EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Experience with early access tools in centralised procedure

Presentation for Expert Group on Safe and Timely Access to Medicines for Patients (STAMP)

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Content

Conditional Marketing authorisation / Accelerated Assessment

- Legal framework and guidance
- Analysis of use in centralised procedure (data lock 31/12/2014)
- Opportunities

Ongoing activities at the EMA

Conditional Marketing Authorisation

Legal framework

Scope (at least one):

- for **seriously debilitating diseases or life-threatening diseases**;
- to be used **in emergency situations**;
- **orphan** medicinal products.

Criteria (all):

- the **risk-benefit balance is positive**;
- it is likely that the applicant **will be in a position to provide comprehensive clinical data**;
- **unmet medical needs** will be fulfilled;
- the **benefit** to public health **of the immediate availability** on the market of the medicinal product concerned **outweighs the risk** inherent in the fact that additional data are still required.

'**unmet medical needs**' means a condition for which there exists no satisfactory method of diagnosis, prevention or treatment authorised in the Community or, even if such a method exists, in relation to which the medicinal product concerned will be of major therapeutic advantage to those affected

Regulation (EC) No 507/2006

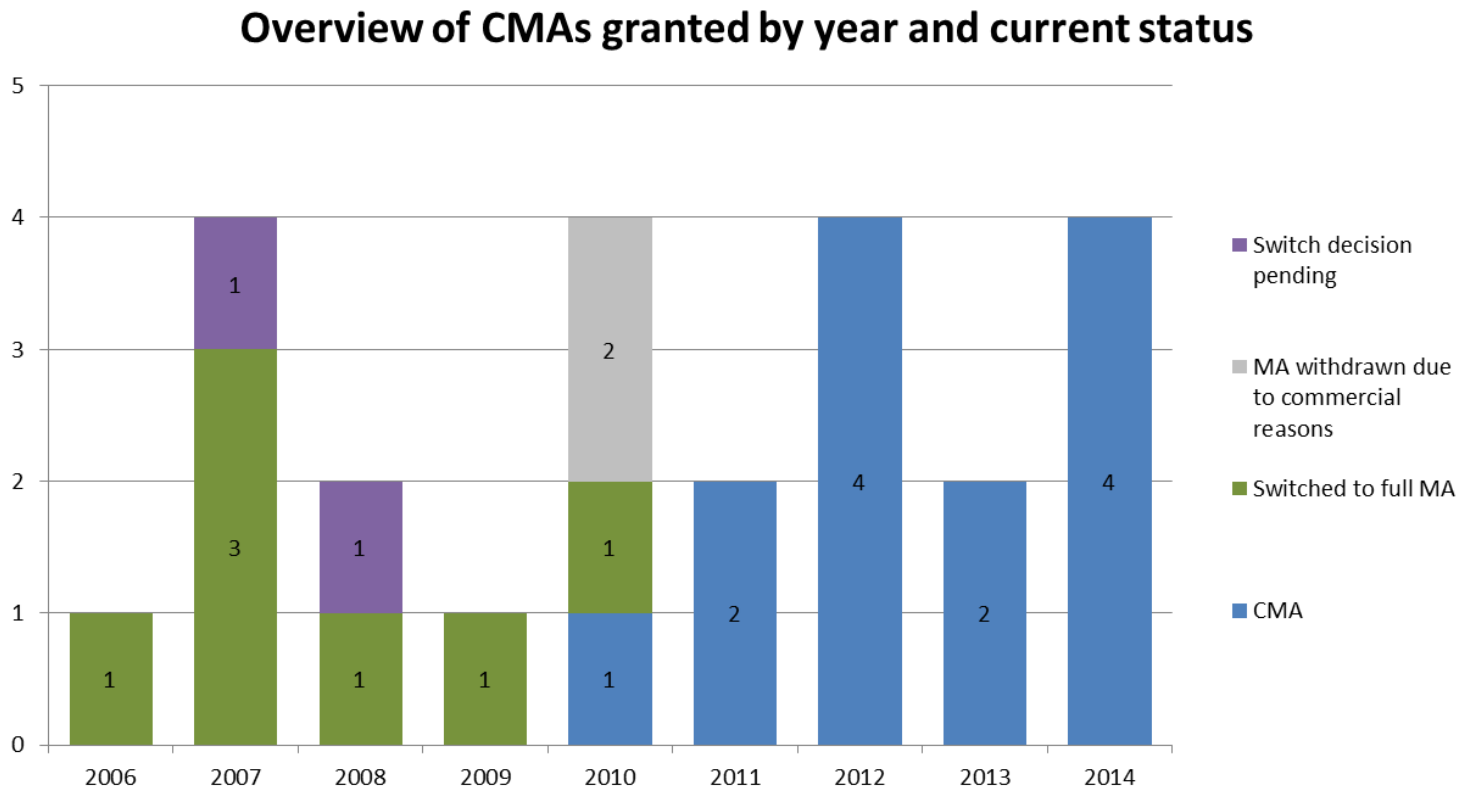
Existing guidance

Serious debilitation, or fatal outcome should be a prominent feature of the target disease and therapeutic indication.

A positive **benefit-risk balance** should be based on (comprehensive) scientific evidence, in particular evidence from therapeutic **confirmatory trials** [..] The **data requirements** laid down in Annex 1 of Directive 2001/83 are also applicable [..] The safety profile of the medicinal product should be adequately defined and appropriate to justify a positive benefit risk. [..] the **robustness and degree of external validity of the results**..

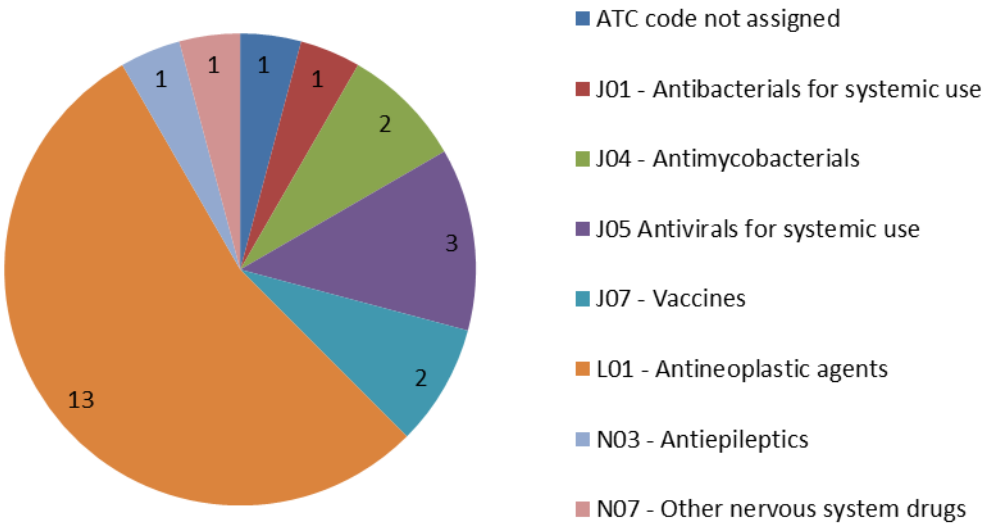
For fulfilment of **unmet medical need:** major therapeutic advantage would normally be based on meaningful improvement of efficacy (or clinical safety).

Conditional Marketing Authorisations (CMAs)

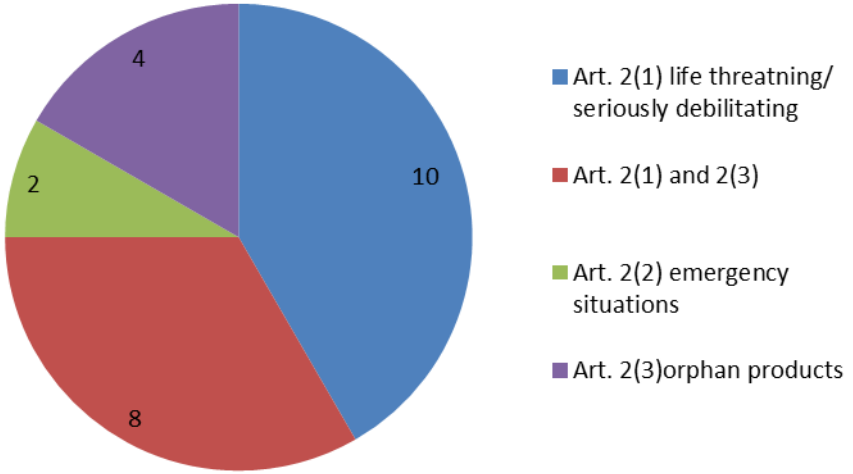


Therapeutic areas and types of products

CMAs by ATC code

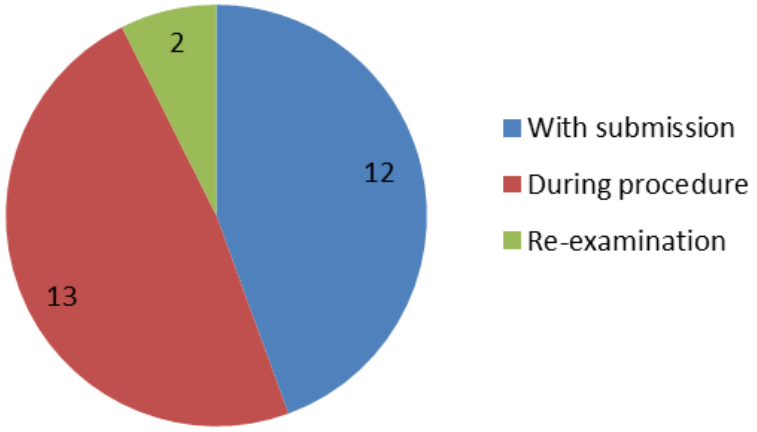


CMAs by category

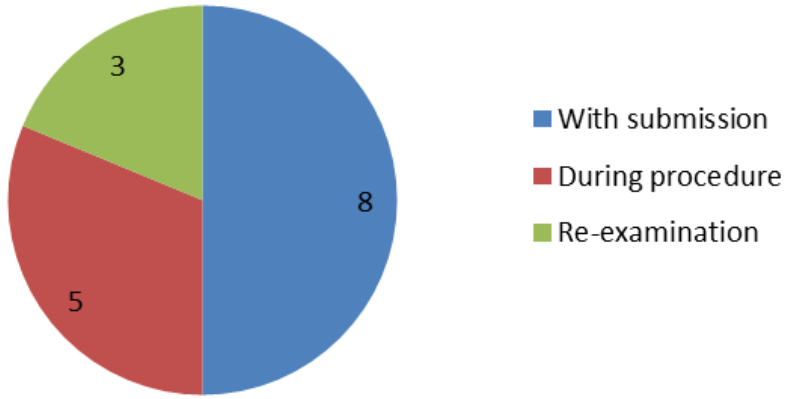


Positive and negative CHMP outcomes by time of consideration of CMA

Step of procedure when CMA is first considered (procedures with positive CHMP outcome, n=27*)



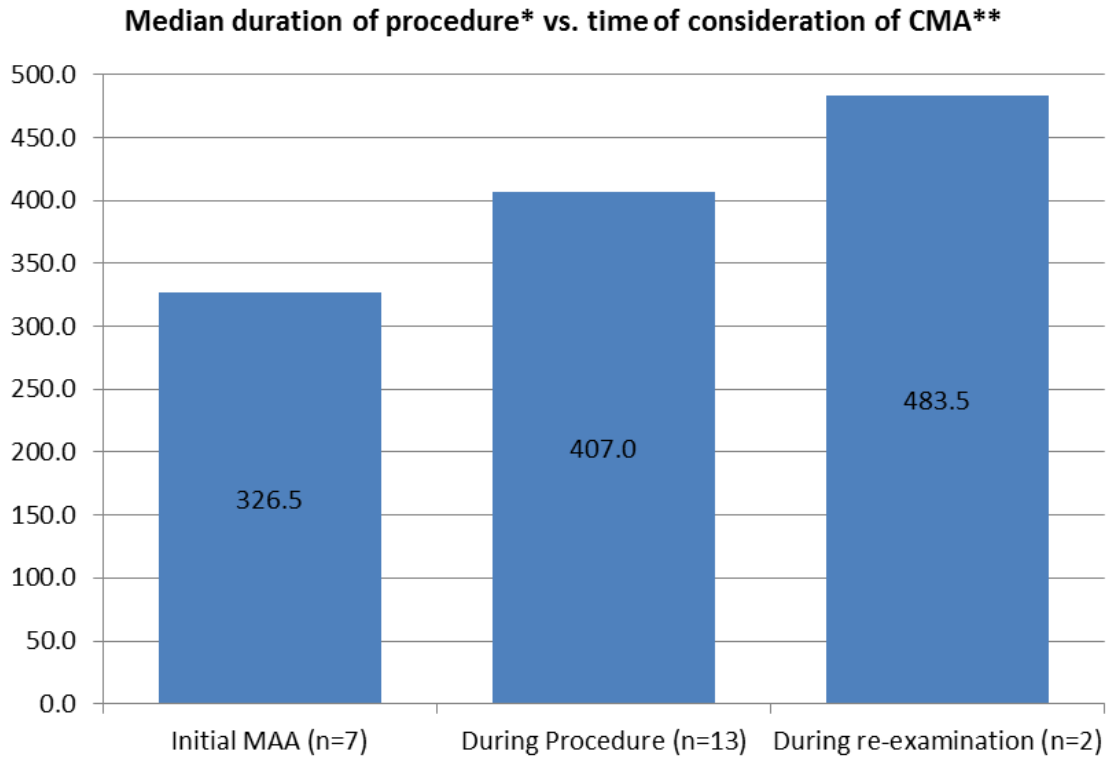
Step of procedure when CMA is first considered (procedures where possiblity of a CMA is discussed in a CHMP document but procedure outome is negative, n=15)**



* Positive outcomes include 3 applications that were withdrawn after positive CHMP Opinion

** Negative outcome = Negative final CHMP Opinion or withdrawal of application after D120

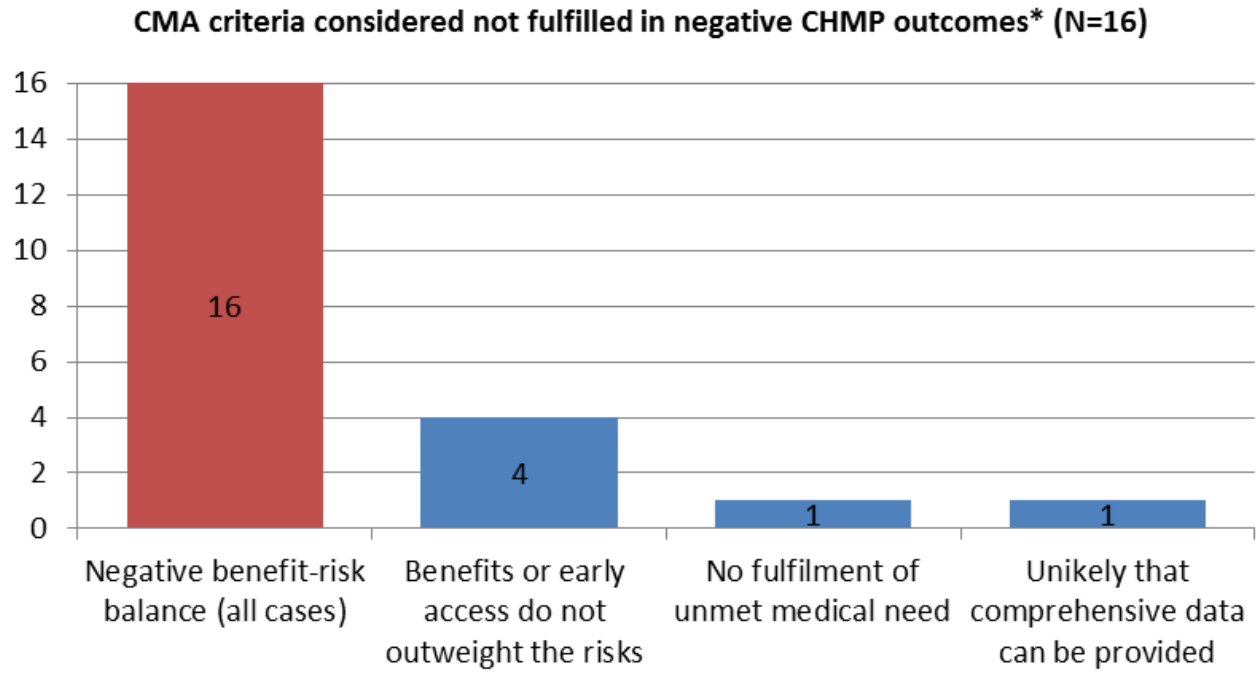
Early vs. late consideration of CMA



*Number of days from start of assessment to adoption of final CHMP Opinion, including clock-stop

** 3 interrelated applications (components of a combination therapy) counted as one

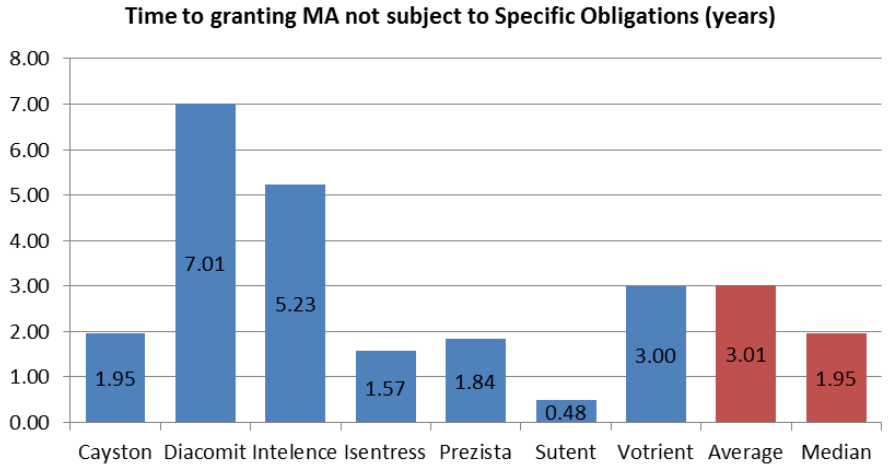
Reasons for negative CHMP outcomes

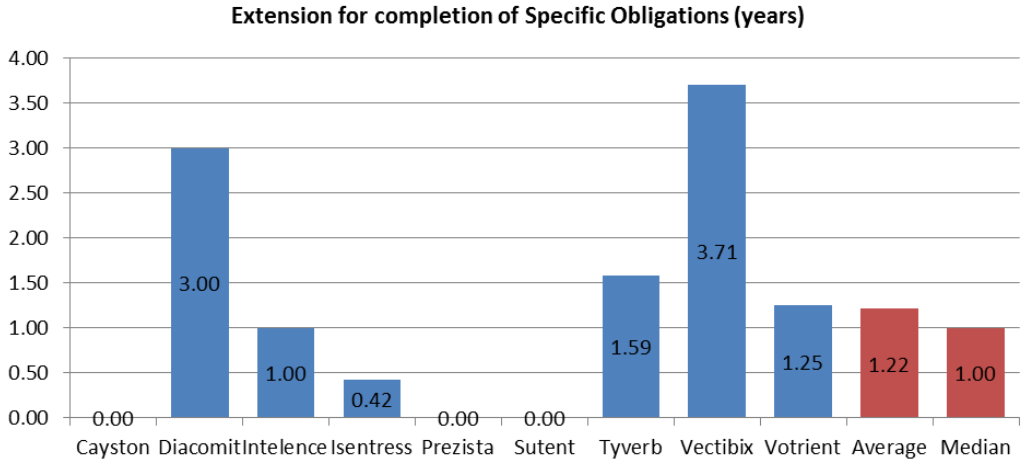


* As reflected in latest discussion and conclusions in final CHMP Opinion (if adopted) or List of Questions / List of Outstanding issues (if application withdrawn)

Time to 'switch' to full MA

- For 7 products that currently have MA not subject to SOs, full MA was granted on average in 3 years
- Approximately half of the products had changes to the scope and/or deadline of at least one of the specific obligations
- For 9 products with SOs completed, on average the due date for completion of last SO was extended by 1.22 years





Accelerated Assessment

Legal framework

medicinal products for human use which are of **major interest from the point of view of public health and in particular from the viewpoint of therapeutic innovation**

Article 14 (9) of Regulation (EC) No 726/2004

Existing guidance

To establish major public health interest, the justification should address:

- **unmet needs** and the available methods
- extent to which the medicinal product is expected to have major **impact** on medical practice, its major added value, **and/or how it addresses the greater unmet needs**
- brief outline of the **main available evidence**

CHMP Guideline EMEA/419127/05

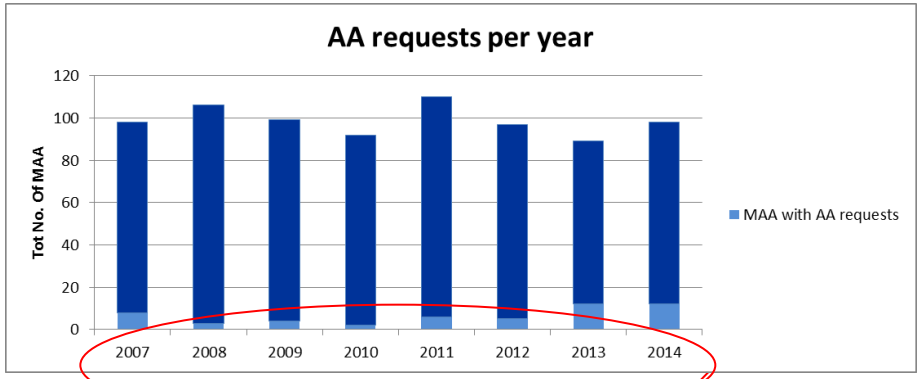
Requests and CHMP Outcome: time trends

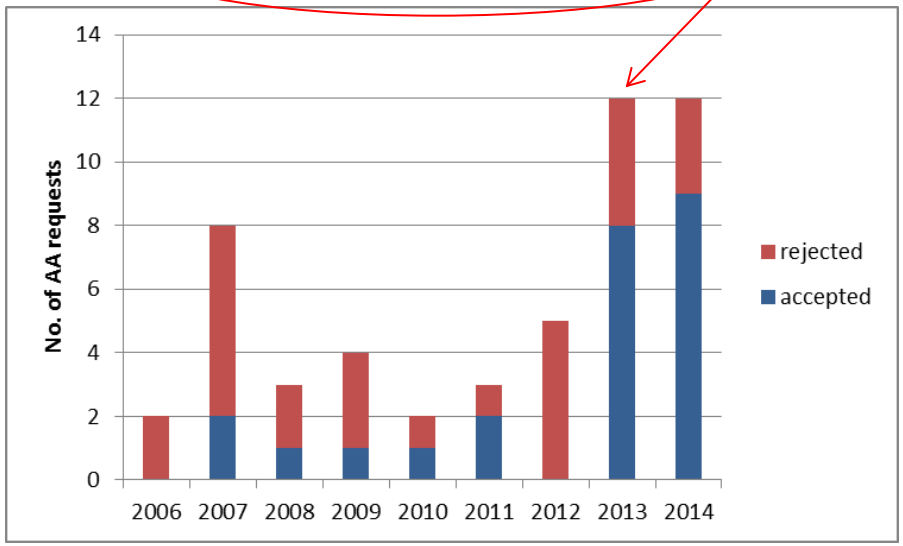
2006-2014

51 requests

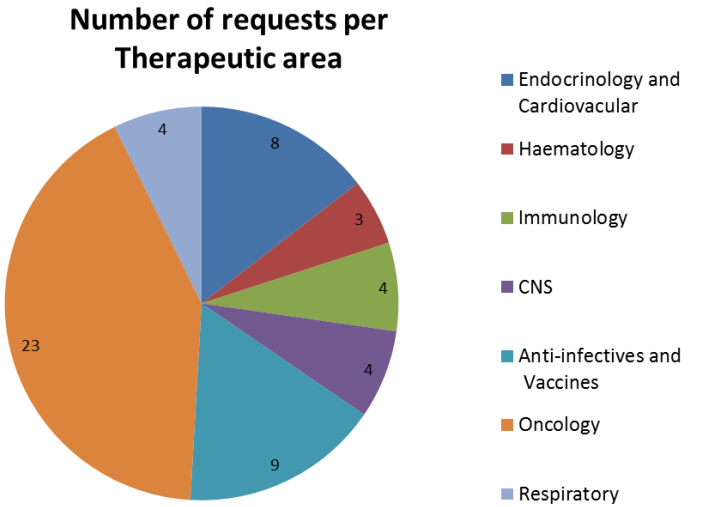
24 granted

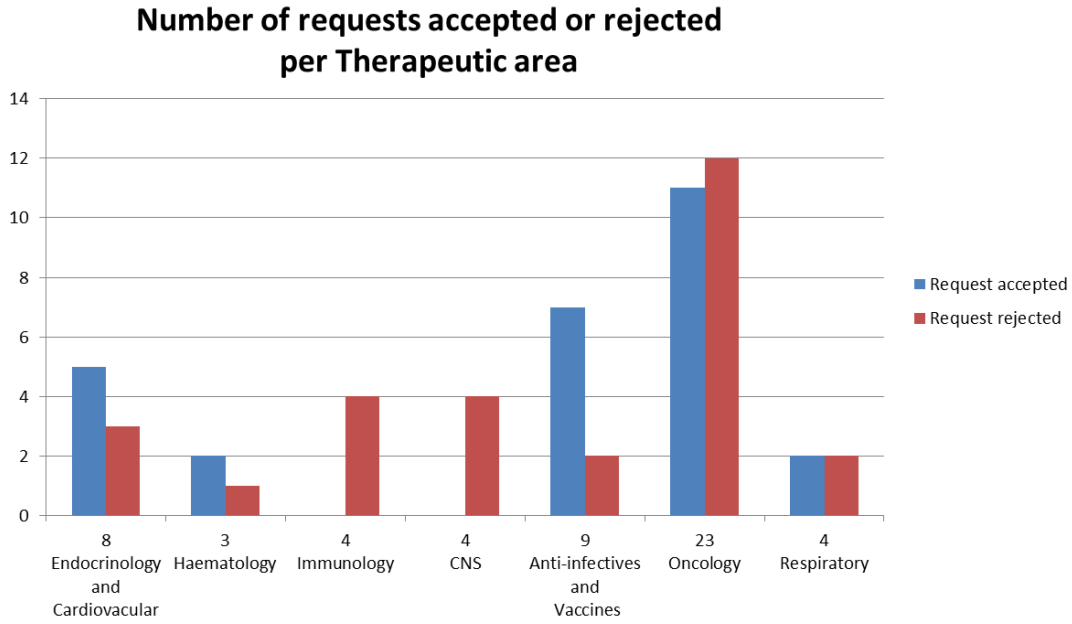
27 rejected





Requests and outcome by Therapeutic area

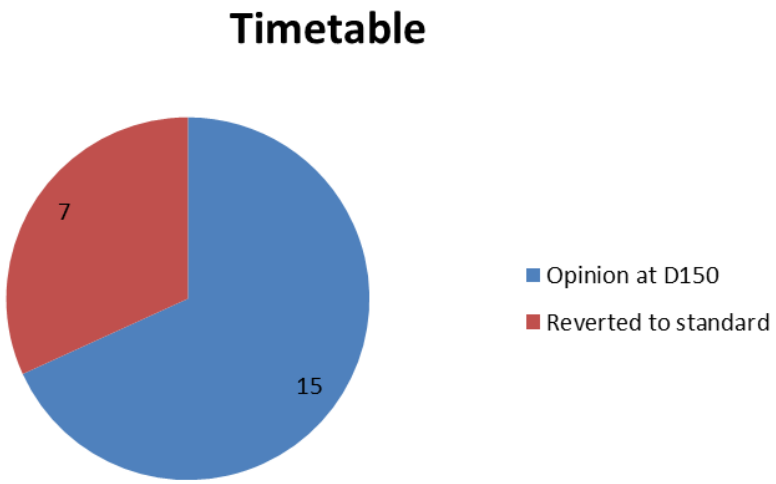




Reasons for rejection

- Uncertainties in level of evidence demonstrating benefit over existing therapies
- Uncertainties in estimation of clinical relevance of the data
- Unmet need not demonstrated in view of targeted indication, available treatments

Revert to 'standard' timetable



Main reasons

- Major objections identified at Day 120 that cannot be quickly resolved
- Need for inspection