EMA/907045/2022
4th January 2023

Highlight report 9th Meeting of the industry stakeholder platform on the operation of the centralised procedure for human medicines

24th November 2022

Role	Name
Chair:	Alberto Gañán Jiménez
Present:	**Industry: AESGP:** Klavdija Kmetic, Christelle Anquez-Traxler and Paul-Etienne Schaeffer. **Alliance for Regenerative Medicine (ARM):** Andrea Braun, Jacquelyn Awigena-Cook, Michael Werner, Mimi Choon-Quinones, Sarah Higham, Sibylle Herzer, Simone Biel and Stuart Beattie. **EFPIA:** Almath Spooner, Ana Begic, Angelika Joos, Chloe Garay, Emma Du Four, Koen Naewelaerts, Pär Tellner, Pedro Franco and Rodrigo Palacios. **EUCOPE:** Axel Korth, Joao Duarte, Karl-Heinz Loebel, Lucia D'Apote, Naseem Kabir and Roberta Bernadelli. **EUROPABIO:** Bettina Doepner, Garry Flounders, Graham Sharp, Laura Liebers, Marcello Milano, Pedro Franco and Sean Byrne. **EUROPHARM:** Alain Verrijdt, Dr. Graeme Ladds and Mrs Parminder Kaur. **MEDICINES FOR EUROPE:** Beata Stepniewska, Britt Vermeij, Vladimir Sokolskyi, Kim Zelič, Christine Forster, Tanja Safinowski, Anjana Pindoria, Juliette Omtzigt and Sophie Dagens. **MPP Association:** Carla Sterk, Barbara Gollob, Ima Miermeister, Samuel Gavillet, Shayesteh Fürst-Ladani and Mike Wallenstein. **VACCINES FOR EUROPE:** Susanne Heiland-Kunath, Stephane Callewaert, Evonne Strand, Laura Oliveira, Agnes Legathe, Helena Ardebrant and Hannah Larkin. **EMA:** Alberto Gañán Jiménez, Alexios Skarlatos, Alexis Nolte, Christelle Bouygues, Eftychia-Eirini Psarelli, Elizabeth Scanlan, Florian Lasch, Francesca Day, Francisco Peñaranda Gaelle Bec, Juan Garcia, Karl Hamilton, Kristiina Puusaari, Marie-Helene Pinheiro, Marta Kollb-Sielecka, Martin Harvey Allchurch, Thomas Castelnovo, Thomas Girard and Victoria Palmi Reig. **EMA scientific committees and working parties:** Sabine Straus **European Commission:** Sara Rafael Almeida **Trade Associations (EFSPI):** Dr. Hans Ulrich Burger

This was the 9th EMA-Industry stakeholder centralised platform meeting developed by the Agency between regulators and representatives of industry stakeholder organisations aiming to foster a constructive exchange with these stakeholders on general updates and more focused discussions on specific processes and issues to support continuous improvement. The purpose of the platform is to provide an opportunity for both general updates and more focused discussions on specific processes or issues to support continuous improvement, and generally to foster a constructive dialogue with industry stakeholders.

Official address Domenico Scarlattilaan 6 ● 1083 HS Amsterdam ● The Netherlands
Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us
Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000
An agency of the European Union

1. Update on electronic submissions & DADI

EMA presented an overview of the development of the Product Lifecycle Management Value Stream, which includes implementation of the eCTD v4.0 standard and web based electronic application forms (eAF). The goal of achieving an optimised regulatory procedure management was explained, with reference made to investments in change management to support the implementation of this target architecture.
See presentation here.

The roadmap for eAF (formerly the DADI project) will see the transformation of all existing PDF forms to an interactive web forms, drawing on SPOR data and FHIR standards to ensure interoperability, data reuse and to eliminate over time the duplication of data entry requirements for Industry, EMA and Network.

An explanation was also given of the various Agile ceremonies and consultation points at both strategic and operational levels. By bringing product teams together under one umbrella, with joint ceremonies, shared roles, such as architects and value stream managers and with strong change management support across the products, EMA is aiming to capitalise on synergies and have a single overall roadmap.

Industry bilaterals and stakeholder meetings are important fora for discussion on specific topics of interest that other ceremonies are not well suited for, however it was highlighted that it is important to use each forum for its intended purpose to avoid duplicated discussions and effort.

An overview of the approach to implementing eCTD v4.0 was given. eCTD v4.0 will be an incremental implementation over the coming years and the focus in 2023 will be on updating the specification and implementation guide, in consultation with affected stakeholders. eCTD v4.0 was given context as to how it relates to the overall eSubmissions portfolio of systems, which deliver the tools required to submit applications to the Agency, share these with business teams at EMA and sharing the submissions with the network through the appropriate repositories. The creation and maintenance of specifications lay the foundation for submissions in the EU Region and provide support and help to users from the EMA, NCAs and industry.

An update was also given on the launch of the eAF for human variations for centrally authorised human medicinal products and the current priorities being progressed by the eAF product team. A UAT will be carried out in the first half of 2023, prior to the release of an updated form for nationally authorised products and the beginning of the transition to the mandatory usage of the new web based eAF. Further updates will be given separately by the product team in the relevant fora.

Industry is eager to participate in the implementation of eCTD4.0 and enquired about the future landscape and detailed roadmap for the eCTD implementation as well as for other upcoming projects like IRIS expansion to PLM or integration of SPOR master data into all systems. Industry valued the opportunity to their participation in the different IT network projects though SMEs.

Conclusion and follow-up actions:

Further updates will be given separately by the respective product teams (e.g. eAF, Regulatory Procedure Management, ePI) in the relevant fora and in future Industry Platform meetings.

2. Regulatory Reliance

Industry presented an overview of the different models of regulatory reliance pathways worldwide and how the application of reliance mechanisms enables a quicker and more equitable access of drugs and vaccines to patients around the world.

Less-well resourced regulatory systems can be as effective as those with more resources if they use a risk-based approach, take advantage of the work and decisions of other regulatory authorities and focus their resources on essential, value-added activities that can be provided only by their regulatory authority.

While reliance approaches are widely used for the initial authorization of medicinal products, they should also be used for vigilance and other post-authorisation activities.

However, as different countries and regions are developing their own reliance approaches, industry highlighted that reliance and work-sharing approaches are not yet optimal.

EMA acknowledges the need for global regulatory strengthening and provided an overview of the bilateral and multilateral relations and initiatives of EMA and other regulatory authorities to enhance harmonisation and trust. EPAR and eCPPs are tools for reliance widely used by countries with more limited regulatory capacity. See presentation here.

Conclusion and follow-up actions:

Initiatives to foster trust among regulatory authorities are essential to build up reliance models. Trust develops with increasing familiarity and understanding of the decision making behind regulatory outputs.

Therefore, it was agreed to establish a focus group with EMA to better understand the current reliance pathways, what are the success stories and the challenges and how can EMA help to support, enable, optimise and advocate work on this area.

3. Pre-submission meetings

EMA presented the 9-month experience of the pre-submission interactions for initial marketing authorisation which was introduced in January 2022. EMA shared the numbers of pre-submission meeting and interaction requests received from 2018 until September 2022, the timing of EMA written responses, and the number of pre-submission meeting organised following written responses. See presentation here.

Industry presented their feedback on the process in a joint presentation, with several suggestions for improvement including the streamlining of briefing package, timeliness, more visibility of EMA information/guidance and enhancement of consistency in advice. Industry highlighted the need of maintaining a good level of communication between sponsor and EMA and suggested the possibility of extending the pre- submission interactions at major post authorisation procedures.

Conclusion and follow-up actions:

EMA welcomed the industry feedback and will continue to improve the process, monitor and discuss further opportunity for improvements.

4. Network Sustainability & Update on CHMP AR revamp project

EMA presented an update on the ongoing activities aimed at addressing network sustainability. The focus group on submission predictability had its kick-off meeting on 22nd of November and EMA presented the planned close monitoring of intended MAA submissions for 2023. See presentation here.

EMA also presented an update of the ongoing CHMP AR revamp project, with details of the proposed changes to the templates. The templates are currently on review, which includes industry representatives, with a deadline for comments of 6th January 2023. Finally EMA mentioned a number of other planned activities, among which the decision to systematically request for the submission of a number of documents (e.g. module 2, SmPC, RMP and responses) in word format in the working documents folder of the eCTD.

Industry presented a joint presentation, with several suggestions for improvement and questions. Industry supports a reinforcement of the MNAT concept of MNAT and staggered submission/dynamic assessment.

There was an overall positive feedback on the use of the Co-Rapp critique and questions related to the co-Rapp involvement in line and indication extensions and feedback on MNAT and rapporteurs' appointments.

Conclusion and follow-up actions:

EMA confirmed that some of the questions posed in the industry presentation will be responded to in writing. In terms of follow-up, there are two ongoing groups with industry representation: the focus group on submission predictability and the CHMP assessment report revamp project. Future work will be undertaken by these groups and outcome presented in a future Industry Platform meeting.

Post meeting note:

The responses to questions posed in the industry presentation were sent to industry associations by email on the 13th of December 2022.

5. Update on Type II validation team

In a joint presentation between EMA and industry, an update was provided on the Type II validation team, which was set up in January 2022 in order to increase consistency across submissions, process simplification, enhanced harmonisation in handling pre-submission queries and freeing up capacity of PLs. The team has updated the Type II validation checklist and is currently working on further support of Industry by creating a chatbox and increasing awareness of most common validation issues through an external publication. Some statistics were presented on handling of presubmission queries.
See presentation here.

Industry associations presented a survey performed among their members with overall support of the new model that is proposed to be extended for Quality Type II variations. Better search engines, complementing procedural and regulatory guidance with examples were suggested to reduce the number of queries.

Conclusion and follow-up actions:

There were no specific follow-up actions. The performance of the Type II validation centre will continue to be monitored.

6. Raw Data Pilot

The Agency presented an update on EMA's proof-of-concept (PoC) raw data pilot which is currently being conducted as part of EMA's raw data project and stems from one of the priority recommendations issued by the joint. See presentation here.

Following an update on the project's background and mandate, the presentation focused on the raw data PoC pilot's details including timelines and scope, integration of pilot with the assessment process and the pilot's first procedure. Engagement with Industry via the establishment of an Industry Focus Group on Raw Data as also next steps were additional topics covered.

The PoC pilot aims to clarify the benefits and practicalities of access to individual patient data from clinical studies (raw data) in the assessment of medicines. The pilot will comprise ten centralised procedures submitted to EMA and will fully comply with data protection legislation requirements. Applicants and Marketing Authorisation Holders (MAHs) may participate in the pilot on a voluntary basis if their marketing authorisation or post-authorisation application submitted to EMA meets the pilot's selection criteria.

The pilot which started in September 2022 will run for up to two years. Learnings from the proof-of-concept pilot will help the EU medicines regulatory network to make an informed decision on the place of raw data in regulatory decision-making. EMA has shared high-level information and initial learnings from the pilot's first procedure, an initial marketing authorisation application in neurology. In terms of engagement with Industry, it was mentioned that an Industry Focus Group on Raw Data which was successfully formed in August 2022 in order for Industry representatives to share their views on specific PoC pilot aspects including guidance for Industry and application of EMA's data transparency policy during the PoC pilot. The PoC pilot's public communication as also additional documents published on EMA's Big Data website were highlighted for Industry's attention. Finally, EMA's presentation concluded with providing information on next steps regarding interactions with Industry, including amongst others the upcoming consultation on the PoC pilot's outcomes via the Industry Focus Group on Raw Data.

Industry presented their views in relation to the upcoming proof-of-concept raw data pilot, highlighting the good interaction with EMA via the Industry Focus Group on Raw Data but also Industry's concerns in management of transparency during the pilot when it comes to the provision of adequate protection for data privacy and CCI/IP-related information.

Conclusion and follow-up actions:

- EMA noted that in compliance with data protection and access to document rules, any document released by AtD, including patients' line listings, is duly anonymized and redacted through a robust process, and in consultation with companies, before being released to individual requesters.
- It was confirmed that data protection rules and principles already apply to raw data when companies are submitting them to EMA. EMA releases anonymised documents and ensure protection of CCI by assessing applicant's redaction proposals.
- EMA also confirmed that access to the raw data will be refused as long as the regulatory procedure is ongoing in order not to jeopardise the decision making process.
- The EMA will continue to engage with Industry during the PoC raw data pilot.
- EMA's reflections on the application of EMA's data transparency policy during the PoC raw data pilot will be made publicly available.

7. ePI

EMA presented an update on the status of the ongoing EMA-HMA-EC ePI pilot project. The milestones to date were briefly described from the adoption of the EU ePI Common Standard at the end of 2021 to the funding of the project by EU4Health, and the achievements of the project in its first Programme Increment (from June to September 2022). The project is developing a Minimum Viable Product (MVP) for creation and management of ePI, which comprises an authoring portal and a repository where ePI can be accessed. The MVP will enable an early version of ePI that can be adapted and improved going forward, and it will be used in a pilot exercise involving both centrally and nationally authorised medicines. The roadmap of ePI towards implementation was outlined. The project is being run using Agile methodology, and interested stakeholders can find out the latest information on development by attending quarterly system demos.
See presentation here.

Industry began by listing the numerous benefits ePI is expected to provide to patients and other stakeholders. Underlining the willingness to participate in an upcoming pilot, more detailed information was requested in order to prepare for this. Recommendations on implementation of ePI and on development in close alignment with other activities such as eCTD, electronic application forms and IRIS were given. The review process of PI is not in scope of the MVP and will not be changed during the pilot phase, which implies

an extra effort for industry, as they will have to generate ePI in addition to the PI as part of the review process. The development of ePI and the revision of the EU general pharmaceutical legislation should be leveraged to reduce regulatory burden and provide a more flexible regulatory framework incorporating digital technology. Several considerations related to future implementation, including how patients would access ePI and receive alerts.

Conclusion and follow-up actions:

- EMA acknowledged the request for more detail on the ePI pilot and implementation and mentioned that, in line with Agile methodology, very detailed information is available for the next programme increment. For future developments beyond the pilot, information is currently less granular. However, it was noted that industry will be informed and fully consulted and have adequate time to prepare for future activities.
- The scope of the MVP was again emphasised, mentioning that many of the benefits of ePI will be realised over time. The input of industry is valued as it ensures that aspects of interest are taken into consideration, even this early in development.