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Committee for Medicinal Products for Human Use (CHMP)

Concept paper on the Need to Develop an Appendix to the Guideline on Bioequivalence Regarding the Presentation of Biopharmaceutical and Bioanalytical Data in Application Dossiers

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Comments should be provided using this template. The completed comments form should be sent to ewpsecretariat@ema.europa.eu

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1. Introduction

There is a need to develop more structured guidance on how to present biopharmaceutical and bioanalytical data in the Marketing Authorisation Application (MAA) dossier, particularly for generic medicinal products. This is because the pivotal data subject to these types of application is located in various modules of the dossier hence optimising the presentation would facilitate the evaluation process.

2. Problem statement

Clinical evaluation of generic medicinal products requires the evaluation of data from bioequivalence, comparative dissolution and bioanalytical validation studies, respectively. European regulatory requirements of these data are set in several guidelines and other regulatory documents (e.g. 1, 2, 4). Comprehensive assessment of these data requires evaluation of several source documents which are located in various CTD modules. The objective of CTD Module 2.7.1 is to facilitate the regulatory review process by giving a detailed factual summarisation of all the relevant information in the MAA dossier with regard to biopharmaceutic studies and associated analytical methods (5, 6). However, this goal is not always met for generic applications partly because there is no clear regulatory guidance how to present relevant data in clinical summary reports, which leads to difficulties in the regulatory review process.

3. Discussion (on the problem statement)

Regulatory assessment of efficacy and safety assessment of generic drug products requires a comprehensive evaluation of a bioanalytical, biopharmaceutical and clinical data. For example, granting of biowaiver requires evaluation of data in Module 2, 3 and 5. Regulatory assessment could be considerably facilitated by an improved presentation of the relevant data using tabulation according to standardised requirements. These tables are recommended to be presented in Module 2.7.1 of the MAA dossier.

4. Recommendation

It is proposed to develop guidance on the biopharmaceutical and bioanalytical data to be summarised for the evaluation of typical generic applications. The guideline does not set any new requirements but provides recommendations for data presentation through model template tables to be included in Module 2.7.1. Besides generic applications, the templates could be used in other applications including hybrid applications and line-extensions.

5. Proposed timetable

It is anticipated that a draft guidance should be available 12 months after adoption of the Concept Paper for public consultation over 6 months and subsequent finalisation within 6 months.

6. Resource requirements for preparation

The preparation of this Guideline will involve the EWP Drafting Group on Pharmacokinetics (EWP-PK).

7. Impact assessment (anticipated)

The development of this guidance will result in improved data presentation in the MAA dossier thus facilitating the regulatory review process. In addition, it would potentially support applicants in the identification of any gaps in their datasets. The primary focus would be on applications for generic medicinal products although the principle can also be applied to any other application where such data is presented.

8. References to literature, guidelines, etc.

1. Guideline on the Investigation of Bioequivalence (CPMP/QWP/EWP/1401/98/rev. 1)

2. Guideline on Validation of Bioanalytical Methods (EMEA/CHMP/EWP/192217/2009)

3. Concept Paper on the Note for Guidance on Modified Release Oral and Transdermal Dosage Forms: Section II (Pharmacokinetic and Clinical Evaluation) (EMA/1303/2010)

4. Note for guidance on Modified Release Oral and Transdermal Dosage Forms: section II (Pharmacokinetic and Clinical Evaluation). (CPMP/EWP/280/96)

5. ICH Harmonised Tripartite Guideline the Common Technical Document for the Registration of Pharmaceuticals for Human Use
   Efficacy – M4E (R1) Clinical Overview and Clinical Summary of Module 2 Module 5: Clinical Study Reports

6. ICH Topic M 4 Common Technical Document for the Registration of Pharmaceuticals for Human Use Questions and Answers (CPMP/ICH/5552/02)