HTA97

Impact of EMA's Conditional Marketing Authorizations on the Benefit Assessment Validity Period in Germany: Insights From 2017-2023

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Background

- The European Medicines Agency (EMA) can grant a conditional marketing authorization (CMA) for medicines addressing an unmet medical need in the interest of public health (ie, if the medicines are intended for treating, preventing, or diagnosing seriously debilitating or life-threatening diseases). This marketing approval is granted on the condition that comprehensive data will be provided within an agreed time frame. Additionally, post-approval obligations are imposed to evaluate efficacy and safety data.[1]
- The German Federal Joint Committee (G-BA) assesses all new active substances entering the market to conduct a benefit assessment. The assessment results may have a limited validity period.[2]

Objective

- To analyze the impact of CMAs on the validity duration of benefit assessment resolutions in Germany.

Methods

- The annual reports published by the EMA were screened to identify products granted a positive Committee for Medicinal Products for Human Use (CHMP) opinion for a CMA between 2017 and 2023.[3]
- For the identified products, the date of the benefit assessment, the date of the reassessment, and the reason for the limitation were analyzed based on the published data on the G-BA website.[4]

Results

- From 2017 to 2023, 55 products received a CMA from the EMA. The distribution across the years is heterogeneous, with only 1 CMA granted in 2018 and up to 13 CMAs granted in both 2020 and 2021.
- Out of these 55 products, the majority (n=32; 58%) were indicated for oncology, followed by those indicated for viral infections (n=8; 15%) and hematology (n=6; 11%).
- In total, 41 of these products were assessed by the G-BA, 12 were not assessed, and 2 are currently pending assessment.
- Of the 41 products evaluated by the G-BA, 14 (35%) were subject to a time limit on the benefit assessment resolution (see **Table 1**). This rate is approximately 3 times higher than the ratio of time-limited procedures across all G-BA assessments (n=142; 15%)[5].
- The average time difference between the date of the initial resolution and the time limit for reassessment was 42 months (range: 5 months to 82 months) (**Figure 1**).
- The primary reason for a time limit was awaited data on efficacy and safety. In some cases, the reason for the limitation highlighted the need for direct comparative data (see **Figure 2**).
- Most cases (12/14) referenced the obligated data delivery required by the EMA as part of the CMA conditions.

Table 1. Overview of products with CMA and time-limited G-BA resolutions (2017-2023)

Active substance	Trade name	CHMP opinion	Date of initial resolution	Date of reassessment
Crizanlizumab	Adakveo	2020	05/20/21	12/01/25
Belantamab mafodotin	Blrenrep	2020	03/04/21	04/01/23
Ciltacabtagene autoleucel	Carvykti	2022	08/17/23	07/01/26
Burosumab	Crysvita	2017	10/04/18	10/01/19
Pralsetinib	Gavreto	2021	06/16/22	12/31/27
Bulevirtide acetate	Hepcludex	2020	02/18/21	06/01/25
Imlifidase	Idefirix	2020	09/02/21	04/01/26
Selumetinib	Koselugo	2021	03/02/22	07/01/23
Sotorasib	Lumykras	2021	08/04/22	02/01/23
Andexanet alfa	Ondexxya	2019	02/20/20	08/01/24
Entrectinib	Rozlytrek	2020	02/18/21	12/31/27
Rucaparib camsylate	Rubraca	2018	08/15/19	04/01/23
Teclistamab	Tecvayli	2022	02/15/24	01/01/27
Betibeglogene autotemcel	Zynteglo	2019	05/14/20	05/15/25

Key: CHMP – Committee for Medicinal Products for Human Use; CMA – conditional marketing authorization; G-BA – Federal Joint Committee.

Figure 1. Time difference between initial resolution and reassessment

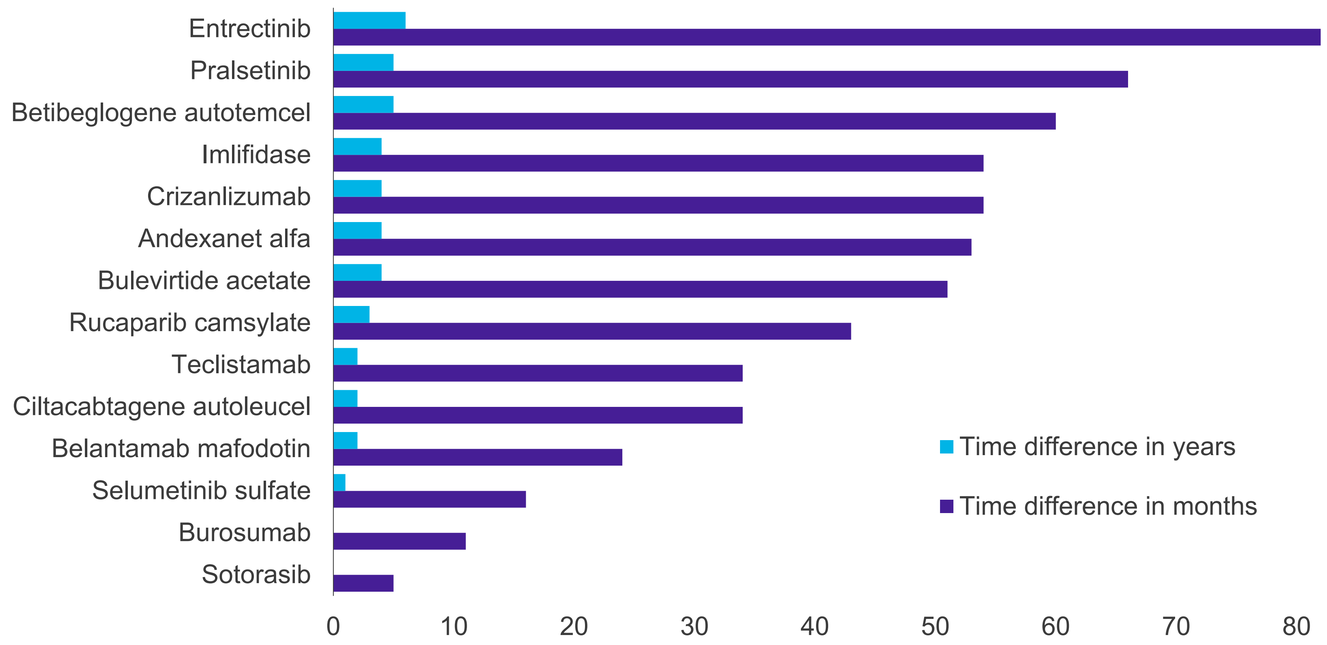
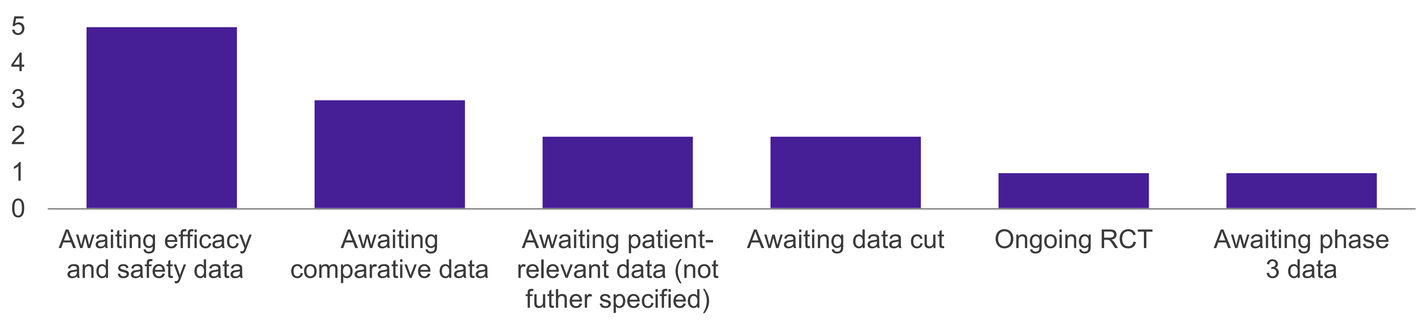


Figure 2. Reasons for the time limit set by the G-BA



Key: G-BA – Federal Joint Committee; RCT – randomized controlled trial.

Conclusions

- Securing a CMA from the EMA significantly increases the likelihood by threefold that the G-BA will impose a time limit on the benefit assessment. Manufacturers must carefully weigh the advantages of expedited market access against the potential risks of a time-limited resolution, which may necessitate subsequent reassessment and price renegotiation.
- To mitigate these risks, one potential strategy could involve conducting supplementary data analyses to enhance the data package submitted for CMA before pursuing market entry in Germany. This proactive approach may provide a more robust evidence base, thereby strengthening the case for sustaining favorable pricing and benefit assessments in the long term.
- Additionally, engaging in early dialogue with the G-BA could provide valuable insights into their expectations and requirements, further enhancing the likelihood of a successful outcome. By adopting a comprehensive strategy that includes both data analysis and stakeholder engagement, manufacturers can better navigate the complexities of the German market.

References

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