PRIME: Implementation of recommendations based on first 5 years’ experience with the scheme: progress update

9th R&D Industry stakeholder platform meeting

Presented by Kevin Cunningham (Francesca Cerreta)
Identified areas for implementation – 8th R&D Industry Platform – July 2022

- Revised entry point(s) for PRIME
- Roadmap of regulatory interactions & development tracker
- Continuity and flexibility of SA
- Submission readiness meeting
Development tracker
Pragmatic approach

- Focus on information linked to action
- Ease of access and update

Submitted by company. Saved by EMA in IRIS. Content ownership: company.

When: updates critical to development & evidence generation. Less critical information also cumulated at the same time.

First column= highlights new information, the rest records the status of earlier submissions. Earlier versions retrievable in SharePoint (Rapporteur+EMA).

Tracks critical development areas (not all areas will be applicable to all products, specific areas can be added)

Blueprint for development roadmap: KOM-> regulatory interactions SA PIP OD ITF-> Submission readiness meeting

Gantt chart of planned global regulatory interactions. Format chosen by the company
<table>
<thead>
<tr>
<th>I. QUALITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stability</td>
</tr>
<tr>
<td>Specifications</td>
</tr>
<tr>
<td>&lt;clarify which specifications, additional lines if necessary&gt;</td>
</tr>
<tr>
<td>Manufacturing issues and process controls</td>
</tr>
<tr>
<td>Comparability</td>
</tr>
<tr>
<td>(changes to manufacturing process / site)</td>
</tr>
<tr>
<td>GMP Issues</td>
</tr>
<tr>
<td>Other (specify)</td>
</tr>
<tr>
<td>NONCLINICAL</td>
</tr>
<tr>
<td>Carcinogenicity</td>
</tr>
<tr>
<td>Reprotox/Germ line integration</td>
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<tr>
<td>Animal model</td>
</tr>
<tr>
<td>Chronic toxicity</td>
</tr>
<tr>
<td>Immunotoxicity</td>
</tr>
</tbody>
</table>
**Pilot** (1 year):
- Planned to commence Q1 2023
- basis for KOM, SA interactions; submission readiness
- Revise/enhance post-pilot

Proposed **metrics** (draft):
- How many times accessed/updated, by whom
- Questionnaires Cy/Rap- usefulness, user friendliness, suggested changes
Flexibility of SA
Agreement on continuity and flexibility of scientific advice

1. Strengthen the involvement of the **SAWP Coordinator from the Rapporteur delegation** in SA requests (by means of increase predictability of SA requests through **roadmap of regulatory interactions**)

2. Explore **flexible approaches to address queries** from PRIME applicants depending on nature & urgency of the query
   - Primary contact for company requests remains EMA
   - EMA to discuss Rapporteur/SAWP Coordinator to explore
     - if issue can be addressed directly by the Rapporteur (**clarification**)
     - if too complex for clarification by Rapporteur or requiring network input → **scientific advice**
     - **expedited advice procedure** for issues related to a **previously discussed development program**, with a **clearly-defined scope**, that is **urgent/critical**
   - Updated public guidance, initiate 1 year pilot Q1 2023
Expedited SA procedure: Decision path

1. Applicant Submits question
2. EMA consults Rapporteur/SAWP Coordinator on best option to respond
3. EMA conveys Rapporteur response
4. Direct reply (clarification) by Rapporteur?
   - Yes
   - No
5. Expedited SA needed & feasible?
   - Yes
   - No
6. Expedited SA request
7. EMA proposes expedited request via IRIS
8. EMA/Rapp/SAWP coordinator agree TT, propose supporting documentation
9. Follow-up SA
10. EMA proposes regular SA request via IRIS

Rapporteur/SAWP Coordinator/SAWP chair
Expedited SA procedure: Outline II

Applicant

Submits request via IRIS, irrespective of published deadlines

EMA

EMA validates submission & links review to next SAWP plenary (as per agreed TT)

Rapporteur/SAWP Coordinator

SAWP Coordinator prepares report

SAWP/CHMP

SAWP agrees advice at next plenary → CHMP adopts FAL

End of procedure

Send FAL to applicant

~ 3-4 weeks
Submission readiness meeting
Submission Readiness meeting: Objectives and Scope

More than 50% PRIME MAAs start as AA but revert to standard TT

SA non-adherence rarely fully justified → MOs/OCs, delays at MAA [average of 4.2 MOs per MAA LoQ (range: 1-10)]

Industry and regulator surveys: strengthen engagement in the period between KOM and MAA

Ensure maturity of the application and facilitate AA

Discuss Implementation of SA

Data package/maturity to support MAA

Discuss development status

Address Regulatory challenges (ODD maintenance, PIP compliance, GxP requirements)
• **1 year to 9 months** prior to MAA filing
• Allow some **flexibility** based on applicant’s and Rapporteur’s preference and type of development
• Could **replace need for pre-submission meeting** (unless Rapp preference to keep PSM)

• **Participants as per KOM**
  i.e. Rapporteur team, CHMP vice chair/CAT chair, SAWP chair, additional experts (COMP, PDCO), EMA product team
  *) to be potentially expanded in the future once network capacity allows

• **Organisation of meeting**: virtual/remote
• **Chair/Lead**: Co-chairing with support from EMA

• **Duration**: 2h
• **‘Internal’ preparatory meeting**: Separate in advance of meeting; duration (1h)
• **Agenda management as per KOM** based on **agenda template**
• **Supportive documentation** – briefing book, draft RMP if available, draft AA request if data available, other documentation (e.g. IMPD) if/as needed
Any questions?

Further information

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