HPRA
An tÚdarás Rialála Táirgí Sláinte
Health Products Regulatory Authority

Guide for
National Scientific and Regulatory Advice

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This guide does not purport to be an interpretation of law and/or regulations and is for guidance purposes only.

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1 INTRODUCTION

The aim of Health Products Regulatory Authority (HPRA) national scientific and regulatory advice is to support the development of new or existing human medicinal products.

Scientific advice may be provided at any time before or after the authorisation of a medicinal product. It may cover questions related to the pharmaceutical quality, the design and conduct of non-clinical investigations and clinical trials, as well as regulatory advice. National scientific advice can be provided to industry and other interested parties such as academic institutions and clinical trial investigators.

2 OVERVIEW

National scientific advice meetings are an optional service provided at the discretion of the HPRA. Upon receipt, requests are considered based on the availability of experts and departmental capacity and accepted or refused as appropriate.

Scientific advice can never be a substitute for an application for marketing authorisation (MA) and the advice provided has no bearing on the final assessment of the HPRA and/or the Committee for Medicinal Products for Human Use (CHMP) at the European Medicines Agency (EMA).

Advice will be given in good faith, however, if circumstances change over time, an alternative approach to that previously advised may become more appropriate. Therefore, any advice provided is not binding for the applicant or for the HPRA.

The scope of the advice is the list of questions to be provided by the applicant in relation to the human medicinal product development programme. The questions should be justified by the fact that they are either not covered by the relevant guidelines, or that specific aspects of these guidelines require interpretation.

It is not in the scope to provide a pre-assessment of data intended for a variation or marketing authorisation. Questions that are prospective and concern the future development of a medicinal product are preferred.

Advice can be requested in quality, pre-clinical and clinical areas.

2.1 Quality advice

We provide national scientific and regulatory advice on quality aspects of product development for the following areas:

- chemical drug substances and medicinal products, including herbal products, oligonucleotides and oligopeptides

- biological drug substances and drug products, including biosimilars and antibody-drug conjugates
- drug device combinations
- continuous manufacturing / process analytical technology / real time release / Quality by Design
- advanced therapies
- bioanalytical methods (for biological products)

For pre-clinical and clinical advice, the advice can be given in conjunction with a meeting as outlined below. If the scope and number of questions are appropriate, a request for swift (30-day) quality advice can be submitted.

2.2 Pre-clinical advice

We provide national scientific and regulatory advice on the pre-clinical (toxicological and pharmacological) development of products. Advice relating to environmental risk assessment (ERA) is not in the scope of national scientific advice.

2.3 Clinical advice

We provide national scientific and regulatory advice on the clinical development of medicinal products.

Clinical national scientific advice is generally sought by pharmaceutical companies for national and decentralised medicines and by academic institutions during their research programmes.

It is not in the scope to provide a pre-assessment of data intended for a variation or marketing authorisation.

Advice prior to a marketing authorisation application or variation is focused on questions related to planning and conduct of a concrete, forthcoming application. Possible topics are the legal basis of the application; the dossier presentation (structure, content); and procedural aspects, as well as the draft labelling.

2.4 Regulatory advice

Regulatory advice may also be requested on issues such as:
- a change to the method of sale and supply of authorised medicines
- proposed labelling for product ranges
- significant changes to product information (SmPC), labelling or package leaflets (e.g. multilingual labelling)
- advertising or post-authorisation regulatory advice relating to a product range
- legal basis of marketing authorisation applications

If the scope and number of questions are appropriate, a request for swift (30-day) regulatory advice can be submitted.

2.5 General points in relation to all types of advice

Advice may not be given in certain circumstances (this list is not exhaustive):
- if a company has already obtained CHMP advice on the same issues
- when the rapporteur and co-rapporteur for an MA request have already been designated by the CHMP
- for concerns raised during assessment of any MA application or other procedures, etc.
- for qualification of biomarkers or other qualification opinions

3 MAKING A REQUEST FOR NATIONAL SCIENTIFIC AND REGULATORY ADVICE

To make a request, download the National Scientific and Regulatory Advice application form from our website at www.hpra.ie and fill in the required details.

You can propose dates for a meeting within the form. In general, meetings are organised within two months from acceptance of the request although delays may arise due to the availability of experts, etc. A meeting is not required for a swift scientific advice (quality and/or regulatory only).

A list of questions must be supplied with the application. A concrete and precise list of questions must be provided together with the request for advice. The list of questions is necessary for the validation of the request. Only questions which have been put forward in the list are subject to the advice procedure.

There is no limit to the number of questions that can be asked; however, there are only 90 minutes available for the meeting. The applicant should ensure there is sufficient time for discussion. The meeting should focus on the key questions that were submitted in the initial request.

A brief overview should be included with the application form. The overview should contain details of the medicinal product, the development programme overview and/or marketing history. For each question raised, the applicant should state their position and provide a written summary.

Submit the completed application form along with your brief overview to scientificadvice@hpra.ie.

Insufficient information or the lack of an appropriate justification for the request may lead to rejection of the application.

After reviewing the questions, the HPRA will inform the applicant if a meeting is considered appropriate and if any specific questions will not be discussed.

For swift scientific advice (quality and/or regulatory only), the applicant may be informed if the scope or the number of questions in the advice is more suitable for the standard (non-swift) scientific advice procedure.

When your request is accepted, a meeting date will be agreed. The full briefing documents must be received at least 30 days before a meeting. For swift scientific advice, the full briefing documents can be submitted as soon as your request is accepted (see section 4 below).

Changes to the list of questions can be submitted to scientificadvice@hpra.ie up to 30 days prior to a meeting and for the swift scientific advice procedure, before validation. If the changes to the list of questions are significant and the assessor(s) assigned to the case must be revised, your national scientific advice case may be delayed while capacity is revised. Please highlight in the email if an updated version of the list of questions is included.

4 DOCUMENTATION PROVIDED BEFORE THE MEETING

In addition to the information provided with the application form, the following briefing documentation must be provided electronically to scientificadvice@hpra.ie at least 30 days before the meeting:

- background information (limited to essential information and no longer than 100 pages)
- disease/targeted population/indication
- the applicant's position and justification for each question
- investigator's brochure if relevant
- list of applicant attendees

For swift scientific advice (quality and/or regulatory only), the final briefing documentation can be provided to scientificadvice@hpra.ie when you receive notification that your request has been accepted. When your final briefing documentation is received, your case can be validated and begin. The final briefing documentation for swift advice must be submitted within seven days of receipt of acceptance.

5 MEETING

The meeting will be 90 minutes long and will be chaired by HPRA staff.

At the start of the meeting the applicant will be asked to provide a brief presentation of the product and topics to be discussed.

The applicant is requested to record brief minutes of the meeting and to send them to the HPRA within one week following the meeting for agreement. The HPRA may comment on the recorded minutes prior to finalisation of the written advice.

Written responses to the applicant's questions will be provided by the HPRA within 30 days following the meeting.

For swift scientific advice (quality and/or regulatory only), the written report will be issued within 30 days of validation of the accepted swift scientific advice case.

If the applicant requires any subsequent clarifications, these are limited to the issues discussed and must be sent within two weeks after receipt of the written advice by email to scientificadvice@hpra.ie. The HPRA will provide clarification within 14 days (and within seven days for swift advice).

6 FEES

The following fee codes apply (please refer also to the HPRA Guide to Fees and the HPRA Fee Application Form for Human Products on our website at www.hpra.ie).

Fee code 240 also applies to swift scientific advice.

Fee Code	Type
240	When advice is requested in a single area of quality or preclinical development.
246	When advice is requested in the clinical development section only.
247	When advice is requested in two sections from preclinical, quality or clinical in any combination.
248	When advice is requested in all three sections.

7 CONTACT DETAILS

For further information or guidance, please contact:

Email: scientificadvice@hpra.ie

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