1st EMEA Workshop for Micro, Small and Medium-Sized Enterprises (SMEs)

"Navigating the Regulatory Maze"

Marketing Authorisation: The Evaluation Process

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Centralised Procedure

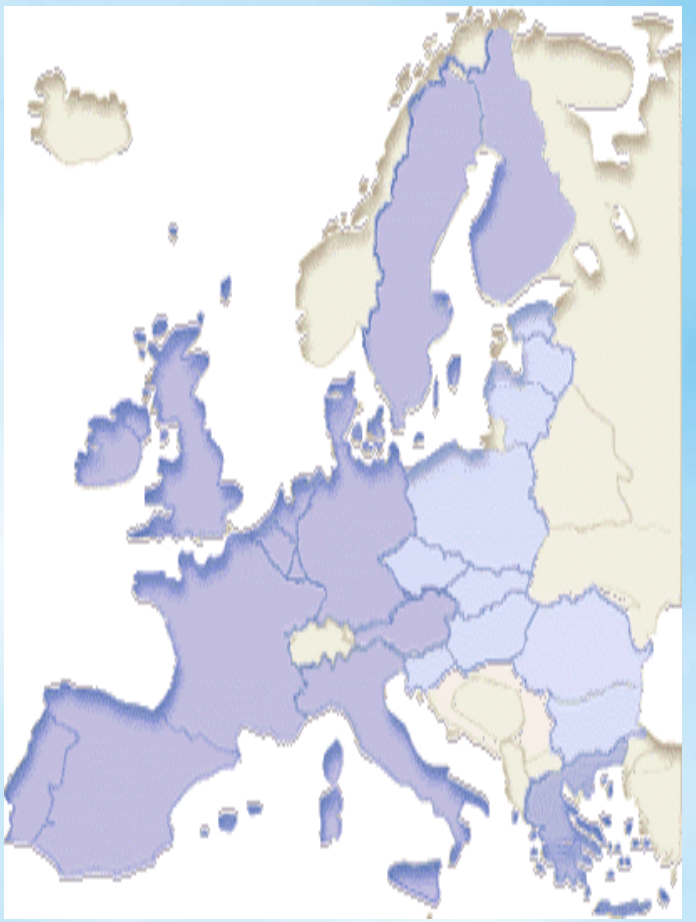
It is one of a number of ‘procedures’ or ‘routes’ to authorisation in the EU

It is a regulatory assessment process leading to:

- 1 Marketing Authorisation (simultaneously valid in ALL EU MS)
- 1 Invented Name
- Identical product information, in all 23 EU languages :
  - Summary of Product Characteristics (SPC) which defines the conditions of use of the product – indications, warnings, shelf-life, etc.
  - Package Leaflet (Information for the patient)
  - Package Labelling (Information on the carton)
- Maximum time limit
  - 210 days Evaluation ➔ Opinion

Centralised Evaluation System

- The centralised evaluation system is designed to coordinate the existing scientific resources of Member States
- EMEA is coordinating the scientific evaluation → Scientific Opinion



- The European Commission grants the **Commission Decision** (Pan European Marketing Authorisation) on the basis of this Opinion
- **Legally binding** to all MS

Partners in the Centralised Procedure

Converts the CHMP opinion into a Decision – i.e. an authorisation

European Commission (Pharmaceutical Committee)

Applicant

CHMP

Committee on Human Medicinal Products

-

Final opinion on all product-related scientific disputes

EMEA secretariat

Coordinates activities and facilitates the CHMP opinion (whether positive or negative !)

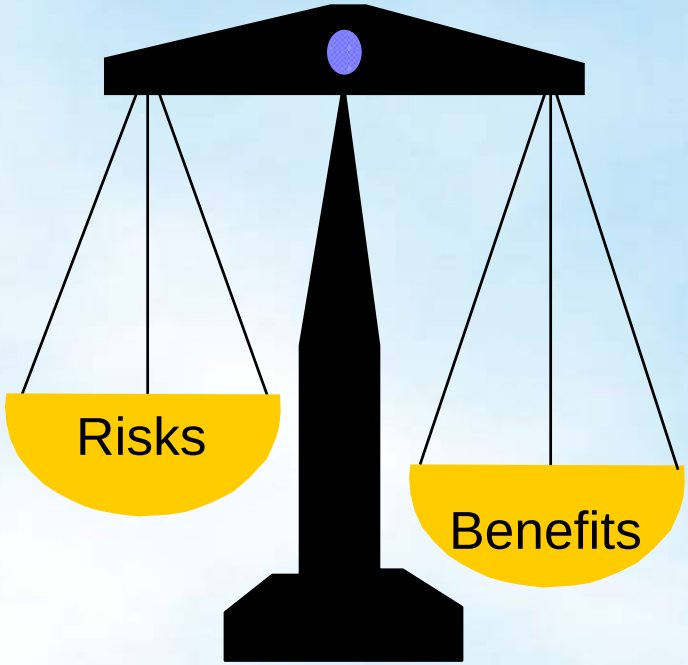
Centralised Evaluation System

- The applicant has to submit a '**dossier**' of scientific information on quality, efficacy and safety to support the application
- The CHMP appoints two of its members to act as "Rapporteurs" who will do the evaluation on behalf of the Community.
- Each Rapporteur has a team of experts in the field of Quality, Safety, Efficacy, so two teams will evaluate the dossier
- The Rapporteurs' assessment is a recommendation to CHMP and forms the basis of the discussion
- **Transparent procedure**, the Rapporteurs' assessment is sent to the applicant

Centralised Evaluation System

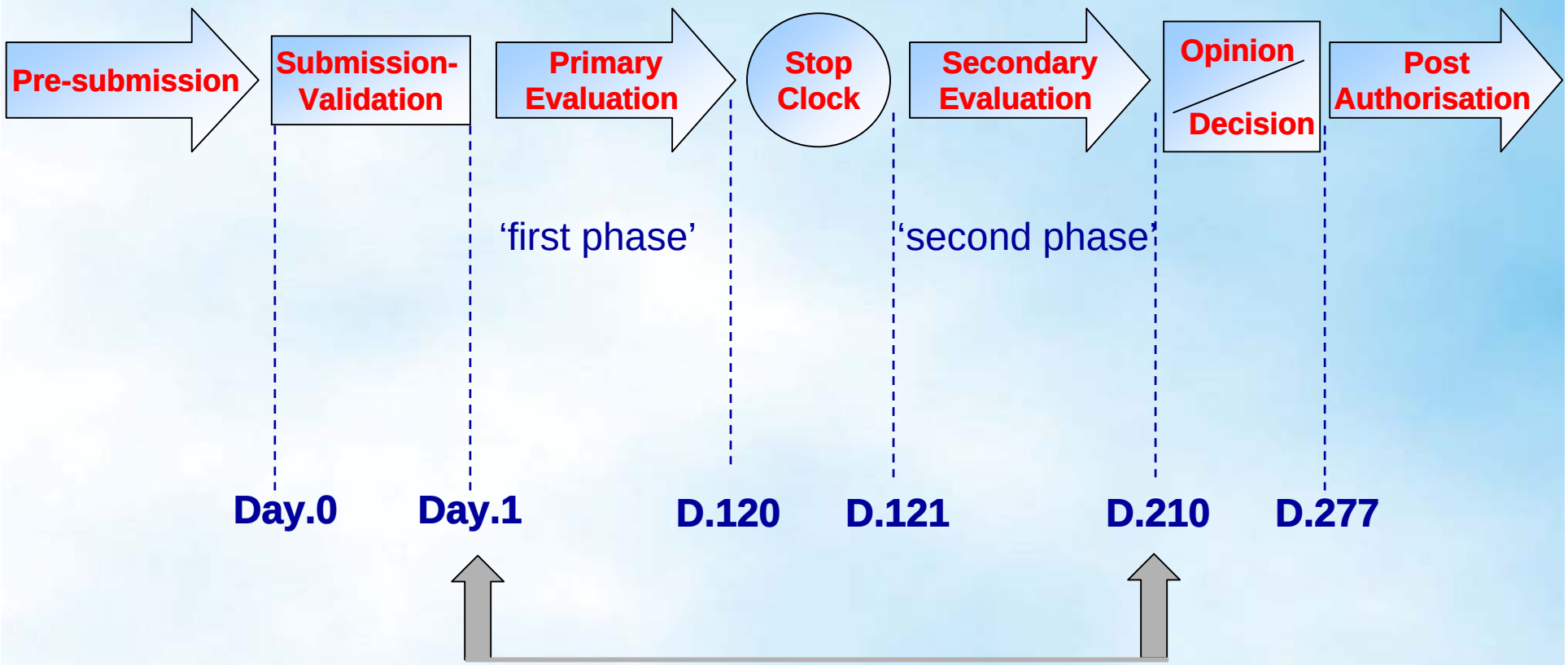
- The decision on whether to recommend the granting of an authorisation is taken by **All** CHMP members
- CHMP Opinions are based on majority, **if a MS does not agree it will still have to comply with the majority view**
- For “unusual” cases the CHMP may seek the advise of specialised experts (Working Parties, SAGs)

Criteria for Authorising Medicines



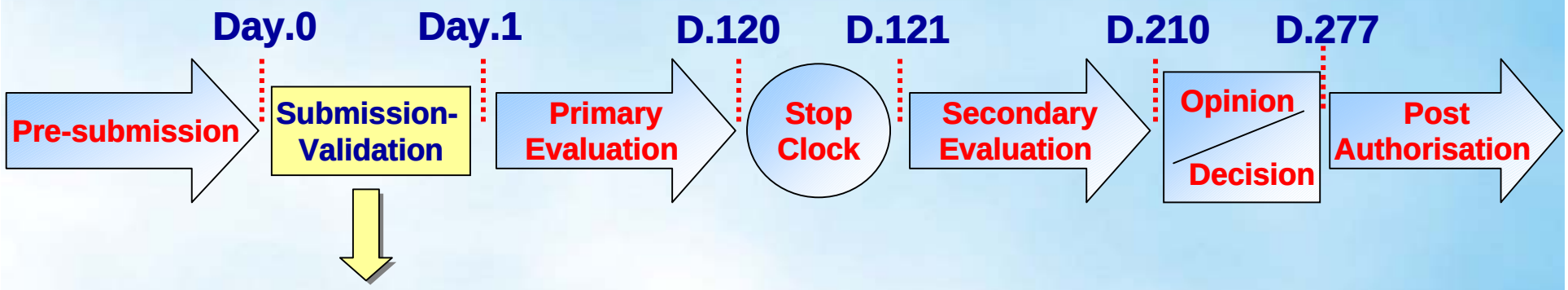
The main scientific principle used in the evaluation of medicines is the **benefit/risk ratio** based on quality, efficacy, safety and risk management considerations.

Centralised Procedure - Overview



Legal requirement ! : CHMP Opinion within **210** days

Submission- Validation Phase



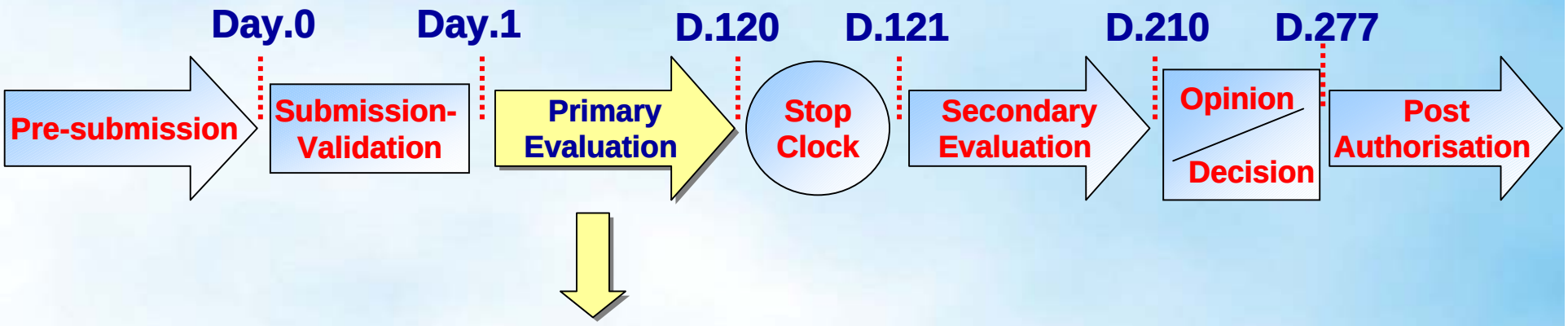
Submission:

- Applicant submits the dossier.
- Dossier requirements are defined in the legislation and in relevant guidelines

Validation:

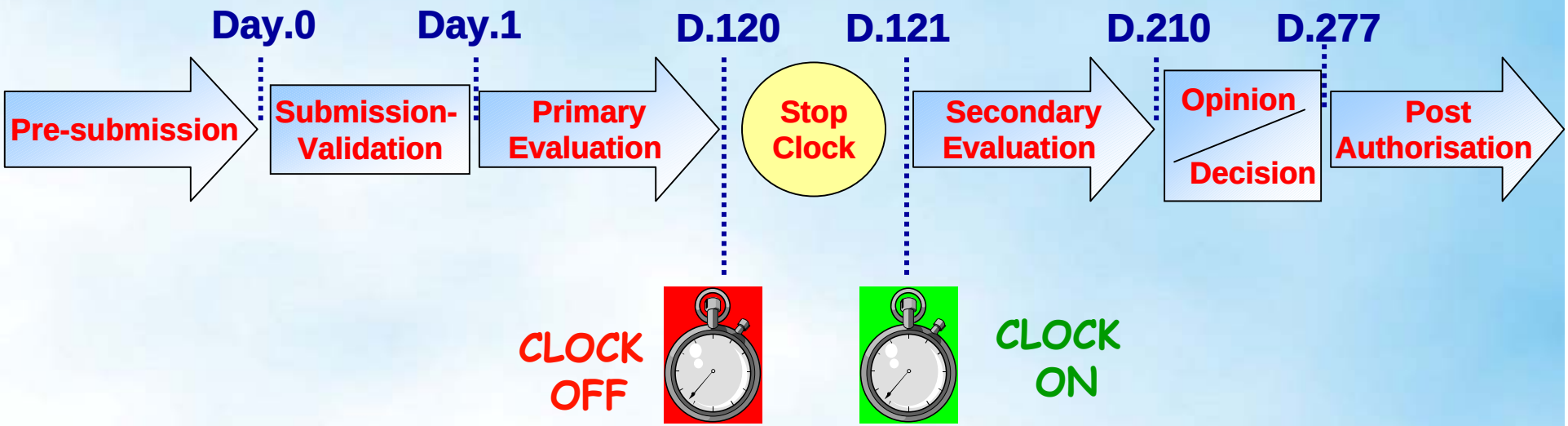
- Performed by the EMEA
- 10 working days from submission date
- No scientific evaluation, at this point
- Only check of:
  - the completeness of the dossier and
  - compliance with legal/regulatory requirements

Primary Evaluation Phase



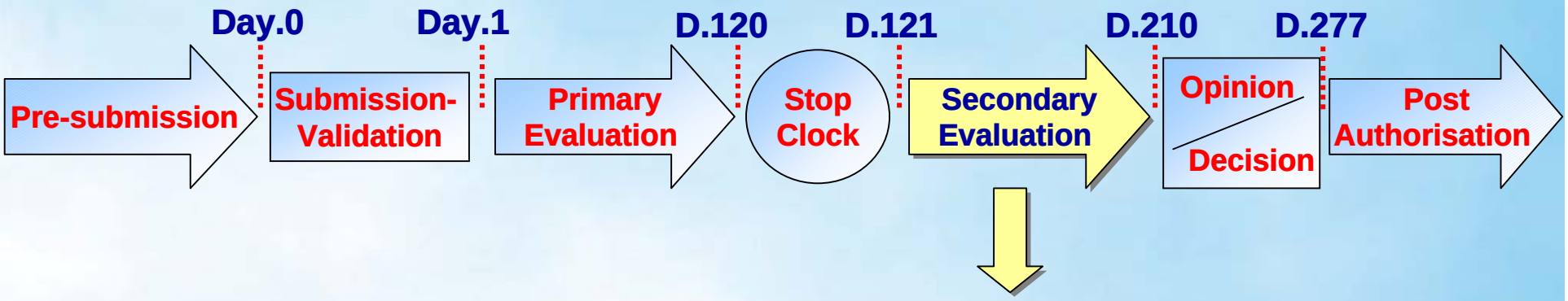
- **D 80** → Rapp./Co-Rapp initial Assessment Report to CHMP → also sent to applicant - first response from the system
- **D 100** → CHMP comments
- **D 120** → Formal CHMP Overview, provisional Recommendation, and consolidated List of Questions (LoQ)

Clock Stop



- Applicant's responses expected within **3 months**
- May be extended up to 6 months
- Optional clarification meeting on LoQ (Applicant / Rapporteurs)

Secondary Evaluation Phase



D 150→ Joint Rapp./ Co-Rapp AR

D 170→ CHMP comments

D 180 → Outstanding issues?

Need for a hearing?

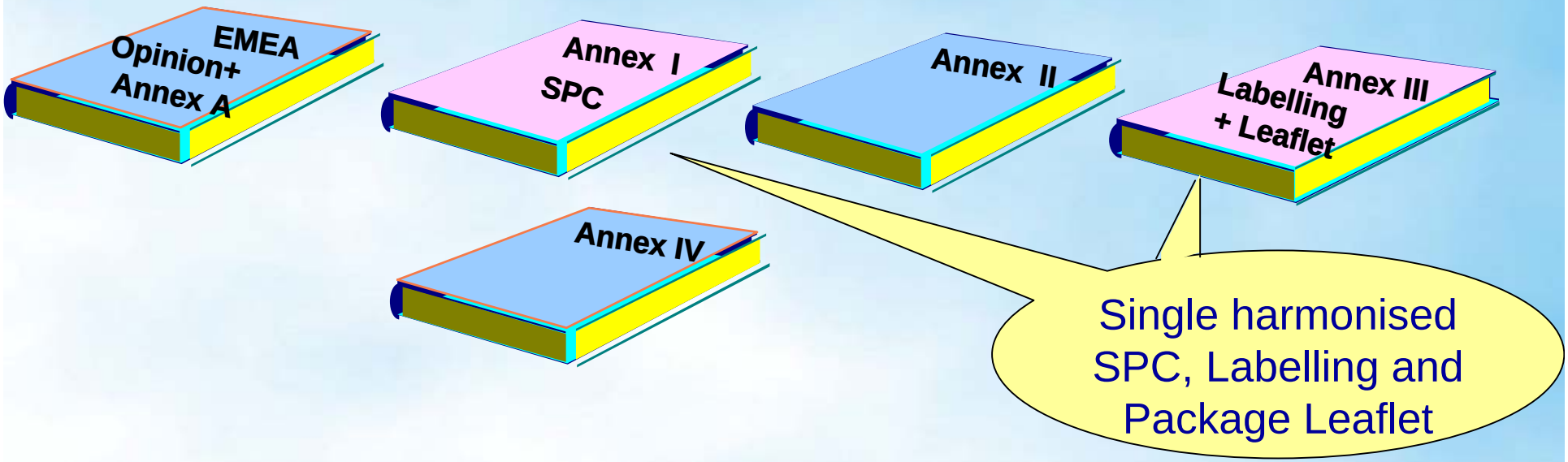
Yes → Stop Clock → Day 181 Hearing → **D 210 Opinion**

No → **D 180 Opinion**

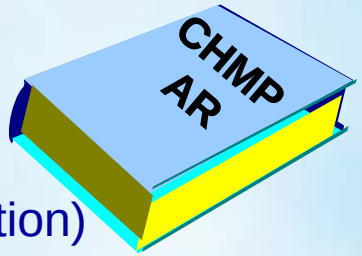
Types of Opinion

- **Positive**
- **Negative**
- **Under Exceptional Circumstances**
  - Comprehensive data cannot be provided
  - Reviewed annually to reassess the risk-benefit balance
- **Conditional**
  - Additional data is required, however the benefit to public health of immediate availability outweighs risk
  - Authorisation valid for one year, on a renewable basis
  - Once the pending studies are provided, it can become a “normal” marketing authorisation

CHMP Opinion



- **Annex A:** pack sizes, pharmaceutical forms, etc
- **Annex II:** manufacturers, legal status, etc
- **Annex IV:** conditions to be implemented by the MS



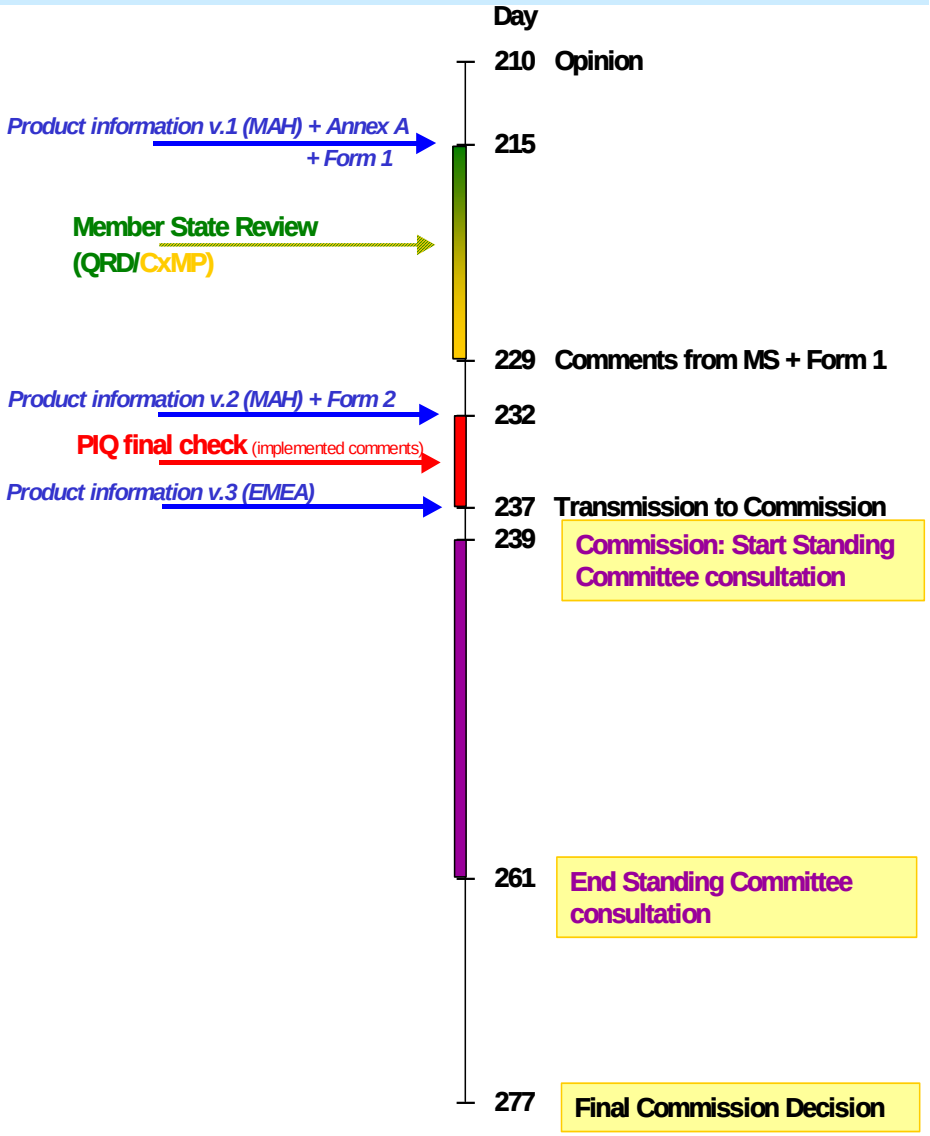
- **Appendix to the Opinion:**
  - CHMP Assessment Report (summary of the scientific evaluation)

Re-Examination

The applicant can appeal against the CHMP Opinion

- 15 days to appeal
- 60 days to submit grounds for appeal
- CHMP 60 days to consider revision of initial opinion
  - No new data
  - Scientific advisory group may be consulted

Post Opinion phase
Timelines



Total time:
67 days

Performed by the EMEA for SMEs

Translation check of product information

EC Decision Making Process

Transparency

- **CHMP Monthly report**
- **CHMP Press release**
- **European Public Assessment Report (EPAR)**
  - It is published in modular form on the EMEA website. Contains:
  - The summary of the scientific evaluation of a product in EN
  - Product Information is published in all EU languages.

(http://www.emea.europa.eu/index/indexh1.htm)

Accelerated procedure

- CHMP opinion in 150 days (instead of 210)

- 1st phase similar
- Day 120 Opinion or List of outstanding issues

- Day 121-150 Oral explanation if applicable + Opinion

Post Authorisation Phase

- Products do not stand still, they are changing all the time.
- Any change to the approved Marketing Authorisation requires regulatory approval.
- There are different procedures for post authorisation changes depending on the nature of the proposed change (minor / major)

Closing Remarks

The Centralised Procedure:

- 1 application, 1 evaluation, 1 authorisation
- EU-wide authorisation binding and identical in all MS
- Provides access at the same time to potentially nearly half a billion patients
- Set timelines → Scientific Opinion in 210 days, followed by authorisation ~ 2 months later
- Transparent procedure, reports are released to applicants and EPARs are published on the EMEA website.
- Support to SMEs
  - Scientific advice from CHMP: reduced fee
  - Procedural assistance from EMEA Secretariat
  - Translations of product information performed by EMEA (no fee)

THANK YOU !

Acknowledgements to G. Wade