TRANSFORM MEP Interest Group Webinar

The EU Pharmaceutical Package:

A once-in-a-generation opportunity to deliver the promise of transformative therapies to all European patients

1 June 2023

European Alliance for Transformative Therapies

#MEPsforATMPs

EVENT REPORT

Executive Summary

On 1 June 2023, the TRANSFORM MEP Interest Group hosted a webinar to launch the TRANSFORM Position Paper on the EU Pharmaceutical Package: ***The EU Pharmaceutical Package: A once-in-a-generation opportunity to deliver the promise of transformative therapies to all European patients***. Some key points and recommendations were raised amongst speakers during the exchange:

- The EU Pharmaceutical Package, adopted by the European Commission on 26 April 2023, aims to address existing barriers and delays to patient care, providing **a unique opportunity to deliver a regulatory and legislative framework appropriate for the full lifecycle of Advanced Therapeutic Medicinal Products (ATMPs)**. Panellists agreed that the revised legislation must be fit-for-purpose and future proof.
- **The EU's Research and Development (R&D) ecosystem must remain attractive to developers of advanced therapies.** Ways this can be achieved include maintaining strong incentives in the legislation and supporting investment in the necessary infrastructure for these technologies.
- Token patient participation must be avoided: it is paramount to **involve and educate patients, from the use of their data to the collection of their feedback concerning a therapy**. A **patient-centric and multistakeholder dialogue, extended to national bodies**, must be implemented to ensure that all voices are heard in regulatory decision making.
- **Cross-border health rights must be strengthened to enable safe and timely access to advanced therapies for all citizens**, including those affected by rare diseases. The involvement of all Member States, including smaller ones, in leveraging existing and new pathways is needed to widen access to advanced therapies across the EU.
- Europe is undergoing a digital revolution, and the **use of data and Real-World Data is steadily growing**. Their collection must be harmonised amongst Member States.
- On the Commission's proposals for streamlining the work of the EMA, there was consensus that this could be a positive development. At the same time, **existing expertise on ATMPs in the Agency must be leveraged to ensure continuity and develop new fit-for-purpose regulatory tools**. TRANSFORM's recommendation is to establish an ATMP Working Party in the EMA, to provide expert advice for the CHMP and PRAC on the specificities of ATMPs.
- The Regulatory Sandbox proposal for new technologies is welcomed to support researcher engagement with the EMA on the regulatory requirements for therapies.
- **The Commission's proposal for collection of data on use of hospital exemption (HE) across Member States will promote transparency and harmonisation**. TRANSFORM calls for further precision on what constitutes 'non-routine' use.

Opening words

Ondřej Knotek MEP (Renew Europe, Czechia), Chair of the TRANSFORM MEP Interest Group opened the event.

> ***"As patients remain at the heart of TRANSFORM's actions, we need to improve their access to innovative therapies, through increased research, development, and manufacturing capacities."***

- MEP Knotek launched TRANSFORM's Position Paper on the Pharmaceutical Package, based on the 2022 TRANSFORM MEP Charter. He outlined some of the evidence-based policy recommendations to deliver innovative treatments to patients.
- He noted that the legislative proposal would impact the ATMP ecosystem. Further action to ensure a safe and efficient delivery of advanced therapies to European patients is needed and will be an objective for MEP Knotek during Parliamentary negotiations.

In conversation with TRANSFORM members: TRANSFORM's ambition for safe and timely access to ATMPs in the EU

Alexander Natz, Secretary General, EUCOPE and **Simone Boselli, Public Affairs Director, EURORDIS** discussed the TRANSFORM Alliance's ambitions for the Position Paper.

> ***"The holistic, life-cycle approach detailed in the TRANSFORM Position Paper is essential to ensure the development, circulation and access to ATMPs and innovative therapies."***

- Mr Boselli provided a patient organisation viewpoint, stressing the importance of addressing rare diseases through the Pharmaceutical Package. He underlined the necessity of including patients in all stages of an ATMP's lifecycle. He called for the EMA's patient consultation mechanism for understanding a disease and patients' unmet needs to be strengthened.
- He added that policymakers and members of the community must be **focused on improving the whole European health system**, through reinforced cross-border rights and social security standards, enhanced dialogue with HTA bodies and strengthened ERN infrastructures**.**
- Dr. Natz shared an industry viewpoint, outlining the significance of ensuring that the updated pharmaceutical legislation is **fit-for-purpose and future-proof**. To do so, a **life-cycle approach must be embraced by all companies**, and the European Medicines Agency's (EMA) rigorous regulatory standards must be maintained.
- Given that ATMPs will be the first to undergo Joint Clinical Assessments from January 2025 under the EU HTA Regulation framework, both Mr Boselli and Dr Natz agreed that **national stakeholders must be included in this dialogue around advanced therapies, and all available resources must be leveraged to increase patient access**, including the use of Real-Word Evidence.

Panel 1: From research to clinical development: a dynamic European environment that responds to patients' needs.

- **Tomislav Sokol,** Member of the European Parliament (EPP, Croatia)
- **Giovanni Migliaccio,** Board of Directors, European Paediatric Translational Research Infrastructure (EPTRI)
- **Dimitrios Athanasiou,** PDCO Member European Medicines Agency (EMA), Board Member, World Duchenne Organization (WDO)
- **Jack Brownrigg,** Early Clinical Development Team Lead, BioMarin

- **MEP Tomislav Sokol:** ***"The updated Pharmaceutical Package's added value is that it embraces a modulation rather than a one-size-fits all approach, setting a new framework for innovative therapies, benefiting patients affected by rare diseases."***

MEP Sokol outlined what he saw as the revised legislation's primary objective, namely getting the best possible new medicines to patients. In this sense, he stated **there are two aspects that need consideration: innovation (including incentives and an innovative research environment) and access. He noted that Europe is lagging globally in terms of research and investment**, and that compensatory incentives were required. He pointed out the need to harmonise and improve quality standards and access to healthcare. He also stressed the Union's capacity to act under pressure in times of crisis, implying that the same level of efficiency could be applied to different scenarios, including speeding up marketing authorisation approvals by the Commission. MEP Sokol also emphasised that patient participation must not be a mere form of tokenism. It is of the **utmost importance to involve all Member States, including smaller ones, to widen participation and incorporate cross-border health care rights** in the Package. Finally, MEP Sokol deemed that the 2024 election calendar would influence the negotiations of the Pharmaceutical Package. He hopes a Draft Report on the legislation will be adopted by the Parliament before the end of the current mandate.

- **Giovanni Migliaccio:** ***"Translational research is a lengthy and burdensome process, which the updated pharmaceutical legislation should seek to alleviate"***

Dr Migliaccio outlined the TRANSFORM position on translational research, defined as the activities taking something discovered in a laboratory setting to being applicable for use with patients as an innovative drug. He welcomed the opening of the dialogue surrounding research to all stakeholders, which he deemed necessary for ATMPs, considering their innovative nature. To ensure future-proof legislation, he called for **latitude to be provided to the EMA, whilst safeguarding its expertise**. Dr Migliaccio concluded that the key to success for fruitful partnerships and collaborations was an **improved cost of manufacturing and more efficient delivery to patients**. If patients are to be treated in a few Centers of Excellence for organisational reasons, **their cross-border rights must be harmonised and strengthened to compensate**, for instance regarding travel reimbursement for themselves and their accompanying carers.

- **Dimitrios Athanasiou:** ***"To really have an impact on the health system as a whole and enforce its position as a global leader, the EU needs serious resources, and serious tools with serious involvement to empower patients."***

Mr Athanasiou presented the TRANSFORM position on patient engagement in research priorities. He explained why the patient-centric, multistakeholder dialogues concerning R&D needed to be

improved alongside the new Pharmaceutical Package. To ensure the proposed legislation is fit-for-purpose, Mr Athanasiou believes that the **participation of patients is key in all stages**, from research protocols to providing feedback on the effects of the drug post-administration. He stressed the need to **advocate for stronger wording in the legislative proposal, requiring their participation rather than suggesting it**. Besides, Mr Athanasiou highlighted the **benefits of running clinical trials in Europe** and improving the trial environment, suggesting the creation of several centralised hubs in Europe where patients could travel to.

- **Jack Brownrigg:** ***"Currently, a complex and heterogeneous set of rules govern GMOs: TRANSFORM advocates for a step beyond harmonisation, taking the shape of a GMO derogation for ATMPs, so as to efficiently reduce the regulatory burden faced by developers."***

Mr Brownrigg presented the TRANSFORM position on the Commission's **proposed changes to the submission of Environmental Risk Assessments (ERAs) for clinical trials in the EU, and the positive impact this could have on the Union's attractiveness for clinical trials**. Not only would increased and simplified clinical trials directly benefit patients taking party, but it would also enable faster adoption of therapies for all. He stressed that the Pharmaceutical Package was generally heading in the right direction, but **European R&D attractiveness needs to be incentivized.** The continent is increasingly facing competition from the US and China for investment. To launch advanced therapies efficiently, he also deemed it necessary for the EMA to create a consultation mechanism for early dialogue along the development pathway, with **improved study design and collection of more relevant data**. He also emphasised the requirement to clearly lay out the role for each actor involved in consultation, complemented by education.

Panel 2: From marketing authorisation to access: a future-proof regulatory framework for innovative therapies in the Pharmaceutical Package

- **Laura Savini,** Advocacy Lead, European Haemophilia Consortium (EHC)
- **Ana Hidalgo-Simón,** reNEW Translational Ambassador, Leiden University Medical Center
- **Paschalia Koufokotsiou,** Policy Officer, Pharmaceutical and Health Policy, DG SANTE
- **Caroline Pothet**, Deputy Head of Advanced Therapies, European Medicines Agency
- **Caroline Mougin,** Market Access Director for Cell and Gene Therapies, Novo Nordisk

- **Laura Savini:** ***"Even though the Covid-19 pandemic is behind us, there is an ongoing crisis in the field of rare diseases, which the updated pharmaceutical legislation should seek to alleviate through improved cross-border access."***

Ms Savini first presented the TRANSFORM position on proposals to increase transparency and harmonise use of the Hospital Exemption (HE). She explained that the Commission's proposal calls for the **creation of a central registry to collect data on the use, safety and efficacy of products prepared under HE**, which is welcomed by the TRANSFORM Alliance. She pointed out that HE is applied in different ways across Members States, hence **a need for more visibility, harmonisation, and clarity on its appropriate use**. On access to ATMPs for patients, she called for an **extension of the dialogue with national payers and reimbursement agencies**, where the delay often originates due to a lack of data. A broader conversation on patient care pathways is also needed, particularly given the way ATMPs are delivered to patients. Ms Savini explained that **every Member State cannot be expected to have the medical expertise and infrastructure for a Centre of Excellence, where advanced**

therapies are administered (either in a clinical trial or as an approved product). This means **EU-level support is needed to increase patient access to ATMPs**. Finally, as ATMPs are one-time therapies that can be life-altering, an integrated patient journey, where the recipient of an ATMP is fully informed of what it means to be treated with such a therapy, is vital.

- **Ana Hidalgo-Simón:** ***"The EMA committee structure must be simplified and streamlined, taking into consideration the utmost priority to safeguard the existing expertise around advanced therapies that was developed within the current structures, including the Committee on Advanced Therapies (CAT)."***

Professor Hidalgo-Simón presented TRANSFORM's position on the proposed EMA reforms to allow more flexibility. She explained that the Alliance is in favour of the streamlined committee structure as it could lead to **greater clarity and more patient involvement, but at the same time it must not compromise the expertise that has been developed over the years on ATMPs**. Consequently, TRANSFORM advocates for transparency to be at the heart of the regulatory process. She said that the **regulatory sandbox is a great tool to better involve academic developers as well as clinicians** and allow them to connect with regulators at an early stage. Professor Hidalgo-Simón finally reiterated Dr Migliaccio's statement, explaining that academics must be supported with more resources, as they are often the ones discovering new innovative therapies. We also need to look beyond rare diseases and be prepared for the time when advanced therapies are developed for more 'mainstream' diseases.

- **Paschalia Koufokotsiou:** ***"Future-proofing the Pharmaceutical Package entails that it is enacted with flexibility, whilst keeping true to its main objective of delivering safe and efficient medicines to the European Single Market."***

Ms Koufokotsiou welcomed the Alliance's reflections on the Commission's proposal. She explained that the grouping of all existing legislation under the Pharmaceutical Package will reduce administrative burden considerably. She assessed that the streamlining of GMO assessments was a game-changer, allowing **to move from 27 different systems to one centralized EU procedure**, at the heart of the EMA structure. She also highlighted that the **use of Real-World Data was pivotal in the authorisation process of ATMPs**, given the need for single-arms clinical trials, complemented by the secondary use of data. On Hospital Exemption, the Commission had identified that its use needed to be improved and regulated, and an exchange of knowledge facilitated. In this sense, she explained that the Commission's proposal introduced the obligation to inform the EMA of any HE approval, in order to create a repository of different exemptions. She also pointed out that DG SANTE has called for a study, funded by the EU4Health Program, to look more closely at HE's use.

- **Caroline Pothet:** ***"Future-proofing entails implementing an adaptive procedural framework for ATMPs, which was not foreseen in the current legislation. The key priority is to leverage the existing expertise and ensure it can be used in an optimal way over the life-cycle of ATMPs."***

Dr Pothet acknowledged the positive proposals outlined in the Position Paper and picked two aspects to elaborate on. First, regarding the simplification of the European regulatory ecosystem, she pointed out that the number of ATMPs coming to market is rising, and that a **more dynamic EMA committee structure was a pre-requisite to match this evolution of science in a sustainable way**. Secondly, whilst the existing Committee on Advanced Therapies (CAT) already has patient's representatives involved as members, **patient input should continue to be further optimized especially at earlier stages, potentially even at protocol design**. She also stressed that transparency and information sharing were key elements of the regulatory system, as committee representatives come from different Member

States. Dr Pothet believes that the Commission's proposal combined with the EU HTA Regulation also creates an opportunity to enhance dialogue and information-sharing between regulators and national market-access decision-makers under the future legislative framework beyond what is possible now. Finally, Dr Pothet concurred with the need for clear definitions concerning Unmet Medical Needs and Highly Unmet Medical Needs, acknowledging however that she expected that most ATMPs would likely meet such criteria, and might benefit from the assistance and protections laid out in the proposed legislation.

- **Caroline Mougin:** ***"The conditionality clause to launch products in all EU countries represents a barrier for ATMPs, as they are delivered in Centres of Excellence which are not present in all Member States."***

Ms Mougin presented TRANSFORM's position on patient access pathways for ATMPs. She explained that **the success of this legislative revision depends on the capacity to adopt a holistic approach revising existing tools such as cross-border health care rights and a concerted action plan harmonised amongst Member States**. There are currently multiple reasons for delays and barriers to access. The introduction of more dynamic early dialogues with authorities, regulators and HTA bodies, as well as the recognition of Real-World Evidence, is welcome. Use of RWE would complement clinical trials and ensure durability is proven. Concerning cross-border health care, she deemed medical and technical expertise necessary, for instance taking the shape of a network - similar to ERNs - which would help patient identification and refer them to the appropriate treatment center. Regarding PRIME and reimbursement provisions, she highlighted the need to ensure that the eligibility criteria are broad enough to close the gap with the US, which is more advanced in its approval design.

Conclusions and next steps – the role of TRANSFORM in the upcoming negotiation of the Pharmaceutical Package

Jacki Davis closed the event, reiterating that TRANSFORM brings together stakeholders from different perspectives and connects them with policymakers. This policy dialogue will be of particular importance in the upcoming months, as the Pharmaceutical Package is analysed and discussed. The Position Paper is a living document and will evolve as the discussion continues among TRANSFORM Alliance members.

The TRANSFORM MEP Interest Group will host an in-person event on 12 October in the European Parliament to further discuss these important topics.

About the European Alliance for Transformative Therapies (TRANSFORM)

We invite you to join the TRANSFORM Community on Twitter and LinkedIn and keep an eye on the website to continue this important discussion online and to stay updated about the TRANSFORM MEP Interest Group and Alliance of experts' plans.

If you did not attend the TRANSFORM webinar on 1 June 2023, or wish to rewatch it, the recording is available here:
https://transformalliance.eu/event/transform-mep-interest-group-webinar/

You can read the TRANSFORM MEP Charter for EU Cooperation to Enable Safe and Timely Patient Access to Advanced Therapies in Europe launched on 13 October 2022 here:
https://transformalliance.eu/charter/

You can read the TRANSFORM Policy Asks on the Regulatory Framework for ATMPs launched on 16 June 2022 here:
https://transformalliance.eu/wp-content/uploads/2022/06/TRANSFORM-Policy-Asks-on-Regulatory-Framework-for-ATMPs_FINAL_June2022.pdf

You can read the TRANSFORM Policy Asks on Access to Authorised ATMPs launched on 31 March 2022 here:
https://transformalliance.eu/wp-content/uploads/2022/03/TRANSFORM-Policy-Asks-for-Access-to-Authorised-ATMPs.pdf

You can read the TRANSFORM MEP Interest Group Policy Asks on Cross-Border Healthcare launched on 10 November 2021 here:
https://transformalliance.eu/wp-content/uploads/2021/11/TRANSFORM-MEP-Interest-Group-Five-Asks-on-Cross-border-Access-to-ATMPs-1.pdf

You can read the TRANSFORM Recommendations for Actions in the context of the Pharmaceutical Strategy for Europe launched in June 2021 here:
https://transformalliance.eu/wp-content/uploads/2021/06/TRANSFORM-Recommendations-Version1.0_June2021-1.pdf

The European Alliance for Transformative Therapies (TRANSFORM) is a multi-stakeholder Alliance that connects Members of the European Parliament (MEPs) and policy-makers with patient groups, medical experts and associations, scientists, researchers, industry actors, networks and other relevant stakeholders. TRANSFORM aims to foster effective dialogue and provide evidence-based policy recommendations to enable safe and timely patient access to cell and gene therapies, whilst ensuring sustainability of healthcare systems.

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The European Medicines Agency is an Observer to the Alliance.

EFNA – European Federation of Neurological Associations

RI – Retina International

WDO – World Duchenne Organization

IPOPI – International Patient Organisation for Primary Immunodeficiencies

TIF – Thalassaemia International Federation

EHC – European Haemophilia Consortium

EURORDIS – Rare Diseases Europe

EPTRI – European Paediatric Translational Research Infrastructure

CCI Europe – Childhood Cancer International Europe

SIOP Europe – the European Society for Paediatric Oncology

EAHAD – European Association for Haemophilia and Allied Disorders

EU EYE – European Alliance for Vision Research and Ophthalmology

ESGCT – European Society of Gene and Cell Therapy

EUCOPE – European Confederation of Pharmaceutical Entrepreneurs

reNEW Consortium – Stem Cell Medicine