European Commission-DG Health and Food Safety and European Medicines Agency Action Plan on ATMPs

The term “advanced therapy medicinal products” (“ATMPs”) is used to designate gene therapies, somatic cell therapies and tissue engineered products.

In the EU, these products are governed by Regulation 1394/2007 on advanced therapy medicinal products (“ATMP Regulation”). The cornerstone of the Regulation is that a marketing authorisation must be obtained prior to the marketing of ATMPs. The evaluation of these products is led by a specialised committee within the European Medicines Agency (EMA) i.e. by the Committee for Advanced Therapies (“CAT”) who prepares a draft opinion before the Committee for Medicinal Products for Human Use (CHMP) adopts a final opinion and the authorisation is granted by the Commission. The ATMP Regulation also empowers Member States to permit the use of advanced therapies that have not been authorised by the Commission under certain conditions (so-called "hospital exemption").

The 2014 report on the application of ATMPs[1], concluded that the Regulation had protected patients from unsound treatments. However, it also recognised shortcomings and identified actions to help translate scientific progress into medicinal products available to patients. Such shortcomings were also discussed in a multi-stakeholder workshop organised by the EMA on 27 May 2016 and certain follow-up initiatives have already been taken, as also reflected in this action plan[2,3].

The European Commission services and the European Medicines Agency, in collaboration with the authorities of the Member States, have initiated a number of initiatives to improve the regulatory environment for ATMPs so as to facilitate the development and authorisation of these products in the EU for the benefit of patients. The actions presented in this document are wide-ranging and target challenges identified by various stakeholders at all stages of development, including manufacturing, early and later phases of development, marketing authorisation process and post-marketing setting.

[1] http://ec.europa.eu/health/human-use/advanced-therapies/developments/index_en.htm

[2] http://www.ema.europa.eu/docs/en_GB/document_library/Report/2016/06/WC500208080.pdf

[3] http://www.ema.europa.eu/docs/en_GB/document_library/Other/2017/02/WC500220952.pdf

ATMP developers also benefit from existing schemes to support the development of medicinal products in the EU, such as PRIME[4], or initiatives designed to support SMEs and academia.

The EU is committed to support the development of these products and will keep monitoring developments in the field to ensure that the regulatory framework supports — and not hinders — the development of ATMPs.

It is expected that the implementation of the proposed actions will increase the opportunity for patients to be treated with novel therapies (through enrolment in clinical trials and authorisation of new products). Moreover, an improved regulatory framework will also contribute to promoting innovation, investments and competitiveness of the EU biotechnology sector, whilst striving to ensure patient access.

ANNEX — List of proposed actions to improve the regulatory framework for ATMPs.

	Action	**Objectives**	**Deadline** *(timelines are indicative and may be subject to change)*
1	EC Guideline on GMP for ATMPs.	To reduce administrative burden and adapt the manufacturing requirements to the specific characteristics of ATMPs. Subsequently to the adoption of the Guideline, EMA will organise specific training to inspectors with a view to achieve more harmonisation.	Q4 2017
2	Exchange of information on GMP inspections within the network.	IWG meetings are being used as a platform for exchange of information and experience on the application of GMP to ATMPs.	Ongoing
3	The European Commission services will initiate a dialogue with national competent authorities to address the interplay between the GMO and the medicines legislation.	To reduce discrepancies across the EU regarding the application of GMO rules (Directives on deliberate release or contained use) to ATMPs containing or consisting of GMOs. Issues relevant for both clinical trials and marketing authorisation will be addressed.	Q3 2018

4 http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general_content_000660.jsp&mid=WC0b01ac05809f8439

		The aim is to help create coherent approaches for the assessment of these novel products without changing the basic legislation.	
4	Revision of EMA procedures regarding the assessment of ATMPs.	To reduce administrative burden, avoid overlaps between the tasks of the various committees involved, and address the specific needs of ATMP developers (*e.g.* longer clock stops).	Q4 2017
5	Provide enhanced scientific support for the development of ATMPs.	Increased opportunities for early dialogue with multidisciplinary or multi-stakeholder expert teams. Streamlined EMA procedures for scientific advice, incl. strengthened interaction between EMA committees.	Ongoing PRIME Parallel EMA-HTA SA
6	EMA Guideline on Investigational ATMPs.	To avoid discrepancies across the EU regarding the requirements for ATMPs in the clinical trial phase. The Guideline will not change the competence of Member States to approve clinical trials but it will help create common standards for the assessment of these novel products.	Draft guideline for consultation Q4 2018
7	EMA Scientific Guidelines on ATMPs.	The adoption of the guideline on gene therapy and the review of the guideline on genetically modified cells will support developers of these novel therapies by clarifying regulatory expectations. The development of guidance on comparability will also address the questions commonly confronted by ATMP developers.	Gene therapy guideline is expected to be adopted Q4 2017 Draft revision of the Guideline on genetically modified cells for consultation Q1 2018 Guidance on comparability Q2 2019

8	GLP for ATMPs: development of adapted guidance.	To facilitate the approval of clinical trials/granting of marketing authorisation in cases where GLP compliant preclinical studies are not feasible.	Q2 2017 Already published: *Marketing authorisation here* *Clinical trials here*
9	Revision of the EMA Guideline on Safety and Efficacy and Risk Management Plans for ATMPs.	To reduce administrative burden in the post-marketing phase.	Q2 2018
10	The European Commission services to initiate a reflection process with the Member States on the hospital exemption.	To discuss with Member States the current situation and address possible options.	Continuous process
11	EMA Q&A on the application of the risk-based approach for ATMPs that have not been subject to substantial manipulation.	To explain to developers the possibilities afforded by the risk-based approach (flexibility, reduction of certain requirements for the submission of a marketing authorisation application depending on specific risks).	Q1 2017 Already published here
12	GCP for ATMPs.	To address as appropriate any specific needs to ATMP developers.	2019
13	Scientific considerations on gene editing technologies.	To reflect on emerging techniques on gene editing.	Q2 2018
14	Awareness and training of the network.	Awareness sessions for the EU network on ATMP-related topics (e.g. AAV Vectors, genome editing); expert meetings organized by CAT	Continuous process

15	Increased stakeholder support SMEs	Publication of a specific action plan for SMEs.	Q2/2017 Already published here
16	Increased stakeholder support Academia	Publication of an action plan specifically designed on the framework of collaboration with academia.	Q1 2017 Already published here
17	Increased stakeholder support ATMP-topic specific	Update the ATMP dedicated webpage on EMA's website to act as a central resource of relevant information.	Q4 2018 See the webpage here
18	Increase awareness of stakeholders on EU regulatory processes and framework.	Development of targeted communication/training material in particular for small developers, academia and stakeholders supporting ATMP development; participation at workshops and relevant fora.	Ongoing
19	Interaction with EUnetHTA	Foster increased interaction between EMA and EUnetHTA on ATMPs to increase understanding of health technology assessment, regulatory processes and clinical added value of ATMPs.	Joined training / workshop planned in 2019