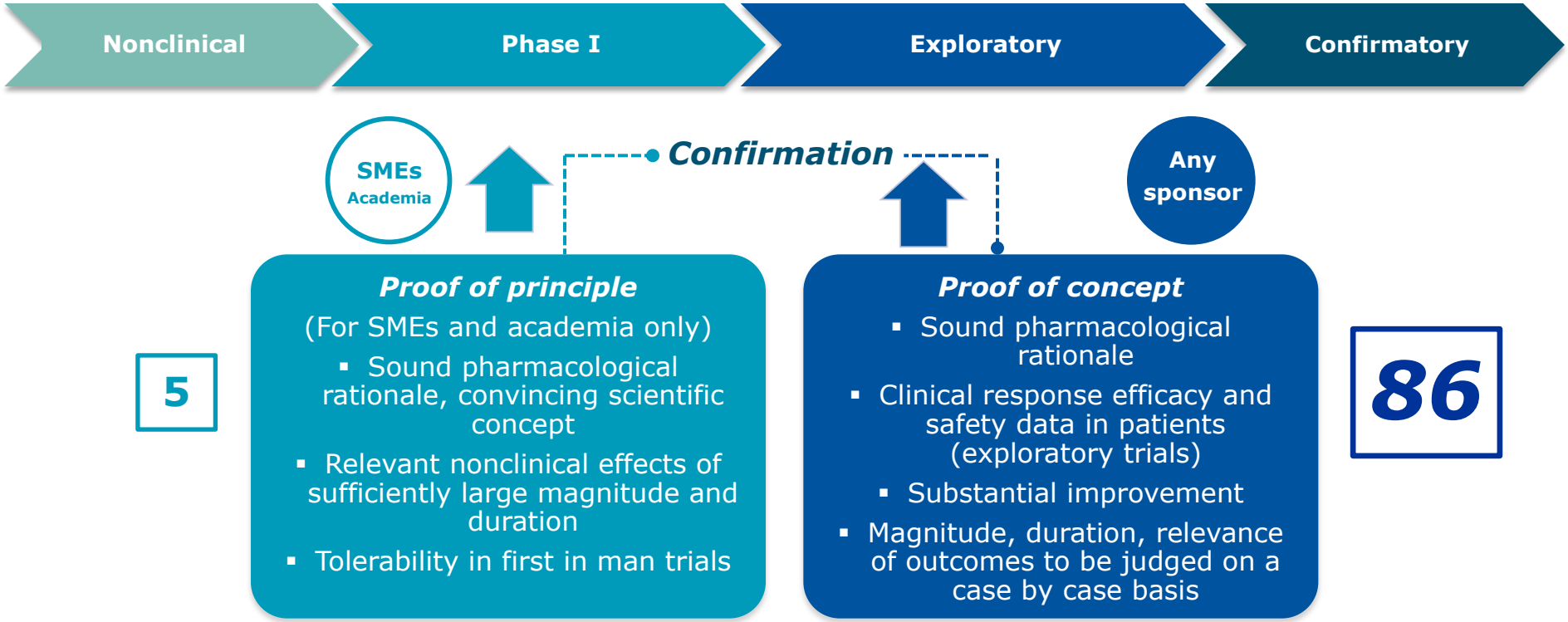


Proof of principle 'early' stage: only 1/5 request granted

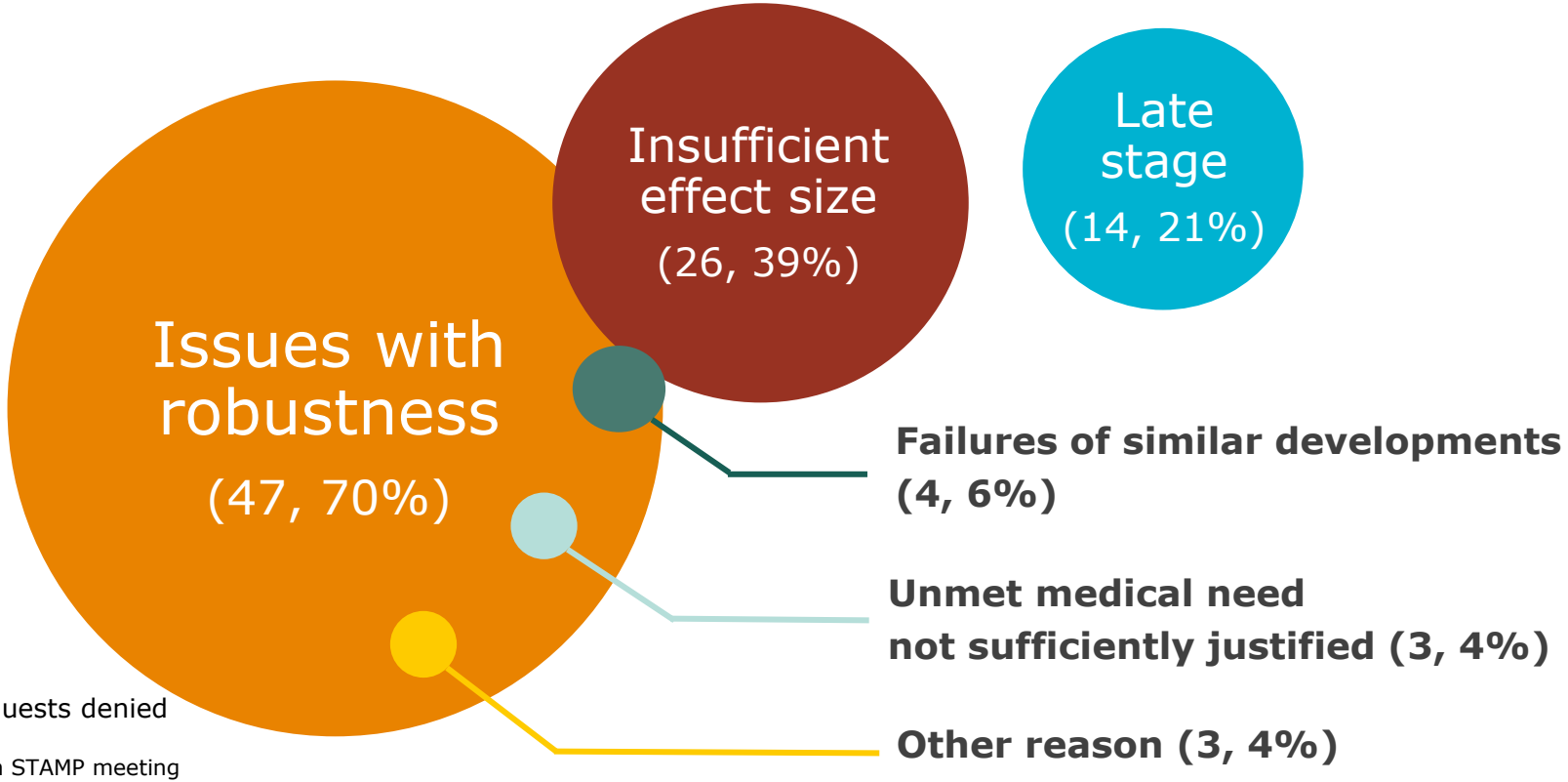
Main reasons for denial

Weak pharmacological rationale, insufficient nonclinical evidence on the claimed mechanism of action

Limited relevance of animal models presented

Insufficient PK exposure data to support expected clinical outcome

Reasons for denial at proof of concept stage



N=67 requests denied

Reasons for denial at proof of concept stage: Examples of robustness issues

Trial design issues eg treatment effect not isolated from other factors, use of concomitant treatments

Failed study

Inconsistency of results
across studies, study groups or endpoints

Claim in subgroup insufficiently justified

Sample issues
size, heterogeneity, insufficient information on baseline

Comparison to inadequate historical control data

PRIME and repurposing: related policy discussion

Requests based on literature

More acceptable at proof of principle

Use of literature may not be applicable similarly between chemicals, biologicals and ATMPs

Need reliable, trustworthy, high quality literature

Applicant planning further studies

PRIME and repurposing: 3 requests, all denied

SME, literature data only

Lack of clear pharmacological rationale

Clinical data not supportive of eligibility criteria

SME, nonclinical and clinical data

Data too limited and not sufficiently supportive

Academic

Literature data: divergent outcomes

Small study from academic group: limited size, non-randomised, issue with robustness

How have eligible products benefited from PRIME so far?

Features of the PRIME scheme

Early access tool, supporting patient access to innovative medicines.

- **Written confirmation of PRIME eligibility** and potential for accelerated assessment;
- **Early CHMP Rapporteur appointment** during development;
- **Kick off meeting** with multidisciplinary expertise from EU network;
- **Enhanced scientific advice** at key development milestones/decision points;
- **EMA dedicated contact point**;
- **Fee incentives** for SMEs and academics on Scientific Advice requests.

Kick-off meetings: experience on 15 products

Applicant

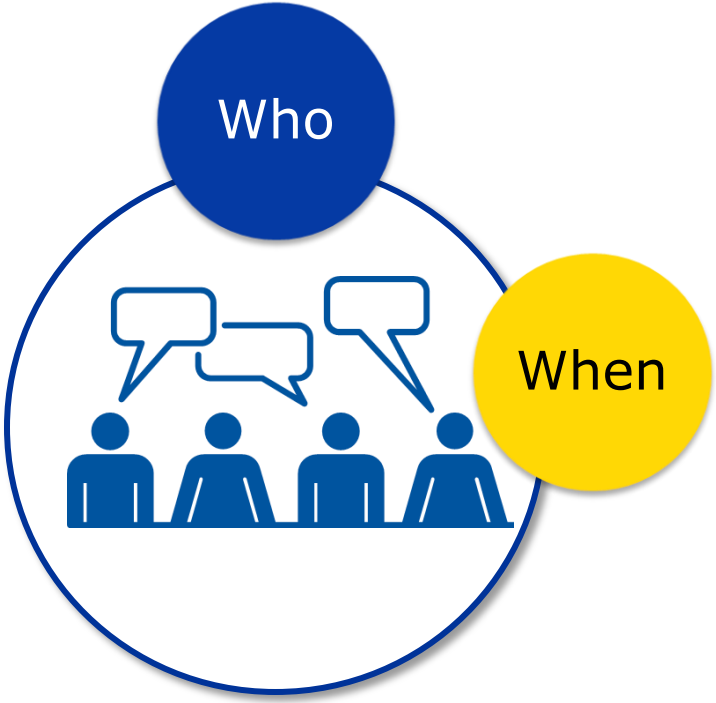
Rapporteur and assessors (all disciplines)

CAT/CHMP/SAWP chairs

Representatives from PDCO, COMP and PRAC

EMA

Kick-off meetings: experience on 15 products

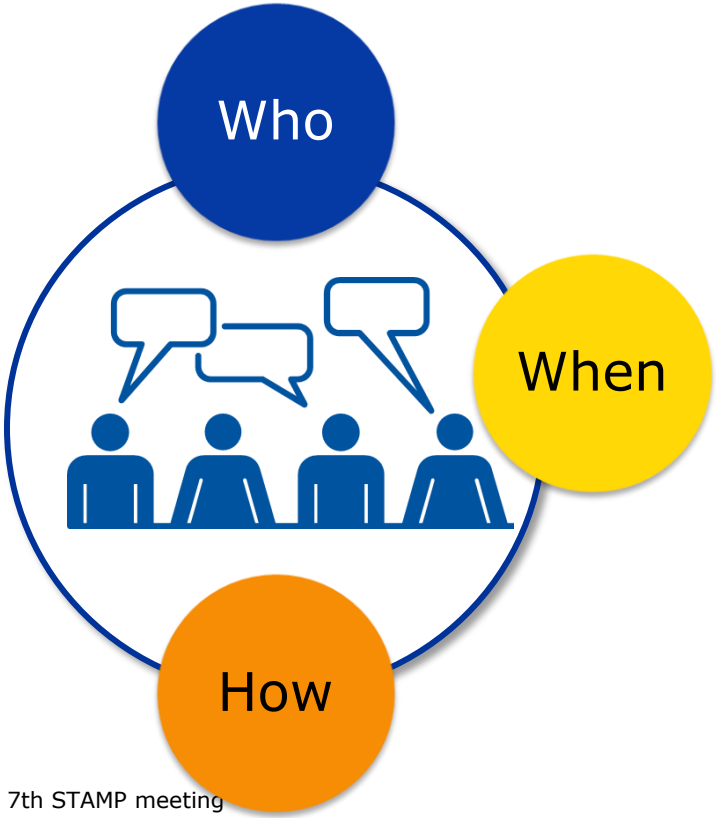


~ 4 months after eligibility
(range: 52-177 days)

In margins of CAT/CHMP meetings

Find optimal timing (particularly if ongoing scientific advice)

Kick-off meetings: experience on 15 products

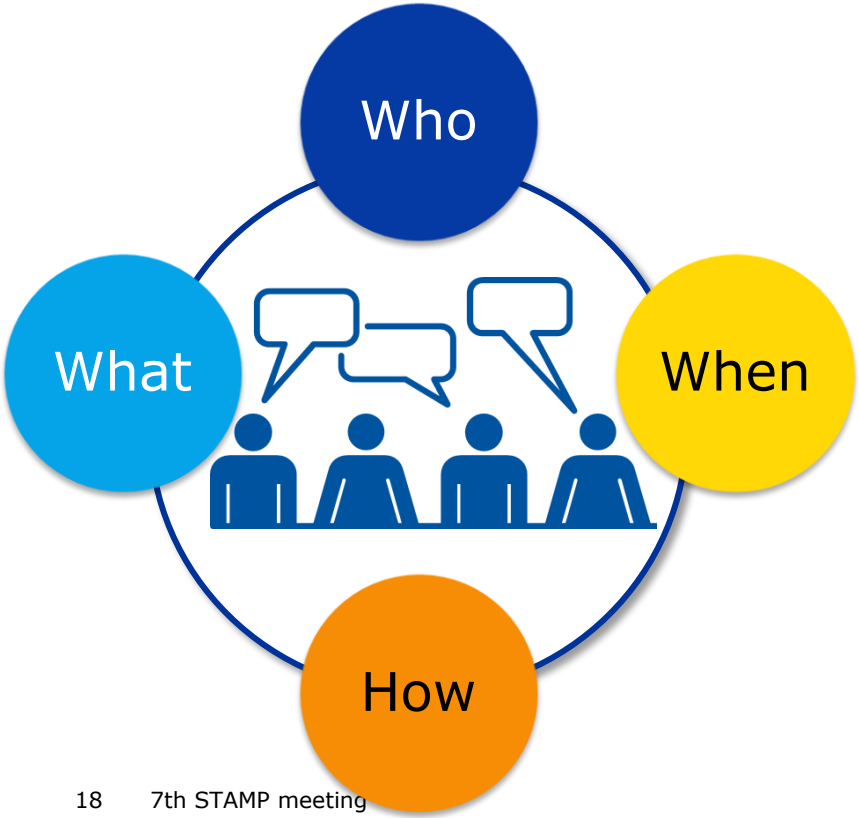


Briefing document
(~3-4 weeks in advance)
essential for fruitful
discussion

Internal preparatory
teleconference
(~2 weeks)

Tailored agenda

Kick-off meetings: experience on 15 products



Broad discussion on development and regulatory strategy

Many issues identified for future scientific advices

★ Raise awareness on planning of post-authorisation aspects and HTA interactions

★ Agree on future interactions

Early Rapporteur appointment: feedback on experience

Opportunity for **knowledge gain** on the product

Identification of **relevant expertise** and build adequate team

Opportunity to **influence** development

Very positive views on the **kick-off meeting**

- ✓ Importance of preparation and tailored agenda
- ✓ Facilitate interactions across committees and with EMA

Timing of PRIME eligibility is critical for fruitful engagement

Involvement in follow-up **scientific advice** and workload

Need to **improve follow-up communications/updates**

Enhanced scientific advice

7 products
11 SA requests
following kick-off meetings

Multi-stakeholder
1 EMA/HTA parallel advice
2 with patients involved

Rapporteur involvement
through one of SAWP coordinator

All aspects covered
Quality,
nonclinical, clinical

Flexibility
Shorter pre-submission
3 adopted in 40 days

Other interactions with the applicant: EMA contact point

Address or direct queries

Ad hoc teleconference/meeting with Rapporteur and EMA

Area for improvement:
Applicant to provide regular updates on development progress and milestones

First anniversary meeting

First anniversary meeting on 19 May

> 120 participants

Wide range of stakeholders: industry, academics, patients, HTA

Recording and presentations available on EMA website

First anniversary meeting on 19 May

Very positive feedback across stakeholders

High number of requests in oncology, but no request in other priority areas such as antimicrobial resistance.

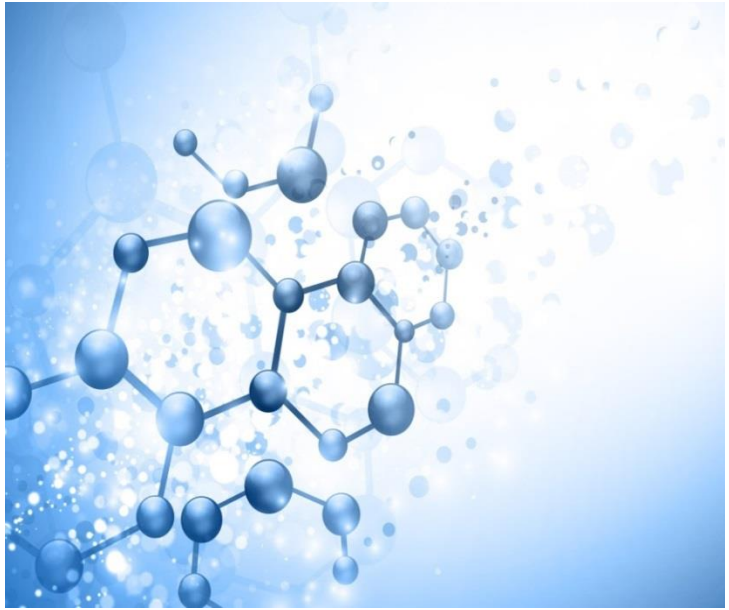
- Industry considered that while the scheme can encourage applicants, it will not on its own incentivise development in a specific area.

No major change to scheme foreseen as outcome

A few areas for improvement identified (guidance, templates, interactions with the Rapporteur…)

Opportunity for further collaboration with HTA to be discussed with EUnetHTA

In summary,



Eligibility review: robust, short time, in writing

Quality of applications received is generally high

Kick-off meeting: excellent opportunity to initiate interaction and flag issues

Rapporteur appointment enables early identification of potential issues

Excellent collaboration across committees

Iterative scientific advices with opportunity for multi-stakeholders involvement

Scheme triggers discussions across product type / class

Thank you for your attention

Further information

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