

Advanced Medical Therapies

The pathway to product approval: new indications

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ReNeuron Ltd

- UK based stem cell company
- 65 employees
- Integrated R&D and large-scale GMP manufacturing facility in South Wales
- Enables capacity build for all Phase III needs and initial in-market supply



New Indications

- Established Indications
 - Established pathway to approval
 - Written guidance on endpoints; safety data; specific guidance on study design
 - Products with Prescribing Information and published Regulatory review data
- New Indications
 - An opportunity for innovative medicines
 - Uncertain development pathway
 - Sponsors have to lead the development of Regulatory guidance and possibly the medical community view on demonstrating safety and efficacy of new products in new indications
 - Takes time and resources - in companies that are often small and with limited time/funds

ReNeuron examples

- CTX0E03 human neural stem cells
 - Treatment of disability following ischaemic stroke
 - 1-1.5 million strokes per year in EU
 - 40% of survivors have some disability
 - Rehabilitation ineffective after 3-6 months
 - 3.5 million DALYs lost per year in EU (6% of all causes)
 - No available pharmacological (or other) treatment

- Human retinal progenitor cell (hRPC)
 - Treatment of retinitis pigmentosa
 - Rod photoreceptor death and retinal dystrophy
 - Orphan indication (1/4000 prevalence)
 - Average age of onset – 36 years
 - No available treatment



Extent of clinical data needed for approvals - safety

- Safety Database Size
 - New classes of therapies may need greater patient exposure, for a longer period of time, more subgroups of patients
 - Regulatory view may be based on existing classes of products – e.g. haemorrhage relating to thrombolytic medication in stroke
 - Potential new risks – gene therapies; immune modifying products; cell based products
 - Long-term follow up
 - Regulatory view is often linked to size of potential patient group
 - expectations for quantity and duration of safety data for advanced therapies in diabetes, stroke, are similar as for established therapies
 - on the other hand, single dose treatment and local delivery may reduce size of safety database required

Extent of clinical data needed for approvals - efficacy

- Regulatory viewpoint is often based on what they know and what they have been asked to review before
- Advice and expectations on new products and new indications can be inappropriate
 - Sponsor needs to challenge; provide evidence; suggest alternative development pathways with supporting data
 - Challenge of placebo controlled trials
 - Maintenance of effect
- Study size is not necessarily smaller for new indications or advanced therapies
 - Tools/scales and the size of change being looked for can lead to large studies to demonstrate statistical significance
- May not be an existing endpoint/scale that is appropriate
 - Meaningful clinical benefit (MCID) is often not established
 - Trying out new scales in pivotal/registration studies is not recommended!
 - Developing new scales: costly, time consuming – but there are clear Regulatory guidelines on doing this

Sources of data and influence

- Traditional Advisory Boards
 - Regional differences in advice/practice
- Allied medical practitioners can be equally valuable sources of information and guidance
 - in stroke rehabilitation: Physical Therapists and Occupational Therapists
- Patient /carer and expert views on treatment risk and meaningful benefit can be influential and helpful in regulatory discussions
 - Inexpensive to collect this in an organised way
 - Agency meetings
- Collaborate with 'competitor' companies working in the same area to bring interest groups together for discussion and consensus development
 - Industry led
 - Academia / Medical Foundation led

Regulatory Agencies Expedited Programmes

- Early Access to Medicines Scheme in UK
- Conditional MA and adaptive licencing in EU
 - Post-approval gathering of confirmatory safety and efficacy
 - High unmet medical need
 - Benefit of early access outweighs risk
- Conditional MA in Japan
 - Regenerative medicine
 - Safety shown, promise of efficacy
- Accelerated approval and priority review in US
 - Surrogate endpoints
 - Reduced FDA review time

Conclusion

- Innovative medicines in areas of unmet need require innovative approaches
- Regulatory agencies are open to these approaches
 - Sponsors and regulators need to support each other
 - Working with experts, other healthcare staff, patients, and carers
- Expedited programmes can lead to early approvals
- But innovative medicines in new indications doesn't mean lower standards