

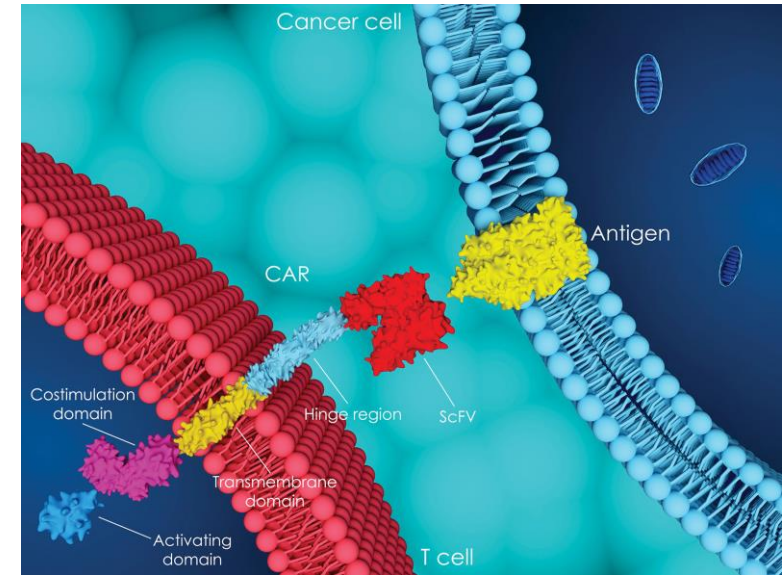
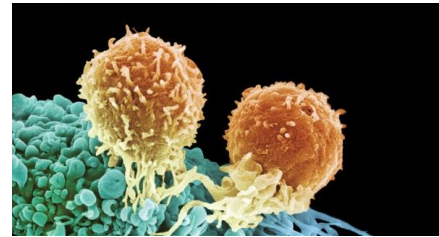
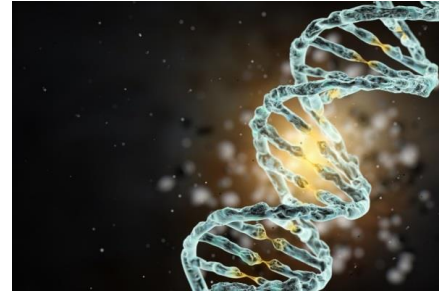
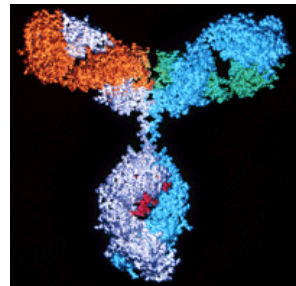
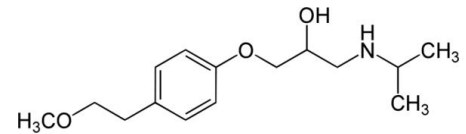
# Regulating ATMPs as medicinal products

RSNN-EMA workshop, 17-11-2020

Delphi Coppens, PhD

Dutch Cancer Society

# Advanced Therapy Medicinal Products



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# Strategies for regulatory change

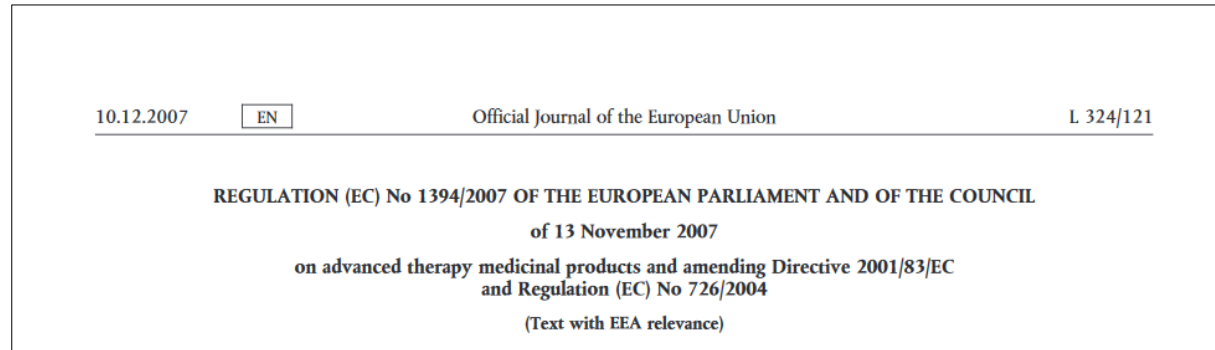
## 1. Stretch existing boundaries

- Regulations aimed at marketing authorization (MA)
- Aimed at commercial development and market entry of new ATMPs as medicinal products

## 2. Implement new regulations

- Regulations that exempt ATMPs from MA
- Aimed to facilitate treatment in clinical practice

# 1. Regulatory change – ATMP Regulation for MA

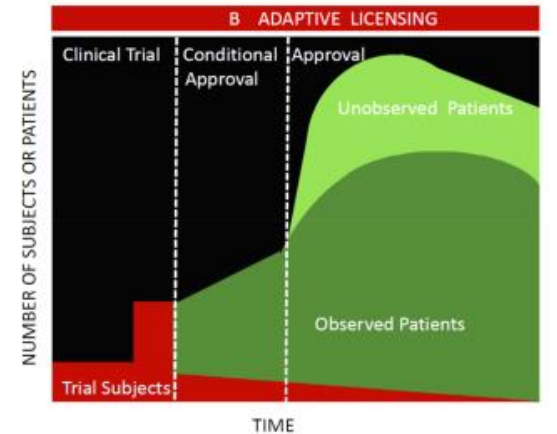
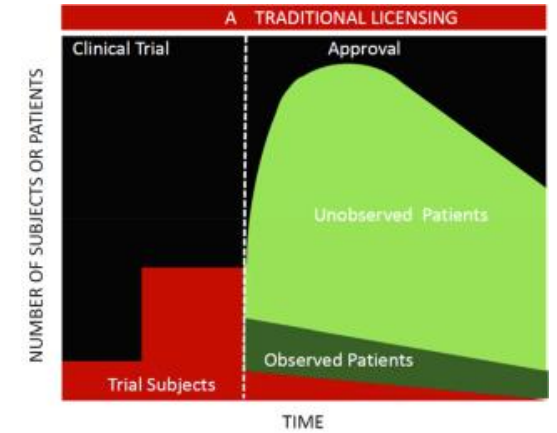


- Committee for Advanced Therapies (CAT)
  - Support CHMP
  - Scientific advice
- Amended Directive 2001/83/EC
  - High-level requirements for ATMP authorization & Guidelines
  - Risk-based approach
  - Hospital Exemption (HE)
- Incentives to stimulate commercial development
  - Fee reductions for scientific advice
  - ATMP classification procedure
  - Certification procedure for quality and preclinical data (SMEs)

# 1. Regulatory decision-making for MA

Product	Considerations for approval				Outcomes	Post-marketing study obligations		
	Study design	Clinical benefit	Safety profile	Unmet medical need	Restricted labeling	Quality	Efficacy	Safety
US								
Laviv	Δ	Δ	Δ	□	■	■	■	□
Gintuit	Δ	■ ■	■	□	■	■	■	■
MACI	■	■ ■	■	□	Δ	■	■	■
Imlygic	□	Δ	■	■	■ ■	■	■	■
Provenge	Δ	■ ■	Δ	Δ	■	■	■	□ Δ
Kymriah	■	■ ■	□	Δ	□	Δ	■	Δ
Yescarta	Δ	■	□	■	■	■	■	□ Δ
EU								
ChondroCelect	□	■	■	□	■	Δ	Δ ■	Δ
Imlygic	Δ	Δ	Δ	Δ	■	■	■ ■	□ ■
MACI	■	■	■	□	Δ	■	■	■
Provenge	Δ	■ ■	Δ	■	■	■	■	□ Δ
Strimvelis	Δ	■ ■	□	■	□	■	□ Δ	□ Δ
Spherox	Δ	■	■	□	■	■	■	■
Holoclar	Δ	■ ■	□	■	Δ	■	□ ■	□ ■
Zalmoxis	Δ	Δ	■	■	□	■	□ Δ ■	□ Δ ■
Glybera	Δ	□	□	■	■	■	■	□ ■
JP								
Temcell	□	Δ	□	■	■	■	Δ	Δ
Heartsheet	□	□	□	■	■	■	■	■

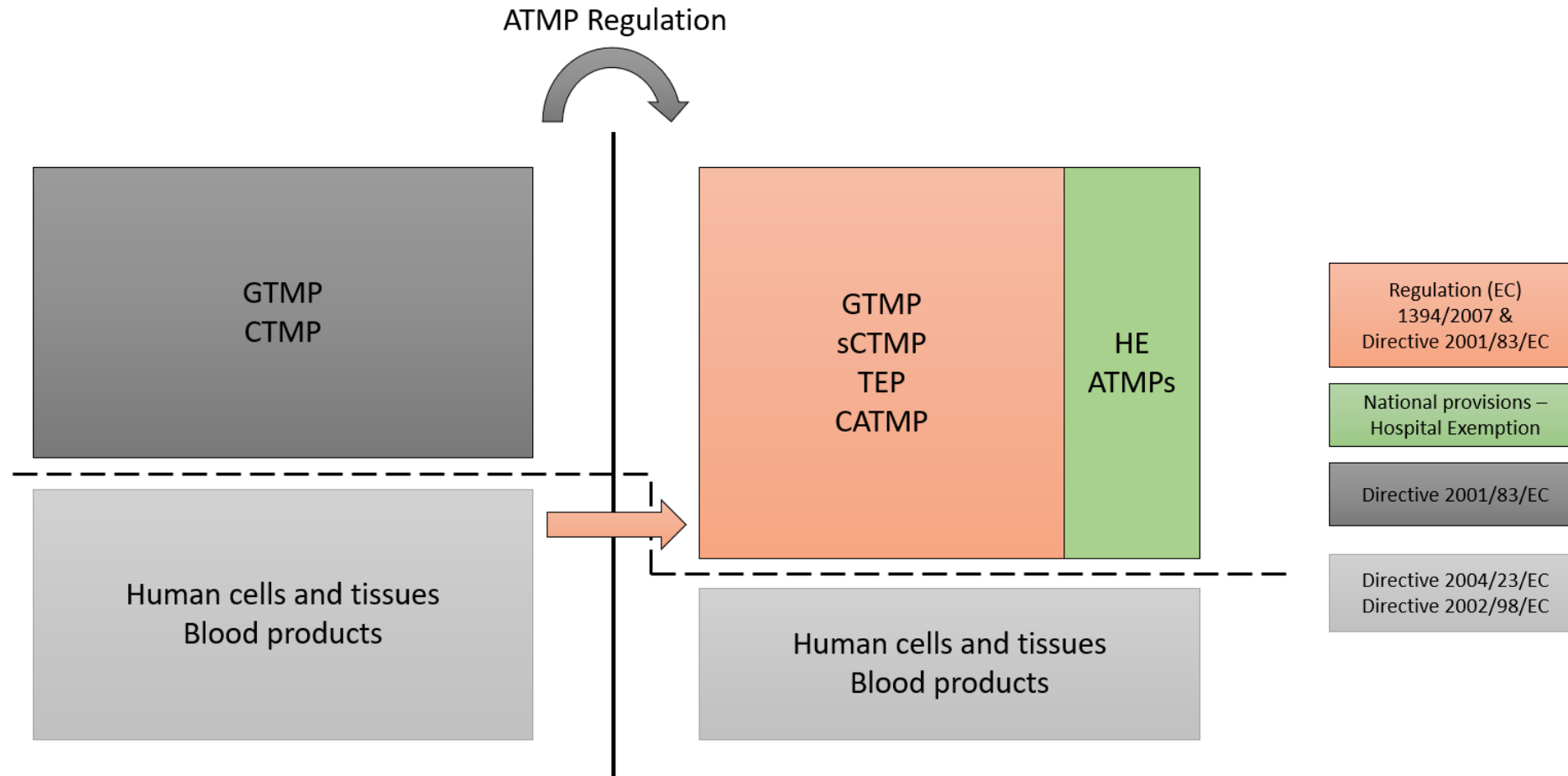
2008-2017



Coppens et al (2018) Cytotherapy

Oye et al (2016) CPT

## 2. Regulatory change - the Hospital Exemption

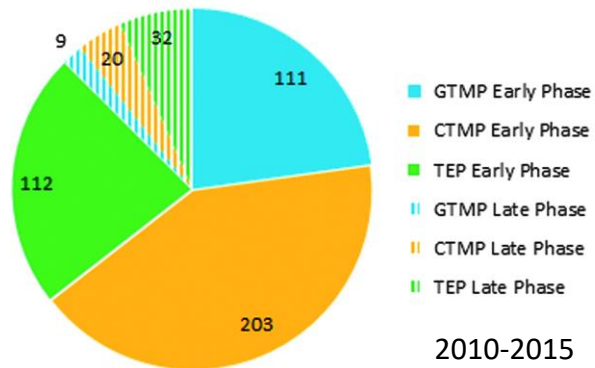
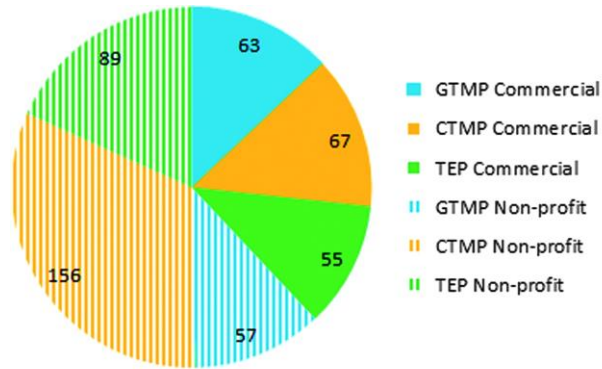


## 2. Regulatory change – use of the Hospital Exemption in clinical practice

		3: Restricted when licensed products are available				
		No	Yes	No	Yes	
4: Medical need required	Yes	AT Or7	IT Or8	None Or15	None Or16	Public institutes or hospitals only
	No	None Or5	None Or6	ES Or13	None Or14	
	Yes	None Or3	FI, FR Or4	None Or11	BE, NL Or12	Not restricted
	No	UK Or1	None Or2	DE Or9	None Or10	
		1: Clinical evidence required				
		No	Yes			

	Public facilities		ATMPs (public)	
	Recipients (n)	Respondents (n)/ Response rate (%)	HE (n) 2009-2017	NPU (n) 2015-2017
Belgium	7	3 (43%)	0	0
Finland	2	1 (50%)	1	0
France	1	1 (100%)	0	0
Germany	22	3 (14%)	3	0
Italy	5	3 (60%)	2	5
Netherlands	9	8 (89%)	6	2
United Kingdom	21	8 (38%)	0	4
Total	67	27 (40%)	12	11

# Way forward



Boráň et al (2017) Hum Gene Ther Clin Dev

## □ Optimized clinical developments

- Improve transfer from pre-competitive to competitive environment
- Early scientific advice
- Knowledge dissemination
- Public-private engagements

## □ EU-wide public registries

- Insight into available ATMPs (clinical trials & HE)
- Continuous long-term surveillance and data collection
- Use MA and HE pathways in a complementary fashion

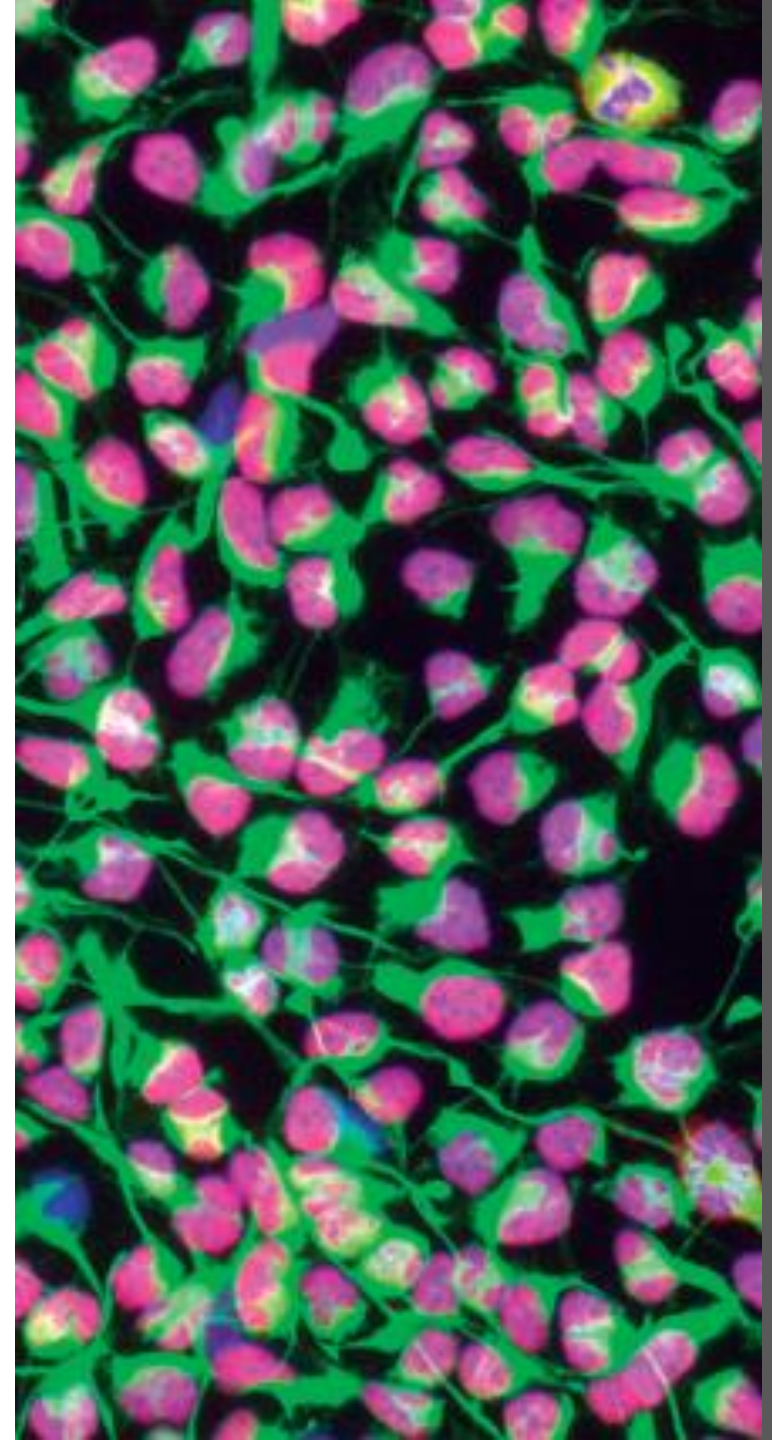
## ➤ More downstream hurdles:

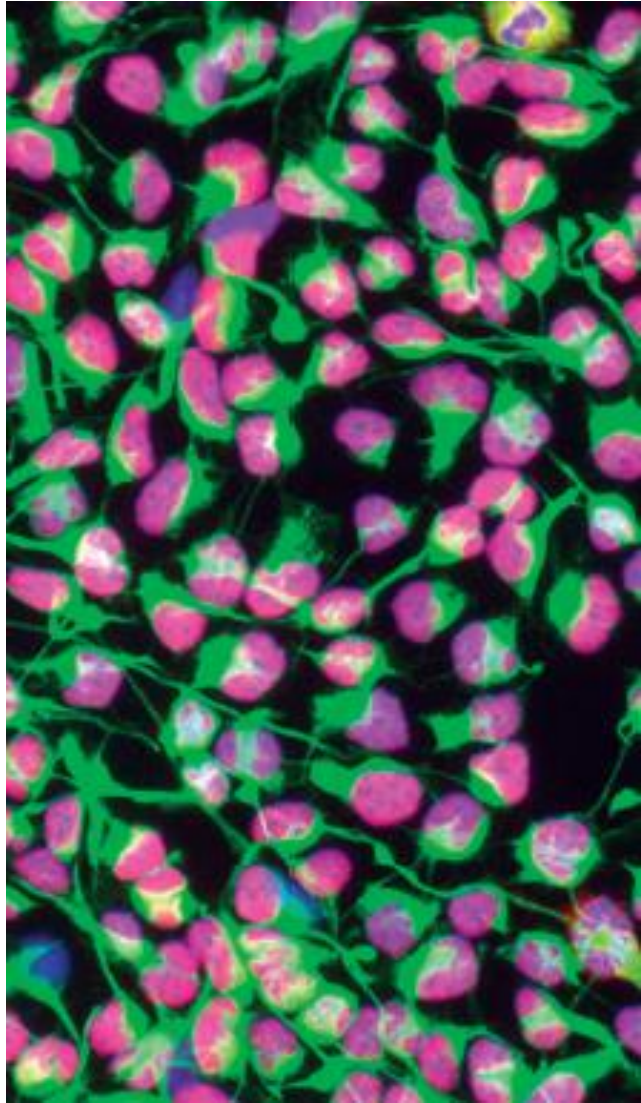
- Global distribution and scaling up issues
- Reimbursement



# Conclusion

- ❑ Shift to early market access and enhance post-marketing surveillance & implementation of exemption pathways
  
- ❑ More centralized knowledge dissemination and collaborative efforts could catalyse availability and benefit patients on a regional and global level
  - Regulators
  - Scientists, pharmacists & medical doctors
  - Industry
  - Coordinating bodies





# Questions?

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