THE PHARMACEUTICAL REFORM AND THE 3RS PRINCIPLE ACROSS THE LIFECYCLE OF A MEDICINAL PRODUCT

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A 4-part package – 26 April 2023

Chapeau communication

New Regulation

- Specific rules for the most innovative medicines such as orphans, antimicrobials
- Rules on shortages and security of supply
- EMA governance

New Directive

- Placing on the market of all medicines
- Authorisation and labelling requirements
- Strong incentives for access

Council Recommendation on AMR

6 Key political objectives

No Single Market **ACCESS**	Shortages and Security of supply **AVAILABILTY**	Budgets **AFFORDABILITY**
Competitive regulatory framework	**Checking** Environmental Sustainability	**Combatting** **AMR**

Single market of medicines in the EU

Proposal for a revised pharmaceutical legislation

1) Strengthening the 3Rs principle

- using the minimum number of animals
- avoid causing pain, suffering, distress or lasting harm to animals
- follow the available EMA and ICH guidelines
- use new approach methodologies in place of animal testing, where possible

2) Obligations for marketing authorisation applicants or holders

- demonstrate compliance w/ 3Rs principle
- abridged applications – refer to studies conducted for reference medicinal product
- carry out product-specific validation studies to replace animal-based control methods, where possible
- reuse animal study results, where possible
- make results from animal studies publicly available
- use alternative testing approaches, where possible

Art 6 (5) Reg. and Art 6 (7) Dir.
Art 12 (4) (m) Reg. and Art 44 (1) (j) Dir.

Proposal for a revised pharmaceutical legislation

3) More cooperation between EU agencies and national competent authorities:

- scientific assessment of substances
- facilitating data sharing
- carrying out joint non-clinical studies

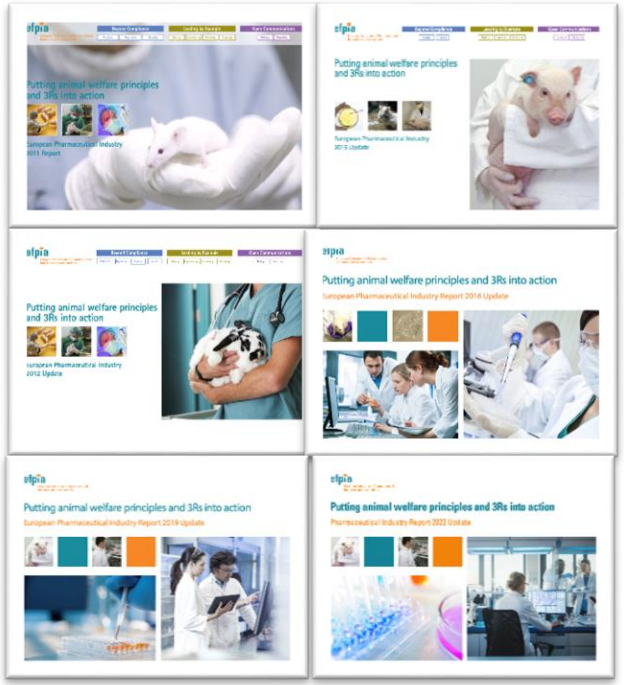
Regulation Art 138 (1) (ze), (zi), (zj), (zk)
Directive Art 23 (4)

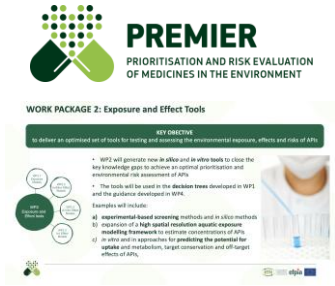
Thank you!

Slide 3 picture source: Getty images

PHARMA INDUSTRY AND THE 3RS

efpia
European Federation of Pharmaceutical Industries and Associations

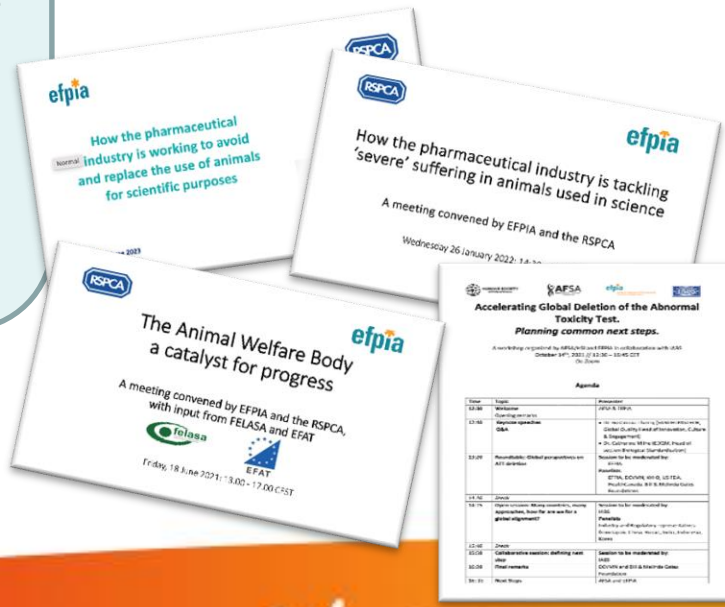




Our Commitment
Phasing-In New Approach Methodologies

EFPIA members are committed to the **science-based phase-in of methods to replace the use of animals for scientific purposes** and the deletion of animal tests which are obsolete or redundant. EFPIA members aim to lead progress on this by engaging in a wide range of practical activities to help drive the development, uptake and promotion of non-animal technologies (NATs) and new approach methodologies (NAMs) so that these can be phased-in as soon as it is scientifically possible to do so.

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH



culture care network

*More than medicine

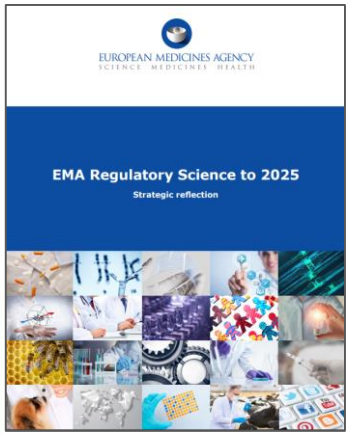
efaa

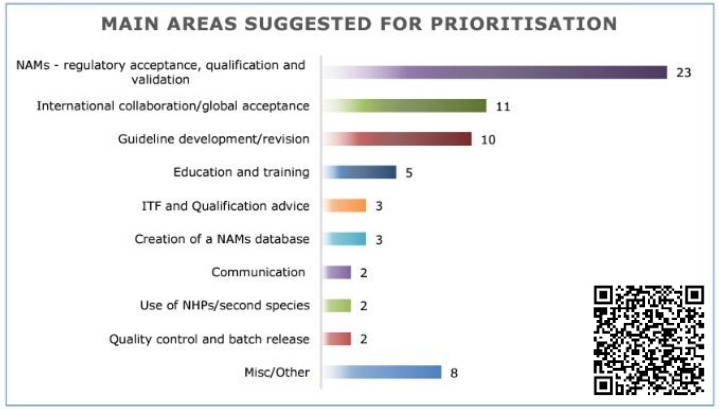
EMA 3Rs Working Party Perspectives

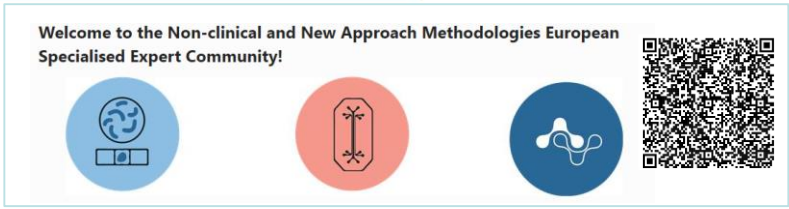
EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

- Joint 3Rs Working Party of CHMP and CVMP
- Role & 3-year Workplan in line with RSS 2025
  - Update of inventory on current regulatory testing in relation to the 3Rs
  - Development of & contribution to guidances in relation to the 3Rs
  - Fostering regulatory acceptance of NAMs
  - 3Rs implementation in batch release testing
  - Stakeholder interactions (e.g. annual stakeholder consultation)
  - International collaboration (FDA, ICMRA)
  - Training
- 3RsWP supported by :
  - NC NAMs ESEC (webinar series, expertise exchange, etc)
  - Drafting/Working Groups (MPS/OoC qualification, alternatives to non-human primates,etc)
  - Operational Expert Groups (e.g. Batch Release Testing)
- Early dialogue via the EMA Innovation Task Force & participation to NAM qualification

Scan me







- Contribution to CVMP/CMDv working group on how to increase transparency of 3Rs compliance in marketing authorisation assessment reports in line with Paragraph I.1.7 Annex II Regulation 2019/6

Reform of the EU Human Pharma Legislation:

- Strong 3Rs wording fully supported with particular interest for future interpretation & implementation,
- Value of multistakeholder discussion!

Contact us ! **3Rs@ema.europa.eu**

Better science through fewer studies: opportunities from a regulatory science perspective

- Science is the foundation underlying the 4 pillars of the EU Pharma strategy
- Innovative technology and scientific solutions to drive human centric drug development

- Strong basis in Europe for responsible animal use (3Rs, Directive 2010/63/EU)
- Need to leverage this in the new EU pharma strategy

- WoE is accepted for: carcinogenicity studies, juvenile toxicology studies and reproductive toxicity studies (ICH S5(R3).
- We can and should consider this for chronic toxicology studies as well:
- Our EPAA-supported project evaluated how often new toxities were identified in long term toxicity studies that were important for clinical safety and could not be mitigated*
- No new findings in 71%, clinically relevant cases that were unanticipated in 15%
- A WoE model can be used to identify products where animal data is useful, and where it is not!

- EU pharma strategy: Smarter, scientific, efficient and patient centric

* Chien et al. https://doi.org/10.1016/j.yrtph.2022.105329

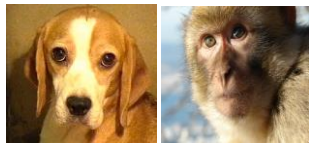
EU pharma strategy & animal testing

Roadmap - phasing out animal testing

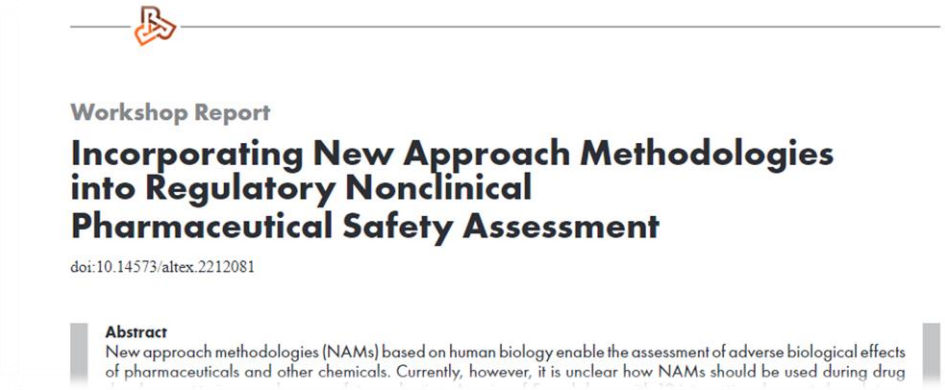
Revision of the pharmaceuticals legislation

RAT list (Replace Animal Tests), including:
topical toxicity
pyrogenicity
batch testing
antibody production

Second species testing



Cruelty Free International's workshops



Workshop Report

Incorporating New Approach Methodologies into Regulatory Nonclinical Pharmaceutical Safety Assessment

doi:10.14573/altex.2212081

Abstract
New approach methodologies (NAMs) based on human biology enable the assessment of adverse biological effects of pharmaceuticals and other chemicals. Currently, however, it is unclear how NAMs should be used during drug