EMA
EUROPEAN MEDICINES AGENCY

# ICMRA collaborative assessment and Inspection pilots: Outcomes and next steps

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# ICMRA Collaborative Assessment Pilot – Overview

- **Scope**

Multi-agency collaborative assessment of Post Approval Change Management Protocols (PACMPs)

Focused on medically important treatments, including chemical and biological products, but excluding vaccines

- **Application Process**

14 applications received

Prioritised based on impact to supply of critical medicines & potential for agreed regulatory approach

- **Pilot implementation**

5 proposals accepted

Identical submissions sent to all participating agencies

# Pilot cases

| Application | Product | Indication | Proposed change | Lead Authority | Participating Authorities | Observer Authorities |
|---|---|---|---|---|---|---|
| Pilot Case 1 | Monoclonal antibody | Follicular lymphoma | Additional active substance manufacturing site and additional QC testing site | EMA | FDA | PMDA |
| Pilot Case 2 | Small molecule | Hyperkalaemia | Additional drug product manufacturing site | FDA | EMA | PMDA, Health Canada, HSA, ANVISA |
| Pilot Case 3 | Small molecule | Non-small cell lung cancer | Additional active substance manufacturing site | PMDA | FDA, EMA, MHRA, Swissmedic | HSA, Health Canada, TGA |
| Pilot Case 4 | Antibody drug conjugate | Metastatic triple-negative breast cancer | Additional active substance intermediate manufacturing site and additional QC testing site | FDA | EMA, MHRA, Swissmedic | Health Canada |
| Pilot Case 5 | Monoclonal antibody | Multiple cancer indications | Improvements to the manufacturing process | EMA | FDA, PMDA, Health Canada | HSA, Swissmedic |

**Lead Authority**

- Assess application
- Propose IRs
- Coordinate all activities
- Lead on project calls
- Consolidates IRs
- Applicants' main contact

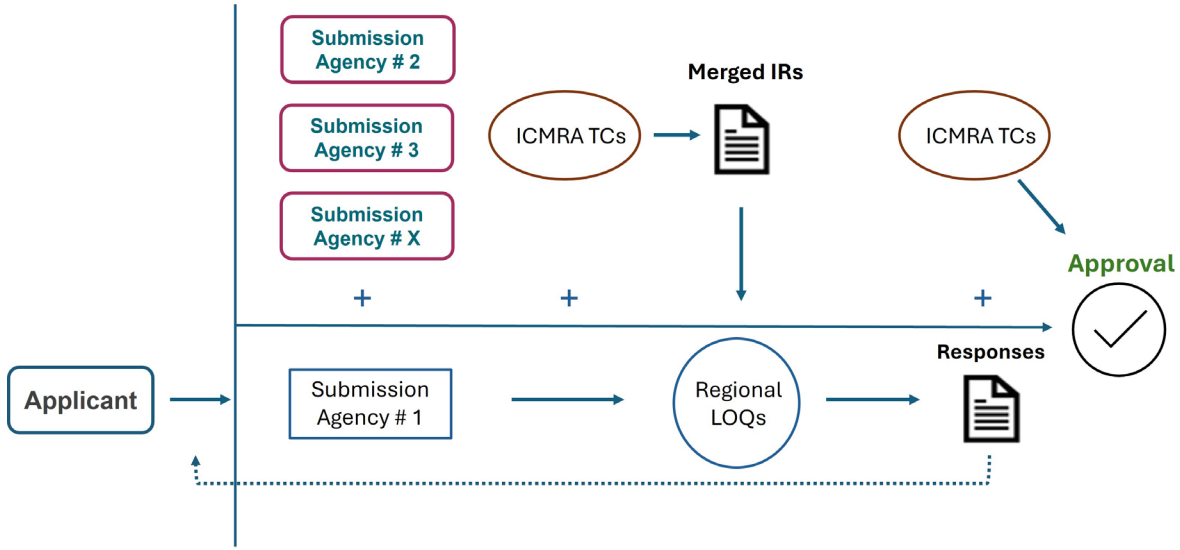
**Participating Authorities**

- Conduct independent assessment
- Participate in discussion meetings
- Propose IRs

**Observer Authorities**

- Participate in discussion meetings
- Cannot raise IRs

# Regional Procedures & ICMRA Pilot: How They Work Together




Once accepted into the ICMRA pilot, the procedure runs in parallel with standard regional procedures

Applicants submit formal applications through the usual regional channels (for participating agencies only — not observers)

Submissions are flagged for ICMRA pilot inclusion, alerting agency procedure managers to track them accordingly

A harmonised set of LOQs/IRs is prepared and sent to applicants by the ICMRA lead

In line with legal requirements, participating authorities may also send LOQs/IRs separately

However, a single harmonised response document can be shared with all participating agencies to streamline communication

# Key achievements

## Streamlined Timelines

- Agreed a common **120 day assessment timetable**
- **Near-simultaneous approvals** — a global first!

| Overall duration (days) | Max difference in approval dates between participating authorities |
|---|---|
| 115 | 0 |
| 118 | 0 |
| 105 | 0 |
| 122 | 2 |
| 119 | 12 |

## Efficiency & Harmonisation

- **88% of all assessment IRs** harmonized via intensive discussions
- Harmonisation achieved across all sections of Module 3
- **~25% reduction** in total IRs due to collaborative review meetings
- All 5 collaborative assessments completed successfully with **harmonised outcomes**
- No increase in standard expectations → the regulatory bar remained unchanged
- **Positive feedback** from industry and regulators (based on survey results)
- Increased resource requirements, especially for regulators

## Regional Specificities

- Some region-specific IRs (e.g. method transfer data, validation report requirements)
- A few region-specific administrative questions (e.g. applicant forms, GMP documentation)

ICMRA collaborative assessment pilots

# Key Benefits of Collaborative Assessment

## Benefits for industry

- Harmonized 120 day approval timeline across multiple jurisdictions
- Alignment on CMC data requirements across regions
- Increased predictability
- Faster implementation of global manufacturing changes
- Agile response to market shifts and capacity demands
- Reduced risk of divergence in global dossiers

## Benefits for regulators

- Enhanced knowledge sharing among global authorities
- Deeper insight into regulatory practices of other agencies
- Builds trust and confidence for future reliance and work-sharing
- Supports international harmonisation and convergence

## Benefits for Patients

- Increased availability of critical medicines through accelerated global approvals
- Assessment outputs support reliance in low- and middle-income countries

# Pilot extension

- Based on positive results, the pilots have been extended for 1 year and we are open to receiving applications
- Ongoing focus areas:
  - High-impact changes for medically important treatments
  - Innovative manufacturing technologies
  - Post approval changes (PACMPs) which impact supply
- Generics and biosimilars now included in the scope
- Applicants are encouraged to contact the PQKM Pilot Coordination Group to discuss potential applications
- **Informal discussions** are welcomed prior to application
- The application process is simple – just a 2 page form

ICMRA website

Summary Report

**Email contacts for queries**
icmra-pac-pilot@fda.hhs.gov
icmra-pac-pilot@ema.europa.eu
icmra-pac-pilot@pmda.go.jp

# How can ICMRA encourage new applications?

| Possible concerns | How concerns are addressed |
|---|---|
| Lack of familiarity with the pilot | ☑ A detailed report is now publicly available |
| Concern that CMC changes may be delayed | ☑ Near simultaneous approval within 120 days |
| Fear of increased burden from IRs/assessment questions | ☑ Fewer IRs overall compared to individual submissions |
| Perceived lack of benefit | ☑ Multiple benefits identified for industry, regulators, and patients |
| Concerns about an increase in regulatory expectations | ☑ No change to standard requirements |
| Limited use of PACMPs | ☑ PACMPs enable early agreement on change plans with regulators |
| Other factors which ICMRA are unaware of | **?** Please raise during the panel discussion or informally with the PQKM Pilot Coordination Group |

# CHIP Main Points

- A collaborative hybrid inspection is a joint inspection by two authorities with one lead authority on site and one  authority participating remotely.

- Goal of the CHIP was to enable a CMC submission that would undergo a single hybrid inspection that would be accepted by participating authorities.

- Scope limited to pre-approval inspections and to selected products (e.g. PRIME & Breakthrough). Aim to increase manufacturing capacity and supply.

# CHIP - Proposals Accepted and Regulatory Authorities

| Applicant | Lead 'Onsite' Authority | Remote Authority | Observers |
|---|---|---|---|
| **Roche** | Swissmedic | FDA | EMA and Health Canada |
| **Gilead*** | FDA | Health Canada | PMDA, Swissmedic, MHRA, MoH Israel, EMA, HPRA |

# Overall Summary

- 3 collaborative hybrid inspections completed without technical difficulties
- Survey of participants was positive with view that the collaborative hybrid approach did not add regulatory burden and can benefit patients and industry
- Good operational outcomes and good communication and interaction between authorities and with the manufacturer and sponsor
- But a collaborative hybrid inspection required a significant increase in workload compared to a normal inspection

# CHIP Achievements

- **Positive and productive collaborations with supporting tools developed**
  - Regulators - **Joint Inspection Protocol** w/ agreed timetable for inspections
  - Sponsors & Facilities **– Industry Expectations Guidance** and timely communication and response to deficiencies.
  - Sponsors achieved approvals w/ sites securing CGMP Compliance Status.
- **Lead and Remote Regulatory Authorities aligned on inspection procedure and findings**
  - **Agreement on deficiencies, significance and post-inspection activities.**
  - Harmonized approach towards unfavourable compliance status in participating regions with no supply from facility pending resolution. Achieved in different ways.
- **Continuous communication among the RAs**
  - Use of IT platform to securely share information between participating inspectorates before, during and post inspection.

# Collaborative Pilots: ICMRA PQKMS Website

Scan the QR code using your phone for all information needed concerning the collaborative pilots

# Desirable factors for long term sustainability of the programme

- **Regulatory Alignment**
  - Regulators apply comparable assessment standards, including implementation of ICH guidelines
  - Comparable data protection and conflict of interest standards are upheld
  - Regulators aim to align assessment outcomes ameworks, but are not bound by
- **Administr**
  - Long-term tain collaborati
- **IT support**
  - Regulators assessment reports, securely
  - Sponsors can authorize access to their regulatory submissions
  - Sponsors can confirm identical submissions have been provided to all participating agencies

**ICMRA Executive Committee currently considering how to ensure the long-term sustainable future of the collaborative assessment initiative**

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# Thank you

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