Info on repurposing pilot from EMA

7th Meeting of the industry stakeholder platform on the operation of the centralised procedure for human medicines

1st December 2021, Session 1: 13:10 – 13:50 (CET)

Presented by Christelle Bouygues, Regulatory Affairs Office, EMA

1. Background

Pilot identified as part of the actions of:

- The European Commission's Pharmaceutical Strategy for Europe
- EMA Regulatory Science Strategy and EMANS to 2025

Initiative of :

- Commission Expert Group on the Safe and Timely Access to Medicines for Patients (STAMP) of the Pharmaceutical Committee
  - **Repurposing Observatory Group (RepOG) – Led by ES**

2. Framework

To facilitate the regulatory recognition of new indications for well-established, authorised medicines

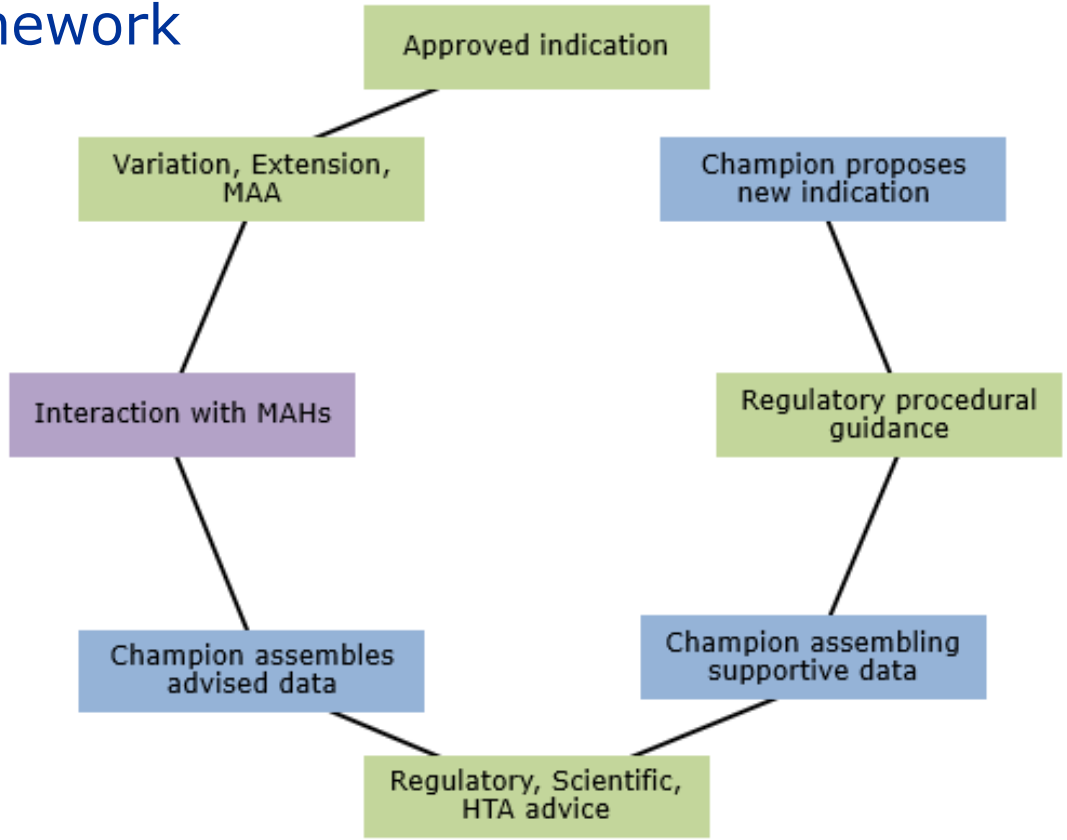
- When supported by a data set
- When out of the protection periods
- MAH does not take the lead in applying for a new therapeutic use

To outline the process to support not-for-profit organisations and academia

- Goal: generating and gathering the required data to support the authorisation new therapeutic uses (through scientific advice and uptake by an applicant / MAH)
- Repurposing sponsors are called “Champion”

To help champions present their proposed repurposing project to regulatory authorities and seek advice

3. Steps of the framework



4. Go live of the pilot

European Comission
https://ec.europa.eu/health/documents/pharmaceutical-committee/stamp_en

EMA:
- news
https://www.ema.europa.eu/en/news/repurposing-authorised-medicines-pilot-support-not-profit-organisations-academia
- web updates
https://www.ema.europa.eu/en/human-regulatory/research-development/scientific-advice-protocol-assistance#scientific-advice-on-medicine-repurposing-(new)-section
https://www.ema.europa.eu/en/partners-networks/academia#regulatory-and-scientific-support-section
https://www.ema.europa.eu/en/academia
- Q&A document
https://www.ema.europa.eu/documents/other/proposal-framework-support-not-profit-organisations-academia-repurposing-authorised-medicines_en.pdf
- form
https://www.ema.europa.eu/documents/template-form/submission-form-repurposing-pilot-project-authorised-medicines_en.docx
- Twitter:
https://twitter.com/EMA_News/status/1453690165734563847
- LinekdIn:
https://www.linkedin.com/feed/update/urn:li:activity:6859456197892861953

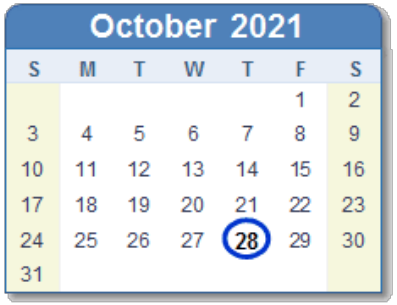
AEMPS:
https://www.aemps.gob.es/informa/notasinformativas/medicamentosusohumano-3/2021-medicamentosusohumano-3/se-inicia-el-piloto-europeo-para-impulsar-el-reposicionamiento-de-medicamentos-autorizados/

EFPIA:
https://efpia.eu/news-events/the-efpia-view/statements-press-releases/supporting-academic-and-non-for-profit-champions-to-repurpose-medicines/

EUCOPE:
https://www.eucope.org/new-ema-hma-pilot-on-medicines-repurposing/

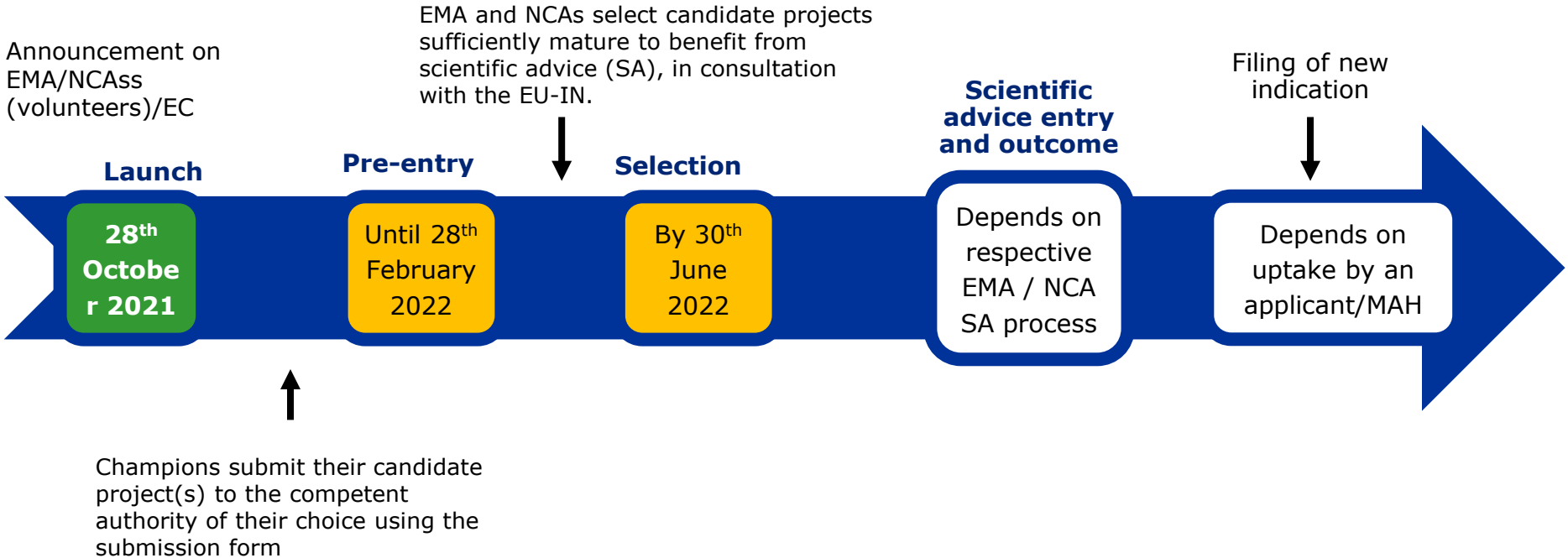
Medicines for Europe:
https://www.medicinesforeurope.com/news/european-commission-pilot-project-on-repurposing-brings-value-added-innovation-to-life/

ACF:
https://www.anticancerfund.org/en/good-news-ema-supports-pilot-project-repurposing-authorised-medicines



Thursday, Oct 28th 2021

5. Steps of the pilot



6. Objectives

- **To assess** the **clarity and comprehensibility** of the framework and process from the not-for-profit organisations' and industry perspective
- **To check** the **feasibility** of compiling the required data for the scientific advice request from the not-for-profit organisation's perspective.
- **To identify gaps** in the **existing guidance** applicable to repurposing, and **evaluate** the potential need for **adaptations and guidance (e.g. RWE/RWD field)**
- **To monitor** the progress of the repurposing programmes **beyond scientific advice towards filing of a new indication**
- **To create** a report to **assess the results** of the pilot

7. Who can participate?

A champion is:

- A **not-for-profit organisation** or **academic institution**, **collaborative groups** and **European References Networks** (ERNs)
- Able to **coordinate and/or foster** the research programme up until the point of **full industry engagement**
- **Transparent** regarding **interactions** with relevant **pharmaceutical company(s)** [*of note: EMA's policy on competing interests of members / experts of committees*]
- In charge of filing the **initial request for scientific/regulatory advice** on the basis of the **available data**.

8. Medicines eligibility criteria

- Be **a well-established** active substance in a medicine authorised in a Member State or in the European Union
- Be an authorised medicine **out of data exclusivity and market protection** periods and **out of basic patent/supplementary protection certificate** (SPC) protection
- To target a **new indication** in a **condition distinct** from the currently authorised indication(s) listed in section 4.1 of the relevant summary of product characteristics (SmPC)
- To target **an indication** in an area where **important public health benefits / Union interests** are likely to be achieved. Conditions for which **no or few medicines are currently authorised** or which are **associated with high morbidity and/or mortality** despite available medicines, will be focus of the pilot.

9. Benefits of taking part of the pilot

Clear engagement with regulatory authorities

Support of the R&D project from not-for-profit organisation

Tailored guidance to prepare for scientific advice

Increase the robustness of the data

Guidance provided should support the not-for-profit organisation engage with a commercial company

10. CA, fees and incentives

No fees for the Pre-entry phase submission

(no) Fees for the Scientific Advice phase – see below

Institution	Country	Type of advice provided	Fees for informal meetings	Fees for formal meeting	If yes, amount
SÚKL	CZ	Formal and informal	NO	NO	N/A
FIMEA	FI	Only formal	N/A	NO*	*(for non-profit Champions)
AEMPS	ES	Only informal	NO	NO	N/A
NIPHN	HU	Formal and informal	NO	NO	N/A
AIFA	IT	Only informal	NO	NO	N/A
PEI	DE	Formal and informal	NO	YES	Variable
FAMPH	BE	Only formal	N/A	YES	Variable
EMA	EU	Formal	For SA pre-submission meeting	YES (**SA fee waiver on selection**)	Fee waiver for orphan SA for academia or fee waiver for a subset of selected candidates

11. Repurposing observatory group (RepOG)

- ✓ will report to the Pharmaceutical Committee
- ✓ will conclude on practical aspects of the pilot
- ✓ will report on the challenges, successes and opportunities
- ✓ will make recommendations
- ✓ will provide contact point for regulatory authorities and other stakeholders
- ✓ will not be involved in selecting Champions or medicines for the pilot nor any individual assessment or decision making role for the individual pilot projects

- The European Commission (DG SANTE and DG RTD)
- Champions representatives
- Industry associations
- One national research funding body
- The regulatory subgroup (EMA and NCA)

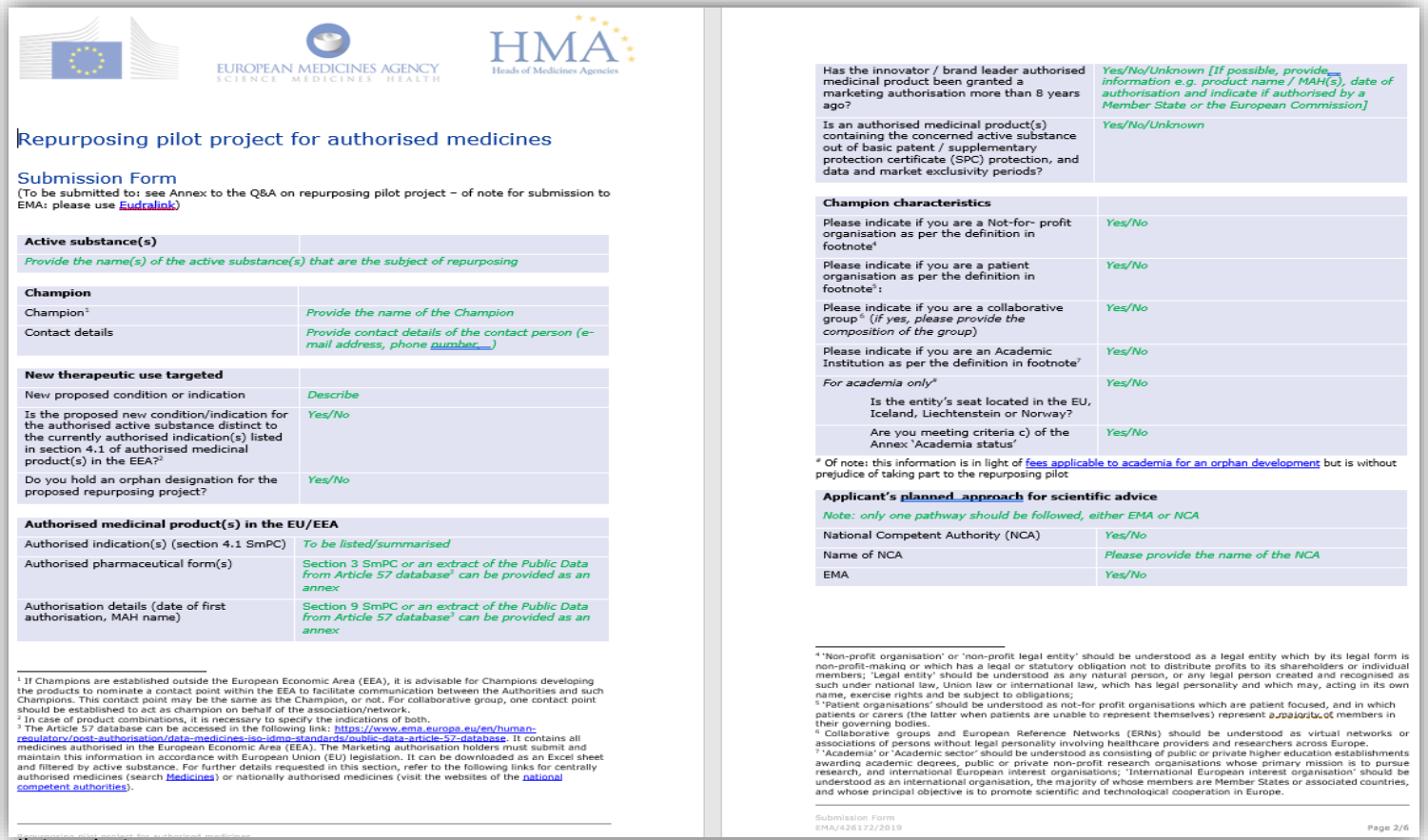
EU-IN repurposing subgroup

Questions & Answers

Questions & Answers

1. What is medicines' repurposing and why it is important?
2. What is the proposed framework to support repurposing?
3. What is the goal of the medicine repurposing pilot project?
4. Who coordinates the pilot project?
5. Who can apply?
6. Which medicines are eligible?
7. What are the benefits of taking part in the pilot?
8. How will candidate medicines be selected during the pre-entry phase?
9. What are the steps of repurposing pilot?
10. How to apply and what information to submit to enter the repurposing pilot?
11. What happens after the scientific advice?
12. How is the Industry engaged in the repurposing pilot?
13. For how long will the pilot run?
14. What fee will be applied?
15. What information on the selected medicines will be made public?
16. Annexes. Contact points in competent authorities and fee-related information

Submission form (p.1)



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

HMA
Heads of Medicines Agencies

Repurposing pilot project for authorised medicines

Submission Form

(To be submitted to: see Annex to the Q&A on repurposing pilot project – of note for submission to EMA: please use Eudralink)

Active substance(s)	
Provide the name(s) of the active substance(s) that are the subject of repurposing	

Champion	
Champion[1]	*Provide the name of the Champion*
Contact details	*Provide contact details of the contact person (e-mail address, phone number,)*

New therapeutic use targeted	
New proposed condition or indication	*Describe*
Is the proposed new condition/indication for the authorised active substance distinct to the currently authorised indication(s) listed in section 4.1 of authorised medicinal product(s) in the EEA?[2]	*Yes/No*
Do you hold an orphan designation for the proposed repurposing project?	*Yes/No*

Authorised medicinal product(s) in the EU/EEA	
Authorised indication(s) (section 4.1 SmPC)	*To be listed/summarised*
Authorised pharmaceutical form(s)	*Section 3 SmPC or an extract of the Public Data from Article 57 database[3] can be provided as an annex*
Authorisation details (date of first authorisation, MAH name)	*Section 9 SmPC or an extract of the Public Data from Article 57 database[3] can be provided as an annex*

[1] If Champions are established outside the European Economic Area (EEA), it is advisable for Champions developing the products to nominate a contact point within the EEA to facilitate communication between the Authorities and such Champions. This contact point may be the same as the Champion, or not. For collaborative group, one contact point should be established to act as champion on behalf of the association/network.
[2] In case of product combinations, it is necessary to specify the indications of both.
[3] The Article 57 database can be accessed in the following link: https://www.ema.europa.eu/en/human-regulatory/post-authorisation/data-medicines-iso-idmp-standards/public-data-article-57-database. It contains all medicines authorised in the European Economic Area (EEA). The Marketing authorisation holders must submit and maintain this information in accordance with European Union (EU) legislation. It can be downloaded as an Excel sheet and filtered by active substance. For further details requested in this section, refer to the following links for centrally authorised medicines (search Medicines) or nationally authorised medicines (visit the websites of the national competent authorities).

Has the innovator / brand leader authorised medicinal product been granted a marketing authorisation more than 8 years ago?	*Yes/No/Unknown [If possible, provide information e.g. product name / MAH(s), date of authorisation and indicate if authorised by a Member State or the European Commission]*
Is an authorised medicinal product(s) containing the concerned active substance out of basic patent / supplementary protection certificate (SPC) protection, and data and market exclusivity periods?	*Yes/No/Unknown*

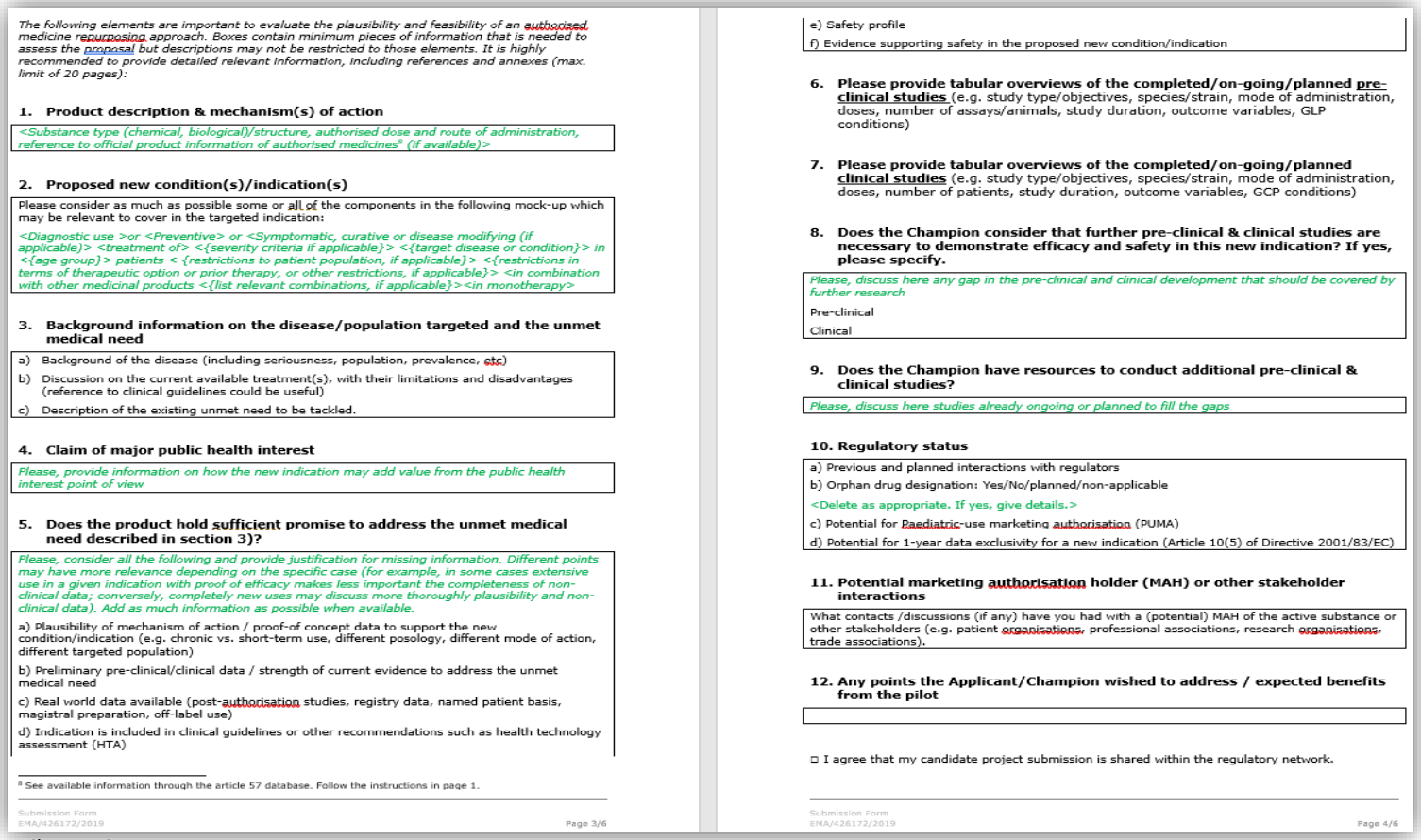
Champion characteristics	
Please indicate if you are a Not-for- profit organisation as per the definition in footnote[4]	*Yes/No*
Please indicate if you are a patient organisation as per the definition in footnote[5]:	*Yes/No*
Please indicate if you are a collaborative group[6] (*if yes, please provide the composition of the group*)	*Yes/No*
Please indicate if you are an Academic Institution as per the definition in footnote[7]	*Yes/No*
For academia only[#]	*Yes/No*
Is the entity's seat located in the EU, Iceland, Liechtenstein or Norway?	
Are you meeting criteria c) of the Annex 'Academia status'	*Yes/No*

[#] Of note: this information is in light of fees applicable to academia for an orphan development but is without prejudice of taking part to the repurposing pilot

Applicant's planned approach for scientific advice	
Note: only one pathway should be followed, either EMA or NCA	
National Competent Authority (NCA)	*Yes/No*
Name of NCA	*Please provide the name of the NCA*
EMA	*Yes/No*

[4] 'Non-profit organisation' or 'non-profit legal entity' should be understood as a legal entity which by its legal form is non-profit-making or which has a legal or statutory obligation not to distribute profits to its shareholders or individual members; 'Legal entity' should be understood as any natural person, or any legal person created and recognised as such under national law, Union law or international law, which has legal personality and which may, acting in its own name, exercise rights and be subject to obligations;
[5] 'Patient organisations' should be understood as not-for profit organisations which are patient focused, and in which patients or carers (the latter when patients are unable to represent themselves) represent a majority of members in their governing bodies.
[6] Collaborative groups and European Reference Networks (ERNs) should be understood as virtual networks or associations of persons without legal personality involving healthcare providers and researchers across Europe.
[7] 'Academia' or 'Academic sector' should be understood as consisting of public or private higher education establishments awarding academic degrees, public or private non-profit research organisations whose primary mission is to pursue research, and international European interest organisations; 'International European interest organisation' should be understood as an international organisation, the majority of whose members are Member States or associated countries, and whose principal objective is to promote scientific and technological cooperation in Europe.

Submission form (p.2)



The following elements are important to evaluate the plausibility and feasibility of an authorised medicine repurposing approach. Boxes contain minimum pieces of information that is needed to assess the proposal but descriptions may not be restricted to those elements. It is highly recommended to provide detailed relevant information, including references and annexes (max. limit of 20 pages):

1. Product description & mechanism(s) of action

<Substance type (chemical, biological)/structure, authorised dose and route of administration, reference to official product information of authorised medicines[8] (if available)>

2. Proposed new condition(s)/indication(s)

Please consider as much as possible some or all of the components in the following mock-up which may be relevant to cover in the targeted indication:

<Diagnostic use >or <Preventive> or <Symptomatic, curative or disease modifying (if applicable)> <treatment of> <{severity criteria if applicable}> <{target disease or condition}> in <{age group}> patients < {restrictions to patient population, if applicable}> <{restrictions in terms of therapeutic option or prior therapy, or other restrictions, if applicable}> <in combination with other medicinal products <{list relevant combinations, if applicable}><in monotherapy>

3. Background information on the disease/population targeted and the unmet medical need

a) Background of the disease (including seriousness, population, prevalence, etc)

b) Discussion on the current available treatment(s), with their limitations and disadvantages (reference to clinical guidelines could be useful)

c) Description of the existing unmet need to be tackled.

4. Claim of major public health interest

Please, provide information on how the new indication may add value from the public health interest point of view

5. Does the product hold sufficient promise to address the unmet medical need described in section 3)?

Please, consider all the following and provide justification for missing information. Different points may have more relevance depending on the specific case (for example, in some cases extensive use in a given indication with proof of efficacy makes less important the completeness of non-clinical data; conversely, completely new uses may discuss more thoroughly plausibility and non-clinical data). Add as much information as possible when available.

a) Plausibility of mechanism of action / proof-of concept data to support the new condition/indication (e.g. chronic vs. short-term use, different posology, different mode of action, different targeted population)

b) Preliminary pre-clinical/clinical data / strength of current evidence to address the unmet medical need

c) Real world data available (post-authorisation studies, registry data, named patient basis, magistral preparation, off-label use)

d) Indication is included in clinical guidelines or other recommendations such as health technology assessment (HTA)

[8] See available information through the article 57 database. Follow the instructions in page 1.

Submission Form
EMA/426172/2019
Page 3/6

e) Safety profile

f) Evidence supporting safety in the proposed new condition/indication

6. Please provide tabular overviews of the completed/on-going/planned pre-clinical studies (e.g. study type/objectives, species/strain, mode of administration, doses, number of assays/animals, study duration, outcome variables, GLP conditions)

7. Please provide tabular overviews of the completed/on-going/planned clinical studies (e.g. study type/objectives, species/strain, mode of administration, doses, number of patients, study duration, outcome variables, GCP conditions)

8. Does the Champion consider that further pre-clinical & clinical studies are necessary to demonstrate efficacy and safety in this new indication? If yes, please specify.

Please, discuss here any gap in the pre-clinical and clinical development that should be covered by further research

Pre-clinical

Clinical

9. Does the Champion have resources to conduct additional pre-clinical & clinical studies?

Please, discuss here studies already ongoing or planned to fill the gaps

10. Regulatory status

a) Previous and planned interactions with regulators

b) Orphan drug designation: Yes/No/planned/non-applicable

<Delete as appropriate. If yes, give details.>

c) Potential for Paediatric-use marketing authorisation (PUMA)

d) Potential for 1-year data exclusivity for a new indication (Article 10(5) of Directive 2001/83/EC)

11. Potential marketing authorisation holder (MAH) or other stakeholder interactions

What contacts /discussions (if any) have you had with a (potential) MAH of the active substance or other stakeholders (e.g. patient organisations, professional associations, research organisations, trade associations).

12. Any points the Applicant/Champion wished to address / expected benefits from the pilot

☐ I agree that my candidate project submission is shared within the regulatory network.

Submission Form
EMA/426172/2019
Page 4/6

References

Q&A:
Proposal for a framework to support not-for-profit organisations and academia in repurposing authorised medicines (europa.eu)

Submission form:
Submission form - Repurposing pilot project for authorised medicines (DOCX/138.84 KB) (new)

EMA scientific advice webpage
https://www.ema.europa.eu/en/human-regulatory/research-development/scientific-advice-protocol-assistance#scientific-advice-on-medicine-repurposing-(new)-section

Any questions?

Further information

Official address Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands
Telephone +31 (0)88 781 6000
Send us a question Go to www.ema.europa.eu/contact

Follow us on **@EMA_News**