Concept paper on the need for revision of the guideline on the clinical investigation of plasma derived fibrin sealant/haemostatic products (CPMP/BPWG/1089/00) and the related Core SmPC (CPMP/BPWG/153/00)

Agreed by Blood Products Working Party | February 2014
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Adopted by CHMP for release for consultation | 22 May 2014
Start of public consultation | 1 June 2014
End of consultation (deadline for comments) | 31 August 2014

The proposed guideline will replace Guideline on the clinical investigation of plasma derived fibrin sealant/haemostatic products (CPMP/BPWG/1089/00) and Guideline on core SPC for plasma derived fibrin sealant / haemostatic products (CPMP/BPWG/153/00)

Comments should be provided using this template. The completed comments form should be sent to BPWPsecretariat@ema.europa.eu

Keywords

Guidance, fibrin sealant, haemostatic product
Introduction

The currently approved ‘Guideline on the clinical investigation of plasma derived fibrin sealant/haemostatic products’ came into operation in January 2005. Since then, new fibrin sealant products have been authorised, new methods of application have established and applicants have sought scientific advice on the clinical development of further fibrin sealant/haemostatic products or new indications for approved fibrin sealant products. A major safety issue has been identified with the use of spray application of fibrin sealants. A revision of the guideline seems appropriate to reflect recent gain of clinical experience.

1. Problem statement

The occurrence of life-threatening air or gas embolism in association with pressurized spray application of fibrin sealants led to CHMP referrals for concerned products. Safety measures were amended to the SmPCs and communicated to healthcare professionals. The Core SmPC is currently under revision and it appears useful to also update the guideline on clinical development.

Some uncertainties emerged during scientific advice and marketing authorisation application procedures regarding the requirements on the clinical study program. It could be reasonable to give more detailed recommendations within the guideline in order to harmonize future procedures.

The wording of the indications is mainly an issue for the Core SmPC but needs to be based on the clinical guideline. The layout of the indications’ section with the line ‘as a tissue glue to promote adhesion/sealing, or as suture support’ needs a revision in order to clearly separate the two different indications.

The increasing acceptance of fibrin sealants as part of a standard surgical treatment may have led to situations, where study participants in a control group receiving standard treatment without fibrin sealant (comparator) may possibly not receive the “best standard of care” to which a new product should be compared.

2. Discussion (on the problem statement)

The following issues should be considered when updating the guidelines:

1. Implementation of references to new or updated guidelines
2. Safety issue: Air/gas embolism occurred with the use of pressurized spray application of fibrin sealants. Update on the outcome of the referral procedures.
3. Efficacy issue: Clarification on the requirements for demonstration of efficacy in the indication ‘Supportive treatment where standard surgical techniques are insufficient, for improvement of haemostasis’.
4. Indications: Separation of the indications ‘tissue adhesion/sealing’ and ‘suture support’. Proposal to revise the wording of the indications in the Core SmPC.
5. Comparator: The current guideline requests the demonstration of efficacy versus a standard treatment without fibrin sealant. Comparator options should be reconsidered taking recent developments of surgical techniques and standard treatments into account.
6. Applicability for recombinant products.

3. Recommendation

The Blood Products Working Party recommends revising the guideline on the clinical investigation of plasma derived fibrin sealant/haemostatic products and the related core SmPC.

4. Proposed timetable

Q4/2013 Discussion of Concept Paper in BPWP
Q2-3/2014 Drafting and discussion of revised NfG and core SmPC in BPWP
Q3-4/2014 Presentation of proposed NfG and core SmPC to relevant WP/Committees
Q1/2015 Release for public consultation for 6 months

5. Resource requirements for preparation

The revision of these documents will be discussed during the meetings of the BPWP. External parties will have the opportunity to comment during the public consultation phase.

6. Impact assessment (anticipated)

The revised guideline will have influence on the clinical development of different kinds of haemostatic medicinal products and may also give orientation for the development of haemostatic medical devices.

7. Interested parties

To be identified during drafting process

8. References to literature, guidelines, etc.

Guideline on the clinical investigation of plasma derived fibrin sealant/haemostatic products (CPMP/BPWG/1089/00)
Core SPC for plasma derived fibrin sealant/haemostatic products (CPMP/BPWG/152/00)