EMA Initiatives on Product Shortages Due To Manufacturing/GMP Issues

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Shortages - public awareness

- Often start as acute or national and develops into long-lasting and/or worldwide

- Drug shortages cause delays for cancer patients
  - Patients are being forced to wait for vital drugs - including treatments for cancer - because of desperate shortages of medicines across Britain.

- Ipsen warns of shortages of its orphan drug Inrelex
  - Drug treat children with or short for Inrelex

- Pharmacists warn of drug shortage
  - 'Significant reduction' at sanofi; Generic drug maker must upgrade plant to meet U.S. FDA requirements

- Radium-223 Production Halted Due to Manufacturing Glitch

- A Frightening Shortage of Vital Drugs
  - A severe shortage of a drug used to treat childhood leukemia appears
Supply of Medicines to EEA

- Increase in the supply chain complexity

- Perception of an increase in the number of shortages due to manufacturing, quality and compliance problems in the supply chain.

- EEA is important destination and source of medicines and ingredients.
Importance of the Supply Chain

• Supply chain is frequently a complex path
• Every stage in the process there is an opportunity for a problem to arise
• Supply chain disruption due to manufacturing/GMP and quality problems also have an economic impact due to increased costs e.g. recalls and decreased public confidence in the organisation = ↓ shareholder value.
EMA Actions

- Discussions at CHMP and CMD(h), PDCO, COMP

- Discussions at HMA

- Regulatory authority Workshop in September 2012

- In November 2012 EMA published a reflection paper and implementation plan with 2 main objectives;
  - Provide a framework for assessment
  - Raising Awareness and seeking solutions
Shortages – reflection paper

Virtual group on shortages created in 2012

• First phase: Identify tools to assess reports of shortages

• Second phase: Industry to come up with plan

• Third phase: extended implementation
A Framework for assessment

• Developed common understanding of critical medicine/develop decision tree/clarify national input into EU advice/communication (public catalogue)

• Facilitate Benefit / Risk evaluation through template AR (points to consider) and closing AR (retrospective impact of shortage) plus resource guidance.

• Risk indicators for shortages (manufacturing and quality) developed to identify products at risk.

• Crisis situations resulting from product shortages addressed in context of EU Incident Management Plan (IMP)

• Develop international co-operation to foster sharing of information

• Revision of GMP Guide / Compilation of Community Procedures
Raising Awareness / Proactive approach

• Raise awareness of the impact of product shortages and stimulate industry reaction and improvement in Business Continuity Planning.

• Promote better and proactive risk management by Marketing Authorisation Holders – resilience in supply chains.

• Held a workshop with stakeholders

http://www.ema.europa.eu/ema/index.jsp?curl=pages/news_and_events/events/2013/10/event_detail_000796.jsp&mid=WC0b01ac058004d5c3
Stakeholder Workshop

• Held in London, 14th October 2013.

• Attended by Competent Authorities, HCP’s, PCG’s, Industry Associations;

• A challenge to the industry associations to;
  1. formulate proposals to enhance risk-control measures for preventing supply disruptions caused by Manufacturing / Quality problems.
  2. propose the means to communicate such issues to authorities.

• Report back to the Agency and the network.

• Q4 2014 / Q1 2015 – Industry Associations have reported back.
What can industry do?

• Shift focus from reactive to proactive risk management and more explicitly assess supply chains and transport risks as part of procurement and contract management and corporate governance processes.

• Improve pre- and post-incident communication on disruptions.

• Marketing authorisation holders: develop supply chain resilience

• Challenge to Industry Associations: develop and share methodologies for prevention, risk assessment, communication.
What have industry associations done

A positive response

• Formed an Inter-Association Task Force

• ISPE – ISPE Drug Shortages Prevention Plan – October 2014

• AESGP/EFPIA/EGA/PPTA – Industry Communication Principles to Authorities – Q4 2014

Drug Shortages Prevention Plan – a holistic approach to prevention of shortages due to manufacturing quality problems

Features

• Follows ISPE’s unique shortages survey
• Discussions at every ISPE conference during 2014
• A toolbox and best practice examples to help stakeholders correct and prevent manufacturing quality issues that can create supply disruptions & respond to and manage such disruptions should they occur.
Risk-Based Prevention of Drug Shortage

Foundational concepts

1. **Risk-based triage of products**
   - establish preventive end-to-end controls for drug shortage risks based on criticality of the product, patient impact and overall product risk evaluation.

2. **Establishment of a Product Risk Register and a product Drug Shortage Prevention and Response Plan**
   - A holistic framework and simple templates at product level
Communication Principles

Deliverables

1. Harmonised definition of a meaningful disruption to supply

2. Harmonised reporting template with initial categorisation based on PDAs triaging model

3. Harmonised time point and recipient of the information at NCA and EMA
What next?

• Update to the EMA implementation plan – 3rd Phase.
• Developing a response to the association papers.
• Maintaining the positive engagement of the industry associations in the future – raising awareness of the industry to take up and use the documents developed.
Conclusion

• Public Health and patient safety are our main concerns
• Public health and patient safety are linked to supply chain security
• Initiatives have been/are being taken by Regulators
• Initiatives have been taken by industry associations.
• Need for pharmaceutical manufacturing industry to implement tools developed with goal of building more resilient supply chains and establishing more effective communication processes.
Thank you for your attention

Any Questions?

Further information

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