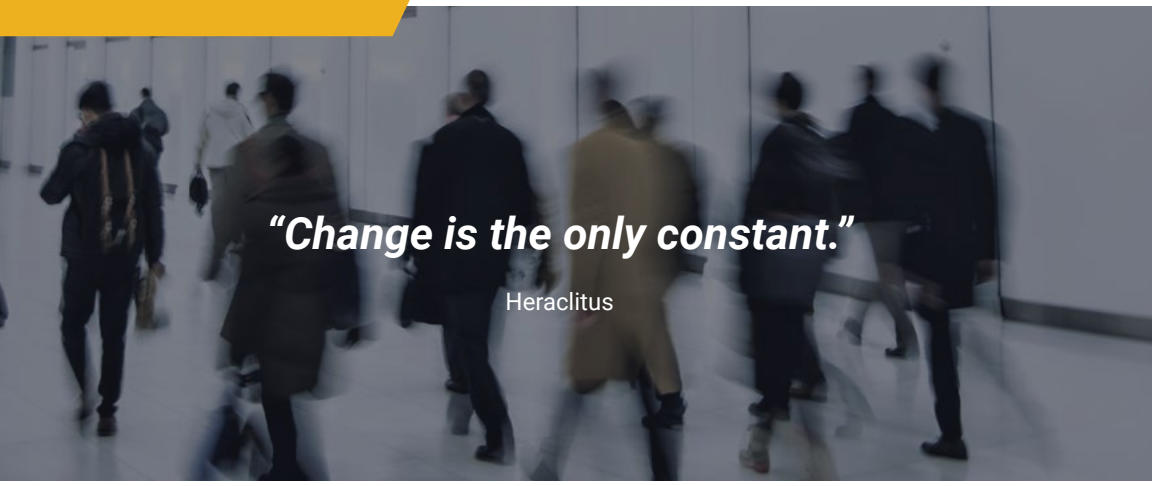
INTRODUCTION

Speaking with Clarity in an Increasingly Complex, Rapidly Evolving Environment



Science, medicine, digital technology, and data analytics are advancing at a breathtaking pace. What was once the stuff of science fiction is fast becoming reality. Whether it's gene therapy, real-world data, electronic health registries, or many other advances, the way medicine is practiced, and healthcare is delivered, is changing rapidly.

Europe's regulators, health technology assessment agencies, and payers are racing to keep up with these developments as they work to assess, regulate, approve, and reimburse for the latest scientific developments.

That puts pharmaceutical companies under mounting pressure to produce more comprehensive evidence packages that satisfy two major forces: a growing number of influential stakeholders with evolving demands and the traditional regulatory review processes that still underpin approval decisions.

There's a lot going on. But as the world around us changes, one thing remains constant and more important than ever: the need for pharmaceutical companies to communicate with clarity.

The ability of drugmakers to turn their complex evidence packages into a clear and persuasive narrative—and outline a sensible pathway forward to address their product's limitations—is particularly acute when they are seeking approval for their medicines from the European Medicines Agency (EMA).

This book is designed to provide pharmaceutical companies with practical insights and specific steps that will help regulatory teams succeed at these high-stakes meetings.

Serving Europe

The EMA was founded in 1995 and is responsible for assessing the efficacy, safety, and quality of all medicines for Europe's 500 million citizens. It serves 27 EU member states plus Iceland, Liechtenstein, and Norway, which are in the European Economic Area.[1] Importantly, its decisions may also influence the UK's Medicines and Healthcare products Regulatory Agency (MHRA).

Within the EMA, there are seven scientific committees and several working groups that evaluate the benefit-risk profiles of medicines for both humans and animals.

The Committee for Medicinal Products for Human Use (CHMP) and Committee for Advanced Therapies (CAT) are arguably the most pivotal committees as these committees ultimately determine whether a medicine is safe, effective, and of a high enough quality to be approved for use in humans. The CHMP and CAT are each made up of one member from each EU member state plus five co-opted members who are chosen because of their specific scientific competence.

Once a company, also known as the applicant, has submitted its Marketing Authorization Application (MAA) the CHMP carries out the initial assessment of the application. During the process, the CHMP raises questions and may ask the applicant to provide clarifications or additional analyses.

If the CHMP believes the benefits of a medicine outweigh the risks, it will recommend to the European Commission that the applicant receive a marketing authorization for its product.

> ***"The Committee for Medicinal Products for Human Use (CHMP) is arguably one of the most pivotal committees as it is the committee that ultimately determines whether a medicine is safe, effective, and of a high enough quality to be approved for use in humans."***

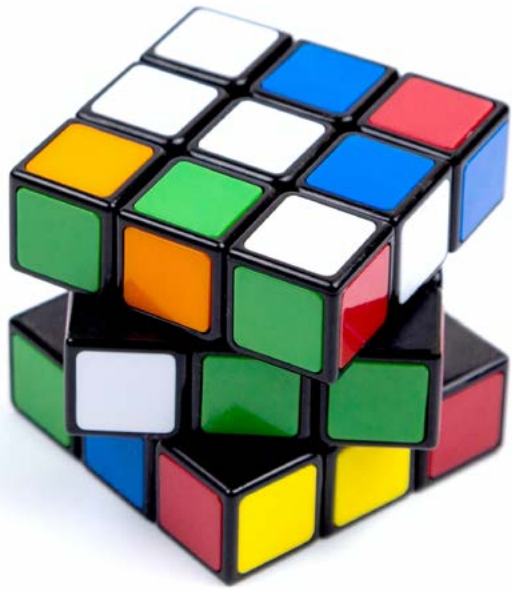
The CHMP's scientific opinions or recommendations are reached by consensus. If it is not possible to reach a consensus, the scientific opinion or recommendation can be adopted if supported by an absolute majority of the CHMP and co-opted members[2] or, in other words, support from 17 members (i.e., half of the 27 member nations and five co-opted members) plus one additional member.

As part of the MAA review, the Pharmacovigilance Risk Assessment Committee (PRAC) will assess and recommend risk management and post-approval actions intended to help mitigate or manage adverse events. The PRAC assessment report will be included as part of CHMP assessment and within the final opinion on an MAA.

CAT at the EMA has a similar role to the CHMP, but is responsible for assessing the quality, safety, and efficacy of advanced therapy medicinal products (ATMPs). As needed, the CHMP will also collaborate with other committees like the Paediatric Committee (PDCO), the Committee for Orphan Medicinal Products (COMP), and other working parties to fulfill other important roles related to the authorization of medicines in the EU.

Enigmatic EMA

Unlike the US Food and Drug Administration (FDA), which runs very public meetings, CHMP meetings happen behind closed doors. This, combined with a lack of public transcripts, makes it very difficult for companies to find out how applicants for previous MAAs have resolved similar issues. The CHMP does publicly share the assessment report for each positive opinion that leads to marketing authorization in the European Public Assessment Report, but these documents lack information on the critical details that identify what the committee's concerns were, or how issues or negative opinions were resolved.



Interacting with the EMA

There are a number of important meetings that occur during a marketing authorization review. Each has specific goals and offers important opportunities to:

- Resolve or ameliorate major CHMP objections
- Demonstrate a positive benefit-risk for a product
- Gain insight into a potential path for obtaining marketing authorization

Effective planning and clear communications are essential for all these meetings.

This book provides a brief overview of the main types of meetings affecting product authorization and focuses on how to best prepare for these meetings by using the example of Oral Explanations (OEs), the most common of these interactions.

CHAPTER
1

Overview of the CHMP Timeline and Key Meetings

"The timeline to prepare for a CHMP meeting can be fast and furious. To succeed, you need to understand the process and have a clear plan so you can effectively navigate critical milestones."

Michelle Zucatti | Strategic Communications Lead | 3D Communications

The typical assessment timeline for an MAA in Europe is based on a review schedule of 210 active days.[3] This timeline is interrupted by multiple clock stops so that applicants can prepare written answers to the CHMP's questions and respond to the major and minor objections. Failure to resolve major objections will likely result in a negative CHMP opinion and prevents authorization in the EU.

Refer to Figure A on the following page for a standard CHMP review timeline.

5