Workshop on data requirements for vaccines March 2015 - Industry Reflections

17th March 2016

Introduction

The workshop was a starting point.

A good productive start; but only the start of the work.

Outcome: 6 recommendations (EMA/258437/2015)

1. Develop proposals to increase communication, cooperation and transparency in the development of scientific and administrative guidelines at early stages.
2. Identify and propose specific training for assessors.
3. Develop lists of diseases for which vaccines are not available and required.
4. Examine in more depth the list of factors prepared and prioritised, that industry consider constraining the availability of vaccines within the EU.
5. CVMP should maximise the existing opportunity of the revision of the MUMS guidelines.
6. The opportunity of the current revision of the legislation governing veterinary medicines should be taken.

Industry Possible Quick Targets

- Abandoning field efficacy study requirement (restrict field studies to safety only), unless claim can only be proven by field efficacy study
- Easier acceptance of serology instead of challenge for efficacy studies.
  - Clear protocol needed to determine when serology can be accepted as a surrogate marker for efficacy.
  - Also a benefit for 3Rs

Industry Possible Quick Targets

- Associated use:
  - acceptance of serology instead of challenge to prove lack of immunological interference,
  - also if data on correlation between serology and protection are not available; in particular with regard to DOI.

- MUMS guidelines – currently out for consultation; missed opportunity to improve?

Field Efficacy Trials - Legislation

Directive 2009/9 EC

Annex 1, Chapter II General Requirements

2. Efficacy trials carried out in the laboratory shall be controlled trials, including untreated control animals unless this is not justified for animal welfare reasons and efficacy can be otherwise demonstrated.

In general, these laboratory trials shall be supported by trials carried out in field conditions, including untreated control animals.

Note for Guidance Field Trials with Veterinary Vaccines (EMEA/CVMP/852/99-FINAL)

Field Efficacy Trials IFAH-Europe position:

- Lab efficacy trials should be sufficient and field efficacy trials not mandatory
  - Where suitable challenge model and satisfactory efficacy results are available
- Facilitate the acceptance of field trials done in non-EU regions
- EU field efficacy trials only to support specific claims (body weight gain,…), and/or in case of lack of good laboratory challenge model
- When efficacy is clearly demonstrated under lab conditions:
  - field efficacy trials may add little value (i.e. for scientific purposes of efficacy demonstration)
  - are complex to manage…

Field Efficacy Trials - Difficulties

- Vaccines are preventive medicines; as a consequence, disease incidence is not always predictable

- Running a field trial can change epidemiological situation
  - Too few controls, not enough circulation of infectious agent
  - Too many controls, disease may not be under control and over challenge the vaccinates
  - Changes in animal handling needed for a GCP trial may improve health status
  - Disease incidence decreasing as Farm Biosecurity improves

Field Efficacy Trials - Difficulties

- More and more, companies vaccinate under EU-field conditions, then move animals into lab facilities for challenge:
  - this is first to ‘tick’ a box in the requirement list
  - usually it does not bring additional ‘claim-supporting’ information.
- Furthermore not possible for companion animals and horses
- For modified live vaccines, it is very difficult to have complete separation of the study groups in routine farm management while keeping the same housing conditions.
- End of the development program, Long, Difficult and Costly.

Field Efficacy Trials - Issues

- Experience of authorities routinely asking for a ‘negative’ statement on the SPC when the applicant was not able to confirm efficacy in the field.

- Even when under laboratory conditions complete efficacy was demonstrated, because of some clinical field trials, where the same level of protection was not achieved, authorities reduced the final label claims to reflect the field situation.

Field Efficacy Proposal

- Industry propose a new Reflection Paper or guideline and/or revision of the Note for Guidance to define the conditions for which field efficacy is required
  - Limit to those cases which are not possible in the laboratory (*e.g*. growth properties or feed conversion).
  - Limit confirmation to pre-defined parameter of immune response (e.g. serology).
  - Acceptability of non-EU trials.

- **<u>Field Trials still required to confirm Safety with possible increased minimal numbers of enrolled animals.</u>**

Final Message

- Industry is willing to work with the regulators to drive progress on all the recommendations.
- We suggest to add this item in the IWP 2016 work plan
- Thank you for your attention.