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Highlight report from the 12th Industry stakeholder platform on research and development support

4 July 2024

Role	Name
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This was the twelfth meeting between regulators and representatives of industry stakeholders to address topics of evidence generation along the medicine's life cycle and related product-development support activities, such as scientific advice and qualification, as well as specifics for paediatric and orphan medicines. The aim 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.

As part of the introduction a review took place of the status of follow-up actions from the last platform meeting. Significant progress was made in accordance with the planned deliverables and timelines, and follow-up discussions took place at the 12th meeting, where required.

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Development support offering for programme-specific evidence planning

Update from EMA on recent developments

In follow-up to exchanges at previous platform meetings concerning optimising the use of discussion meetings during scientific advice, initial proposals were presented by EMA such as adjustment of the default duration to one hour, with longer discussion meeting duration when necessary, in order to allow more such meetings with applicants. Also, reflections for early decision on the need for a discussion meeting were provided (e.g. based on a draft advice letter), which would require adaptation to the overall procedural timeline. Further discussions on these proposals will be held, also involving the Scientific Advice Working Party.

An update was given on the progress with the three pilots initiated in follow-up to the PRIME 5-year report. There have been eight expedited scientific advice requests to date; the actual expedition is related to the validation phase with normal procedural timelines having been followed otherwise. There have also been 38 development tracker submissions until mid-2024 and they have supported the better preparation of kick-off meetings and submission readiness meetings. Five submission readiness meetings have been held until mid-2024 with two more planned until the end of the year. The planning of submission readiness meetings has helped with the forecasting of the timing of marketing authorisation application (MAA) submissions. The interaction with MAA pre-submission meetings will be touched upon in an upcoming focus group, while touchpoints with the pathfinder initiative for anti-cancer medicines will also be considered.

Four applications for parallel joint scientific consultations with health technology assessment (HTA) bodies are progressing by mid-2024, in the interim period until December 2024 before the framework for parallel Joint Scientific Consultations under the HTA Regulation comes into application.

FOLLOW-UP:

- Review of options on better use of discussion meetings with representatives from SAWP and the sounding board, alongside the development of metrics for measuring effectiveness of the process
- Development of the survey on the ongoing three PRIME pilots (expedited scientific advice, development tracker, submission readiness meetings) in consultation with the sounding board
- Discussions on the future parallel JSC arrangements at an upcoming ISG meeting as part of the HTAR implementation updates

Provision of scientific advice on paediatric developments

Following a revision of the guidance for scientific advice in October 2022 which attempted to clarify the remits of Scientific Advice Working Party (SAWP) and Paediatric Committee (PDCO) in supporting paediatric medicines development, industry has identified practical challenges to position scientific advice on paediatric developments. Scientific advice is available in preparation for a paediatric investigation plan (PIP) submission, but certain questions falling under the strict remit of the PDCO are outside the scope of scientific advice (refer to slide 6 of this presentation).

Clarifications of the current guidance have been proposed by the industry sounding board on scientific advice and will be implemented in due course. EMA has also offered to strengthen pre-submission meetings for complicated PIPs by facilitating the discussion of scientific questions. This will be based on the practice already in place for stepwise PIPs. In addition, EMA will not apply scope restriction on

paediatric scientific advice during the clock-stop of a PIP and in cases where a stepwise PIP has been agreed.

FOLLOW-UP:

- EMA to introduce clarifications in the scientific advice guidance on the basis of the comments received
- Strengthening of the use of scientific pre-submission meetings for complicated PIPs (in extension to the experience with the stepwise PIP)
- Review of the requirements for paediatric scientific advice in collaboration with the concerned sounding boards (scientific advice and paediatrics)

Consolidated advice on clinical trials

EMA presented two recently launched, consolidated advice pilots stemming from Accelerating Clinical Trials in the EU (ACT-EU) Priority Action 7 (PA7). The first pilot pertains to consolidated scientific advice from the Clinical Trials Coordination Group (CTCG) and the SAWP on clinical trial and marketing authorisation requirements, respectively (SAWP/CTCG scientific advice). The SAWP scientific advice process will be used with the involvement of the CTCG. SAWP members from the reference member state (RMS) and/or concerned member states (CMS) of the clinical trial application will act as coordinators for the scientific advice with clinical trial and scientific advice assessors collaborating at national competent authority (NCA) level. The pilot will run for 10 months and involve one application per month.

The second pilot refers to consolidated technical and regulatory advice before the submission of a clinical trial application (CTA) by the RMS and CMSs (pre-CTA advice). The simultaneous national scientific advice (SNSA) submission mode will be used, but the procedure will be a short, 30-day assessment led by the RMS which will also determine the fee to be paid based on respective fees for national scientific advice. There will be an interim evaluation of the pilot every 5 applications received and processed towards improvement of the process.

EMA highlighted a webinar on the two pilots scheduled on July 17th while more information can be found on Consolidated advice on clinical trials.

FOLLOW-UP:

- Industry trade associations to cascade information on the upcoming webinar for applicants on the newly launched advice pilots related to clinical trials, including the early identification of the questions through the QR provided

Action plan to future-proof the Qualification of Novel Methodologies platform

EMA presented the draft action plan to future-proof the Qualification of Novel Methodologies platform. This action plan identifies prioritised actions and timelines for implementation based on the recommendations from the multistakeholder workshop. Industry welcomed the action plan and commitment to supporting the implementation of the actions was expressed.

FOLLOW-UP:

- EMA to publish the action plan on future-proofing the Qualification of Novel Methodologies platform, once finalised

- Existing sounding board to be engaged into the delivery of the actions and reporting on progress

Implementation of the new Fee Regulation

EMA provided updates regarding the new Fee Regulation and upcoming changes for R&D procedures. The presentation was structured in three parts: introduction and background to the new fee regulation, presentation of operational changes and information about engagement opportunities.

As of 1st January 2025 the new Fee Regulation (EU 2024/568) will become applicable. The new fees will be proportionate to the work carried out and based on actual service costs. The changes and benefits for the industry include the update and rationalization of fee structures, the removal of certain fees and introduction of new fees.

EMA presented operational changes of the main impacted procedures in the area of research and development which are scientific advice, paediatric applications and orphan designation. With regards to scientific advice it was highlighted that from 2025, there will be no change in fee levels or areas of advice, no longer distinction between initial and follow-up advice, a revision of payment methods to prepayment, and a new penalty for false declarations. Main changes for paediatric applications and orphan designation are that a fee is introduced but waived, and a new administrative charge will be applicable in case of withdrawals within 24 hours.

Opportunities for industry stakeholders to engage with the EMA are the Small-Medium Enterprises Info Day on 18th October 2024 and an Industry dedicated webinar in Q4 2024. Further, for NFR related queries, stakeholders can contact the Agency via NFR@ema.europa.eu.

FOLLOW-UP:

- Industry associations to disseminate the revised working arrangements, which can be found here.

Completion of onboarding of R&D processes onto the IRIS platform

EMA presented the onboarding of paediatric processes onto IRIS, which went live on 4th June 2024, and how this impacts applicants when submitting paediatric applications to EMA. In addition, information was provided where the new, consolidated and comprehensive guidance for paediatric medicines could be found and how to consult helpful technical information for submitting paediatric applications.

Industry representatives, who were involved during IRIS development for Paediatrics, made suggestions for improvements of the system, including the ability for applicants to download data submitted to EMA, and suggested to initially treat ServiceNow IRIS tickets as priority. EMA clarified that the possibility to download submitted data is under development with the target completion date of October 2024 and that IRIS tickets are being prioritised.

FOLLOW-UP:

- EMA to continue optimising the IRIS platform for paediatric procedures in view of the user feedback provided

EMA Survey focused on early engagement meetings that foster innovation

EMA presented the launched survey on industry early engagement fostering innovation which aims at monitoring the adequate implementation of the framework for interaction between EMA and industry stakeholders. The survey is targeting all pharmaceutical companies and network representative attending any of the following meetings from 1st January - 15th December 2024, namely:

- Innovation Task Force Briefing Meetings (ITF BM)
- Portfolio and Technology Meetings (PTM)
- Small-, Medium- Sized Enterprises briefing meetings (SMEs)
- Quality Innovation Group (QIG) (Listen & Learn (LL) focus group and targeted companies' (1:1) meetings)

Industry trade associations were invited to raise awareness within their affiliated members who may receive the survey on the importance of participating to this exercise. Following the analysis of the results, a consolidated report is expected to be published on the EMA website early 2025.

FOLLOW-UP:

- Industry associations to highlight the importance of the ongoing survey sent monthly to the concerned industry stakeholders attending relevant ITF/PTM/QIG/SME briefings meetings
- EMA to present survey findings and proposed action(s) follow up at the R&D stakeholder platform meeting in 1H2025

Exploring opportunities for the use of real-world data turning into evidence

EMA presented a proposal for a new focus group to be created with the overall objective to share knowledge and experience with use of real-world data (RWD) and generation of real-world evidence (RWE) to advance integration of relevant and reliable RWE in regulatory decision making. RWD and RWE play a crucial role in bridging the gap between clinical research and practice. Even if clinical trials remain core, RWE is more and more enabled, and its value is established. On one side, medicines developers often submit RWE to support efficacy/effectiveness claims and safety, and on the other side, EMA can also generate and deliver RWE via three different pathways, including DARWIN EU and the Framework Contracts with academic or other research organisations.

The proposed focus group will complement other existing forums to exchange views on RWD and RWE key concepts, discuss priorities and possible approaches, explore possible solutions for enhancing the use of excellent evidence generated by the analysis of RWD into regulatory decision making. It is anticipated to particularly discuss any relevant topics related to design of studies using RWD (e.g., data quality, fit-for-purpose data, feasibility assessment, place for innovative designs and/or methods…), interpretation and reporting of results (e.g., impact and interpretation of heterogeneity in multi-database studies…), and good science principles to be applied to any study using RWD (e.g., transparency, fit-for-purpose evidence…).

FOLLOW-UP:

- Establishment of a Focus group to share knowledge and experience with use of RWD and generation of RWE to advance integration of relevant and reliable RWE in regulatory decision making

Evidence planning for combination developments comprising of medicinal products with medical devices and/or companion diagnostics

Follow-up from the Focus group work

EMA provided an update on the Focus group follow-up actions from December 2023. A collaborative effort by a sub-group of the Focus Group, with representatives from all the different stakeholder groups (SAWP, NCA, NBs, Industry, EMA) has taken place and a draft scientific publication is now under final revisions ahead of submission.

On the other action items, discussions have been initiated to explore the complementarity between SAWP (medicinal product focus) and expert panels (medical device focus). Further, EMA continues its contribution to the COMBINE programme and its collaboration with the EC as Chair of the Medical Device Coordination Group (MDCG).

FOLLOW-UP:

- Submission of the scientific paper for publication, once finalised
- Continued dialogue on the remaining action items from the focus group, to support the development of innovative combination products

Progress with the COMBINE project

The COMBINE project lead presented the background, scope, actors and stakeholders, as well as the analysis phase 1 results and next steps of the project. A stepwise programme approach will be implemented, with work across fields with established groups and noting that several projects are already ongoing by the respective groups (e.g. clinical investigations pilot for voluntary coordination across MS competent authorities - launch Q4 2024/Q1 2025). COMBINE can keep an overview of relevant projects ongoing in each relevant group, and projects specific to the interface can be considered. Further details on the framework for continued collaboration are expected later this year.

Industry welcomed the COMBINE project phase 1 outcome and the transition from project to programme. Industry also supports the intent to launch a clinical investigations pilot in Q1 2025 while at the same time expressing concerns that coordinated assessment of performance study applications (PSAs) for IVDs are not included in the 1st wave of pilots and called for enlargement of the scope of this pilot into the PSAs. Further, industry called for more transparency and timely communication on the COMBINE programme deliverables and expressed their commitment to continue to collaboration with regulators to timely implement COMBINE recommended solutions.

FOLLOW-UP:

- EMA and industry to continue contributing into the COMBINE programme and to seek opportunities to support the implementation of solutions
- EMA to review the recommendations regarding combined trials presented by industry, particularly the interface with CTIS and related guidance