EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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Patient Health Protection

Scientific recommendation on classification of advanced therapy medicinal products

Article 17 – Regulation (EC) No 1394/2007

Disclaimer: This document is a summary for public release of a scientific recommendation on classification of advanced therapy medicinal products. The original text adopted by the Committee for Advanced Therapies (CAT) has been redacted to delete commercially confidential information.

The present scientific recommendation refers exclusively to the case as presented to the European Medicines Agency (EMA) without prejudice to future evaluations by the Agency.

This scientific recommendation is not binding and is without prejudice to any decision taken by Member State competent authorities on matters falling within their own remits.

Short descriptor (or name when available) of the proposed active substance

The product contains autologous oral mucosa cells as active substance.

Brief description of the proposed finished product

The final product is provided as a sterile cell layer of autologous oral mucosa cells on a 2.8 cm x 3.8 cm membrane.

Proposed indication

Urethral Stricture- Intended for the use in urethroplasty.

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EMA/CAT comment

Consideration of Article 1(2) of Directive 2001/83/EC (definition of medicinal product – see Annex A)

The product consists of viable oral mucosal cells seeded onto a membrane which can be considered a 'substance' in the meaning of the pharmaceutical legislation (in accordance with article 1(3) of Directive 2001/83/EC), administered to humans with a view to treating urethral stricture.

The product is presented as having properties for treating disease in human being.

According to Article 1(2), the restoration, correction or modification of the physiological function is to be mediated by the substances that exert "a pharmacological, immunological or metabolic action". As the product consists of viable oral mucosal cells it can be agreed that the product acts via pharmacological means.

Fulfilment of Article 2(1) of Regulation (EC) No 1394/2007 (definition of advanced therapy medicinal product – see Annex A)

The product contains viable cells which were isolated from autologous oral mucosa biopsy. During manufacturing the cells are cultivated for proliferation. Therefore the cells may be regarded as substantially manipulated. Moreover the oral mucosa-derived cells are intended for reconstruction of the urethra resulting in a change of function. In summary the cells have to be considered as 'engineered' according to Article 2(1)(c) of Regulation (EC) No 1394/2007.

Fulfilment of Article 2(1)(d) of Regulation (EC) No 1394/2007 (definition of combined advanced therapy medicinal product)[i]

The product does fulfill the definition of a combined advanced therapy medicinal product as laid down in Article 2(1)(d) of Regulation (EC) No 1394/2007.

The membrane is effectively a 3-dimensional structure that temporarily occupies a physical, mechanically stable space, until such time as the oral mucosa-derived cells and then the indigenous human urothelial cells have infiltrated and proliferated the same physical space to form rigid tissue, replacing the biodegraded membrane.

EMA/CAT conclusion

On the basis that:

The product contains 'engineered' cells in the meaning of Regulation (EC) No 1394/2007 and it is *'administered to human beings with a view to regenerating, repairing or replacing a human* [uretheral] *tissue*'

and

that the membrane, a classified medical device in the meaning of Article 1(2)(a) of Directive 93/42/EEC, contained in the finished product temporarily replaces or modifies the anatomy of the

desired urothelial tissue by providing a mechanically sound, 3-dimensional matrix-like template that supports cell infiltration, proliferation and, ultimately, tissue growth.

The EMA/CAT considers that the product falls within the definition of Combined Tissue engineered Product as provided in Article 2(1)(a) of Regulation (EC) No 1394/2007.