



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

# Accelerated (& Early) approvals – current situation in the EU

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New Developments in Drug Regulations  
Pretoria, September, 2015



Presented by: Tomas Salmonson

An agency of the European Union





# Review 2001

## “ Early Access ” Tools





# Revision of guidelines on Early Access tools

## News

27/07/2015

### Fast track routes for medicines that address unmet medical needs

#### Launch of two-month public consultations on revised guidelines on accelerated assessment and conditional marketing authorisation

The European Medicines Agency (EMA) has revised its guidelines on the implementation of accelerated assessment and conditional marketing authorisation, two key tools in the European legislation to accelerate patients' access to medicines that address unmet medical needs.

EMA/CHMP/697051/2014 Rev. 1

EMA/CHMP/509951/2006 Rev. 1

**Draft revisions of these guidelines have been published for public consultation until 30 September 2015**

EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

1 23 July 2015  
2 EMA/CHMP/697051/2014-Rev. 1  
3 Committee for Medicinal Products for Human Use

4 Guideline on the scientific application and the practical  
5 arrangements necessary to implement the procedure for  
6 accelerated assessment pursuant to article 14(9) of  
7 regulation (EC) No 726/2004  
8 Draft

Adoption by CHMP for release for public consultation  
End of consultation (deadline for comments)  
Revised draft adopted by CHMP  
Draft presented to CHMP  
Adopted by the CHMP for release for public consultation  
Start of public consultation  
End of consultation (deadline for comments)  
Date for coming into effect

9 This guideline replaces 'Guideline on the scientific application and the practical arrangements necessary to implement the procedure for accelerated assessment pursuant to article 14(9) of Regulation (EC) No 726/2004' (EMA/CHMP/509951/2006, Rev. 1).  
10 Comments should be provided using the template available at: [AA\\_guideline@ema.europa.eu](http://ema.europa.eu/AA_guideline@ema.europa.eu)  
11 Keywords  
12  
13 Note for the public consultation: This guideline is being developed in order to reflect the experience accumulated with Conditional Marketing Authorisations and is therefore released for repeated public consultation. Comments should be provided using this template. The completed comments form should be sent to [EMA\\_guideline@ema.europa.eu](mailto:EMA_guideline@ema.europa.eu).

| CHMP discussion                                     | July 2006         |
|---|-------------------|
| Adopted by CHMP for release for consultation        | 14 December 2006  |
| End of consultation (deadline for comments)         | 31 March 2007     |
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23 July 2015  
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Committee for Medicinal Products for Human Use

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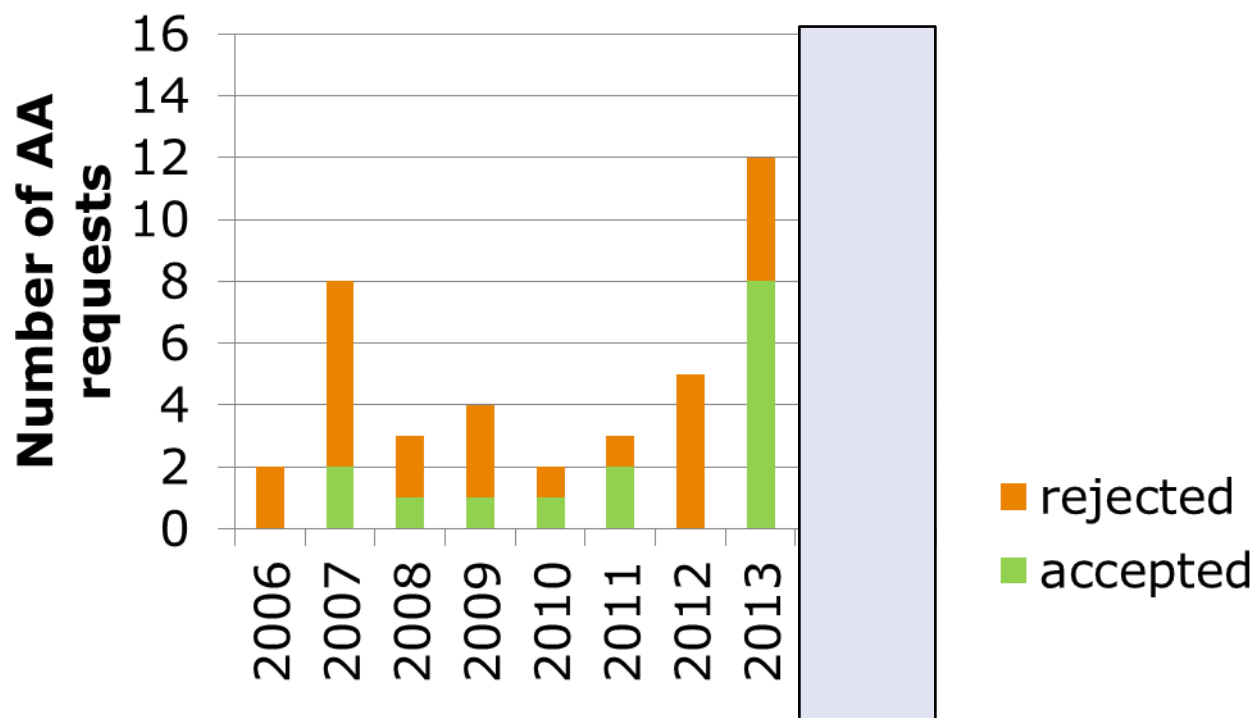
Keywords: Accelerated assessment, Conditional marketing authorisation

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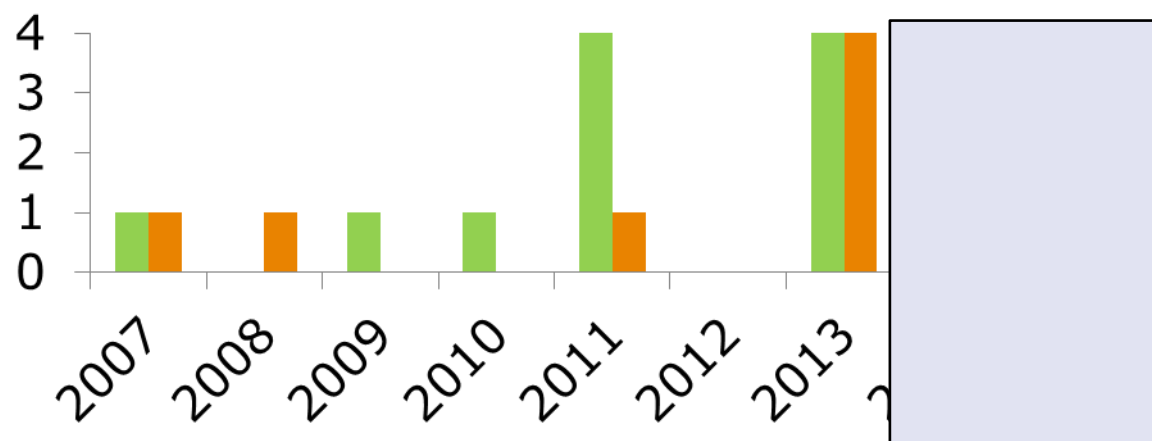
# Number of requests for Accelerate Assessment and acceptance rates





# Experience with evaluations under accelerated assessment

MAA evaluations started under an AA timetable with outcome between 2007 and 2013



**Main reasons for reverting to standard TT were 1/ Major objections identified at Day 120 that cannot be quickly resolved; 2/ Need for inspection.**

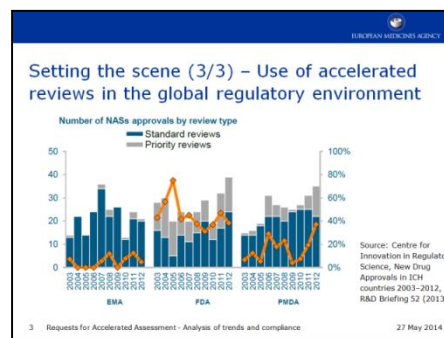


# CHMP discussion at the Presidency meeting May 2014



We faced the **problem statement**:

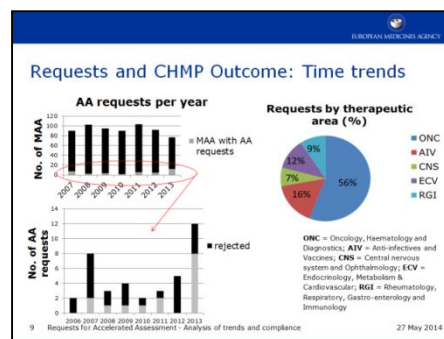
Limited uptake of AA reviews



We **concluded** from the analysis:

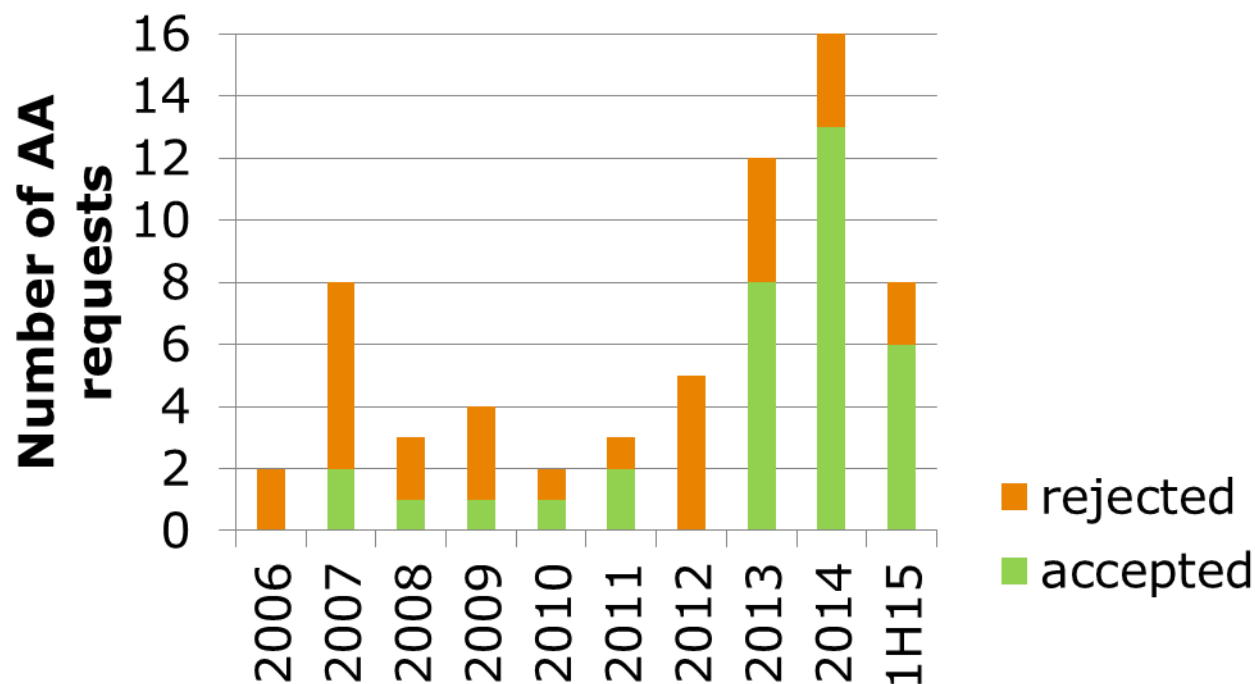
- Reasonable compliance with template criteria
- Driver of the decision: Unclear ?
- Need to optimise learning from previous assessments

Few AA requests / low acceptance rate





# Experience with Accelerated Assessment: Requests and acceptance rates



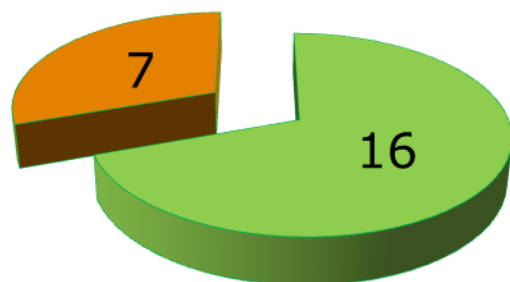
**An increase in requests for accelerated assessment was observed over the last years along with a increase of acceptance rate of such requests.**



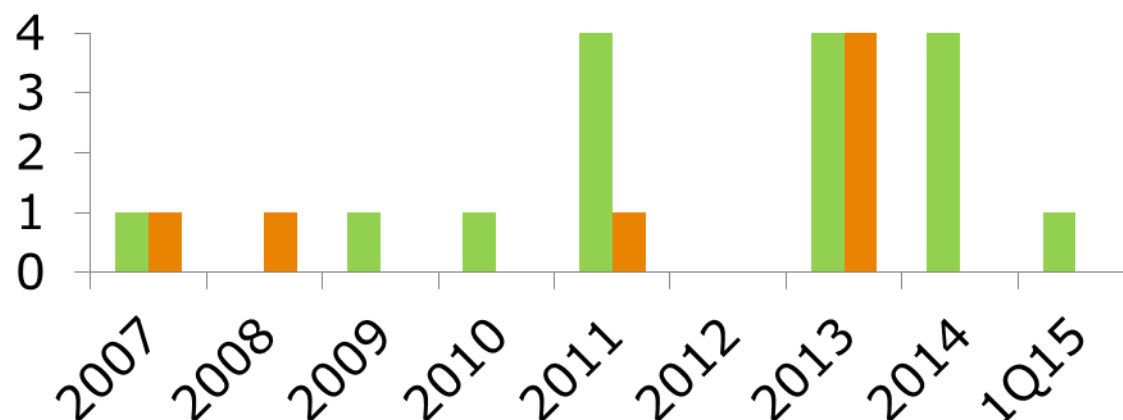


# Experience with evaluations under accelerated assessment

MAA evaluations started under an AA timetable with outcome between 2007 and 1Q15:




- Full review under accelerated TT
- Reverted to standard TT



**Main reasons for reverting to standard TT were 1/ Major objections identified at Day 120 that cannot be quickly resolved; 2/ Need for inspection.**



# Translation of changes in the guideline into the templates for applicants and rapporteurs

  
EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

1 19 May 2015  
2 EMA/CHMP/597051/2014-Rev. 1

3 Guideline on the scientific application and the practical  
4 arrangements necessary to implement the procedure for  
5 accelerated assessment pursuant to article 14(9) of  
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|   |                 |
|---|-----------------|
| Draft agreed by <Working Party>                     | <Month YYYY>    |
| Adopted by <Committee> for release for consultation | <DD Month YYYY> |
| Start of public consultation                        | <DD Month YYYY> |
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| Agreed by <Working Party>                           | <Month YYYY>    |
| Adopted by <Committee>                              | <DD Month YYYY> |
| Date for coming into effect                         | <DD Month YYYY> |

8  
9 This guideline replaces 'Guideline on the procedure for Accelerated Assessment pursuant to Article  
10 14(9) of Regulation (EC) No 726/2004' (EMA/419127/05).

11 Comments should be provided using this [template](#). The completed comments form should be sent to  
12 <as appropriate> @ema.europa.eu

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Keywords Accelerated Assessment

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## Template for applicant's request

- Follows the structure to provide justifications.
- The strength of evidence was expanded with the guidance.

## Briefing note for Rapporteurs

- More detailed guidance on important aspects to be addressed in the assessment .
- More detailed guidance on how to express the conclusions.



# High-level summary of proposed revisions

## **Draft revision of the guideline on the scientific application and the practical arrangements necessary to implement the procedure for accelerated assessment pursuant to Article 14(9) of Regulation (EC) No 726/2004**

### Content

- More detailed guidance on how to justify major public health interest (unmet medical need, strength of evidence)
- Acknowledgment that comprehensive clinical data may not be available in certain situations, allowing accelerated assessment in the context of a conditional marketing authorisation for example

### Process

- Intent to request accelerated assessment to be indicated 6-7 months in advance and submission of accelerated assessment request to take place 2-3 months ahead of marketing authorisation application
- Importance of early dialogue / pre-submission discussions.
- Optimisation of the assessment timetable by better balancing evaluation phases to reach a CHMP opinion within 150 days



# Outline of the potential evaluation timelines

Acceleration of the timelines proposal: 90/30/30 days

- 1<sup>st</sup> evaluation phase: 120 → 90 days (as is extension of indication)
  - Include PRAC evaluation & Peer review
- Clock-stop: 1 month by default
- 2<sup>nd</sup> phase: 60 → 30 + 30 days:
  - Opportunity to reach an opinion at Day 120 (w/o OE); or
  - LoI with no clock-stop (PI, RMP finalisation) → opinion at Day 150
- Possibility to switch to standard timelines at
  - Day 90 (followed by 90+30 days TT) or
  - Day 120 (followed by 60+30 says TT as usual) TBC



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6 Regulation (EC) No 507/2006 on the conditional  
7 marketing authorisation for medicinal products for human  
8 use falling within the scope of Regulation (EC) No  
9 726/2004  
10 Draft

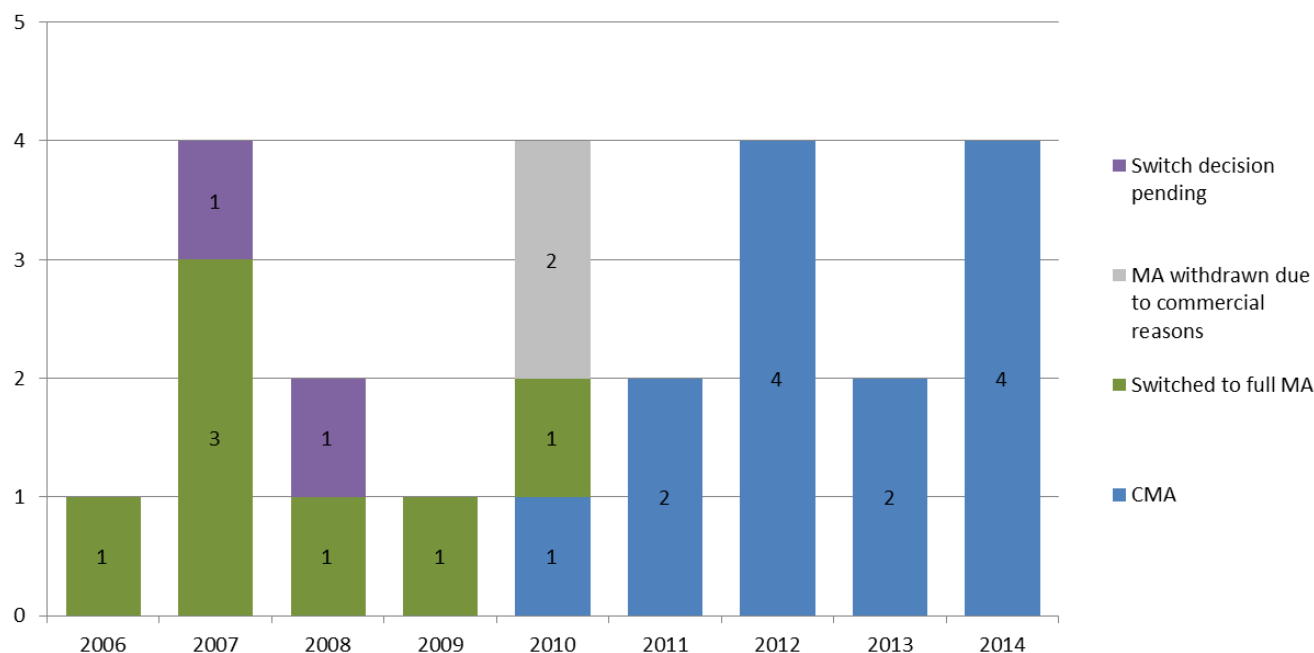
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# Conditional Marketing Authorisation granted in the centralised procedure (until 12/2014)

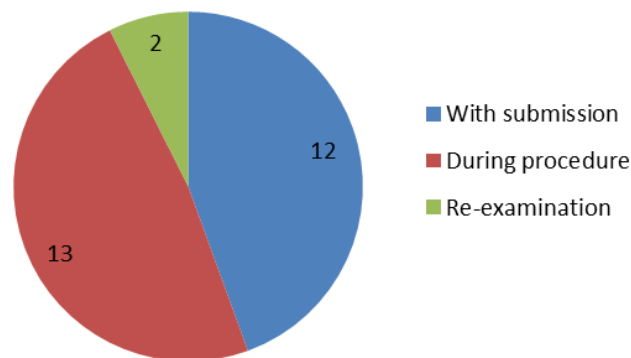
Overview of CMAs granted by year and current status



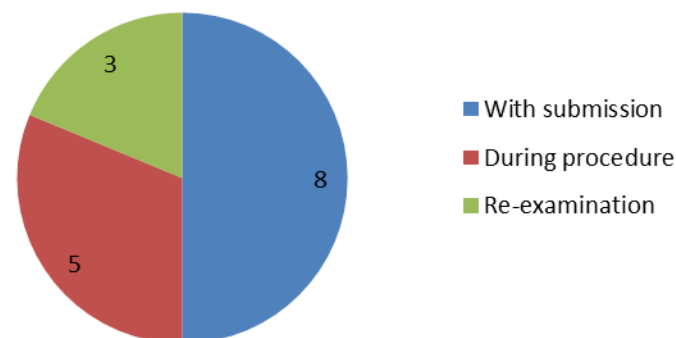


# Positive and negative CHMP outcomes by time of consideration of CMA

Step of procedure when CMA is first considered (procedures with positive CHMP outcome, n=27\*)



Step of procedure when CMA is first considered (procedures where possibility of a CMA is discussed in a CHMP document but procedure outcome is negative, n=15\*\*)



\* Positive outcomes include 3 applications that were withdrawn after positive CHMP Opinion

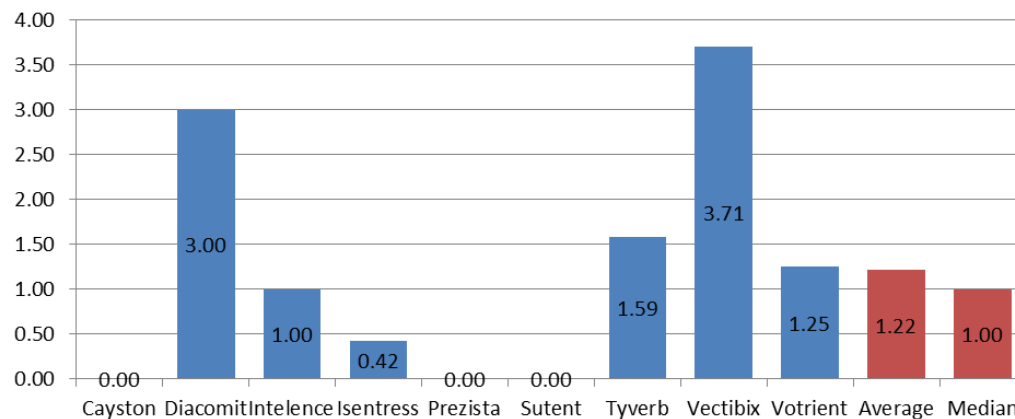
\*\* Negative outcome = Negative final CHMP Opinion or withdrawal of application after D120

# Time to 'switch' from conditional to full marketing authorisation

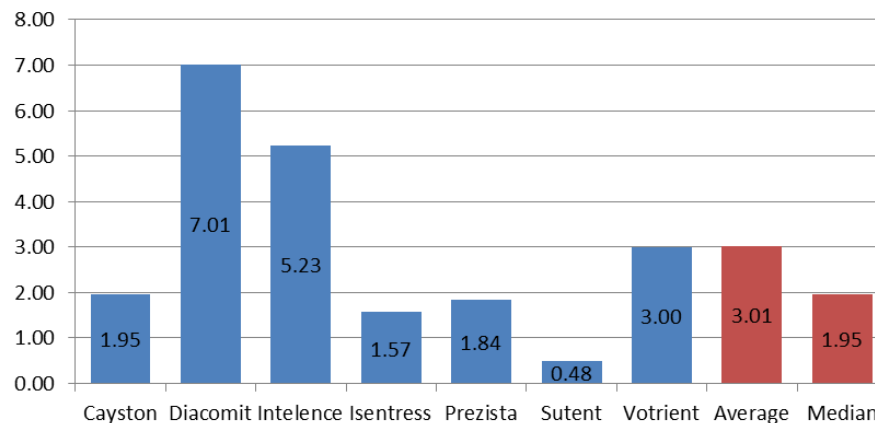
- Approximately half of the products had changes to the scope and/or deadline of at least one of the specific obligations
- For 9 products with SOs completed, on average the due date for completion of last SO was extended by 1.22 years
- For 7 products that have MA not subject to SOs, it was granted on average in 3 years

Note: data lock December 2014

Extension for completion of Specific Obligations (years)



Time to granting MA not subject to Specific Obligations (years)







# High-level summary of the draft guideline

## **Draft guideline on the scientific application and the practical arrangements necessary to implement Regulation (EC) No 507/2006 on the conditional marketing authorisation for medicinal products for human use falling within the scope of Regulation (EC) No 726/2004**

### Content

- Clarification how a positive benefit-risk balance should be substantiated where there are less complete data
- Examples and further guidance on the level of evidence that must be provided at the time of authorisation and data that can be provided post-authorisation
- Guidance on when a condition could be considered life threatening or seriously debilitating if these effects are in the long-term
- Clarification on fulfilment of unmet medical needs, i.e. medicines providing major improvements in patient care over existing therapies can be eligible in certain cases

### Planning and submission requirements

- Emphasis on importance of planning conditional marketing authorisation prospectively to ensure swift assessment procedure
- Emphasis on advantages of engaging in early dialogue with EMA on the development programme, in particular in the context of parallel scientific advice with health technology assessment bodies
- Updated guidance on extent and type of data required to be included in annual renewal submissions



# What will the future bring?



# Thank you!

European Medicines Agency

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