EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

ATMPs guideline on Safety and Efficacy follow-up and risk management

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The views expressed in this presentation are personal and do not represent the EMA and its Committees and/or Working Parties

ATMP guideline on S&E Follow-up and risk management

Scope - Scientific guideline:

- Specific safety concerns for ATMPs
- Guidance on risk minimisation measures
- Methodology to design & set up PASS/PAES with specific S&E objectives
- Pharmacovigilance system
- Management and reporting of AEs and PSURs


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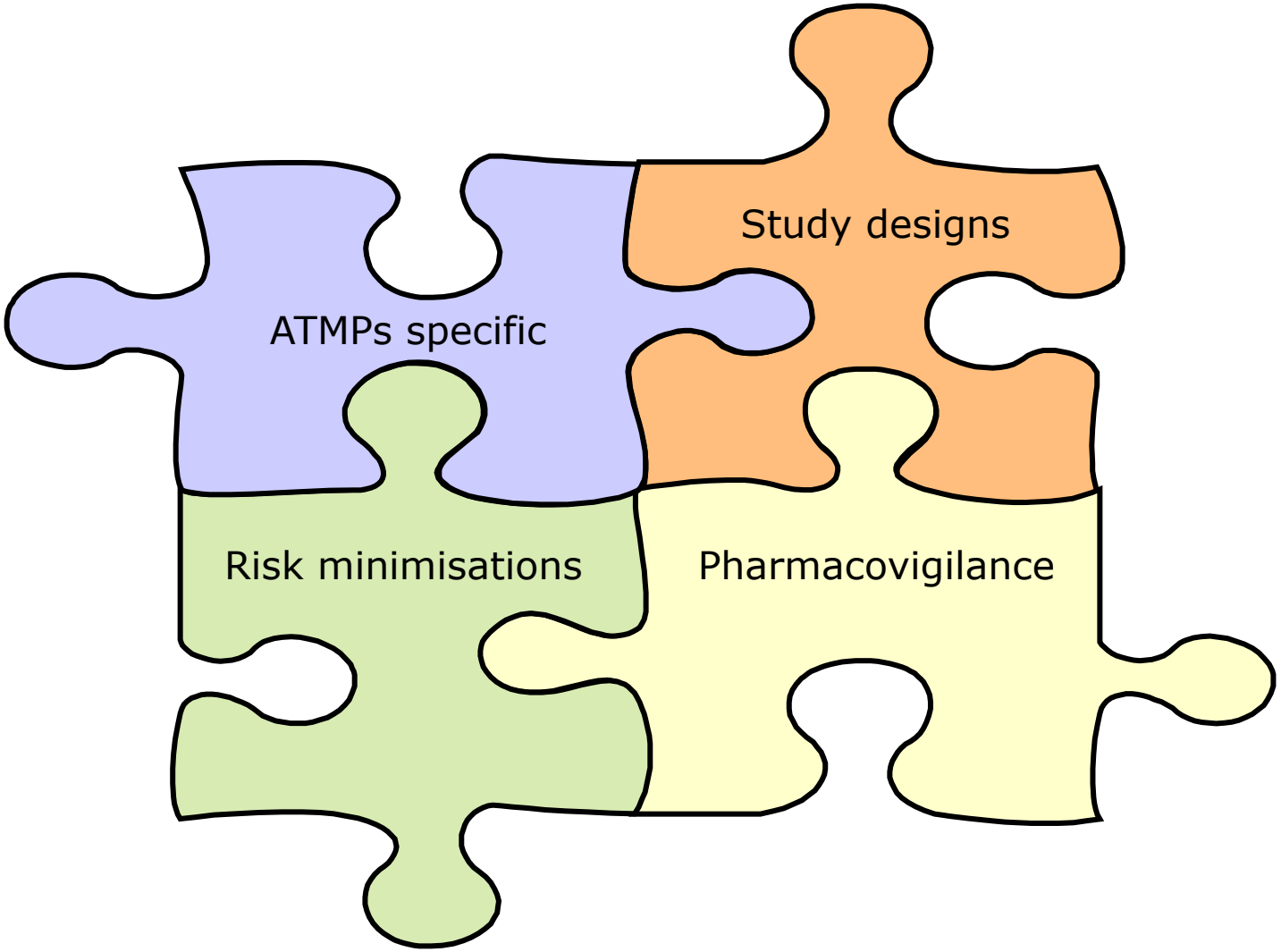
EMEA/149995/2008 rev.1
Committee for Medicinal Products for Human Use (CHMP)

Guideline on safety and efficacy follow-up and risk management of Advanced Therapy Medicinal Products
Draft

- 1st version published in 2008
- Revision published in Jan. 2018
- Comments received, public consultation ended 30th April

A multidisciplinary guideline



Overview of comments received

Interested parties (organisations or individuals) that commented on the draft document as released for consultation.

Stakeholder no.	Name of organisation or individual
1.	ACRO: Association of Clinical Research Organization
2.	NICE: National Institute for Health and Care Excellence, UK
3.	Torbjörn Callréus and Morten Andersen. Pharmacovigilance Research Group, Department of Drug Design and Pharmacology, Faculty of Health and Medical Sciences, University of Copenhagen, Denmark.
4.	ARM: Alliance for Regenerative Medicine
5.	EAHP: European Association Hospital Pharmacists
6.	EBE and EFPIA
7.	EUCROF: European CRO Federation
8.	Gilead Sciences International Ltd.
9.	JDRF International
10.	BPI: Bundesverband der Pharmazeutischen Industrie e. V. – German Pharmaceutical Industry Association
11.	AstraZeneca / MedImmune
12.	EBMT: European Society for Blood and Marrow Transplantation
13.	ISCT: International Society for Cellular Therapy

Overview of comments received - general

Revision of the guideline is welcome:

- Comprehensive document that provides useful guidance for ATMPs with regards to scope of guideline
- Proposed guideline is comprehensive, well written, addresses most of the key points and provides detailed examples of risks and associated risk mitigation measures that will be very useful to ATMP developers
- Quite comprehensive and holistic approach toward the definition of safety and efficacy concerns to be addressed in the risk management plan and efficacy and safety follow-up studies

Overview of comments received – S&E concerns

- Clarify risks which are in pre-authorisation setting vs. post-authorisation
- Additional examples were given + clarifications on some risks
- Ask for classifying safety concerns for each ATMP sub category (cell, tissues, gene, combined)
- Indicate what risks might influence the product's benefit-risk profile if they would materialise or be identified?
- Provide guidance on risks to patients for ATMPs that are synthetically manufactured without cell production, such as modified mRNA
- Risks for product specific (by indication/disease)

Overview of comments received – risk minimisation measures

- Welcome the emphasis placed on education for the different roles contributing to the therapeutic application of these therapies
- Patients and the caregivers should receive the Patient Alert card (PAC). Use of a patient brochure should not be required in most cases as most of the critical information will be in the PAC
- EMA should promote accreditation by an appropriate medical organisation, e.g. JACIE, rather than accreditation by MAH as the standard for the therapies

Overview of comments received – S&E follow-up

- Provide additional guidance on use of registries
  - Good Registry Practice
  - Based on CAR-T cells workshop (held on 9th February) and haemophilia registries workshop (held on 8th June)
- Guidance on the use of historical controls
- Disease registries may also be hosted by professional societies that group together multiple centres
- Difficulties might arise when multiple MAHs might be competing for data from the same disease registry, especially in orphan diseases or when disease registries might depend on MAH's financial contributions for generating data through their registries.

Overview of comments received – S&E follow-up

- An operation in the EU network should be added
- Provide more guidance on tissue engineered products based on past MA
- The usefulness of developing CDx could be clarified, to take it into consideration when designing long-term follow-up studies
- Provide definitions on registry, healthcare database

Next steps

- Revision of the guideline on hold due to EMA move
- Continue building on ATMP evaluation experience
- Please do not hesitate to send additional comments to ATMPguideline@ema.europa.eu or caroline.voltz@ema.europa.eu
- To reflect:
  - Publication of S&E follow data?
  - Post-authorisation S&E outcomes used by HTAs/payers/MAHs for price re-negotiation (outcomes based deals)?

Key to success is early dialogue!

Acknowledgement

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Brigitte Keller-Stanislawski

Rocio Salvador-Roldan

Thank you for your attention

Further information

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