Paediatric Project / Development Planning
- Key Points to Consider -

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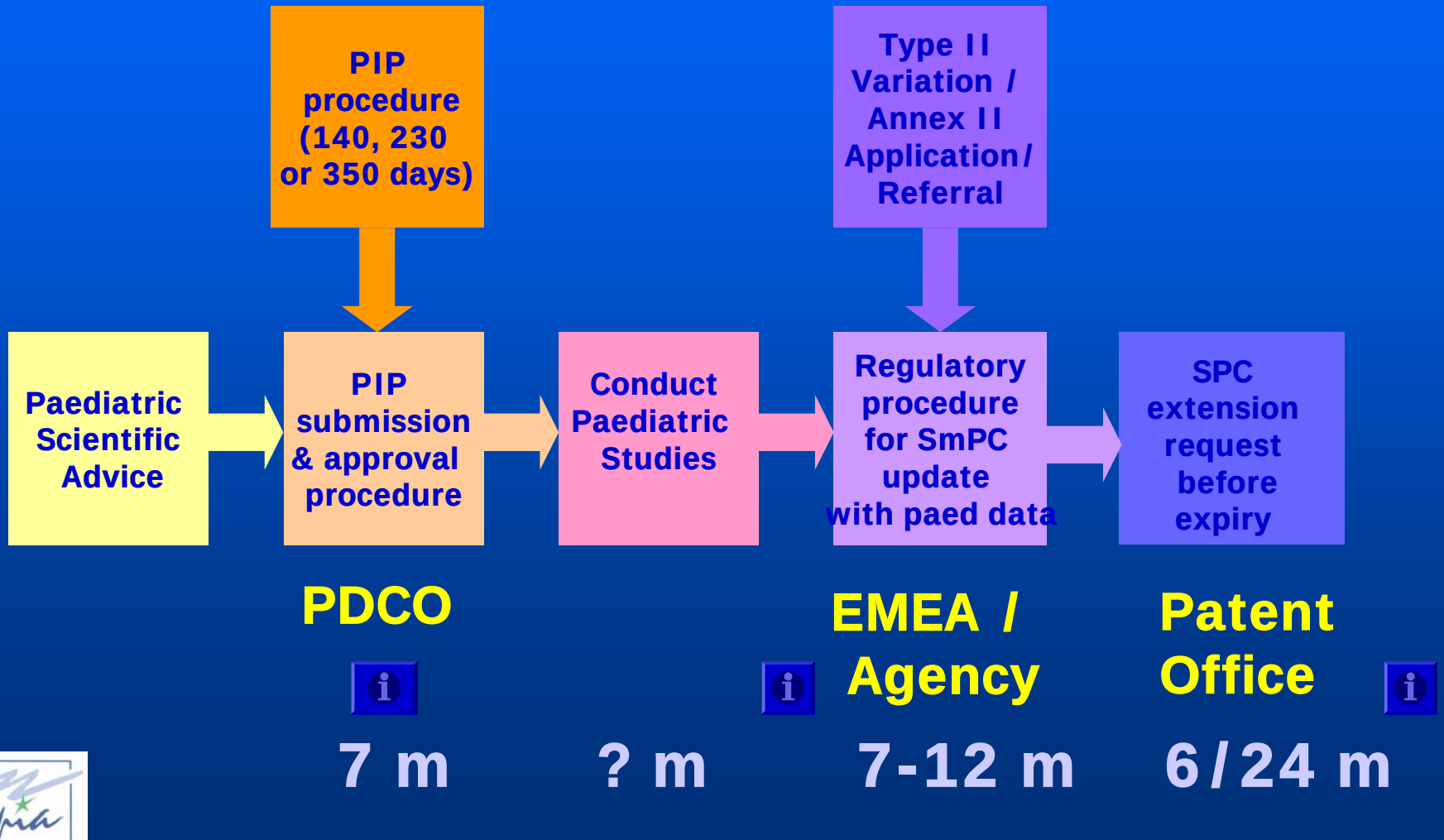
5 February 2007

EFPIA fully supports all Objectives of the Regulation

- Increased development of indications & formulations for children
- Early dialogue
- Facilitating fast implementation

Regulatory Success Factors



Success factors to achieve fast approval of PIP

- Need for good guidance to benefit patients, PDCO & Industry
- ➢ Develop good & thought through documentation to avoid any clock-stop !
  - Include clear identification of therapeutic need & justified clinical benefit for children
  - Justify waivers & deferrals thoroughly
  - Consider all ICH E11 age groups and indications
  - Explore the feasibility to develop a suitable formulation

Success factors to achieve fast approval of PIP

EMEA

- No clock-stop during summary report
- Short EMEA decision making phase

➢ Have PIP pre-submission meeting with EMEA to clarify any issues

➢ Accept EMEA draft decision in writing
  – Reduce waiting period

PDCO

- Have opinion in 60 days
  – Success depending on expectations of PDCO for individual paediatric program

➢ Seek prior paediatric SA on proposed clinical studies

➢ Have oral hearing to explain program

Success factors to achieve fast inclusion of paediatric data in SmPC

- Avoid delay at validation
  - Check completeness of documents according to Art 7 & 8
  - Ensure compliance check of included paeds data by PDCO is performed before start of procedure
    - For approved PIP with deferral, no compliance check required, if no data have been generated
- Allow enough time to complete procedures
- Ensure that data is filed for inclusion in all EU SmPCs
- Success depending on quality of paediatric data

What are important issues to consider for the SPC extension?

- Will the product be eligible for SPC?
  - Granting of SPC depends on drug development timelines
- Will the product be registered in all Member States?
  - Registration Strategy (MRP/DCP or CP or Referral)
  - Maybe need for repeat MRP (co-operation of CMD)
- Can compliance with the PIP be granted for the conducted paediatric studies?
- Have all MAs incl. paed information been received in time?

Success factors to achieve reward from Patent Offices

- National responsibility
  - Collaboration between national patent offices required
  - Development of a clear harmonised procedure is a must !
- Closer collaboration between Regulatory & Patent experts within company

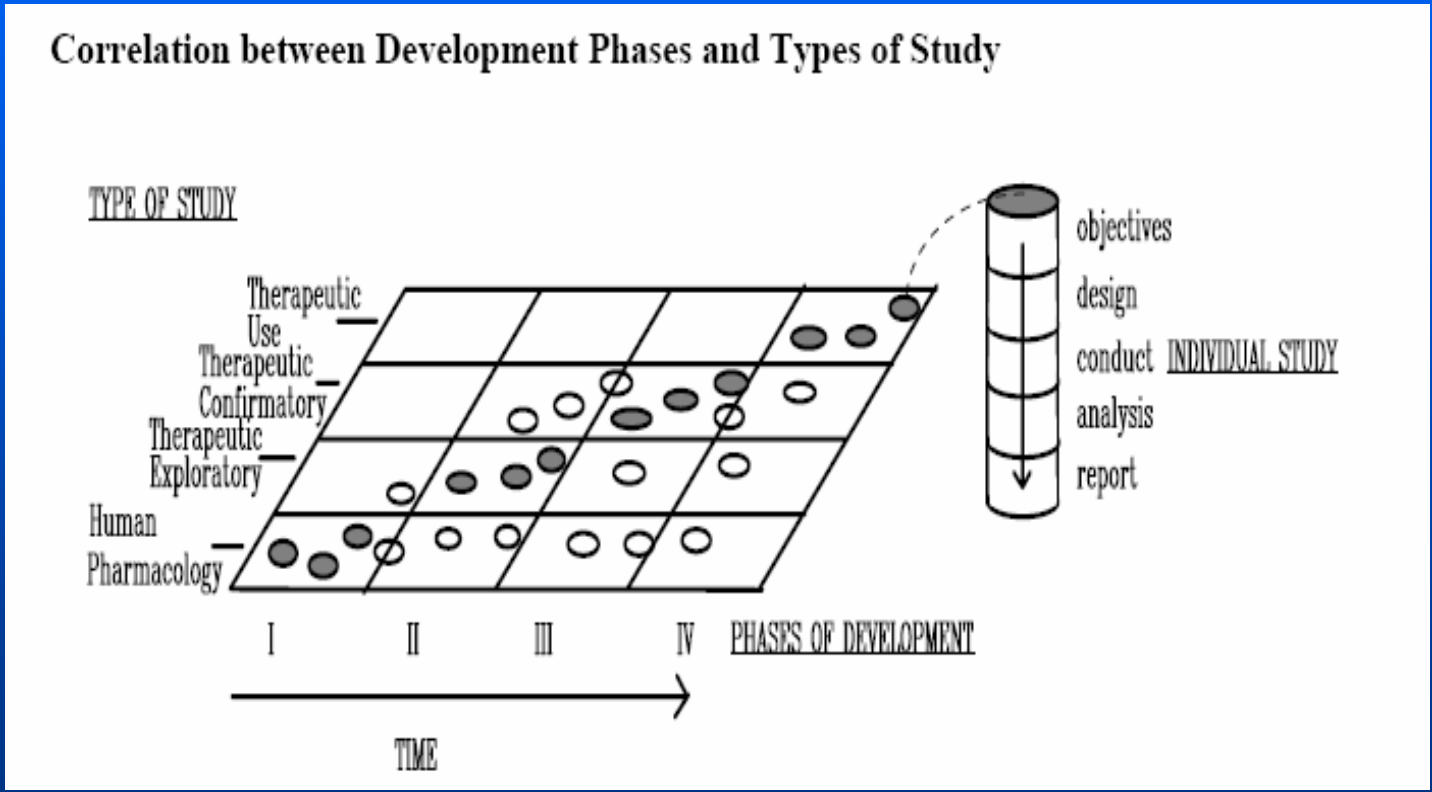
Specific Points to Consider for different Scenarios

Scenario A

A new medicinal product is currently in early development (Phase I) and has not yet completed human PK studies

"How should the sponsor pursue paediatric development to comply with EU requirements?"

ICH E8: Phases of Clinical Development



What do we not know in adults…

… after Phase I ?

- Clinical validation of the new target
- PK/PD relationship & potential adult dose
- Clinical safety & tolerability profile
- Toxicity issues (reprotox, long-term tox, carco, QT)

… after Phase II?

- Clinical safety & tolerability profile
- Toxicity issues (carco)

- Final formulation
- Demonstration of efficacy in large patient population

Need to balance time point of PIP submission with probability of success of project to avoid unrealistic expectations in patients.

Scenario B

A new medicinal product is currently in late development (Phase III) and will be filed in July 2008

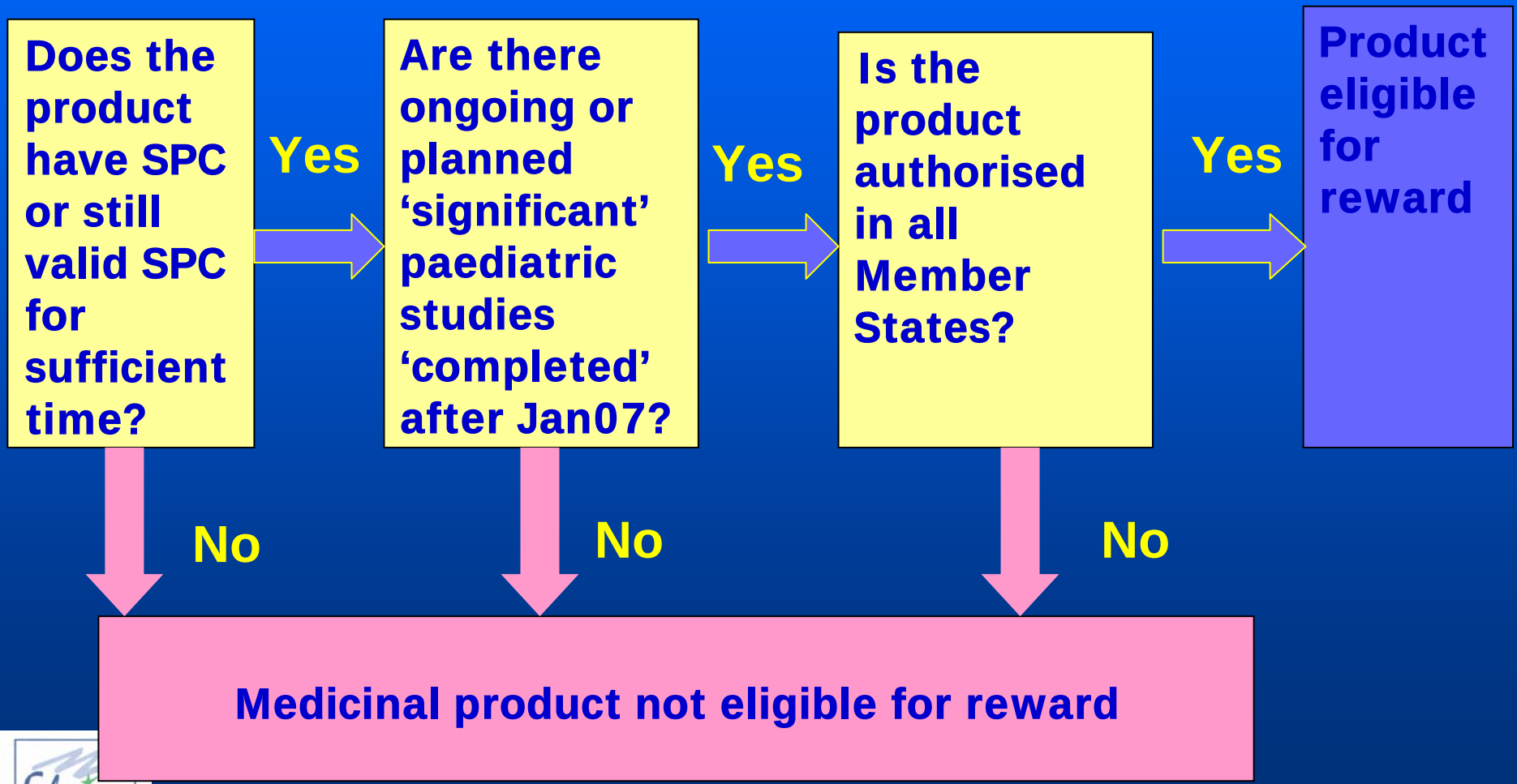
"How should the sponsor pursue paediatric development to ensure filing on time?"

Scenario C

A medicinal product is already on the market and the SPC is expiring within the next 3 years

"Can the MAH still benefit from a paediatric reward?"

Which existing products can still benefit from a reward?



Conclusion

- Paediatric studies become an integral part of the clinical development program
  - very early
- Increased demand for paediatric expertise & studies
- At “completion of human PK studies”

  ➔ mandatory submission of
  - PIP
  - Waiver
  - Justification to submit PIP later
- Development of suitable paediatric formulations required

Conclusion

- Timeline issues initially for
  - existing products
  - products in late stage development
- There is not a single regulatory project plan!
  - Every project is different
- Ensure flexible, pragmatic & collaborative implementation to facilitate success of the new Regulation