

Advanced therapy medicinal products (ATMPs) and ATMP Regulation

 2^{nd} International Awareness Session - The EU medicines regulatory system and the European Medicines Agency

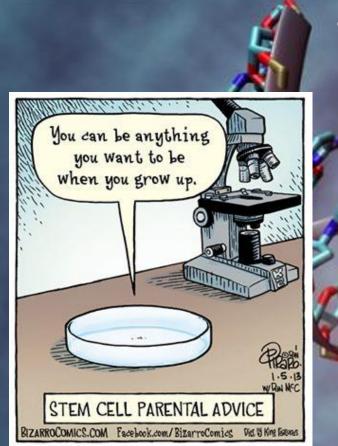




• Advanced therapy medicinal products (ATMPs): what are they? why are they so different from other medicines?

• Why is there a special legislation for ATMPs? The European regulatory framework

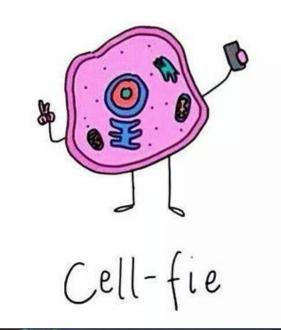
• ATMP classification and certification procedures



The Beauty and the Beast Genes Cells

ATMPs:

- Gene therapy medicinal products
- Somatic cell therapy medicinal products
- Tissue engineered products

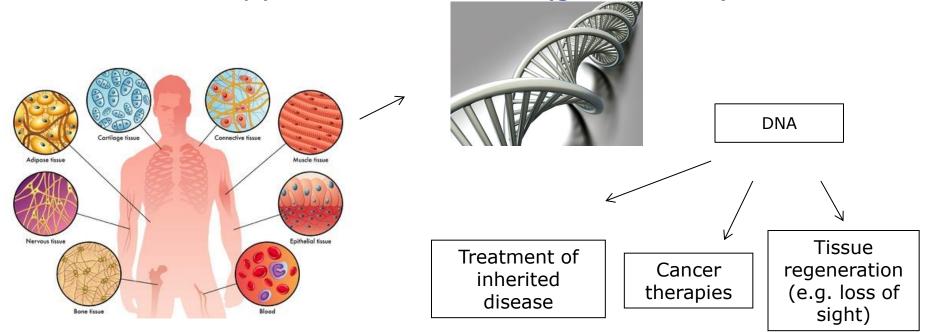


Credit: Christoph Bock/Max Planck Institute for Informatics

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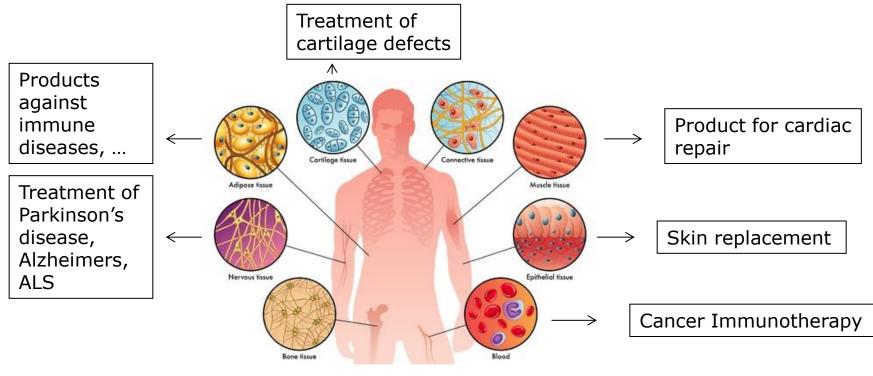
Advanced Therapy Medicinal Product (gene-based)



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Advanced Therapy Medicinal Product (cell-based)

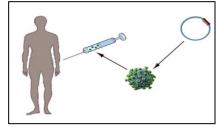


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Example of approved Gene therapy medicinal products

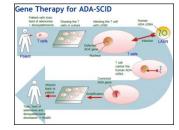
In vivo gene therapies



Example: Glybera

- Treatment of lipoprotein lipase deficiency
- Replication-deficient adeno-associated viral vector designed to deliver and express the human LPL gene variant LPLS447X
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Ex-vivo gene therapies



Example: Strimvelis

•CD34+ cells transduced with retroviral vector that encodes for the human ADA cDNA sequence

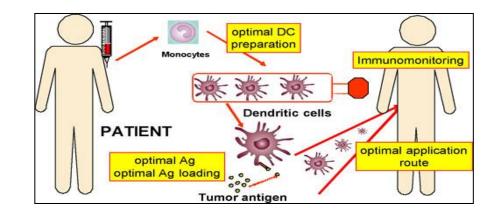
•Treatment of patients with severe combined immunodeficiency due to adenosine deaminase deficiency (ADA-SCID)

Example of an approved somatic cell therapy medicinal product

Example: Provenge

•Autologous peripheral blood mononuclear cells activated with PAP-GM-CSF (sipuleucel-T)

•Treatment of asymptomatic or minimally symptomatic metastatic (non-visceral) castrate resistant prostate cancer



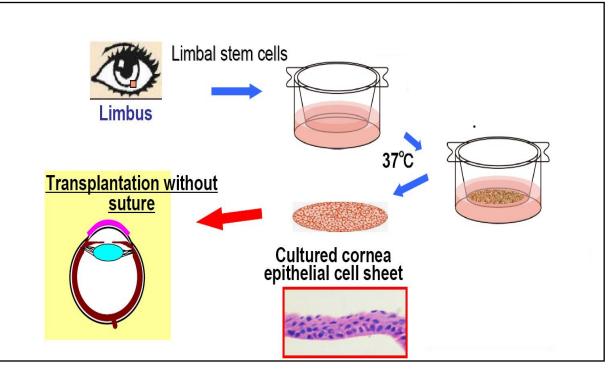


Example of an approved Tissue engineered product

Example: Holoclar

•Ex vivo expanded autologous human corneal epithelial cells containing stem cells

•Treatment of adult patients with moderate to severe limbal stem cell deficiency unilateral or bilateral, due to physical or chemical ocular burns.

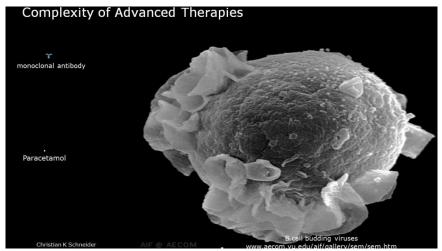




Wrap-up (1): ATMPs are ...

- Medicinal products based on cells or genes
- Very different from medicines based on chemical entities or biological / biotechnological origin

- But same requirement for testing / controlling each batch
 - Impact on cost of manufacture of the ATMPs
 - Very small batch size (autologous CBMP: batch size = 1)
- In EU: GTMPs, CTMPs and TEPs approved
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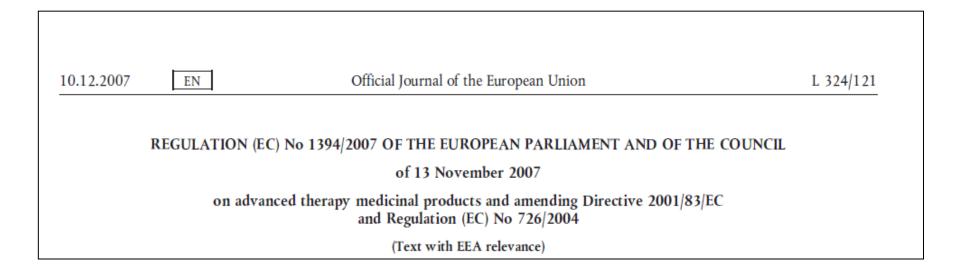


Legislation

Medical Devices 93/42/EE	Regulat Advance C Therapi	e <mark>d</mark>	Medicina Products 2001/83/E	;		
Advanced Therapies						
 Medical Devices	 Tissue Engineering	Cell Therapy	Gene Therapy	 Biotech (e.g. insulin)	Pharmaceuticals (e.g. hypertension drugs)	
Committee for Advanced Therapies (CAT) Specific expertise			CHMP expertise			



ATMPs and the EU legal framework – Lex specialis





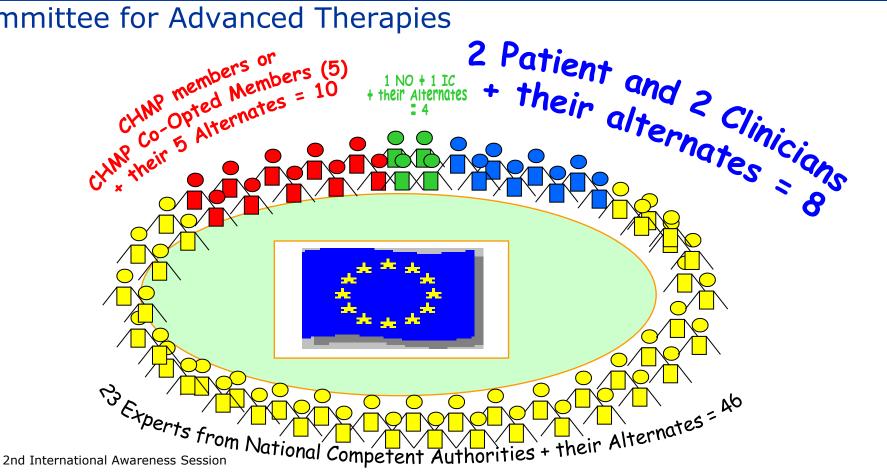
Some highlights of the ATMP Regulation

- ATMPs
 - Gene therapy MP, Cell therapy MP and Tissue engineered products
 - Are medicinal products
 - ATMPs are authorised in the EU via the centralised procedure
- Principles of existing legislation on medicines apply to advanced therapies:
 - marketing authorisation
 - demonstration of Quality, Safety & Efficacy
 - GMP, GCP (adapted to ATMPs)
 - post-authorisation vigilance and RMP



Committee for Advanced Therapies

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CAT covers the scientific areas relevant to advanced therapies, including: medical devices tissue engineering, gene therapy, cell therapy, biotechnology, surgery, pharmacovigilance & risk management ethics.





Tasks of the Committee for Advanced Therapies (CAT)







Marketing Authorisation of ATMPs

- Centralised MA: one license valid in entire EU
- 210-day procedure
- Review by CAT
- Final opinion adopted by CHMP

Pre- submission	Day 0 - 120 Primary evaluation CLOCK STOP						
Day 121 - 210 → 277 Secondary evaluation Opinion (EMA Committee) / Decision (Eur. Commission)							
	LAUNCH Post authorisation Activities	>					



Marketing authorisations (until December 2017)

- 10 ATMPs authorised (3 GTMP, 3 CTMP, 4 TEP)
 - Chondrocelect TEP Comm Dec 5/10/09 / MA withdrawn July 2016
 - Glybera GTMP Comm Dec 25/10/12 / MA ended Oct 2017
 - MACI TEP, combined ATMP Comm Dec 27/6/13 / MA suspended Sept. 2014
 - Provenge sCTMP Comm Dec 6/9/13 / MA withdrawn May 2015
 - Holoclar TEP Comm Dec 17/2/15
 - Imlygic GTMP Comm Dec 16/12/15
 - Strimvelis GTMP Comm Dec 26/5/16
 - Zalmoxis CTMP Comm Dec 18/8/16
 - Chondrosphere TEP Comm Dec 10/7/17
 - Alofisel CTMP Opinion 12/17 (Comm Dec. Pending)



Incentives

- Scientific Advice:
 - Questions on Quality, Non-clinical and clinical development
 - Aim: provide scientific certainty to ATMP developers
 - 90% fee reduction for SMEs, 65% for others
- Scientific recommendation on advanced therapy classification
 - 'Is the product I am developing an ATMP?'
 - Aim: provide regulatory certainty
- SMEs: Certification of quality and non-clinical data
 - 'Is my product development so far on track for a future Marketing Authorisation Application?'
 - Aim: provide scientific certainty to SME Developers
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ATMP classification: what is it?

- Simple procedure, incentive included in the ATMP Regulation
 - 60 day procedure (often shorter), no fee
- To provide <u>regulatory certainty</u> to the ATMP developers:
 - 'Am I developing an ATMP?' (what legislation do I have to consult)
 - 'What guidelines are applicable to my product?'
- For early developments (no expectation that the product is already in non-clinical or clinical development)

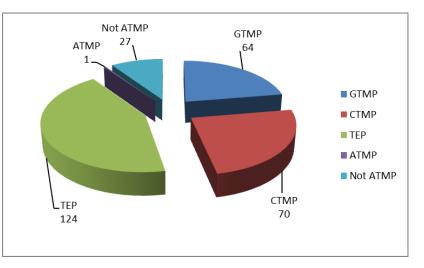


Classification procedure for ATMPs – until Dec. 2017

 All classification outcomes are published (summary)

http://www.ema.europa.eu/docs/en_GB/ document_library/Regulatory_and_proce dural_guideline/2012/04/WC500126681. pdf

- Up to end Dec 2017:
 - 286 procedures finalised
 - 290 procedures submitted



Finalised classifications

(Status Dec 2017)



ATMP Certification procedure

- Incentive: early-late
- For SMEs only
- <u>Scientific certainty</u>
 - 'Is my product development so far on track for a future Marketing Authorisation Application?'
- CAT will perform a scientific evaluation of
 - (early) quality / development data
 - (early) non-clinical data



ATMP Certification procedure

- 90 day procedure
- The applicant will always received the evaluation report and List of issue for future consideration
 - If positive evaluation: Certificate by EMA
- 10 Certification procedures finalised
 - 1 withdrawn because 'too early' (Q-certification)
 - In recent cases: pre-assessment of Q/NC data, shortly before MAA.

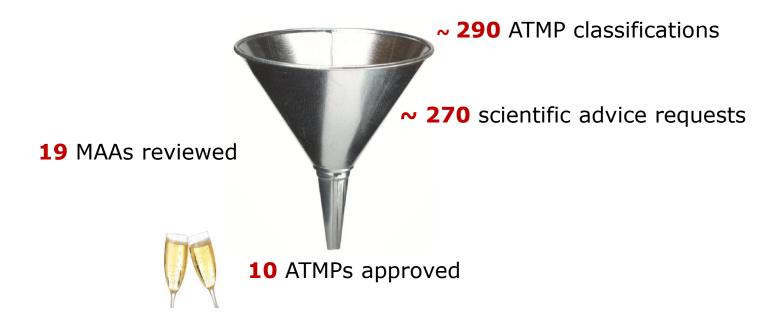


Wrap-up (2) – ATMP Regulation

- Adapted legislation established in EU (in force since 2009)
 - Definitions
 - Specialist Committee (CAT)
 - Authorisation procedure
 - Incentives
 - Hospital exemption
- 'Lex specialis': Pharma legislation applies unless specified differently in ATMP regulation

ATMPs in Europe (2009-2017)

~ 500 clinical trials using ATMPs in EU





Market

6 licensed ATMPs



EUROPEAN MEDICINES AGENCY

Conclusions

- ATMP Regulation provides a clear regulatory framework for ATMP developers
- The approval of products for each of the 3 categories (GTMP, CTMP, TEP) indicates that the system is workable
- Incentives (ATMP specific, other)
- Most activities of the CAT in the pre-submission phase (SA, classification)
- Lot of ATMP clinical trials (review and approval of CTs by national authorities)
- ATMP developers need support from authorised (before, during and after MAA)



Thank you for your attention

Further information

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