EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Assuring the Network's Sustainability

Industry Stakeholder Platform meeting

19 June 2024 - Topic 8

Fran Day

Background

Problem

The EU regulatory network is under pressure:

- Difficulties finding rapporteur teams
- Scientific Advice delays

Objective

- Improve efficiency
- Streamline processes
- Simplify templates
- Better guidance for assessors
- Closer dialogue with applicants

Ambition

- Better submission predictability
- Leaner processes
- Better quality of dossiers at submission
- Shorter clock-stops
- Shorter approval times

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Projects

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H2 2022	H1 2023	H2 2023	H1 2024	H2 2024	H1 2025	H2 2025
Network Capacity Monitoring						
Network capacity project						
EMA/HMA Strategic Resource oversight group						
EMA/NCA Operational resource planning group						
Templates and processes						
CHMP AR Revamp Project						
Focus group on submission predictability						
GIREX						
Pre-submission interaction revamp project						
Training						
Benefit/Risk Project						
Focus group on streamlining LoQ						

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Achievements/milestones

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Q1 2022	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023	Q3 2023	Q4 2023	Q1 2024	Q2 2024
Network Capacity Monitoring									
Kick-off network capacity project			Kick-off EMA/NCA resource oversight group						
		Network capacity project report to Tactical group					Simplified MNAT bidding process		
		Kick-off EMA/HMA tactical group on resourcing					Automated email – submission plans		
Templates and processes									
				Template for response to LoQ	D80 non-clin and clin templates		Annex to LoI		
	Kick-off CHMP AR Revamp Project				Kick-off GIREX project	Pilot with Applicant pre-fill			
Kick-off Focus group on submission predictability				Report #1	Report #2	Report #3	Report #4	Final report publication	
							New template for clock-stop extension request		
					Kick-off Pre-submission interaction revamp project				
Training									
						B/R trainings for PLs			
		Kick-off Focus group on streamlining LoQ				Workbook adopted by CHMP		Assessor training	

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Selected updates

- GIREX
- Response template
- Submission predictability workshop
- PPD redaction

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GIREX (Group for Internal Rules for EXtensions of clock-stops)

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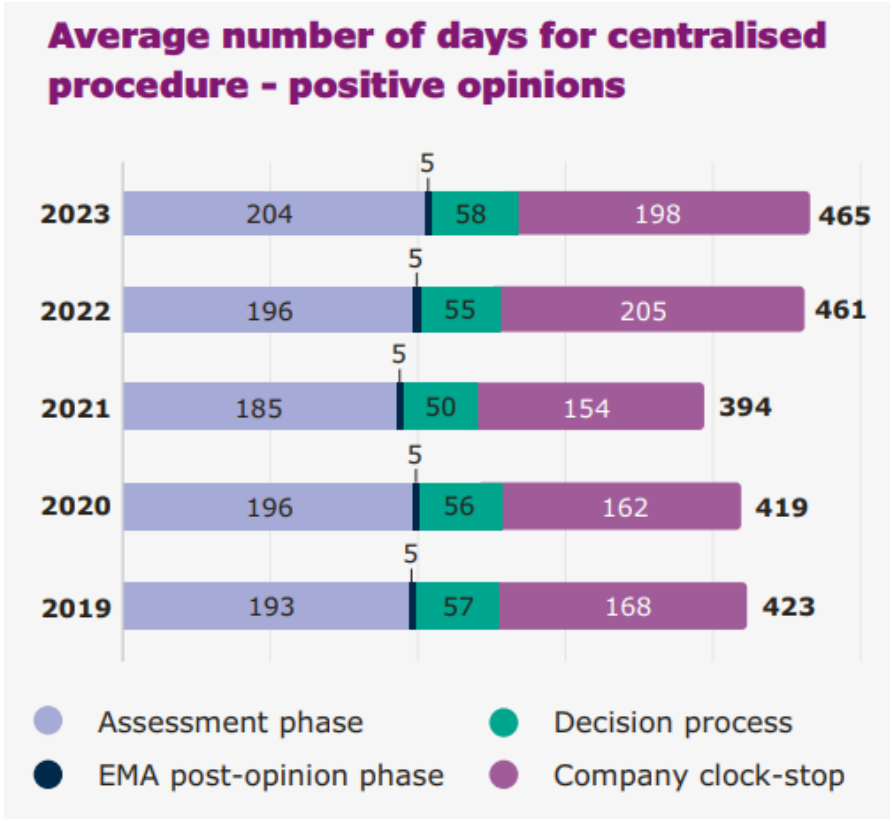

Source: EMA 2023 Annual Report

The length of approval timelines in the EU is often criticized. In 2022 the average time of clock stops exceeded the average time of assessment.

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In October 2023, CHMP reviewed the latest trends on extensions of clock stops and agreed to constitute a group to look at reducing them.

	2012 (n=57)	2019 (n=66)	2022 (n=92)
D 120			
<3 months	35 *(62%)*	36 *(55%)*	49 *(53%)*
3-6 months	19 *(33%)*	24 *(36%)*	25 *(27%)*
>6 months	3 *(5%)*	6 *(9%)*	18 *(20%)*
D 180			
<1 month	36 *(63%)*	30 *(46%)*	32 *(35%)*
1-2 months	16 *(28%)*	22 *(33%)*	39 *(42%)*
>2 months	5 *(9%)*	14 *(21%)*	21 *(23%)*
+1 LoOI	15 *(26%)*	26 *(39%)*	22 *(24%)*
+2 LoOIs	1 *(<2%)*	8 *(12%)*	5 *(5%)*
+3 LoOIs	0	2 *(<1%)*	1 *(<1%)*

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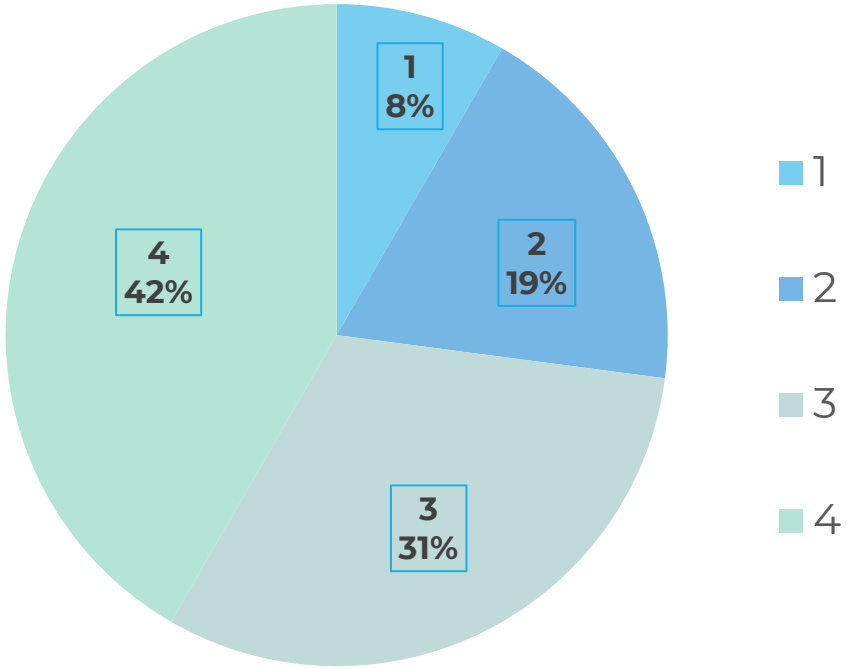
Reasons given for clock stop extension requests:

1) CHMP request for additional data (not known at time of submission)
2) Issues beyond control (COVID, political situations, inspections in China)
3) Need for inspection or SAG/AHEG
4) Lack of data, more time needed (issues known at the time of submission – i.e. immature dossier)



Data from October 2021 to October 2023

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(< APPLICANT/MAH NAME/ID/LOGO ON HEADED PAPER >)

Category	**Reason** <delete/duplicate as appropriate>	**Description/Justification(s)**
☐	CHMP requested <GMP/GCP/GLP/PhV> inspection	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
☐	CHMP requested <Scientific Advisory Group/Ad-hoc Expert Group> meeting	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
☐	Time needed to address CHMP's Quality <MO(s)/OC(s)>in the <LoQ/LoI/RSI> ☐ Previously identified/discussed at <presubmission/validation/LoQ/LoI/RSI>	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
☐	Time needed to address CHMP's Non-clinical<MO(s)/OC(s)>in the <LoQ/LoI/RSI> ☐ Previously identified/discussed at <presubmission/validation/LoQ/LoI/RSI>	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
☐	Time needed to address CHMP's Clinical <MO(s)/OC(s)>in the <LoQ/LoI/RSI> ☐ Previously identified/discussed at <presubmission/validation/LoQ/LoI/RSI>	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
☐	Time needed to address CHMP's other <over-arching, multidisciplinary, procedural, regulatory> <MO(s)/OC(s)>in the <LoQ/LoI/RSI>	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*
	☐ Previously identified/discussed at <presubmission/validation/LoQ/LoI/RSI>	
☐	Other	*<please specify MO(s)/OC(s) and provide detailed justification(s)>*

Since 1st April, all applicants are asked to complete a dedicated template for the request of extension of clock stops.

Any requests need to be very well justified.

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Starting July 2024, CHMP has agreed to revert to a much stricter application of the existing 2009 guideline.

COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE (CHMP)

TIME ALLOWED FOR APPLICANTS TO RESPOND TO QUESTIONS AND ISSUES RAISED DURING THE ASSESSMENT OF NEW MARKETING AUTHORISATION APPLICATIONS IN THE CENTRALISED PROCEDURE

The **LoQs at day 120** should be responded to within 3 months. Applicants may request an additional period of up to 3-month for providing their responses by writing to the Chair of the CHMP outlining their reasons. This request will however only be considered by the CHMP if the applicant provides appropriate scientific justification. The CHMP will review the justification for the additional period (up to 3 months) for responding to the LoQs at its next scheduled plenary session following the receipt of the applicant's request and will only grant such requests, in the event that it is considered that this extension will enable the applicant to respond fully to the questions raised. Extensions beyond 6 months from the date of issue of the day 120 LoQs would not normally be accepted.

Following the release of the **LoOIs at day 180**, applicants should respond in writing within 1-month. Only very limited new data derived from new studies would be acceptable at this point of the procedure as assessment time beyond day 180 is extremely limited. In exceptional circumstances, a 1-month extension in submission of the written responses may be granted only upon provision of appropriate scientific justifications to be reviewed and agreed upon by the CHMP. The request for an extension of the timeframe should be submitted as soon as possible and addressed to the CHMP Chairman. In case the LoOIs is to be addressed partly or completely as part of an oral explanation, this will normally be scheduled one month after the submission of the written responses. In preparation for such oral explanation, applicants are advised to consult the "Guidance to applicants on CPMP oral explanations in relation to centralised applications" (CPMP/2390/01 – rev.1):

- Additional clock stops would not normally be permitted unless relating to issues of inspection (i.e. need for GCP or GMP inspection instigated by the CHMP) or need for additional expert input (i.e. SAG or ad-hoc expert group).

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Applicants must ensure that they are better prepared at submission. No extended clock stops for immature dossiers.

Applicants should be fully aware of relevant guidance ahead of submission (or ask for scientific advice in good time).

Clock stops needed to solve problems that were evident prior to submission will not be granted.

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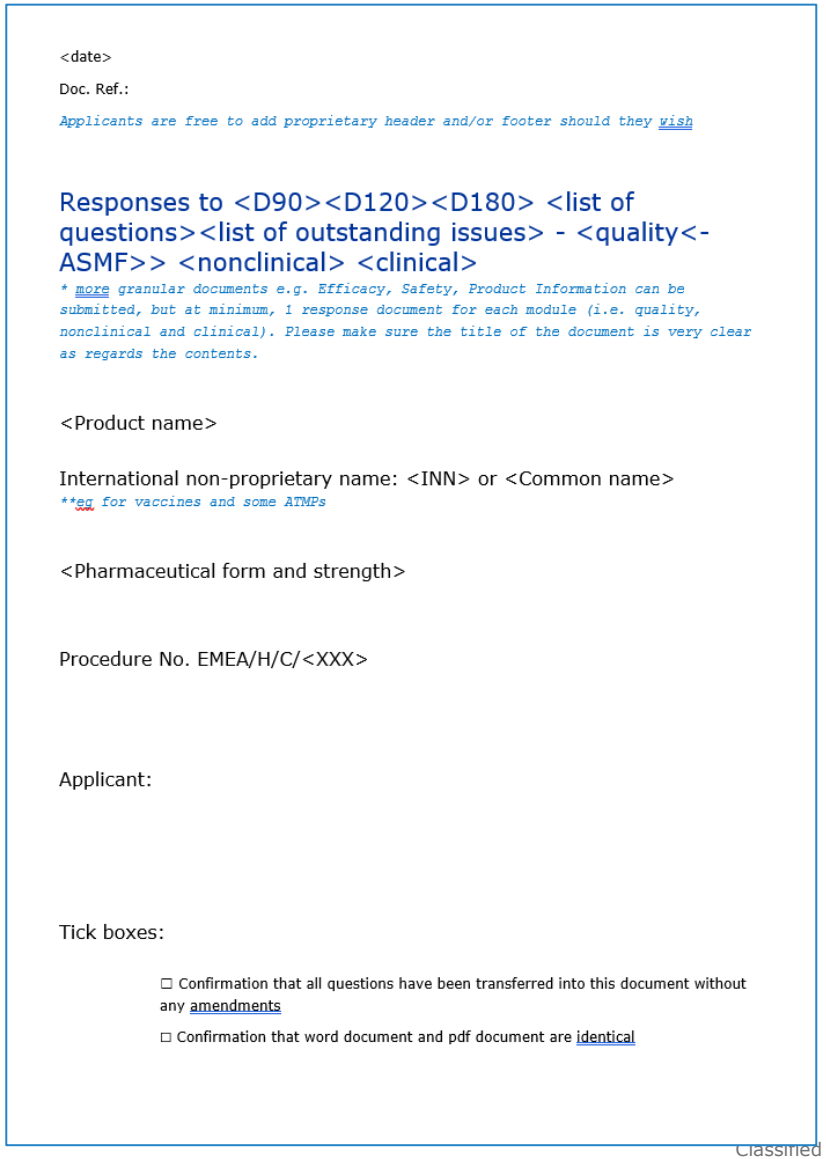
Response template



<date>

Doc. Ref.:

Applicants are free to add proprietary header and/or footer should they wish

Responses to <D90><D120><D180> <list of questions><list of outstanding issues> - <quality<-ASMF>> <nonclinical> <clinical>

** more granular documents e.g. Efficacy, Safety, Product Information can be submitted, but at minimum, 1 response document for each module (i.e. quality, nonclinical and clinical). Please make sure the title of the document is very clear as regards the contents.*

<Product name>

International non-proprietary name: <INN> or <Common name>

***eg for vaccines and some ATMPs*

<Pharmaceutical form and strength>

Procedure No. EMEA/H/C/<XXX>

Applicant:

Tick boxes:

☐ Confirmation that all questions have been transferred into this document without any amendments

☐ Confirmation that word document and pdf document are identical

Use of the EMA template for responses to questions will become mandatory by 1st September for all initial MA applications.

The use is strongly encouraged for all other applications types as well.

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Submission predictability workshop

Date TBD (September/October 2024)

PPD redaction for PSUSA ARs

- As of January 2024, EMA is piloting the outsourcing of PPD redaction from PSUSA Assessment Reports
- The pilot is restricted only to nationally authorised products (PSUSAs) for the time being
- Post PPD redaction, the reports are checked for CCI by the Product Leads
  - Two different styles of redaction may be present
  - Might involve a small delay (max 24h) in the reports being shared
- Expect to be able to extend the pilot to all PSUR ARs and include CCI redaction after summer.

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