Good off-label use practices: Where are we? What next?

European Parliament – Members's Salon
Date: 14 November 2023
8h00/9h30

Context

The off-label use of medicinal products is often a necessity in areas of unmet medical needs. The prevalence of off-label use in the EU in both the paediatric and adult population is high in a broad range of therapeutic areas such as rare diseases, oncology, psychiatry, neurology and rheumatology, in both hospitals and outpatient settings.[1]

Off-label practice poses a range of quite different challenges such as ethical and legal issues for healthcare professionals, increased risk for patients, patient information and consent.[1]

While not optimal but essential to address unmet medical needs, the manner in which countries deal with the off-label use of medicines is not harmonised across the EU.[1]

In 2016, the Declaration for Good Off-Label Use Practice[2] (GOLUP) was launched, supported by a coalition of European organisations dedicated to ensuring that high standards of patient care are upheld and that progress in medical research and innovation is achieved.

The Declaration put forward the basis for a harmonised approach on when and how off-label prescription should take place across Europe:

- Presence of a medical therapeutic need based on a current examination of the patient by a suitably qualified health care professional,
- Absence of authorised treatment and licensed alternatives tolerated by the patient or repeated treatment failure,
- A documented review and critical appraisal of available scientific evidence favours off-label use to respond to the unmet medical need of the individual patient,
- Patients (or their legal representative) must be given sufficient information about the medicines that are prescribed to allow them to make an informed decision,
- Presence of established reporting routes for outcomes and adverse events linked to off-label use.

[1] Study on off-label use of medicinal products in the European Union, NIVEL, Dutch National Institute for Public Health and the Environment, European Public Health Alliance, February 2017. https://op.europa.eu/en/publication-detail/-/publication/ecf85518-d376-11e9-b4bf-01aa75ed71a1/language-en
[2] Declaration on Good Off-Label Use Practice, 2016, https://www.braincouncil.eu/golup/wp-content/uploads/2017/11/GOLUP_Declaration.pdf

Where are we today?

The repurposing of medicines is about identifying a new therapeutic use for an existing medicine/active substance for an indication outside its existing authorised indication(s). It is a way of making new treatment options available to patients.

- **EMA (European Medicines Agency)**

  In 2021, the repurposing of EMA and the Heads of Medicines Agencies launched a pilot project to support the repurposing of medicines as a follow-up to the European Commission's Expert Group on Safe and Timely Access to Medicines for Patients (STAMP) discussions on a proposal for a medicines repurposing framework[3].

  The aim of this initiative is to support not-for-profit organisations and academia to gather or generate sufficient evidence on the use of an established medicine in a new indication with the view to have this new use formally authorised by a regulatory authority. This is a way of making new treatment options available to patients.

  As part of the pilot, EMA and the national medicines agencies will provide regulatory support, primarily scientific advice, to help these stakeholders generate a data package robust enough to support a future application by a pharmaceutical company.

- **Spanish EU Presidency**

  The topic of 'Repurposing and better use of clinical data' is a topic of the Spanish EU Presidency with a meeting on 27 September 2023, in Madrid.

  The Spanish Agency of Medicines and Medical Devices (AEMPS) is organising this event under the Spanish 2023 EU-Presidency to promote the repurposing of medicinal products and how the better use of clinical data can help to the repurposing of medicines in the European Union.

Meeting objectives and goals

- **Objectives**

[3] EMA - Repurposing of authorised medicines: pilot to support not-for-profit organisations and academia https://www.ema.europa.eu/en/news/repurposing-authorised-medicines-pilot-support-not-profit-organisations-academia

It is time to look at what has been achieved both at national and EU level since the launch of the GOLUP Declaration in 2016, take stock of the on-going work in the off-label use / repurposing of drugs and prepare for future developments.

The current European legislative and EBC policy advocacy work provide a spring-board to revitalise and further promote the Declaration:

- European Commission for a Directive on medicinal products for human use
  - adverse reactions reporting in the case of off-label use products (Article 105)
  - unmet medical needs are one reason and objective of the proposal (Exploratory memorandum and article 83)
- European Commission proposal for a Regulation for the authorisation and supervision of medicinal products for human use
- European Commission proposal on rare diseases (expected Q4 2023)
- European Commission 2021 Ageing Report looking at the economic and budgetary projections for the EU Member States (2019-2070)
- European Brain Council's work on animal research (Statement on the use of animals in scientific research
- European Brain Council work on research and innovation (Pledge for Science: Brain Research and Innovation in the EU and Brain Innovation Policy Roadmap

The main objectives of the meeting are:

- To inform stakeholders on the EU Repurposing Pilot Project, on other NCA repurposing projects and bring some cases of success,
- To learn about repurposing initiatives around Europe,
- To look into different financing perspectives and opportunities,
- To exchange knowledge and collect inputs, experience and good practices among stakeholders involved in repurposing and explore opportunities for collaboration,
- To explore how the better use of clinical data can help the repurposing of medicines in the European Union.

- **Goals**

- Reconnect with the GOLUP Declaration promoters and revitalise the Declaration
- Involve a broad panel of national and EU stakeholders to exchange ideas and experiences and further disseminate the Declaration
- Secure EU and national recognition of the Declaration with the ultimate goal to promote a common European approach for off-label use
- Strive to have the Declaration principles embedded in the EU and national legislation
- Call for and propose EU guidelines for the good use of off-label medicinal products.

The feedback gathered during this meeting will inform recommendations and follow-up actions with the aim to further catalyse the repurposing of medicines in the EU.

Event – Details

- **Location**: European Parliament – Brussels - Member's Salon
- **Date**: 14 November 2023
- **Host** : Stelios Kympouropoulos, MEP – EPP/Greece
- **Format**: Breakfast meeting - In-person event
- **Duration:** 1h30 (8h00/9h30)
- **Audience**: EU and national policy makers, interested stakeholders (patients, health professionals, researchers, like-minded NGOs…)
- The event is organised by EBC with unrestricted support from the European Confederation of Pharmaceutical Entrepreneurs (EUCOPE)

Draft programme

Good off-label use practices: Where are we? What next?		
	Speakers (*TBC*)	**Timing** (indicative)
Opening remarks*	**Stelios Kympouropoulos**, MEP – EPP/Greece	5 minutes
Introduction to the topic and goal of the event	**Frédéric Destrebecq,** European Brain Council, Executive Director	5 minutes
Patient perspective on GOLUP	**Dr. Orla Galvin**, European Federation of Neurological	5 minutes x 2

	Associations, Executive Director (TBC) **Wendy Yared**, European Cancer Leagues, Director (TBC)	
Clinician representative Good off-label use of medicines: looking at the patient safety aspect	**Mike Isle**, European Alliance for Access to Safe Medicines (EAASM), Chair and Executive Director	10 minutes
Implementing the GOLUP Declaration Good-off label use and medical devices	**Marc Dooms** (Senior Orphan Drug Pharmacist, University Hospitals, Leuven, BE)	10 minutes
Policy response ▪ **European Commission** Can the revision of the EU pharmaceutical legislation lead the way? ▪ **EMA / Spanish Agency of Medicine and Health Products** EMA's repurposing project and outcomes of the EU Presidency meeting on repurposing	**Olga Solomon,** European Commission, Directorate General for Health and Food Safety, Deputy Director General for Health responsible for Directorates B, C and D, Medical Products and Innovation; Medicines: policy, authorisation and monitoring (TBC) **Yoana Nuevo,** Spanish Agency of Medicines and Medical Devices (AEMPS), Responsible for the Innovation Office and National Scientific Advice Unit, Spanish representative in the EU Innovation Network (EU-IN)	10 minutes x 2

and better use of clinical data		
Q&A session	**Frédéric Destrebecq,** European Brain Council, Executive Director	10 minutes
Next steps	**Frédéric Destrebecq,** European Brain Council, Executive Director **Biomedical Alliance in Europe representative** (TBC)	5 minutes
Closing remarks	**Stellios Kympouropoulos**, MEP – EPP/Greece	5 minutes