Orphan Drug Development Guidebook

Building Block E136

This document defines the content of the Building Block created for each identified tool, incentives, initiative or practice introduced by public bodies or used by developers to expedite drug development in Rare Diseases (RDs).

ITEM	DESCRIPTION
Building Block (BB) Title	EMA pre-submission meeting (Pre-MAA meetings)
References	https://www.ema.europa.eu/en/human-regulatory/marketing-authorisation/pre-authorisation-guidance Pre-submission procedural guidance (Q&A) and Notice to Applicant (NtA): https://www.ema.europa.eu/documents/regulatory-procedural-guideline/european-medicines-agency-pre-authorisation-procedural-advice-users-centralised-procedure_en-0.pdf ; this Q&A document has to be read in conjunction with https://ec.europa.eu/health/documents/eudralex/vol-2_en
Description	A Marketing Authorisation Application (MAA) pre-submission meeting is not mandatory, however, it is strongly recommended as it is the final meeting before the registration (MAA submission) where the developer address product-specific legal, regulatory and scientific issues. The meeting is intended: 1. to facilitate the validation of the marketing authorisation application (MAA); 2. to support applicants in submitting applications for smooth evaluation. Based on the briefing package and the presentation, the team will review: - overall compliance of the intended submission package with applicable regulatory requirements, - the draft justifications and whether additional information is needed, - whether there are gaps that could be useful to discuss (e.g. RMP-related topics (RMP, Risk management plan))

ITEM	DESCRIPTION
	- the documentation against relevant scientific and regulatory guidelines (including relevant scientific advices considering the indication applied for and the RMP outline against similar products) - core SmPC (Summary of Product Characteristics), as well as potential labelling, standards and mock-ups issues
Category	Regulatory Building Block
Geographical scope	Europe
Availability	Applicants developing human medicines for rare and non-rare diseases.
Scope of use	<u>Pre-MAA meeting scope:</u> (1) To discuss the **legal basis** of the MAA dossier: - Full approval vs Conditional vs Under Exceptional Circustances - Accelerated Assessment (2) Dossier requirements (data content) linked to legal basis ○ Full/Stand-alone submission: Articles 8(3), 10(a), 10(b) of Directive 2001/83/EC ○ Submission that use a reference medicinal product: Articles 10(1), 10(3), 10(4) & 10(c) of Directive 2001/83/EC ○ Dossier requirement = Annex I of the Directive ⇨ <u>Mix & Match approach not possible</u> (3) To discuss where to include the relevant data (data location), i.e., in which ICH M4 CTD Common Technical Documents module (4) During the development orphan designation can be granted for the same orphan indication to different sponsors; first sponsor with MA for an orphan indication obtains market exclusivity (for the therapeutic indication). Hence, the subsequent MAA for the same therapeutic indication needs to confirm possible DEROGATION during the pre-MAA meeting (otherwise MAA can not be submitted) (5) Appointment of Rapporteur/Co-Rapporteurs - Appointment of Rapporteurs based on objective criteria - Use of best available expertise in EU in relevant scientific area (6) PIP compliance check (7) Check of (Invented) Name (8) Environmental risk assessment (ERA) (9) Risk management plan (RMP)

ITEM	DESCRIPTION
Stakeholders	- Drug developers - MAA (different committes depending on the drug type)
Enablers/ Requirements	• Applicant established in the EEA • Dossier in line with chosen legal basis • GxP requirements met • Paediatric requirements met • Orphan similarity clarified ⇨ successful Validation and Start of procedure
Output	The CHMP conclusions is communicated to the applicant and the reasons for accepting or rejecting the request will also be summarised in the CHMP assessment report.
Best time to apply and time window	• 'Letter of Intent': 18 Months before planned submission or, at the latest 7 months; • actual meeting: 6-7 Months before submission.
Expert tips	PROS • Discuss final **practical** & **regulatory** aspects of upcoming application • Clarify application-specific issues not addressed on the EMA website • Useful step to ensure that application will meet all requirements for **validation** • **Strongly recommended**, even for experienced users of the centralised procedure • Reconfirm various administrative/procedural/legal issues; requirements may have changed • Meeting with Rapporteurs and co-Rapporteur before the procedure officially start • Under the PRIME scheme launched in March 2016, it is now possible for applicants to receive confirmation during the clinical development phase that their medicine might potentially be eligible for accelerated assessment. CONs • none