



*Making Medicines Affordable*

EUROPEAN GENERIC MEDICINES ASSOCIATION



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# Industry's perspective on implementation

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# Agenda

- Educational material
  - Requests from referrals
  - Pharmacovigilance fees
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# Educational materials

■ New GVP model creates a high workload ...

■ ... but the issue remains on how this should all be handled?

- Do it jointly between companies?
  - Difficult to reach agreement.



# Educational materials

- Would it be an option if this is organized by EMA or the NCAs?
- DDL in the local language(s).
  - DDL as outcome of a referral → coming from NCAs.
  - Organised by NCA & paid by all MAHs who market the product.



*Centralize  
(French case)*

# Requests from referrals

## ■ Trimetazidine Example

- Working group was established;
- Protocols ready for submission;
- Remaining question(s):
  - Who owns the data?
  - Which formulation to be used?
  - ...



# Requests from referrals

## ■ Trimetazidine Example

- PK study
- Drug Utilization Study (DUS)
- PASS study:
  - Study in Europe: 7 million € + submission costs

Is it worth spending the money on the PASS or will the product be withdrawn from the market?

# Requests from referrals

## ■ Scenarios to consider...

- Big generic companies may have resources.
- Small generic companies will withdraw the product from EU markets.
- What if all generic companies withdraw the product?

Is that in the patients' interest?





# Requests from referrals

## ■ Scenarios to consider...

- Several similar studies being conducted.

Is it ethical?

Competition for same patients in the same countries ...

- The innovator company is not always interested in grouping.



# Pharmacovigilance fees

## ■ Welcome:

- Dual structure of fees.
- Fee reduction for lower risk products.
- Fees charged at national level should not overlap with fees already paid to the EMA.

## ■ Still a major concern!

- Generic MAHs has in average 10-times the product portfolio vs. originator MAH.





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*Thank you!*





# Acronyms

- DDL: Dear Doctor Letter
- EMA: European Medicines Agency
- GVP: Guidelines on Good Pharmacovigilance Practices
- HcP: Healthcare professional
- MAH: Marketing Authorisation Holder
- NCA: National Competent Authority
- PASS: Post-Authorisation Safety Study
- PK: Pharmacokinetics