



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Clinically Relevant Advantage and Major Contribution to Patient Care

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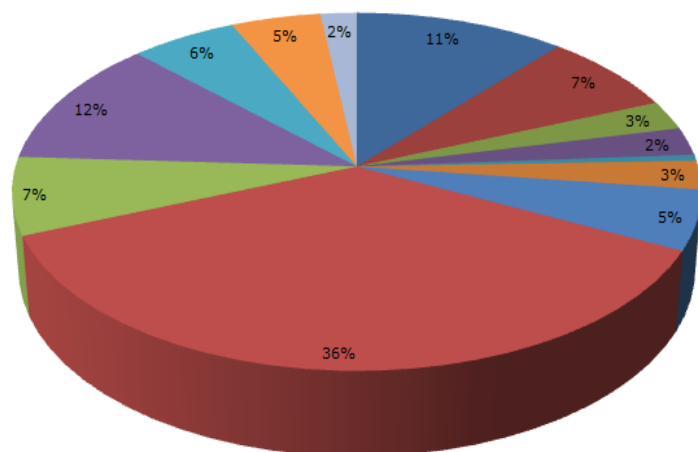
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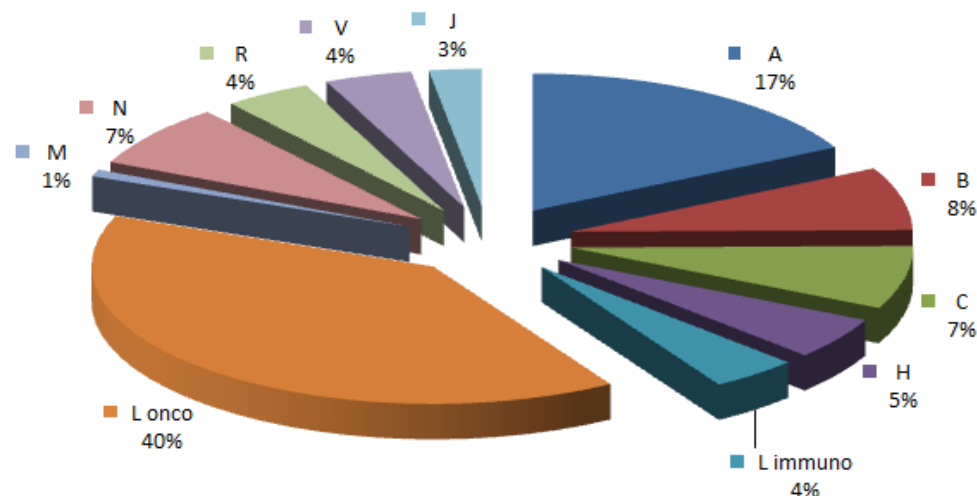
Conflict of interest: none



Orphan Medicinal Products (2000-2014)



Orphan designations
(OD)
n = 1430



Orphan Medicinal Products at
MA
n = 105

A Alimentary tract and metabolism; **B** Haematology; **C** Cardiovascular system;
H Systemic hormonal; **J** Antiinfectives for systemic use ; **L** Immunology; **L** Antineoplastic;
M: musculoskeletal; **N** Nervous system; **R** Respiratory system; **V** Various



Satisfactory methods $\neq$ Comparators

Satisfactory

- authorized medicinal products for the condition
- non pharmacological methods part of standard of care

Comparators for determination of SB?

OD

- overall condition
(comparative discussion)
- preclinical data
supporting claims
whenever possible

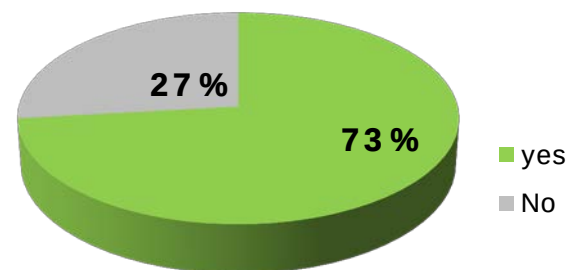
MA

- therapeutic
indication/position in
standard of care
- different comparators for
different grounds
- includes recently
authorized products



Significant benefit concepts

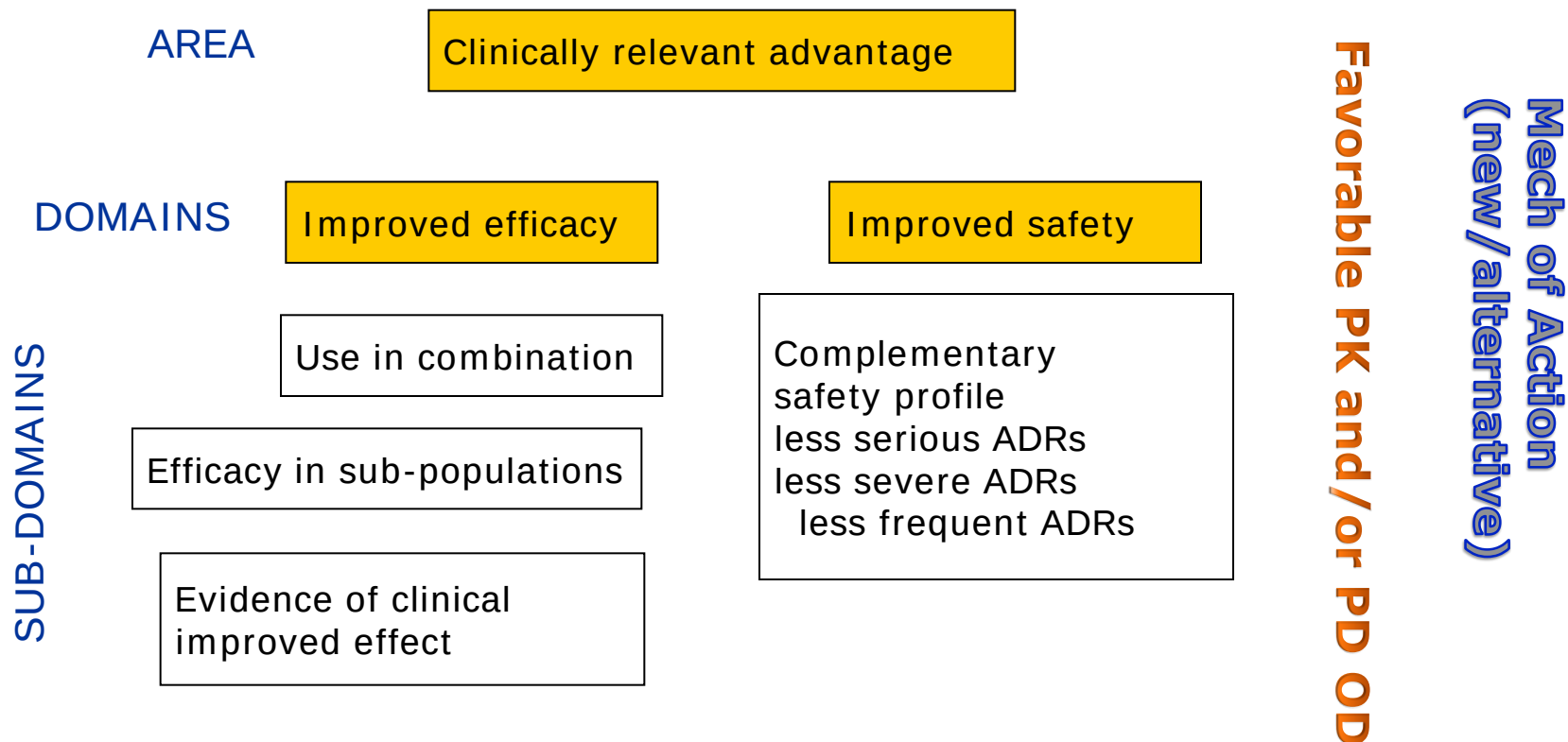
- Retrospective analysis of COMP reports at OD and MA of authorized OMPs 2000-2014
- Identification of **scientific concepts** and of **domains and sub-domains** within the two main areas of SB
- Criteria for definition of domains and-sub-domains:
 - EMA/COMP/15893/2009 Recommendations
 - working experience of the COMP
 - sound scientific and pharmacological concepts



Significant benefit at MA



Conceptual grounds (I)



(grounds not mutually exclusive, i.e. one product can have more than one ground)



Improved efficacy

Ideally better efficacy head to head trials

Clinical Effect
 $B > A(s)$

Evidence of improved effect

- $\text{Effect } B+A(s) > A(s)$
- $B + A(s) = \text{treatment sparing}$

Use in combination

Therapeutic effect of the combination

Effect of $B \neq \text{Effect of } A(s)$

IMPROVED
EFFICACY

- Condition refractory to $A(s)$
- Condition relapsing to $A(s)$
- Condition resistant to $A(s)$
- Subpopulations not treated by A

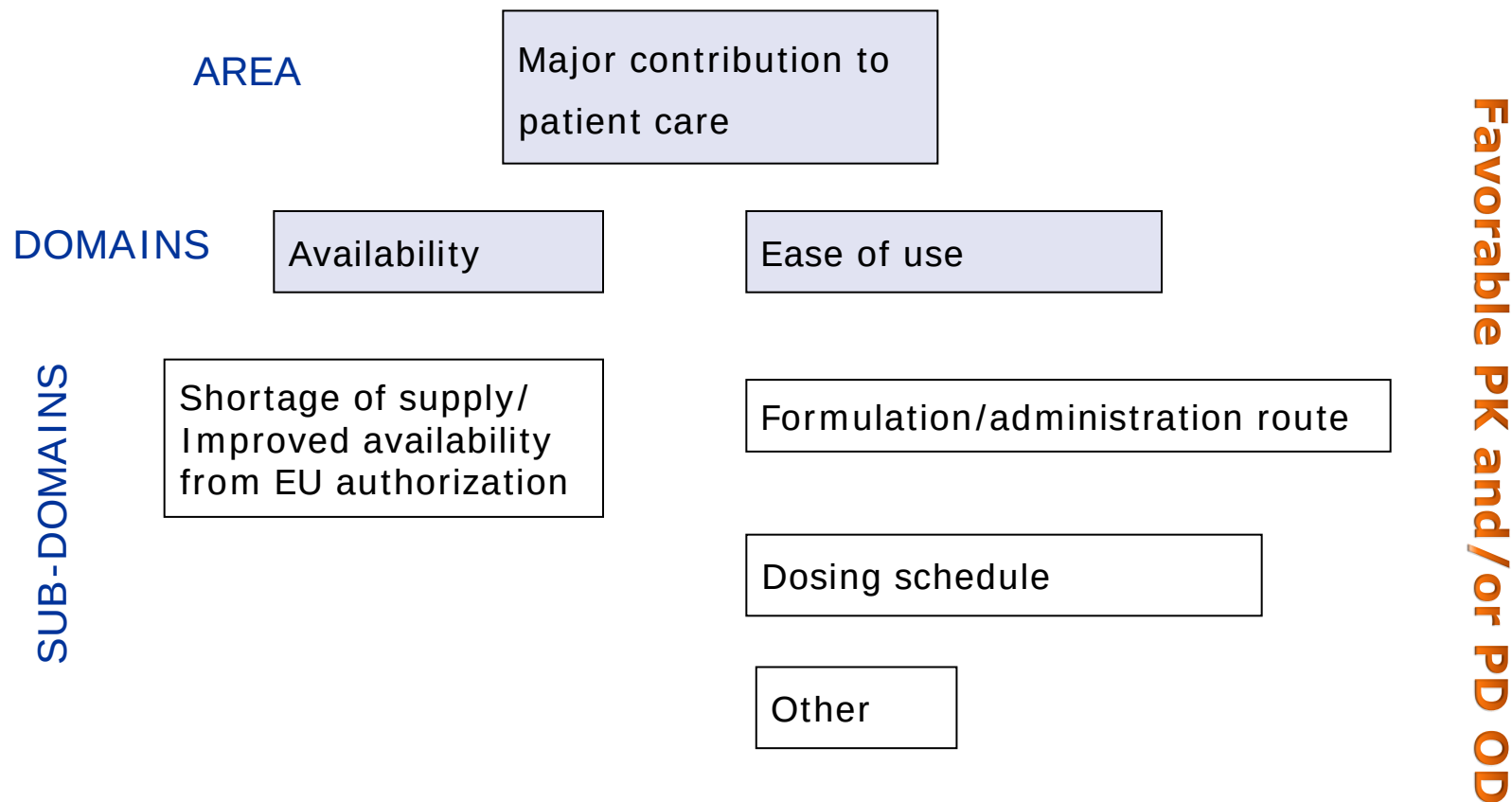
Efficacy in sub-populations

Qualitative/enlargement of population

- Meaningful and clinically relevant changes that allow the product to be used in a wider patient population or previously excluded sub-groups

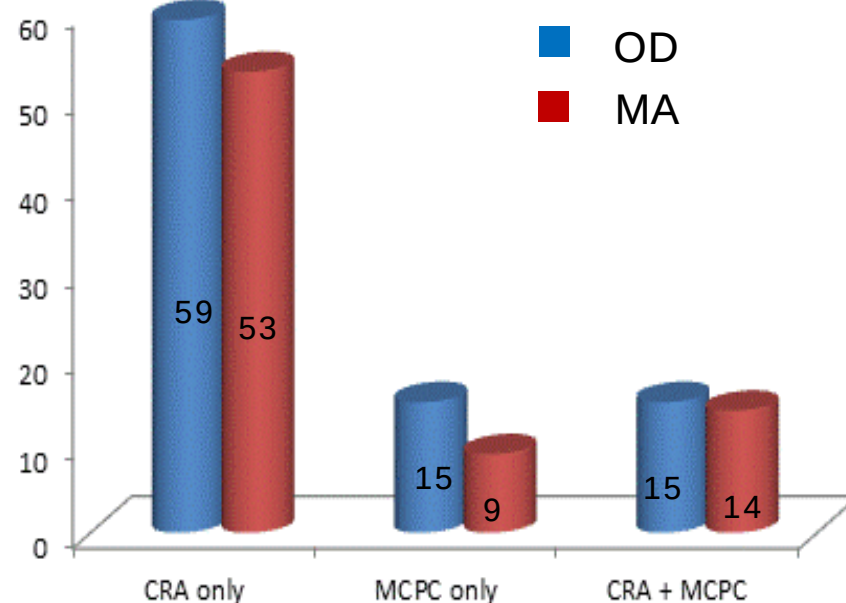
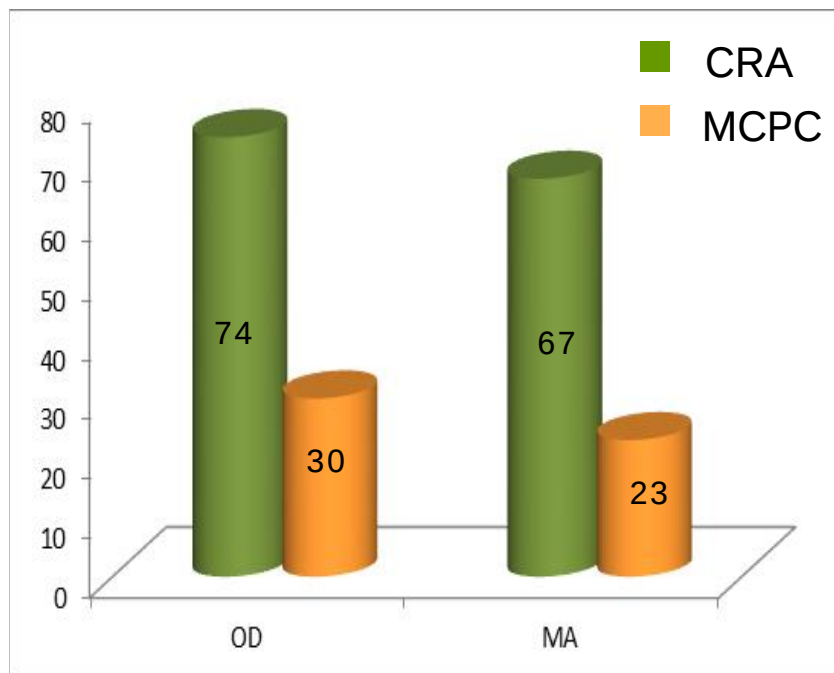


Conceptual grounds (II)





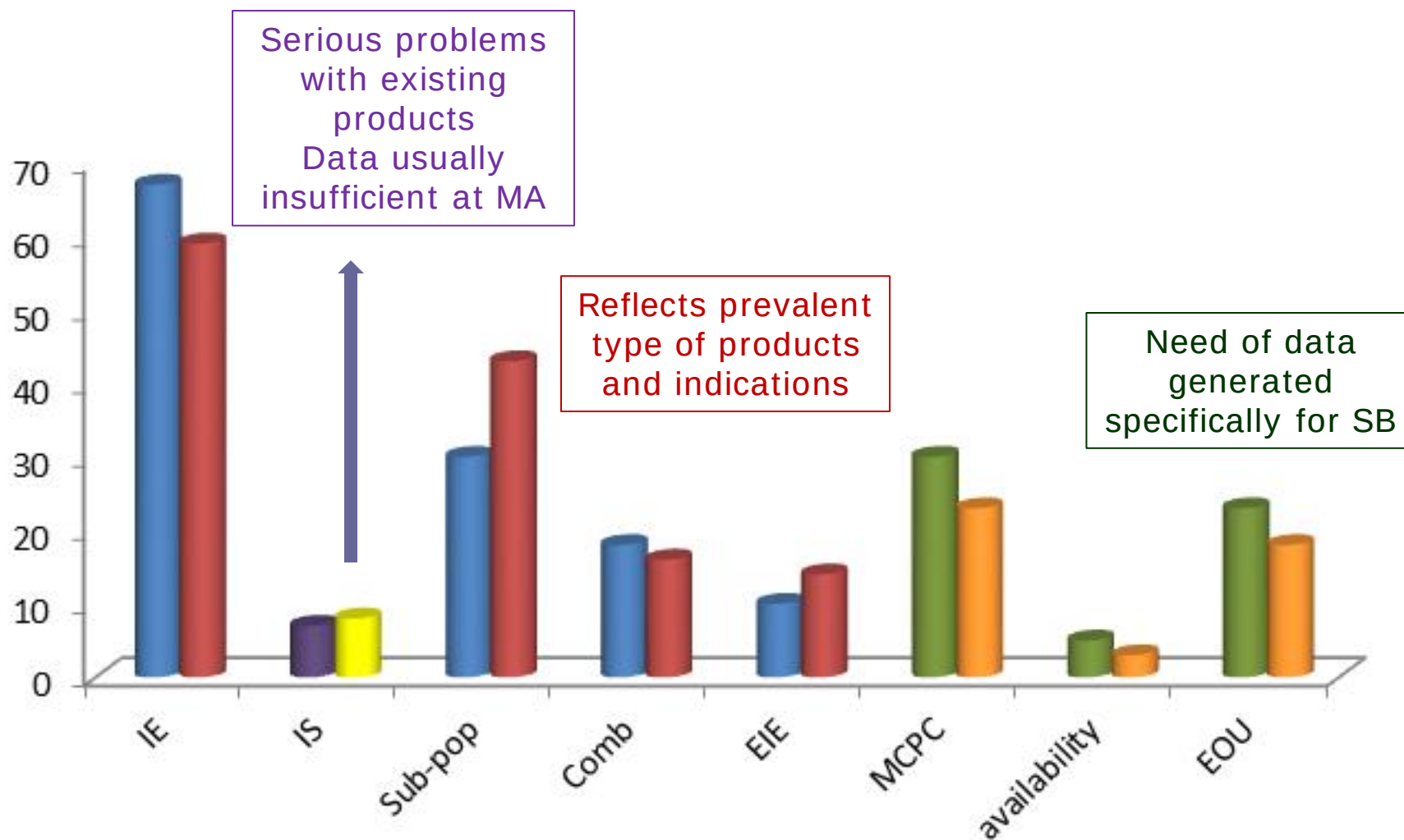
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(Figures include products withdrawn before MA and after OE in the COMP, and products with more than 1 MA)



Distribution of grounds



(Figures include products withdrawn before MA and after OE in the COMP, and products with more than 1 MA)



Challenges of clinically relevant advantage

Data generation in rare diseases

Quantum of Effectiveness Evidence in FDA's Approval of Orphan Drugs

Cataloguing FDA's Flexibility in Regulating Therapies for Persons with Rare Disorders

by Frank J. Sasinowski, M.S., M.P.H., J.D.¹

- Limited data sets, natural history, difficulties in studying subgroups
- Minimum clinical relevant advantage (e.g. last line therapy)

Breakout session 2

Crowded areas (SB vs several products at the same time)

- Role of indirect comparisons, data other than RCTs, registries. Same class, sequential treatments
- **Parallel development**

Breakout session 1



Challenges of major contribution to patient care

- Data for MCPC collected in pivotal trials for orphan MA often sub-optimal (non validated instruments, limited data-sets)
- Role of PROs? Core outcome measures vs. subjectivity
- Balance between generation of instruments for large number and heterogeneous rare diseases and case by case decisions on self-evident advantages as base of SB? (oral vs. IV, portability)
- How to quantify ease of administration, convenience, less monitoring needs, etc...? role and methodology of patient preferences

Breakout session 3



Thank you

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- COMP, SB-Working Group,
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- Breakout session moderators

Questions?