



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

25 November 2020
EMA/637405/2020
MLT

Rolling report of COVID-19 related MLT outcome

Last MLT date: 25 November 2020 (ad-hoc)

Date	Product	MLT discussion	Additional Actions agreed
25/11/2020	COVID-19 mRNA Vaccine BioNTech	<p>MLT looked at the main CMC concern of lower % mRNA integrity levels (full length mRNA), which were observed in commercial product batches as compared to clinical batches and could have an impact on efficacy and safety. There is some indication that an adjustment of the commercial manufacturing process may restore integrity levels to levels seen during clinical development, but questions remain on reproducibility and further data are awaited. Overall, provided all remaining issues are addressed, the currently available batches could be sufficient to support an EU marketing authorisation. Remaining quality issues will be considered in the context of overall B/R including the possibility to request additional (qualification and performance evaluation) data post-authorisation.</p> <p>Timelines to obtain additional information are aligned with a possible December opinion (see timetable below). MLT stressed need for liaison with FDA to exchange views on the quality assessment.</p> <p>Post-meeting note (main points from TC with FDA/MHRA/Health Canada):</p> <ul style="list-style-type: none">• Additional commercial lot data confirm restoration of mRNA integrity, giving reason for careful optimism with a view to an opinion in December.• The concerns on increased immunogenicity due to the mRNA integrity loss are deemed theoretical by	



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		<p>the international partners.</p> <ul style="list-style-type: none"> Information was shared on a new emerging quality concern about visible particles to be investigated. There is common interest to align the scientific assessment including quality control ranges. 	
		<p>MLT noted that distant GMP inspections at 2 sites are ongoing. MLT stressed need for EMA to closely liaise with the inspectors to learn about any emerging critical finding without delay. In absence of such finding a GMP compliance statement (albeit no GMP certificate) is expected to be available in time for a possible CHMP opinion in December.</p> <p>Furthermore, close interactions with the supervisory authorities and EC are important to ensure agreement on the approach to transfer drug product release and stability testing from the US to the EU post-approval.</p>	
		<p>MLT was informed of the anticipated PIP decision by 27 Nov 2020. No issue escalated at this stage.</p>	
		<p>MLT was informed of the December evaluation timetable (TT) providing for a possible CHMP Opinion prior to the holidays, i.e. by December 22nd.</p>	
25/11/2020	mRNA vaccine-1273 vaccine Moderna	<p>MLT noted the ongoing distant GMP inspection of the US manufacturing site, which also performs some of the release testing for finished product manufactured in the EU. MLT stressed need for close interactions with the supervisory authority. In absence of critical findings, a GMP compliance statement (albeit no GMP certificate) is expected to be available in time for a possible CHMP opinion in December.</p>	
		<p>The PDCO is further accelerating their rapid review of the PIP to adopt an opinion by end of November 2020 (in time for filing of MAA). However, difficulties have been encountered in the communication with the company, who voiced disagreement with certain aspects of the PDCO opinion. It was noted that this company has started engaging late into the PIP agreement process. The product team will reach out to company who has limited experience with the EU</p>	<p>PPO to review pipeline to identify other planned MA applications where developers need to be guided to accelerate engagement on the PIP agreement</p>

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		regulatory system.	
		MLT was informed of the December evaluation timetable (TT) providing for a possible CHMP Opinion prior to the holidays, i.e. by December 22 nd .	
25/11/2020	COVID-19 Oxford-AstraZeneca Vaccine	Progress has been made in liaising with Brazilian authorities to obtain as much information as possible from GCP inspections performed at local sites with unknown compliance history, who also participated in the pivotal clinical trial for AstraZeneca vaccine. MLT welcomed the collaboration put in place which will allow to identify any early flags and be helpful in the event that any issue should arise during the EU MAA.	