



4 September 2020

ISPE Response to EMA Public consultation on European Medicines Agencies Network Strategy to 2025

ISPE thanks European Pharmaceutical regulatory organisations for the opportunity to consult on the 2025 plan for the European agencies network. ISPE is a leading not for profit organization of more than 18,000 individual members reflective of technical, engineering, quality, and operational activities throughout pharmaceutical product lifecycle. A major part of ISPE's efforts to connect pharmaceutical knowledge focuses on advancing scientific and regulatory concepts for innovation in pharmaceutical products, manufacturing processes and facilities.

ISPE's response does not indicate endorsement of the Strategy, however, it does indicate ISPE activities relevant to the Strategy.

As written, Strategic Themes 1, 2 and 3 are primarily oriented toward clinical and pharmacovigilance aspects and would benefit from inclusion of more manufacturing and quality considerations. ISPE recommends expanding these Themes to include considerations for pharmaceutical quality. Suggestions are provided in the responses below.

Strategic Theme Area 1: Availability and accessibility of medicines

ISPE has been instrumental for more than a decade in facilitating communication among the different sectors of the pharmaceutical industry and global Health Authorities related to drug shortages. Foundational work in this area is presented in the ISPE Drug Shortage Prevention Plan (DSPP), published Oct 2014. EMA /HMA recognized this guidance and advised marketing authorization holders and operators within the supply chain to utilize it in the "Guidance on detection and notification of shortages of medicinal products for Marketing Authorisation Holders (MAHs) in the Union (EEA)", published Jun 2019. Following the DSPP, the ISPE Drug Shortage Assessment and Prevention Tool was released to assist companies in preparing a DSPP, published Nov 2015.

ISPE continues to support Industry and Regulators in the effort to better prevent or mitigate supply disruptions. Currently, the ISPE Drug Shortages Initiative team has initiatives underway to develop new resources for successful Health Authority engagement and Business Continuity Planning, both of which offer powerful opportunities to mitigate or prevent drug shortages. Through this work, it has been recognized that ISPE efforts and industry progress in the area of drug shortages would be profoundly improved and generate more successful business cases and continuity plans, if the starting question of "which products to prioritize?"

for business continuity measures could be clearly and consistently answered globally. ISPE and its Drug Shortages Initiative Team of industry experts is prepared to provide platforms for discussion with appropriate government or regulatory agencies in support of global harmonization activities regarding defining “essential” medicines that would be beneficial to the industry and the patients they serve.

Lastly, the ISPE continues to host conference sessions which are designed to provide constructive Industry and Regulatory information exchange to educate and raise awareness of evolving developments in the area of Drug Shortages. In the fall of 2020, ISPE will host Drug Shortage Sessions in the ISPE European Annual Conference (featuring Regulators from AIFA, ANSM, MHRA, FDA, AEMPS, WHO, Russia), and the ISPE Annual Meeting & Expo (featuring COVID-19 impact on supply chain and drug shortages), and is releasing an ISPE Webinar Resolving & Avoiding Drug Shortages & the Health Crises They Create (Sep 2020), which highlights the patient perspective in Drug Shortage events.

ISPE welcomes this pan-European approach organized by EMA which should harmonize risk mitigation and reporting amongst competent authorities and we are happy to comment on any reflection papers and guidelines fostering a unified approach. ISPE has had a long-standing commitment to mitigating and preventing drug shortages and looks forward to sharing the outputs of our industry-led programs that are appropriate inputs to the EU Pharmaceutical strategy.

Strategic Theme Area 2: Data analytics, digital tools and digital transformation

The Industry 4.0 model is a well-developed automation and data-based approach to apply modern smart technology into best practice cross industry activities. ISPE has developed the “Pharma 4.0 Operating Model” by adding the regulatory considerations into appropriate pharmaceutical industry activities, particularly along the product supply chain of pharmaceutical development, manufacturing and distribution. Connections are also considered relating to patient outcomes such as patient involvement and feedback. Pharma 4.0 will help pharmaceutical companies move towards a more fully automated environment that considers data integrity from the beginning of the design period based on a “Holistic” Control Strategy approach.

Pharma 4.0 is developed as a global approach, based on underlying ICH Quality Guidelines and taking into consideration the potential complexity of global supply networks. Examples of Pharma 4.0 applications include Blockchain and Data Integrity by Design, both which aim to have data-driven processes for accurate decision-making based on secure data during the realization & execution of the “Holistic” Control Strategy. ISPE is developing concepts and practical training around the ISPE Pharma 4.0 Operating Model. These activities include

roadmaps and Guidance Documents for organizations to achieve Digital Maturity and to apply Data Integrity by Design.

Strategic Theme Area 3: Innovation

ISPE is advancing the scientific and regulatory understanding of many new manufacturing technologies including continuous manufacturing for small and large molecules, advanced therapy medicinal products

(ATMPs), and portable and point of care manufacturing. For each of these technologies, teams of industry experts are working to identify best practices for their development, manufacturing, and regulatory approaches. Additionally, ISPE teams work to identify innovative ways to provide and advance the use of science- and risk-based approaches to provide additional flexibility in manufacturing, which in turn should support enhanced continual improvement leading to increased quality assurance and lower risk of shortages.

The concepts developed through ISPE teams are shared through conference presentations, webinars, publications and guidance documents. ISPE welcomes the opportunity to comment on any relevant draft proposals or guidelines.

Strategic Theme area 5: Supply chain challenges

ISPE believes that the title of this Theme 5 “Supply Chain Challenges” is misleading as many of the underlying challenges are related to manufacturing and quality assurance. We recommend retitling the Theme as “Supply Chain, Production, and Product Quality”.

ISPE’s responses given to Strategic Themes 1, ISPE Drug Shortages Initiative, Strategic Theme 2, Pharma 4.0 and Strategic Theme 3, Innovation are relevant to this section.

Regarding the last goal of this theme on “implication of new manufacturing technologies”, ISPE thinks enhanced communication to increase the knowledge and experience of regulatory authorities relating to these technologies would be helpful. A harmonized approach across all National Competent Authorities in Europe should also help with new technology development and implementation.

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