Clinical trial related multi-national scientific-regulatory advice within the European Medicines Regulatory Network: Quo vadis?

WG SNSA – Working Group of the EU-IN on Simultaneous National Scientific Advice
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DIA Symposium, 14th March 2024
#S0204-L: How to de-risk early development?

Disclaimer

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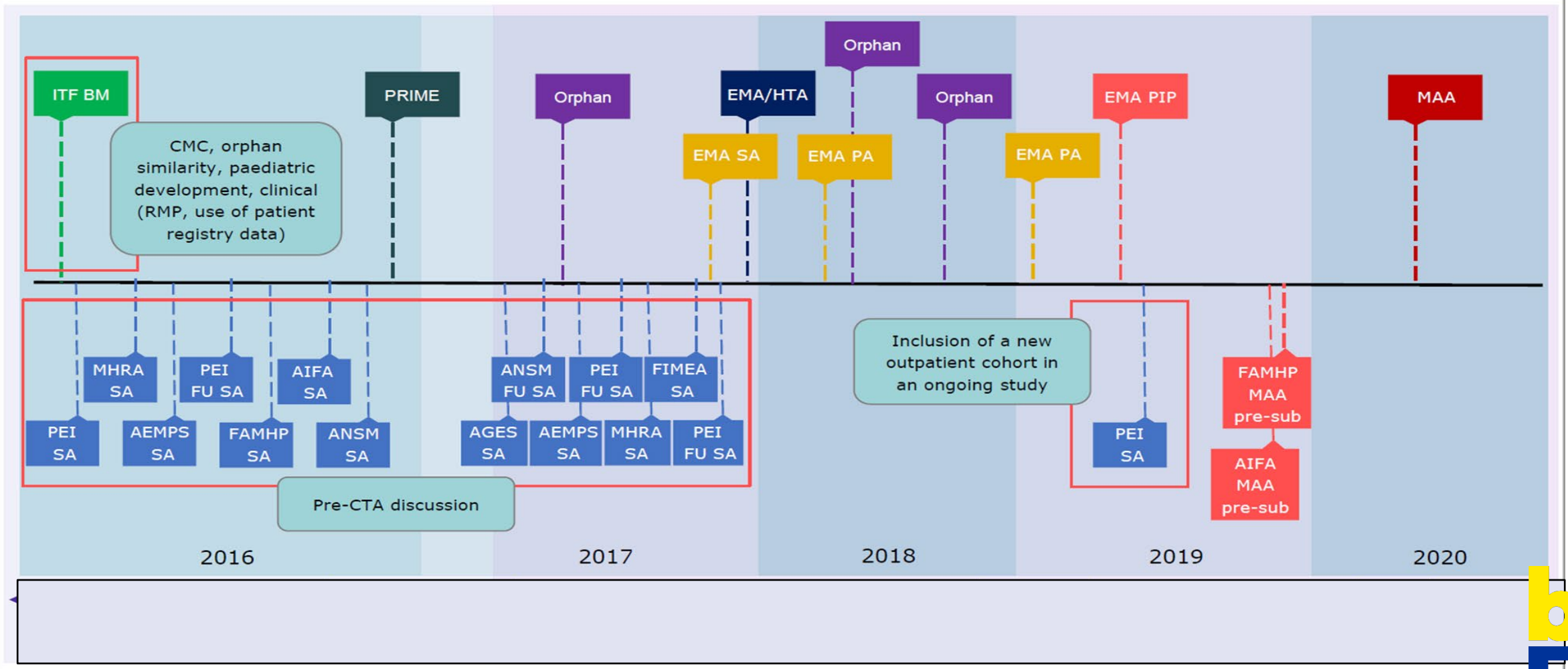
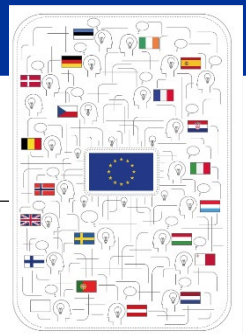
The presenter does not have any conflict of interests.

Why is SNSA needed ?

Case study on an innovative pharmaceutical product development



EU-IN context



- Vision and mission
- Structure
- Working Groups
  - Benchmarking of European Medicines Agencies
  - EU Network Pharmacovigilance Oversight Group
  - European Surveillance Strategy Working Group
  - EU Network Training Centre (EU-NTC) - former OTSG
  - **EU-Innovation Network (EU-IN)**
  - HMA/EMA Joint Big Data Steering Group
  - HMA/EMA Joint Task Force on Availability of authorised medicines for human and veterinary use (TF AAM)
  - HMA/EMA Joint Audit

EU-INNOVATION NETWORK (EU-IN)

- **EU-IN Introduction and Overview** +
- **Strengthening Training of Academia in Regulatory Science (STARS)** +
- **Involvement of competent authorities in externally funded projects** +
- **Simultaneous National Scientific Advice (SNSA)**
- **Horizon Scanning** +
- **EU-IN Members and Representatives** +
- **Contact** -

Contact Point

Secretariat
e-mail: EU-INSecretariat@ema.europa.eu

SNSA WG:

- Founded: Q1 2019
- Co-chairs: FAMHP, PEI, AEMPS
- Monthly meetings + annual F2F meeting
- Collaborations & interactions:
  - Other EU-IN WG's
  - CTCG (pre-CTA advice)
  - SAWP
  - ACT-EU Initiative: PA7 on Scientific advice (+ PA5, PA2)
  - HMA
  - Annual INNO meetings: (EU-IN, CTCG, SAWP, EUnetHTA)
  - Industry (eg. EFPIA, EUCOPE,..)

https://www.hma.eu/about-hma/working-groups/eu-innovation-network-eu-in.html

Project overview

Pilot phase 1

(Feb. – Dec. 2020):

starting **10 volunteer NCAs** with 2 NCAs/SNSA

with HMA support

Pilot phase 1 extension

(until Dec. 2021):

increasing participation of NCAs with 2 NCAs/SNSA + option of 3rd NCA as observer

Jan-Nov 2022: Review pilot phase 1 and ACT-EU engagement

Pilot phase 2 (Dec. 2022 – Dec. 2024):

- Increase participating NCAs &

- extend cooperation:

Accelerating Clinical Trials in the EU (ACT-EU)

Clinical Trial Coordination Group (CTCG)

Scientific Advice Working Party (SAWP)

> 17 NCAs participating

simultaneously interacting experts

across selected EU-Member States

... improving efficiency and consistency of advice

Pilot phase 2 – optimizating efficiency & harmonization

1st NCA coordinating

2nd NCA participating

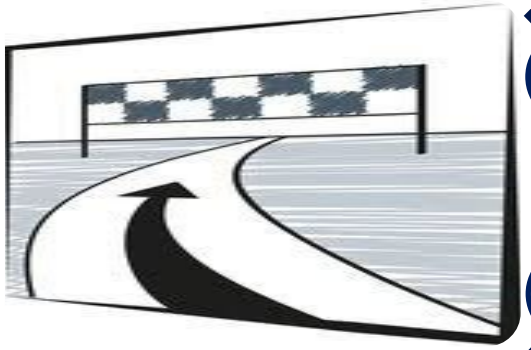
+ optional in *observing role:*

Additional NCA

3rd NCA participating

CTCG Representative of CTCG and/or ethics committee(*)

Applicant



- Single entry point: SNSA@pei.de, common application form & briefing book
- Harmonised process based on procedure specific opt-in and predictable timetable: (fixed timelines at start of procedure & flexibility under special circumstances)
- Clearly documented outcome of position of each NCA in meeting report

(*) on voluntary basis, subject to case-by-case agreement

SNSA – target group & scope

Target groups

- **no restrictions**:
all types of applicants can apply

- Focus on **innovative developments**, but not only…
- especially requests for
advice in early stage of development +
- special guidance for **SME**[+] **and academia**

N.B. EMA scientific advice should continue to be used for scientific advice related to the suitability of the proposed clinical development to support a centralized marketing authorisation application.

Scope

Scientific & regulatory advice
= similar to national procedures

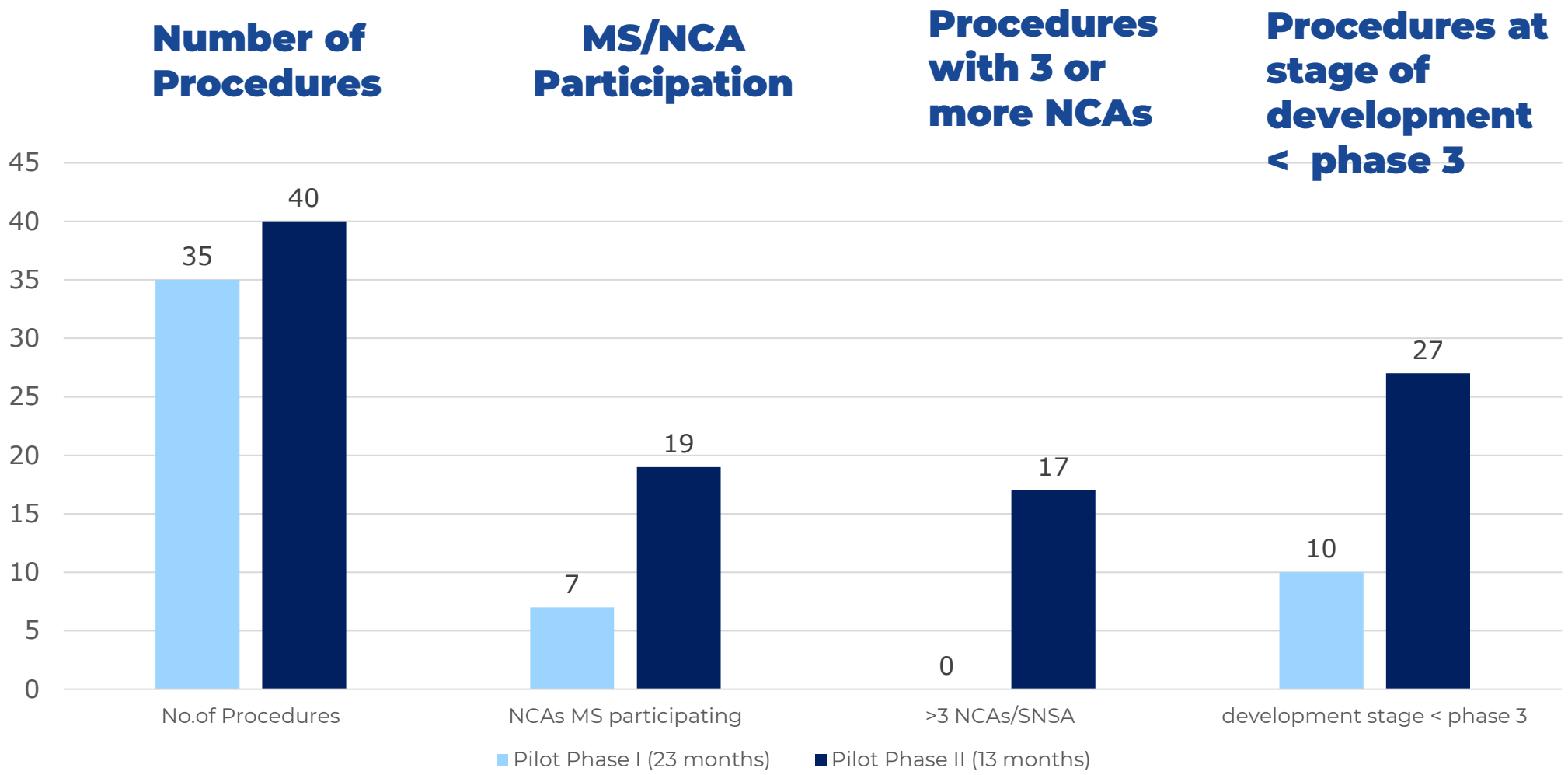
Questions on e.g. **quality, safety and efficacy**
- focusing on **early stage of product development**
- including, but not restricted to clinical trial applications/concepts, e.g. multinational trials in small (patient) populations

Restrictions:
- Requests for **combination products** for human use only accepted if within remit of participating NCAs
- **HTA*** and reimbursement aspects **currently excluded**
- Limitation of SNSA to the **scope and questions** raised in the **briefing documents**

[+] Small and Medium Size Enterprise

*Health Technology Assessment

Interim analysis: SNSA phase 1 - 2 procedures

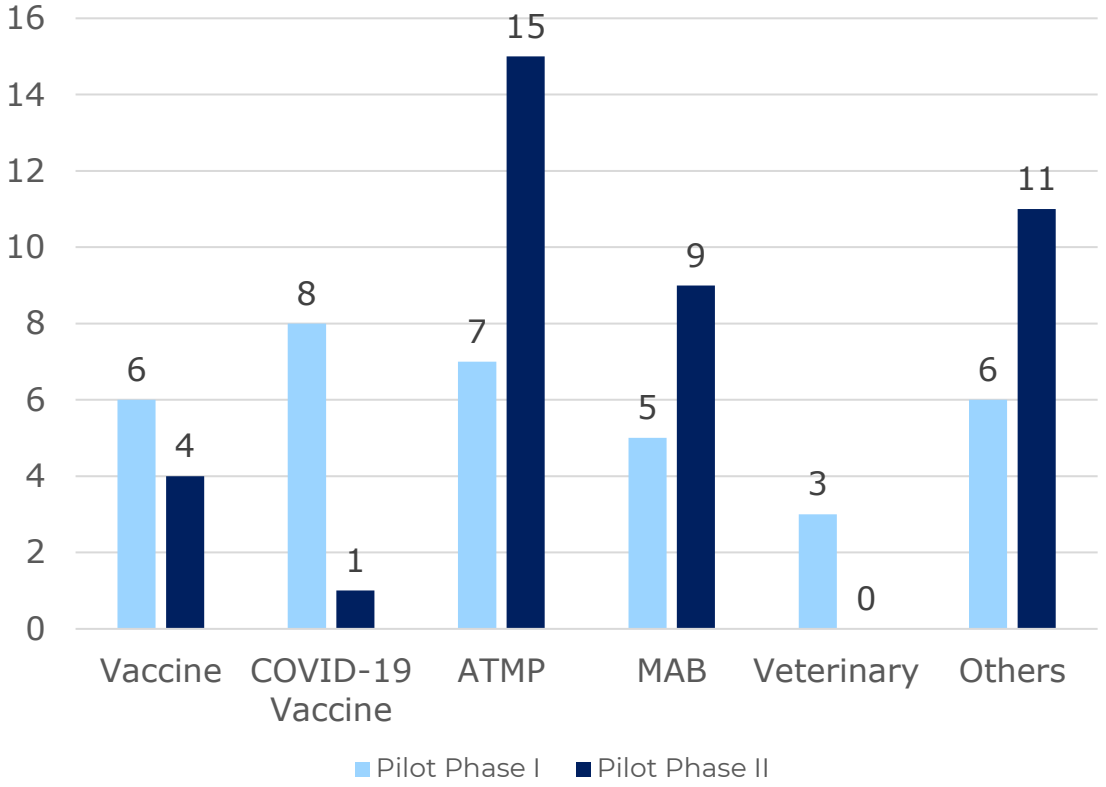


Increased uptake and NCA participation observed in first year of phase 2 compared to full phase 1

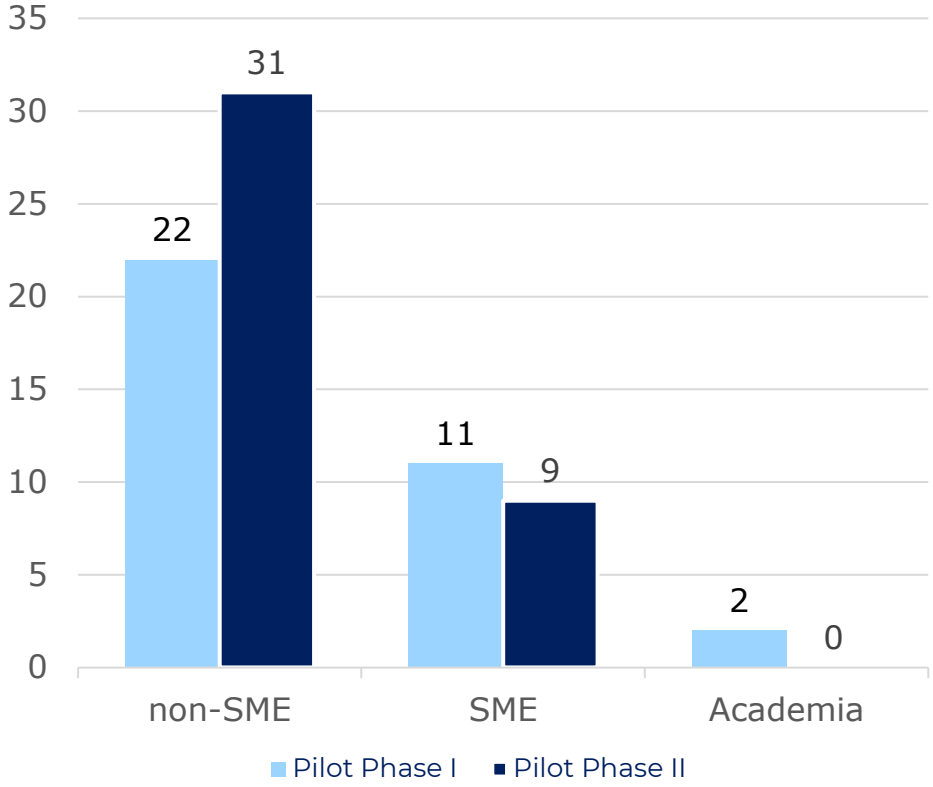
Focus of advice: mainly (early) clinical stage

Interim analysis: SNSA phase 1 - 2 procedures

Type of medicinal product



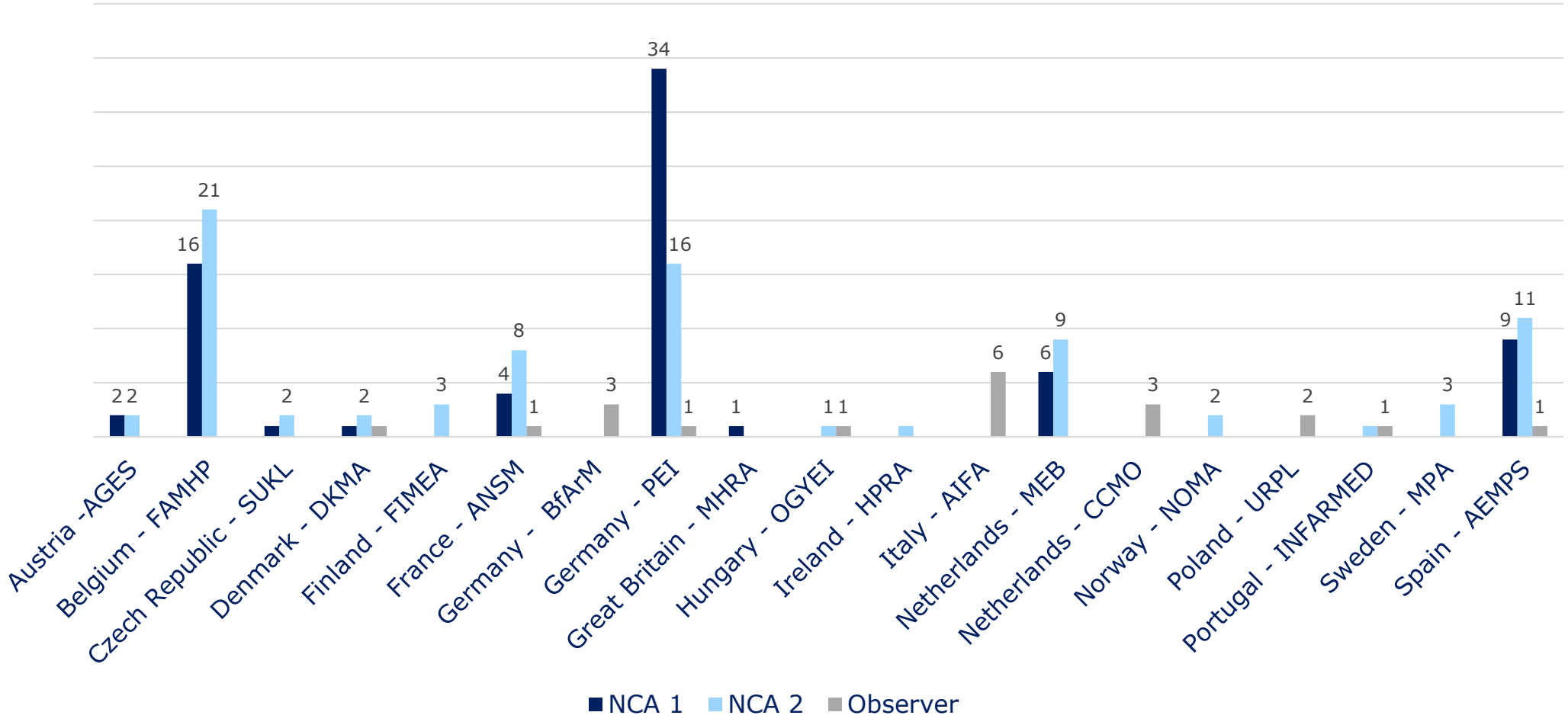
Applicant type



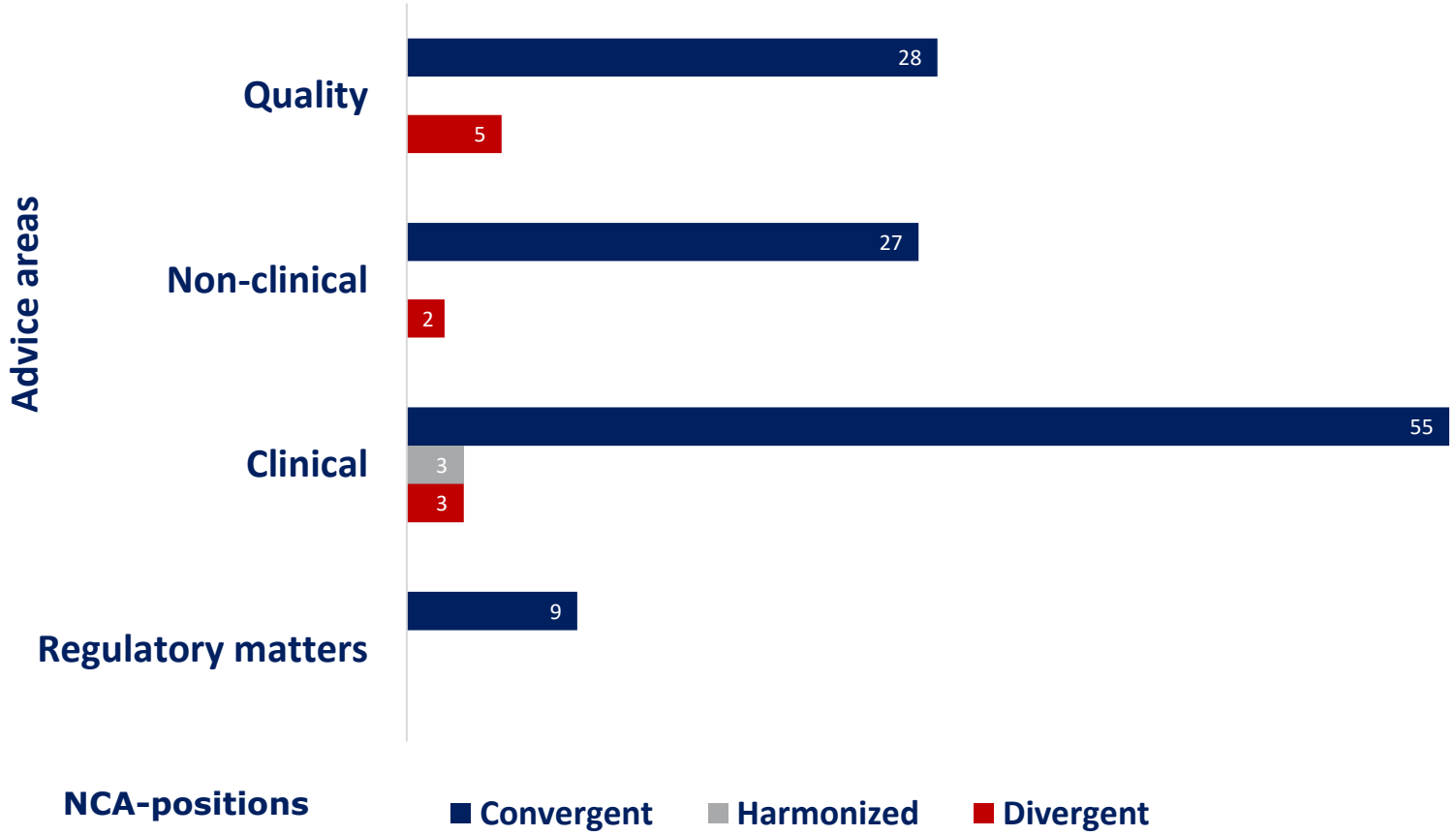
- Increased uptake from large pharma
- need to encourage SME / academia

Interim analysis: SNSA phase 1 - 2 procedures

NCA Participation in Phase 1 and 2



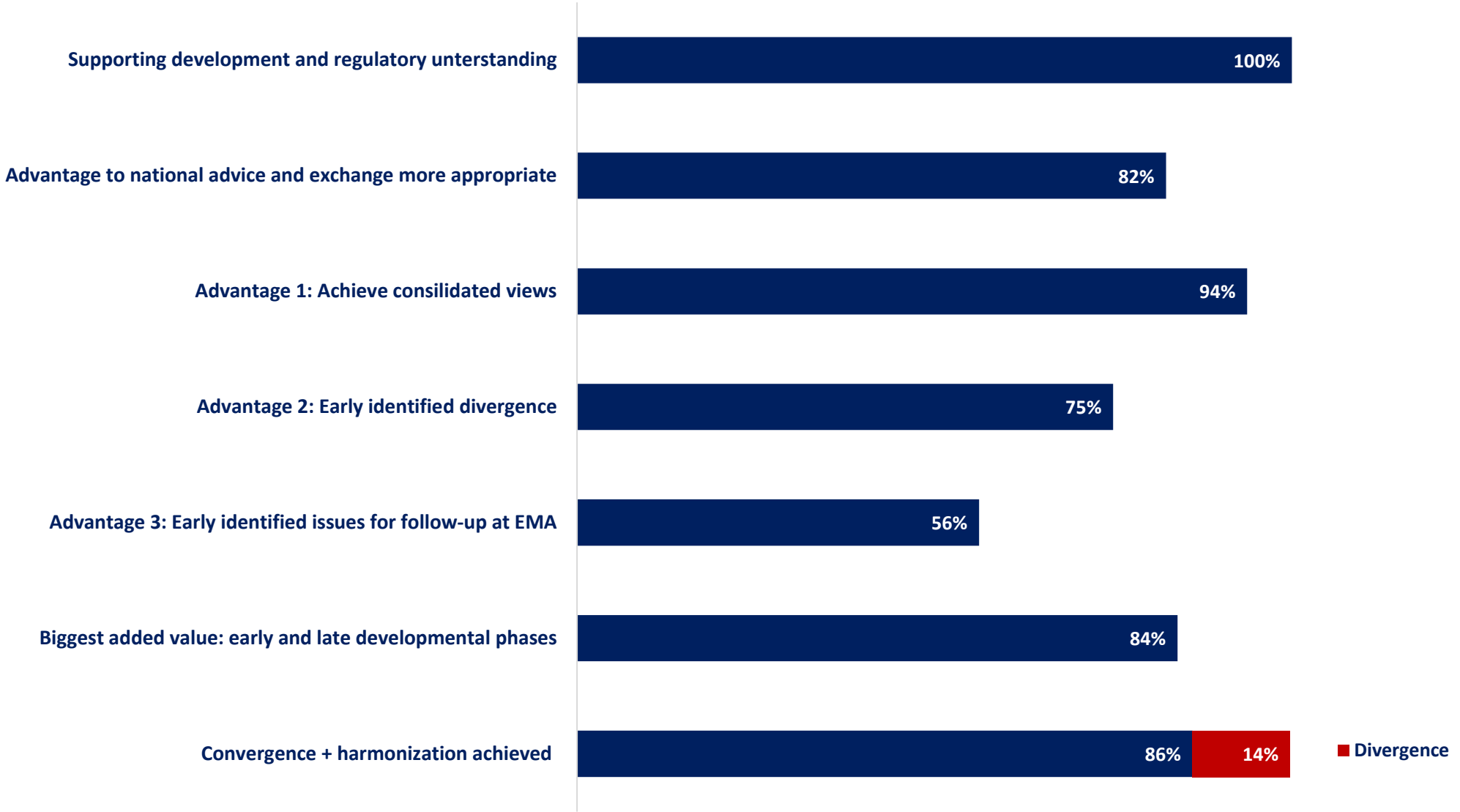
Analysis: SNSA meeting results of pilot phase 1



n= 27 out of 33 SNSA

approx. 50% issues challenging and/or to be followed-up at EU level, eg. at EU-IN, CTCG, SAWP

Feedback from applicants on SNSA concept (Phase 1)



Case study – SNSA from academia

European academic life science institute

Mono-clonal anti-body

Treat-ment of COVID-19

Areas of advice

Key areas:

Quality, non-clinic, clinic

Specific issues:

Viral & micro-biological safety & paediatric indication

Results of advice

Positions of NCAs largely harmonized &

identification of critical issues for subsequent discussion

Product development: **non-clinic**

Timeline of advice: total 65 days; 44 days from application to meeting

Support for development of innovative medicinal product in pandemic situation for academia

SNSA – a fit for purpose advice concept

Advantages

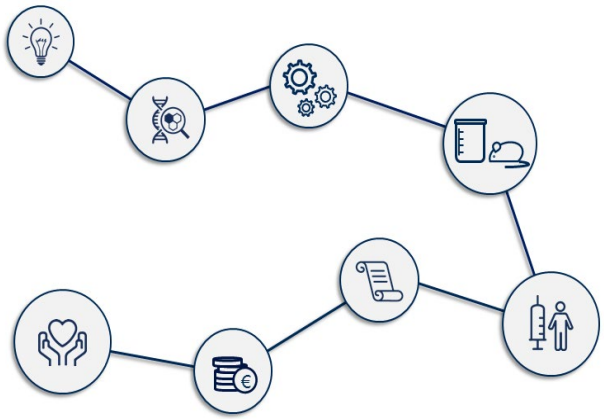
- focus on key scientific aspects in a tailor-made multi-national regulatory frame

- early identification of regulatory challenges in a detailed harmonized approach

- shared knowledge & experts‘ discussion to early align (national) requirements

- efficient procedure to maximize advice consistency in the entire drug development process in (dedicated) MS

- added value involving affiliated important areas, such as CTCG, ethics committees



Recommendations

- request customized advice early on in your (pre-clinical) development

- consider the stepwise advice approach:
  faster adaptation of consolidated development at decisive steps

- use the format to avoid delays for the submission & approval of a CTA prior to submission

- apply for SNSA complementary to national SA and EMA SA: combine, but do not overlap

- **Timing is everything! Don’t come too late; raise the right questions @ the right time!**

SNSA future perspectives

Planned activities during 2024:

- **Updated Guidances & procedural timeline**
- **Communication & training webinars** for **NCAs (22 March)** & **Applicants (19 April)**
- Development of **common IT platform for NCAs** (coordination of SNSA & data sharing)
- **Process optimisation:** to ensure predictable timelines & consistency
- Consider involvement of **other relevant stakeholders**: eg. Ethics Committees, CTCG, patient representatives, …
- **Pre-CTA advice pilot** procedure in cooperation with CTCG and ACT EU
- **IncreaseNET WP8:** Conceptual development of **pre-grant regulatory advice**

Pre-CTA advice pilot: Introduction

Scope

Pre-CTA advice focuses on **regulatory and technical** aspects of CTs

No scientific aspects of CTs

Within the ACT EU Priority Action – Advice **two main pilots** are planned:

1. **Consolidated advice: CTCG – SAWP**
2. **CTCG Pre-CTA advice**

Aim: de-risking CTA's prior to formal submission under CTR / CTIS & enhancing evaluation of Multinational CT's

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Pre-CTA advice pilot:

Key features

- Short procedure (written advice)
- Validation of application in order to decide if within scope; if not, deferred to other advice services
- Limited nr. of questions
- Close to CTA submission (Mature protocol)
- Proposed RMS and MS concerned for CTA should be known
- Entry port: SNSA coordination unit

- Expected start of the pilot :
  < end April 2024
- Pilot will be evaluated after 5 completed advice and adjusted accordingly

https://www.hma.eu/about-hma/working-groups/clinical-trials-coordination-group.html

Thank you for your attention…

… to our support in bridging regulatory gaps!

The floor is yours for any questions

More information available at:

FAMHP: https://www.famhp.be/en/human_use/medicines/medicines/scientific_technical_advice/regulation
HMA: https://www.hma.eu/about-hma/working-groups/eu-innovation-network-eu-in.html
EMA (ACT-EU): https://accelerating-clinical-trials.europa.eu/priority-action-areas/scientific-advice_en

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