

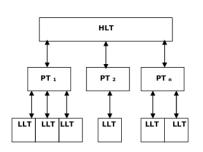
Non-oncological MoA based PIP - Initial Deliberations from the **PDCO** working group discussions

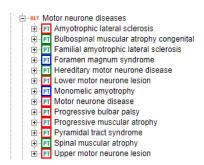
Sabine Scherer on behalf of the PDCO working group (Chrissi Pallidis, Sylvie Benchetrit, Yury Kiselev)



Determination of the PIP condition

- Currently the PIP condition for an active compound is defined based on the Policy on the determination of the condition(s) for a PIP/Waiver
- The proposed adult indication, mode of action, medical need (e.g off-label use) and MedRA system (High level term) are taken into account





The proposal for the new pharma legislation includes a mode of action based approach

Article 75 (Regulation)

Waivers

...the Agency may decide that the production of the information...shall be waived for products or for classes of medicinal products, if there is evidence showing...

- 1. (b) that the disease or condition for which the specific medicinal product or class is intended occurs only in adult populations, unless when the product is directed at a molecular target or due to its mechanism of action on the basis of existing scientific data, is responsible for a different disease or condition in the same therapeutic area in children than the one for which the specific medicinal product or class of medicinal products is intended for in the adult population;
- Valid for waivers based on disease not occurring only? (2021: 12, 2022: 16, 2023: 4)

N	12	16	4



Mode of action PIP

Definition of "same therapeutic area"? MedRA System Organ Class? Word condition based on MoA?

- soc Nervous system disorders Central nervous system infections and inflammations Central nervous system vascular disorders Congenital and peripartum neurological conditions Cranial nerve disorders (excl neoplasms) Demyelinating disorders Encephalopathies ± Headaches Increased intracranial pressure and hydrocephalus Mental impairment disorders Movement disorders (incl parkinsonism) Nervous system neoplasms benign H. Nervous system neoplasms malignant and unspecified NEC Neurological disorders NEC Neurological disorders of the eye Neuromuscular disorders Peripheral neuropathies

Seizures (incl subtypes)

Structural brain disorders

Sleep disturbances (incl subtypes)
Spinal cord and nerve root disorders

Which areas are most likely to profit?

- Neonatology
- A product that is developed for COPD might be useful for the treatment of BPD
- COPD is on class waiver list -> Class waiver list needs to be revised
- Neurodegenerative diseases
- Products developed for Alzheimer disease might be useful for paed. tauopathies, but available scientific data is limited -> stepwise approach could be used
- MoA will be difficult to apply in very rare paed. diseases as the **potential to extrapolation** will be limited due to the lack of an adult program
- In case of paediatric specific therapeutic need, a specific development according to drug characteristics might be appropriate: e.g. aggressiveness instead of major depressive disorder

-> further case studies are planned



Thank you!