ALMAC

Partnering to Advance Human Health

Launching drug product in Europe Q&A

Q&A

David McCoubrey: Regulatory Affairs Lead, Almac Group

Launching drug product in Europe Q&A

David McCoubrey: Regulatory Affairs Lead, Almac Group

Q What are the various regulatory submission strategies for launching your drug product in Europe?

A To be able to market a medicinal product in Europe, you must obtain a Marketing Authorisation (MA) from the relevant regulatory authority.

There are a number of different routes to apply for an MA depending on the markets you wish to launch your drug product onto. It is worth considering long term goals as well as immediate plans at this stage.

The four main options are:

- The National Procedure
- The Mutual Recognition Procedure
- The Decentralised Procedure
- The Centralised Procedure

The National Procedure

The National Procedure is used to gain approval of an MA in a single country within the EU. This may be suitable if the drug is intended for a specific market or the applicant does not wish to make use of the product in other EU member states. If at a later time point, the MA holder wishes to launch in additional countries then the National Procedure can serve as the first phase of a Mutual Recognition Procedure where the 'national state' serves as the Reference Member State (RMS).

The Mutual Recognition Procedure

In the Mutual Recognition Procedure a country where the product is already approved acts as a Reference Member State (RMS) and then the other states named in the procedure (Concerned Member States) have 90 days to consider the application.

This means that the work of one state can be used as a starting point to get the product approved in other states as the RMS will have already granted an MA in their own country.

The Decentralised Procedure

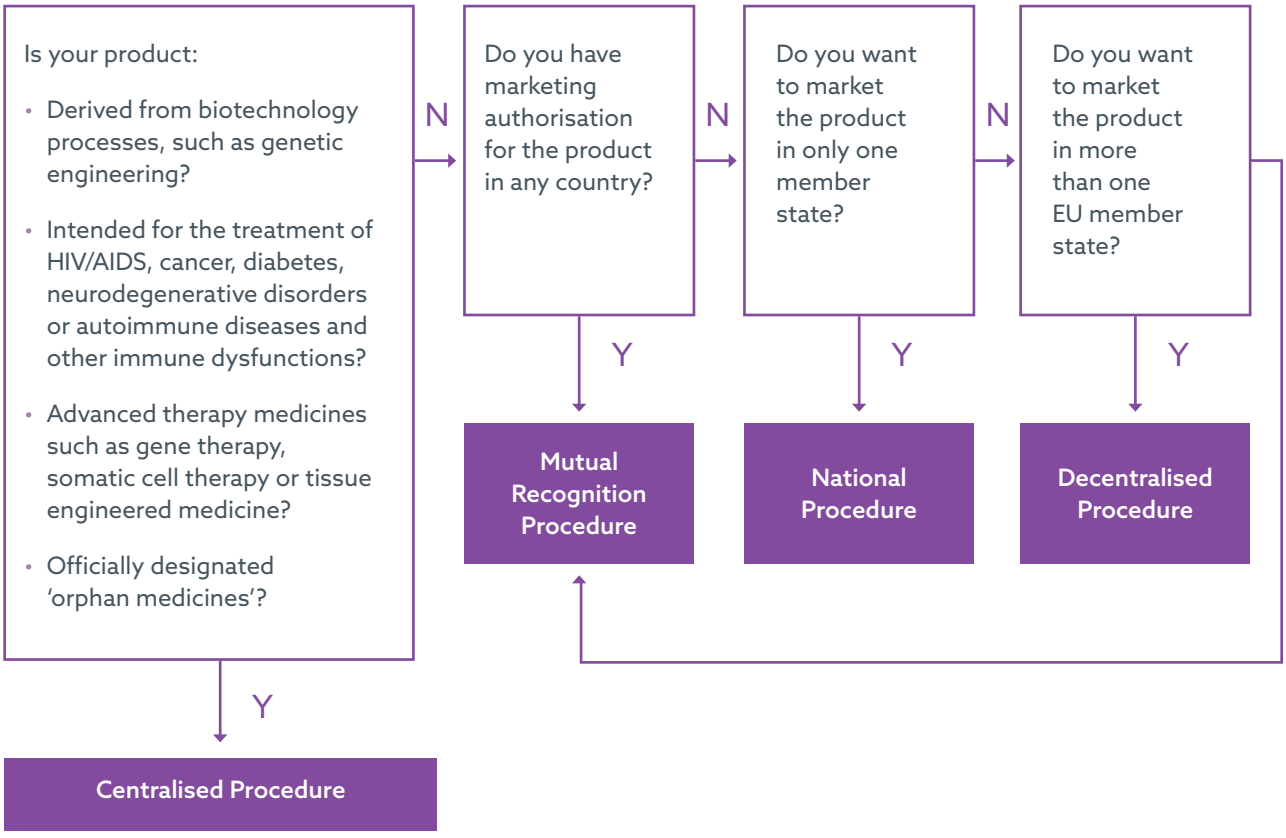
The Decentralised Procedure is for products that do not already have an EU national MA. It allows approval across multiple EU member states. The chosen RMS will lead the assessment of the MA application and produce a report, including comments from the Concerned Member States. All the countries involved must reach a consensus decision on whether to approve the application.

The Centralised Procedure

This regulatory path allows the product to be marketed in all EU member states through a single MA application to the European Medicines Agency (EMA). It's not open to all products but is compulsory for some. As part of the Centralised Procedure the EMA give the option of some special early access schemes for innovative products for serious and rare diseases.

Q Why would you select one procedure over the other?

A The application route to be chosen will be determined by your launch strategy, your intended market and your medicinal product.



As well as the product types described in the diagram above that must use the Centralised Procedure, it is also an option for:

- New active substances
- Significant therapeutic, scientific or technical innovation, or in the interest of patients
- Certain paediatric products
- Generics or hybrids of Centralised products

The Mutual Recognition and Decentralised Procedures allow the applicant to choose the individual member states they want access to and which country's regulatory authority will assess their application.

A National Procedure permits access into a single country without having to gain the consensus of multiple member states.

Q In your opinion, what would be the 'top 5' pieces of information needed for submission?

A Prior to submitting your Marketing Authorisation (MA) application there are various items to be considered. If seeking regulatory approval in the EU is a new concept to the pharmaceutical company, in my opinion, they would be best consulting a regulatory expert to ensure they have all the necessary information to avoid costly mistakes and time delays.

I. The application & applicant

The ICH Common Technical Document (CTD) content and structure is the only format accepted when filing for medicinal product approval in Europe. The EMA and most EU national authorities require electronic submissions in accordance with eCTD EU specifications.

The applicant (the company who will be the holder of the MA) must be established within the EU/EEA and provide proof of that establishment in the application. The extent of 'formation' is flexible, from having a registered office to having full operations.

II. Drug substance & drug product manufacturing sites

These sites will need to be detailed within the application. While assessing your MA submission the EMA may request an inspection of your manufacturing sites to ensure GMP compliance. If your drug product is manufactured outside of the EU/EEA, you will be required to nominate an EU/EEA Import Testing and Batch Release Site.

Each active substance will require the submission of a Qualified Person (QP) Declaration to confirm it is manufactured in accordance with GMP.

III. Risk management & pharmacovigilance

A Risk Management Plan for the product must be submitted with every application. This is a document focusing on the safety profile of the medicine and how its risks will be prevented or minimised in patients.

Details of a separate 'Qualified Person responsible for Pharmacovigilance' (QPPV) are required when filing for regulatory approval in Europe. The QPPV is responsible for ensuring that provisions for the monitoring of the drug's safety have been set up.

IV. Packaging design & mock-ups

When submitting your MA application, packaging mock-ups must be provided for review of their content and lay-out. You must provide English language and multi-lingual packaging mock-ups of outer and immediate packaging in each strength and container type in the smallest pack size.

V. Package leaflet & user testing report

While these are optional at the time of the initial MA submission, they must be provided during the assessment process. The EMA produce 'Quality Review of Documents' (QRD) templates which provide a structure for the product information along with standard wording for many sections.

In the EU, the Package Leaflet must be tested on the patient population to ensure it can be easily read and understood by the general public and especially those likely to be prescribed the product. A summary of the results of this testing goes into the application dossier.

Q Typically, how long does the Centralised Procedure take?

A The core assessment timeline is 210 calendar days. However, additional time for company clock stops (when the applicant prepares their responses to EMA questions) and also the European Commission Decision, means that the Centralised Procedure can typically take up to 14 months. If the applicant is asked to explain their responses in person to the EMA (known as an oral explanation) then this will increase the normal timeframe to around 16 months. These are average procedure times and the variability of the clock stop phases means that each assessment timeline will be different.

Q Are there any products that can be 'fast tracked' through the process?

A To ensure unmet medical needs are addressed as quickly as possible, there are certain drug products that can avail of Accelerated Approval. This reduces the core assessment to 150 days. Qualifying products have to be of major public health interest, particularly from the point of view of therapeutic innovation.

Another option for products that address an unmet medical need is a Conditional Marketing Authorisation. The assessment timeline is unchanged but the application can be submitted at an earlier stage of development on the basis of less complete clinical data.

Interested in finding out more?

GET IN TOUCH

UK
Almac Group
(Global Headquarters)
22 Seagoe Industrial Estate
Craigavon
BT63 5QD
United Kingdom

Pharmaservices@almacgroup.com
+44 28 3836 3363

US
Almac Group
2661 Audubon Road
Audubon, PA 19403
United States of America

Pharmaservices@almacgroup.com
+1 610 666 9500

AM5753