

## Why children and adolescents with cancer are still missing out on potentially life-saving treatments, despite the Paediatric Regulation

### SIOPE Briefing

Addressed to Members of the European Parliament ENVI Committee

June 16<sup>th</sup> 2015

The [European Society for Paediatric Oncology \(SIOPE Europe or SIOPE\)](#) is the only pan-European organisation representing the full spectrum of professionals working in the field of childhood cancers in close partnership with parents, patients and survivors.

#### CALL TO ACTION:

While recognising the progress made possible by the Paediatric Medicine Regulation, SIOPE calls for an efficient revision of the legislation to reflect the urgent needs of children and adolescents with cancer:

- Paediatric development of an oncology drug should be based on its **own mechanism of action** and paediatric tumour biology (rather than dictated by its adult indication),
- Paediatric development of an adult drug should **start early** - as soon as sufficient scientific and safety data are available,
- **Mechanisms to prioritise** drugs from different companies should put in place,
- Development of **specific paediatric oncology drugs** should be incentivised,
- **Paediatric Investigation Plans (PIPs) should be significantly improved and the PIP process simplified** to better meet the patients' needs and be feasible in practice.

#### **PERSISTING ISSUE: Cancer is still the leading cause of death by disease beyond the age of 1**

- Each year **6,000 children and adolescents** die of cancer in Europe, despite progress in the last 50 years
- **Less than 10%** of them had access to an innovative treatment - a second chance
- **Significantly increased access to innovative therapies is imperative for young patients dying of cancer**

#### **PROGRESS SO FAR: EU Paediatric Medicine Regulation definitely changed the landscape since 2007**

- The number of new drugs in early phase paediatric trials somewhat increased; some 60 PIPs were approved for oncology drugs, but many proved unfeasible; only one targeted anti-cancer drug was authorised for a paediatric malignancy, so far.
- Efficient cooperation between stakeholders, namely academia, parents and survivors, industry, and regulatory actors, was set up (*see Example 3: CDDF Platform*)
- **Overall progress is present but far from sufficient to address patients' needs in a timely fashion**

#### **! BUT: Children with life-threatening disease have been denied access to potentially effective drugs !**

- **Drugs have been unjustifiably waived** because their adult indication did not exist in children, despite a strong scientific rationale for their evaluation in the paediatric population (*see Example 1: crizotinib*),
- **Major delays occur** in starting the paediatric development of innovative anti-cancer drugs (*see Example 2: pembrolizumab and nivolumab*),
- **Development of specific paediatric anti-cancer drugs has not been incentivised** and extremely few specific paediatric anticancer drugs are in development as a result.
- **SIOPE strongly believes that the EU Paediatric Medicine Regulation can be efficiently revised in line with its Call to Action**

## SELECTED EXAMPLES

### 1. Unjustified waiver: crizotinib

*Crizotinib* is an anticancer drug targeting ALK. Its development in adults started in 2007. *Crizotinib* has been approved for the treatment of ALK positive lung cancer in 2011 and 2012, in the USA and Europe, respectively. There was a strong scientific rationale to develop *crizotinib* in children. ALK is altered in several malignancies in children, including a subset of lymphomas, neuroblastoma and a subtype of soft tissue sarcomas. In 2009, the National Cancer Institute in the USA supported a paediatric phase I trial of *crizotinib* in children that showed outstanding tumour responses in lymphomas and soft tissues sarcomas and some activity in neuroblastoma (Mossé, Lancet Oncology, 2013). The European Medicine Agency (EMA) issued a class waiver in 2010 on the following grounds: lung cancer does not exist in children. Pfizer did not develop *crizotinib* in children. Over the last 6 years in Europe, children with a relapsed ALK positive malignancy have been denied access to *crizotinib* and were not given a second chance.

### 2. Unjustified major delays: pembrolizumab and nivolumab

*Pembrolizumab* and *Nivolumab* are new immune therapy drugs targeting PD1. Their clinical development started in 2011 and 2012. Major therapeutic activity has been shown in adults in melanoma, lung cancer, bladder cancer, gastric cancer, MSI colorectal cancer and other adult malignancies. These drugs represent a major breakthrough in oncology saving adult lives. Both drugs have already been approved by the Food and Drug Administration in the USA in 2014 and are expected to be approved in Europe in 2015. A Paediatric Investigation Plan was approved by the EMA in 2014 for both *pembrolizumab* and *nivolumab*. The first paediatric phase I trials started only in early 2015 in the USA and in Europe, i.e. after approval in adults. For the last 4 years, children and adolescents with relapsed malignancies have been denied access to anti-PD1 therapy, on both sides of the Atlantic.

### 3. The CDDF-ITCC-ENCCA-SIOPE multi-stakeholder paediatric oncology platform to improve development of oncology drugs for children and adolescents

Created in December 2013, this platform is a forum of discussion between Academia, Parents, Industry and Regulators working together to identify hurdles and bottlenecks in paediatric oncology drug development and making proposals to improve the regulatory environment as well as cooperation between all stakeholders. (Eur J Cancer, (2015) 51, 218– 224 ((See ANNEX 2)). Three working groups are addressing:

- WP1:** New strategies for improved development of oncology drugs for children and adolescent: i) Mechanism of action based development strategy, ii) Compound prioritisation, iii) Changes needed in the paediatric medicine regulation,
- WP2:** New incentives for specific paediatric drug development and drug repositioning,
- WP3:** Implementation of long-term follow up measures of children and adolescents receiving new anticancer drugs.

The platform is willing to work with members of the European Parliament, of the European Council as well as the European Commission to design a better regulatory environment that will speed up and facilitate the development of life-saving treatments for children and adolescents with cancer.

Contact: [www.cddf.org](http://www.cddf.org) / [cddf@ecco-org.eu](mailto:cddf@ecco-org.eu); [office@siope.eu](mailto:office@siope.eu)

#### References

1. Vassal G, Rousseau R, Blanc P, Moreno L, Bode G, Schwach S, Schrappe M, Skolnik J, Bergman L, Bradley-Garelik MB, Saha V, Pearson A, Zwierzina H. Creating a unique, multi-stakeholder Paediatric Oncology Platform to improve drug development for children and adolescents with cancer. Eur J Cancer. 2015 Jan;51(2):218-24
2. Adamson PC, Houghton PJ, Perilongo G, Pritchard-Jones K. Drug discovery in paediatric oncology: roadblocks to progress. Nat Rev Clin Oncol. 2014 Dec;11(12):732-9
3. Wimmer S, Rascher W, McCarthy S, Neubert A. The EU paediatric regulation: still a large discrepancy between therapeutic needs and approved paediatric investigation plans. Paediatr Drugs. 2014 Oct;16(5):397-406
4. Vassal G, Blanc P, Pearson A. Need for change in implementation of paediatric regulation. Lancet Oncol. 2013 Nov;14(12):1156-7
5. Vassal G, Georger B, Morland B. Is the European paediatric medicine regulation working for children and adolescents with cancer? Clin Cancer Res. 2013 Mar 15;19(6):1315-25
6. Mossé YP, Lim MS, Voss SD, Wilner K, Ruffner K, Laliberte J, Rolland D, Balis FM, Maris JM, Weigel BJ, Ingle AM, Ahern C, Adamson PC, Blaney SM. Safety and activity of crizotinib for paediatric patients with refractory solid tumours or anaplastic large-cell lymphoma: a Children's Oncology Group phase 1 consortium study. Lancet Oncol. 2013 May;14(6):472-80.

## **ANNEX 1: ABOUT SIOPE**

The [European Society for Paediatric Oncology \(SIOPE Europe or SIOPE\)](#) is the only pan-European organisation representing the full spectrum of professionals working in the field of childhood cancers. With more than 1,500 members across Europe, today SIOPE is leading the way to ensure the best possible care and outcomes for all children and adolescents with cancer in Europe.

### **- History**

SIOPE was established in 1998 as [SIOPE](#) European branch. In 2007, following the revision of its Statute SIOPE becomes an independent organisation. SIOPE developed into a professional organisation with a permanent Secretariat in Brussels and an established governance structure. In the same year, SIOPE joined forces with [ESSO](#), [EACR](#), [ESMO](#), [ESTRO](#) and [EONS](#) and founded the [European CanCer Organisation \(ECCO\)](#).

### **- Mission and Vision**

Through the integration of **research, care and education**, SIOPE and the European community of health professionals address the two goals of the next decade: **to increase the cure rate and the quality of cure of children with cancer**. This will be achieved through:

- Strong and integrated research programmes from basic science to clinical research;
- Improved access to standard care and expertise across Europe;
- Training and education of all health professionals taking care of children and adolescents with cancer.

The mission of SIOPE is to ensure the best possible care and outcome for all children and young people with cancer in Europe: to achieve this goal, our Society addresses the main challenges faced by European paediatric oncology professionals through a multidisciplinary and pan-European perspective.

### **- Areas of activity**

SIOPE focuses its efforts in several activities, within the following major areas:

- **EU Projects**: breakthrough scientific research and international cooperation are essential to improve the treatment of children with cancer. For this reason, we actively support our community creating EU-funded projects together with our international partners focusing on the initiation of clinical trials and the implementation of the standards of care for children with cancer
- **Advocacy**: perfectly located within the EU panorama, SIOPE engages with stakeholders, policy-makers and the European Union in order to shape the future EU health and research policy
- **Educational opportunities**: we work to train the new generation of excellent professionals, offering various types of education and training opportunities to our community
- **Communication**: we produce and disseminate relevant information for our members and in support of our research collaborations. Furthermore, we work to stimulate cross-border exchange of best practice
- **Parents and patients**: to bridge the existing gap between paediatric oncology professionals and childhood cancer patients and parents, we actively create and maintain solid partnerships with their advocates at the European level

### **European Childhood Cancer Plan**

SIOPE is currently working on its long-term sustainable strategic plan. This proposal for a Roadmap was discussed in a multi-stakeholder meeting in Brussels in September 2014, an event attended by academia, parents, survivors, agencies, national bodies, charities, industry. The attendees supported the proposal and agreed to call for a [European Childhood Cancer Plan](#) in order to address the needs in research and care and tackle inequalities. The strategic plan is currently being finalised by defining actions, platforms, and programmes needed for its implementation. SIOPE is therefore gearing for active dissemination and putting the agenda into practice.

Available at [www.sciencedirect.com](http://www.sciencedirect.com)

ScienceDirect

journal homepage: [www.ejcancer.com](http://www.ejcancer.com)

## Creating a unique, multi-stakeholder Paediatric Oncology Platform to improve drug development for children and adolescents with cancer ([Online version here](#))



Gilles Vassal<sup>a,\*</sup>, Raphaël Rousseau<sup>b</sup>, Patricia Blanc<sup>c</sup>, Lucas Moreno<sup>d</sup>, Gerlind Bode<sup>e</sup>, Stefan Schwoch<sup>f</sup>, Martin Schrappe<sup>g</sup>, Jeffrey Skolnik<sup>h</sup>, Lothar Bergman<sup>i</sup>, Mary Brigid Bradley-Garelik<sup>j</sup>, Vaskar Saha<sup>k</sup>, Andy Pearson<sup>l</sup>, Heinz Zwierzina<sup>m</sup>

<sup>a</sup> Department of Clinical Research, Institut Gustave Roussy, Paris-Sud University, Paris, France

<sup>b</sup> Genentech, Inc., 1 DNA Way, South San Francisco, CA 94080, USA

<sup>c</sup> Imagine for Margo, 9 Avenue Eric Tabarly, 78112 Fourqueux, France

<sup>d</sup> CNIO Centro Nacional de Investigaciones Oncológicas, C/ Melchor Fernández Almagro, 3, E-28029 Madrid, Spain

<sup>e</sup> International Confederation of Childhood Cancer Parent Organizations, Schouwstede 2B, 3431 JB Nieuwegein, The Netherlands

<sup>f</sup> Eli Lilly, Erl Wood Manor, Sunninghill Road, Windlesham, Surrey GU20 6PH, UK

<sup>g</sup> Department of General Pediatrics, Christian-Albrechts-University and Medical Centre Schleswig-Holstein, Campus Kiel, Schwanenweg 20, D-24105 Kiel, Germany

<sup>h</sup> GlaxoSmithKline, 5 Crescent Drive, Philadelphia, PA 19112, USA

<sup>i</sup> Medizinische Klinik II, J.W. Goethe Universität, D-60590 Frankfurt, Germany

<sup>j</sup> Bristol-Myers Squibb, 5 Research Parkway, Wallingford, CT 06492, USA

<sup>k</sup> Institute of Cancer Sciences, The University of Manchester, Manchester Academic Health Science Centre, 550 Wilmslow Rd, Manchester M20 4BX, UK

<sup>l</sup> The Institute of Cancer Research, The Royal Marsden NHS Foundation Trust, 15 Cotswold Road, Sutton, London SM2 5NG, UK

<sup>m</sup> Medizinische Universität Innsbruck, Anichstrasse 35, 6020 Innsbruck, Austria

Received 22 October 2014; accepted 28 October 2014

Available online 27 November 2014

### KEYWORDS

Drug development  
Paediatric oncology  
Regulatory framework

**Abstract** Seven years after the launch of the European Paediatric Medicine Regulation, limited progress in paediatric oncology drug development remains a major concern amongst stakeholders – academics, industry, regulatory authorities, parents, patients and caregivers. Restricted increases in early phase paediatric oncology trials, legal requirements and

\*Corresponding author at: Division of Clinical Research, Institut Gustave Roussy, 114, rue Edouard-Vaillant, Paris-Sud University, 94805 Villejuif, France. Tel.: +33 1 42 11 62 18.

E-mail addresses: [gvassal@igr.fr](mailto:gvassal@igr.fr) (G. Vassal), [rousseau.raphael@gene.com](mailto:rousseau.raphael@gene.com) (R. Rousseau), [imagineformargo@gmail.com](mailto:imagineformargo@gmail.com) (P. Blanc), [lmorenom@cnio.es](mailto:lmorenom@cnio.es) (L. Moreno), [gerlind-bode@t-online.de](mailto:gerlind-bode@t-online.de) (G. Bode), [schwoch\\_stefan@lilly.com](mailto:schwoch_stefan@lilly.com) (S. Schwoch), [m.schrappe@pediatrics.uni-kiel.de](mailto:m.schrappe@pediatrics.uni-kiel.de) (M. Schrappe), [jeffrey.m.skolnik@gsk.com](mailto:jeffrey.m.skolnik@gsk.com) (J. Skolnik), [l.bergmann@em.uni-frankfurt.de](mailto:l.bergmann@em.uni-frankfurt.de) (L. Bergman), [m.brigid.bradleygarelik@bms.com](mailto:m.brigid.bradleygarelik@bms.com) (M.B. Bradley-Garelik), [vaskar.saha@manchester.ac.uk](mailto:vaskar.saha@manchester.ac.uk) (V. Saha), [Andrew.Pearson@icr.ac.uk](mailto:Andrew.Pearson@icr.ac.uk) (A. Pearson), [heinz.zwierzina@i-med.ac.at](mailto:heinz.zwierzina@i-med.ac.at) (H. Zwierzina).

<http://dx.doi.org/10.1016/j.ejca.2014.10.029>

0959-8049/© 2014 The Authors. Published by Elsevier Ltd.

This is an open access article under the CC BY-NC-ND license (<http://creativecommons.org/licenses/by-nc-nd/3.0/>).

Paediatric Investigation Plan  
Precompetitive development  
Long-term follow up

regulatory pressure to propose early Paediatric Investigation Plans (PIPs), missed opportunities to explore new drugs potentially relevant for paediatric malignancies, lack of innovative trial designs and no new incentives to develop drugs against specific paediatric targets are some unmet needs. Better access to new anti-cancer drugs for paediatric clinical studies and improved collaboration between stakeholders are essential. The Cancer Drug Development Forum (CDDF), previously Biotherapy Development Association (BDA), with Innovative Therapy for Children with Cancer Consortium (ITCC), European Society for Paediatric Oncology (SIOPE) and European Network for Cancer Research in Children and Adolescents (ENCCA) has created a unique Paediatric Oncology Platform, involving multiple stakeholders and the European Union (EU) Commission, with an urgent remit to improve paediatric oncology drug development. The Paediatric Oncology Platform proposes to recommend immediate changes in the implementation of the Regulation and set the framework for its 2017 revision; initiatives to incentivise drug development against specific paediatric oncology targets, and repositioning of drugs not developed in adults. Underpinning these changes is a strategy for mechanism of action and biology driven selection and prioritisation of potential paediatric indications rather than the current process based on adult cancer indications. Pre-competitive research and drug prioritisation, early portfolio evaluation, cross-industry cooperation and multi-compound/sponsor trials are being explored, from which guidance for innovative trial designs will be provided.

© 2014 The Authors. Published by Elsevier Ltd. This is an open access article under the CC BY-NC-ND license (<http://creativecommons.org/licenses/by-nc-nd/3.0/>).

## 1. Introduction

Childhood and adolescent cancers remain a major cause of morbidity, mortality and social concern in Europe [1–3] with 3000 children and adolescents dying of cancer each year [4]. In the developed world, although 80% of children survive cancer, they may suffer long-term effects from their treatment [5] and approximately 20% of patients will die of their disease or of disease-related causes; as such paediatric cancer remains the number one non-accidental cause of death in children and adolescents [6]. Improvements to all standards of paediatric cancer care and a focus on incurable diseases are urgently needed, entailing fresh approaches to the many complex aspects of treating childhood cancers, including faster introduction of new medicines for children into front-line care, innovations in study design and drug development and collaboration between stakeholders. Additionally, as new drugs are introduced, it is imperative for childhood cancer survivors to have long-term follow up (LTFU) into adulthood to collect data on the later effects of childhood treatment for cancer [2].

The European Paediatric Regulation [7] provides the regulatory framework for drug development for children and adolescents with cancer. It aims to increase availability of authorised medicines for children through generation of safety and efficacy data and high-quality ethical paediatric clinical research, and to produce better information on paediatric medicines, in general. Overcoming off-label use by developing and making available new, age-appropriate paediatric medicines is also within the Regulation's remit.

The Paediatric Regulation stipulates that pharmaceutical companies propose and comply with a Paediatric Investigation Plan (PIP) before seeking marketing

authorisation (MA) for a new medicine (or variation of an existing MA). Completed PIPs are rewarded with a six-month extension of the medicine's Supplementary Protection Certificate (SPC) or, in the case of orphan-designated medicines, a 2-year extension of the 10-year market exclusivity for the authorised indication.

Despite significant changes in paediatric oncology drug development in the years after the Regulation came into force in 2007 and an increase in the total number of PIPs filed, frustration remains amongst all stakeholders at the seemingly slow speed of progress [8]. The lack of a unified driving force to facilitate coherent actions for further change and progress has become apparent. A lack of increase in early phase paediatric oncology trials in Europe compared with the United States (US), growing regulatory requirement to propose PIPs early in drug development, missed opportunities to explore efficient drugs in development for adults that may be relevant for paediatric malignancies, lack of innovation in trial designs and limited incentives to develop drugs against specific paediatric targets continue to be areas of significant concern for paediatric drug developers across academia, industry, regulatory authorities, and importantly, amongst patients, parents and caregivers.

To address these concerns and promote progress, two-yearly Paediatric Oncology Workshops were initiated in 2011 by the Cancer Drug Development Forum (CDDF, previously the Biotherapy Development Association (BDA)) along with the European consortium for Innovative Therapies for Children with Cancer (ITCC), and the European Society for Paediatric Oncology (SIOPE Europe) [1], within the framework of the European Network for Cancer Research in Children and Adolescents (ENCCA). The ITCC consortium was created in 2003 to develop early evaluation of new



oncology drugs [9] and ENCCA is a network of excellence awarded funding for 2011–2015, in the European 7th Framework Programme (FP), to structure and enhance collaboration in clinical and translational research in European paediatric oncology.

The 2011 BDA/CDDF Workshop identified sectors within paediatric oncology drug development for action and specific strategies to improve upon and speed drug development and despite methodological challenges, between 2011 and 2013 some improvements to paediatric cancer drug development were made. The second workshop in 2013 examined paediatric cancer drug development progress, or more specifically lack thereof, and sought input from all stakeholders on the means to enact needed changes. The need to create a Paediatric Oncology Platform to enable all stakeholders to work together to improve current implementation of the Regulation was made clear, as was the need to identify where changes may most usefully be made to the Regulation at the time of its review in 2017.

## 2. Landscape, needs and progress (2011–2013)

### 2.1. Regulation

Pharmaceutical companies are regulated by the legal framework Eudralex, a 10-volume collection of regulations governing medicinal products for public health needs in the EU. The Paediatric Regulation aims to make medicines for cancer and other diseases available in Europe for children [7]. The European Medicines Agency (EMA) operates within this framework. Securing authorisation for oncology drugs requires extensive assessment of data on quality, efficacy and safety. In oncology drug development, data are often not sufficiently robust and failure late in development is a particular risk due to early studies not being predictive and target populations not well identified. Such challenges are even greater for paediatric oncology medicine development because often less is known about these new medicines and their effects on paediatric cancer, both pre-clinically and in the clinic and rarely are exploratory studies performed in children before a clear benefit-risk relationship has been established in adults.

Within the EMA, the Paediatric Committee (PDCO) is responsible for agreement of PIPs proposed by the sponsoring pharmaceutical company. PIPs include comprehensive study plans aimed at generating age-appropriate safety and tolerability, pharmacokinetic (PK) and, potentially, efficacy data for MAs of medicines for specific indications in children. Each MA for an adult indication (e.g. treatment of breast cancer) requires an agreed PIP covering the same condition, and/or a waiver for clinical studies where there is no opportunity for a paediatric indication. Waivers can be granted on three specific grounds – the product is

likely ineffective or unsafe, the condition or disease does not occur in children, or the product does not represent a significant benefit over existing treatment. As a result, the opportunity to study innovative anti-cancer medicines in children is difficult.

In 2012, the Commission reported that in general there had been improvement in the development process for paediatric medicines since 2007 [10]. However, this was not true for paediatric oncology where expectations for PIPs had not been met [8]; while the number of submitted PIPs had increased overall, successful completion had not always followed. Although the PDCO can review and agree to the original requirements of a PIP, modifications often follow as additional adult data are acquired during development, resulting in terminated development programmes, and modified PIPs. In part due to this there have been half as many modified PIPs as new PIPs. This again highlights the challenges faced in paediatric oncology drug development, which is perceived as dependent upon adult indications.

In addition, regulators are aware that the current Regulation does not yet fully cover the public health needs of paediatric oncology due to the mismatch between the conventional adult-centred drug development programmes and the urgent medical need in taxonomically unrelated paediatric malignancies. Work is ongoing to develop a more relevant framework for paediatric oncology PIPs based on a drug's mechanism of action (MoA) rather than the adult indication, particularly where a drug is used in adult oncology and where there is evidence for use in children with as yet unmet needs. Encouragingly several companies have already proposed such MoA driven PIPs on a voluntary basis.

Finally in 2011, the European Network of Paediatric Research at the EMA initiative (EnprEMA) was established to facilitate communication between academia and the EMA enabling paediatric groups to share knowledge and best practice. Enhanced communication between the EMA and the Federal Drug Agency (FDA) also contributed to better overall communications. There was simplification of some administrative regulatory requirements and a small increase in the number of PIPs in oncology, but the pace of change continues to be too slow.

### 2.2. Academia

While survival for childhood cancers has improved steadily since 1960, as of 2000 the decrease in mortality has reached a plateau. For children with poor-prognosis cancers resistant or refractory to conventional treatment, overall survival is less than 25%. High-risk leukaemias, high-risk neuroblastomas, metastatic sarcomas, high-grade gliomas and high-risk medulloblastomas are the most common paediatric cancers with poor outcomes [11–17]. Improvements in survival for children with these diseases have lagged behind other malignancies, and with

intensification of therapies, long-term complications have increased leading to chronic and disabling morbidities [18,19].

Despite successful development of molecularly targeted therapeutics in adults over the last decade, relatively few such studies have been completed in paediatric oncology, highlighting an unmet need in this area. Further progress in this field suggests clinical trials driven by biological hypotheses result in higher numbers of drugs reaching the bedside [20,21], but this has not yet translated into improvements within paediatric oncology drug development.

From 2007 to mid-2012, 45 PIPs were approved in oncology for the central nervous system (CNS), leukaemia, lymphoma, solid tumours and supportive care, but none have included the most aggressive of childhood cancers such as high-risk neuroblastoma [22]. This is because creation of PIPs has been driven by the relevant adult indication; regulatory obligations for paediatric development for a number of drugs with potential for childhood cancers were waived, as noted above, despite the fact that the MoA may have been shown to be biologically relevant in a specific paediatric cancer.

Since 2007 the number of drugs in early phase trials being run by the ITCC has grown from one in 2007 to 12 in 2013, with half the trials being conducted to comply with the regulatory requirements of a PIP [23–28]. The New Drug Development Strategy (NDDS) project run by ITCC and ENCCA continues to define strategies for specific malignancies. However, of 28 non-generic oncology drugs approved since 2007, of which 26 were potentially relevant for paediatric malignancies based on MoA, 50% of them were waived [22].

For the academic community, frustration continues in the lack of early access to new drugs for preclinical and early clinical trials, the difficulty of organising, funding and conducting academic-led trials, and the challenge of managing PIPs. A development programme in an adult disease should not be the only valid guide to paediatric oncology drug development, and paediatric development should instead clearly be guided by the biology of the malignancy and the MoA of the drug. Only then will true benefit again be able to be seen in paediatric cancer drug development.

### 2.3. Industry

As PIP requirements become more stringent, sponsoring pharmaceutical companies have invested more time and resource to develop and execute them; specifically because of the numerous PIP modifications noted above, this process is often long-term, and delivery of a successful PIP is often seen as 'at risk'. Multiple PIPs in the same area of development, for example, within a similar diagnosis or tumour type may be required, and make recruitment to required clinical studies and subsequent successful PIP

execution extremely difficult. There is also a lack of clarity on the procedure regarding the compliance check at the finalisation of the PIP. For small organisations, such as biotechnology companies and so-called 'start-ups', the increasing cost of paediatric development can be prohibitive despite the long-term incentives offered by the Paediatric Regulation, and the PIP opportunity is often unclear, or lost with these early phase compounds, as the ultimate fate of many molecules in development by biotechnology companies is unknown to their sponsor.

Additional, significant challenges are posed by discrepancies between US and European requirements, as well as by differences in timelines for paediatric drug development. Numerous delays have been identified around PIPs which, while a European legal requirement, have global implications. Although there are similar but not identical legal requirements in the United States, the mismatch between PDCO requirements, academic recommendations and US and EU agencies has led to considerable challenges for industry, where the drive to paediatric development may be rare or absent, and balance, greater flexibility of process and collaborative venture are essential to the success of a paediatric programme. Greater clarity, and more importantly synergy between legislative regulations may improve the ability of industry to deliver a singular, succinct paediatric oncology drug development plan to time and quality.

### 2.4. Parents, patients and patient advocates

For parents and patient advocates there are aspects of paediatric oncology drug development that are unpalatable and unacceptable. The lack of options through early phase trials for patients with relapsed malignancy and painfully slow progress in bringing new drugs into front-line therapy are very major concerns. Financial limitations within the pharmaceutical industry and regulatory hurdles within EMA are perceived as a hindrance to an increase in paediatric trials and a cause of major delays in the development of specific drugs for children. The disparity between US and EU paediatric drug development due to the lack of centralised funding in Europe and poor coordination between EMA and FDA on the authorisation process is an enormous frustration and leads, each year, to parents taking their children to the US for treatment that is unavailable in Europe; this is both an emotional and financial cost to families and a cause of inequality of treatment. Parents and patient advocates see paediatric drug development as a social responsibility and the perceived lack of drive for change and lack of flexibility in the system is a cause of frustration.

Meanwhile, there is recognition that patient advocacy groups could achieve more through better focussed collaboration in the field of lobbying regulators, sponsors, politicians and policy makers, and in fundraising. The

Creating Hope Act (2010), initiated in the United States of America (USA) by the mother of a child who did not survive cancer, provides a transferable incentive to sponsoring pharmaceutical companies – an FDA priority review voucher – and shows what is possible with directed partnership [29].

### 3. 2014–2017 focus

Until the opportunity comes in 2017 to revise the current Regulation, further developments and initiatives must take place within its confines and should act as a force for change to guide forthcoming modifications. Specific areas have been identified and are summarised in Table 1. Some of this work has already begun through the ITCC and ENCCA's New Drug Development

Strategy (NDDS) programme, which is integrating basic, translational and clinical research into guidelines for drug development for each paediatric cancer and will provide expertise to regulators and pharmaceutical companies. Additionally, the NDDS disease focus groups bring together clinicians, researchers, statisticians, regulators, PDCO members and EMA's Paediatric Oncology Task Force, enabling academics and EMA/PDCO participants to share and address topics in oncology drug development.

### 4. The CDDF-ITCC-ENCCA-SIOPE Paediatric Oncology Platform

The Platform comprises four Working Groups each made up of members from all stakeholder groups

Table 1  
Proposed initiatives and actions.

#### *Improving early access to new anticancer drugs for children and adolescents in Europe*

1. Improve access to compounds for preclinical testing and biological studies
2. Increase the number of drugs in early phase trials significantly
3. Consider running early phase trials before submitting a Paediatric Investigation Plan (PIP)
4. Consider accrual of adolescents in adult phase 1 and 2 trials when scientifically and medically relevant
5. Emulate the National Cancer Institute (NCI) clinical trial funding and programming model in Europe
6. Work to de-risk the perception of paediatric studies and create value in paediatric oncology
7. Simplify the process for initiation of a PIP proposal and enforce academic participation in this

#### *Prioritising oncology compounds for development in children/adolescents with cancer*

1. Develop a strategy for selection and prioritisation of drugs for paediatric development based on biology and mechanism of action rather than the current process based on adult cancer indications
2. Increase our understanding of molecular pathways and key drivers which are relevant for paediatric tumours
3. Set up disease focus groups: academic tumour groups must identify key contacts, review existing data on tumour biology and preclinical work, and define a strategy for each disease based on current treatment options
4. Consider paediatric oncology drug development as pre-competitive research
5. Set up early cross-portfolio evaluation, including academic investigators and paediatric oncology networks
6. Implement cross-pharmaceutical company discussion that will facilitate drug selection and prioritisation
7. Develop multi-compound, multi-company trials to speed up evaluation and spread risk and cost
8. Set up better incentives tailored to risks taken and commitments made by pharmaceutical companies, as well as for development of specific paediatric drugs

#### *Facilitating cooperation and collaboration between all stakeholders*

1. Achieve better academia-industry communication with improved trust and confidence. Academic groups to identify global leaders who will link with industry and have global harmonised opinions
2. Encourage four-party discussions and drug-prioritisation meetings
3. Broaden collaborative links between clinicians, scientists, European Medicines Agency (EMA)/Paediatric Committee (PDCO) and parent/patient organisations: the Cancer Drug Development Forum (CDDF)-Innovative Therapy for Children with Cancer Consortium (ITCC)-European Network for Cancer Research in Children and Adolescents (ENCCA)-European Society for Paediatric Oncology (SIOPE) Paediatric Oncology Platform
4. Set up an annual international working meeting with all stakeholders to update and share, address issues, propose solutions and elaborate action plans
5. Link with initiatives in North America and worldwide
6. Include the European Commission
7. Prepare the proposals for revision of the Paediatric Regulation in 2017

#### *Setting-up long-term follow-up (LTFU) of children and adolescents exposed to new drugs*

1. Set up LTFU that is patient-centred and performed in academic centres
2. Define LTFU so that data can be shared with regulatory authorities for continuous monitoring of benefit-risk
3. Build a joint programme and partnership between academia and industry
4. Use the concept of Survivorship Passport and empower survivors as partners of LTFU research
5. Implement LTFU on extension studies, with post-marketing surveillance and risk management plans
6. Perform large, joint – academic and industry – randomised trials and transfer LTFU to sustainable academic platforms
7. Consider cross-pharmaceutical company initiatives



– academia, industry, regulators and parent/patient advocates – and led by a stakeholder appropriate to the specific priority of that group:

#### 4.1. MoA and biology-driven drug development within the current regulation

*Academia led:* To define a strategy and process for the implementation of MoA and biology-driven drug development and deliver precision medicine within the current regulation; (i.e. to drive the inclusion of patients into early drug trials through molecular profiling of their tumour).

#### 4.2. Compound prioritisation across industry

*Industry led:* To address prioritisation of drugs within pipelines across companies (especially where several companies are developing drugs against the same target) and define how best to implement multi-compound/multi-company trials.

#### 4.3. Innovative design and methodology for drug development

*Including better extrapolation from adult data – EMA and PDCO led:* To propose methodology guidance to accelerate paediatric drug development with consideration of current challenges: drugs used at their optimal biological dose; use of biomarkers; the challenge of the extreme rarity of paediatric patients with a biomarker-defined malignancy; and concomitant evaluation of efficacy and toxicity.

#### 4.4. New incentives for specific paediatric drugs and drug repositioning

*Parents/patient advocate led:* To propose new EU regulatory initiatives to better incentivise drug development for life-threatening paediatric diseases; e.g. oncology drugs against specific paediatric biological targets (e.g. N-MYC in neuroblastoma) or drugs failing in adults to be repositioned for paediatric diseases.

The CDDF-ITCC-ENCCA-SIOPE Paediatric Oncology Platform will meet annually to monitor progress.

## 5. Conclusion

The CDDF-ITCC-ENCCA-SIOPE Paediatric Oncology Platform, a unique collaboration of academia, industry, patient advocates and regulatory authorities, has been formed to harness the energies of these stakeholder groups for their common purpose and most importantly to provide the drive for change in paediatric oncology drug development. The goal is to rapidly and efficiently evaluate and prioritise new anti-cancer drugs

in children with cancer and to advance those with promise quickly into front-line therapy. For now this will be carried out within the confines of the current European Paediatric Regulation, but with a view to providing the framework for essential revisions to the Regulation in 2017. By strengthening cooperation through understanding and working with the problems faced by each stakeholder group, and through a determination to work cooperatively for the future of children with cancer, the Platform aims to achieve concrete results in paediatric oncology drug development.

## Conflict of interest statement

None declared.

## Acknowledgements

ADJP is funded through a Cancer Research UK Life Chair and Programme Grant included within a Cancer Research UK ICR Core Award (C347/A15403) and is supported from the NIHR RM/ICR Biomedical Research Centre. We thank Maren White for editorial and writing support in the preparation of the manuscript.

## References

- [1] Vassal G, Fitzgerald E, Schrappe M, Arnold F, Kowalczyk J, Walker D, et al. Challenges for children and adolescents with cancer in Europe: The SIOP-Europe agenda. *Pediatr Blood Cancer* 2014, <http://dx.doi.org/10.1002/pbc.25044> [Epub ahead of print].
- [2] Pritchard-Jones K, Pieters R, Reaman GH, Hjorth L, Downie P, Calaminus G, et al. Sustaining innovation and improvement in the treatment of childhood cancer: lessons from high-income countries. *Lancet Oncol* 2013;14(3):e95–e103, [http://dx.doi.org/10.1016/S1470-2045\(13\)70010-X](http://dx.doi.org/10.1016/S1470-2045(13)70010-X) [Epub 2013 February 20].
- [3] Pritchard-Jones K, Sullivan R. Children with cancer: driving the global agenda. *Lancet Oncol* 2013;14(3):189–91, [http://dx.doi.org/10.1016/S1470-2045\(13\)70043-3](http://dx.doi.org/10.1016/S1470-2045(13)70043-3) [Epub 2013 February 20].
- [4] Gatta G, Botta L. Childhood cancer survival in Europe: action is needed. *Epidemiol Prev* 2013;37(6):363–6.
- [5] Reulen RC, Winder DL, Frobisher C, Lancashire ER, Stiller CA, Jenney ME, et al. Long-term cause-specific mortality among survivors of childhood cancer. *JAMA* 2010;304(2):172–9, doi:10.1001/jama.2010.923.
- [6] Wolfe, I. et al. Royal College of Paediatrics and Child Health and National Children's Bureau; 2014.
- [7] EMA Regulation (EC) No 1901/2006 of the European Parliament and of the Council of 12 December 2006 on medicinal products for paediatric use and amending Regulation (EEC) No 1768/92, Directive 2001/20/EC, Directive 2001/83/EC and Regulation (EC) No 726/2004 (Official Journal L 378, 27/12/2006 p.1–19). Available at: [http://ec.europa.eu/health/documents/eudralex/vol-1/index\\_en.htm](http://ec.europa.eu/health/documents/eudralex/vol-1/index_en.htm). Last Accessed 29 August 2013.
- [8] Vassal G, Geoerger B, Morland B. Is the European pediatric medicine regulation working for children and adolescents with cancer? *Clin Cancer Res* 2013;19:1315–25.
- [9] Zwaan CM, Kearns P, Caron H, Verschuur A, Riccardi R, Boos J, et al. The role of the 'innovative therapies for children with

- cancer' (ITCC) European consortium. *Cancer Treat Rev* 2010;36(4):328–34, <http://dx.doi.org/10.1016/j.ctrv.2010.02.008> [Epub 2010 March 15].
- [10] EMA 5 year Report to the European Commission. General report on the experience acquired as a result of the application of the Paediatric Regulation, Available at: [http://ec.europa.eu/health/files/paediatrics/2012-09\\_paediatric\\_report-annex1-2\\_en.pdf](http://ec.europa.eu/health/files/paediatrics/2012-09_paediatric_report-annex1-2_en.pdf). Last accessed 29 August 2013; 2012.
- [11] Piu CH, Gajjar AJ, Kane JR, Qaddoumi IA, Pappo AS. Challenging issues in pediatric oncology. *Nat Rev Clin Oncol* 2011;8(9):540–9.
- [12] Bhojwani D, Pui CH. Relapsed childhood acute lymphoblastic leukaemia. *Lancet Oncol* 2013;14(6):e205–17.
- [13] Yu AL, Gilman AL, Ozkaynak MF, London WB, Kreissman SG, Chen HX, et al. Anti-GD2 antibody with GM-CSF, interleukin-2, and isotretinoin for neuroblastoma. *N Engl J Med* 2010;363(14):1324–34.
- [14] London WB, Castel V, Monclair T, Ambros PF, Pearson AD, Cohn SL, et al. Clinical and biologic features predictive of survival after relapse of neuroblastoma: a report from the international neuroblastoma risk group project. *J Clin Oncol* 2011;29(24):3286–92.
- [15] Chisholm JC, Marandet J, Rey A, Scopinaro M, de Toledo JS, Marks JH, et al. Prognostic factors after relapse in nonmetastatic rhabdomyosarcoma: a nomogram to better define patients who can be salvaged with further therapy. *J Clin Oncol* 2011;29(10):1310–25.
- [16] Broniscer A, Gajjar A. Supratentorial high-grade astrocytoma and diffuse brainstem glioma: two challenges for the pediatric oncologist. *Oncologist* 2004;9(2):197–206.
- [17] Jakacki RI, Burger PC, Zhou T, Holmes EJ, Kocak M, Onar A, et al. Outcome of children with metastatic medulloblastoma treated with carboplatin during craniospinal radiotherapy: a children's oncology group phase I/II study. *J Clin Oncol* 2012;30(21):2648–53.
- [18] Oeffinger KC, Mertens AC, Sklar CA, Kawashima T, Hudson MM, Meadows AT, et al. Chronic health conditions in adults survivors of childhood cancer. *N Engl J Med* 2006;355(15):1572–82.
- [19] Geenen MM, Cardous-Ubbink MC, Kremer LC, van den Bos C, van der Pal HJ, Heinen RC, et al. Medical assessment of adverse health outcomes in long-term survivors of childhood cancer. *JAMA* 2007;297(24):2705–15.
- [20] Yap TA, Sandhu SK, Workman P, de Bono JS. Envisioning the future of early anticancer drug development. *Nat Rev Cancer* 2010;10(7):514–23.
- [21] Moreno L, Pearson AD. How can attrition rates be reduced in cancer drug discovery? *Expert Opin Drug Discov* 2013;8(4):363–8.
- [22] Vassal G, Zwaan CM, Ashley D, Le Deley MC, Hargrave D, Blanc P, et al. Improving cancer care for children and young people: new drugs for children and adolescents with cancer: the need for novel development pathways. *Lancet* 2013;14:117–24.
- [23] Geoerger B, Morland B, Ndiaye A, Doz F, Kalifa G, Geoffray A, et al. Target-driven exploratory study of imatinib mesylate in children with solid malignancies by the Innovative Therapies for Children with Cancer (ITCC) European Consortium. *Eur J Cancer* 2009;45(13):2342–51.
- [24] Geoerger B, Chisholm J, Le Deley MC, Gentet JC, Zwaan CM, Dias N, et al. Phase II study of gemcitabine combined with oxaliplatin in relapsed or refractory paediatric solid malignancies: an Innovative Therapy for Children with Cancer European Consortium Study (ITCC). *Eur J Cancer* 2011;47(2):230–8, <http://dx.doi.org/10.1016/j.ejca.2010.09.015> [Epub 2010 October 11].
- [25] Geoerger B, Hargrave D, Thomas F, Ndiaye A, Frappaz D, Andreiuolo F, et al. Innovative Therapies for Children with Cancer pediatric phase I study of erlotinib in brainstem glioma and relapsing/refractory brain tumors. *Neuro Oncol* 2011;13(1):109–18, doi:10.1093/neuonc/nog141.
- [26] Geoerger B, Estlin EJ, Aerts I, Kearns P, Gibson B, Corradini N, et al. A phase I and pharmacokinetic study of plitidepsin in children with advanced solid tumours: an Innovative Therapies for Children with Cancer (ITCC) study. *Eur J Cancer* 2012;48(3):289–96, <http://dx.doi.org/10.1016/j.ejca.2011.10.036> [Epub 2011 November 24].
- [27] Hargrave D, Geoerger B, Frappaz D, Pietsch T, Gesner L, Cisar L, et al. A phase II single-arm study of irinotecan in combination with temozolomide (TEMIRI) in children with newly diagnosed high grade glioma: a joint ITCC and SIOPE-brain tumour study. *J Neurooncol* 2013;113(1):127–34, <http://dx.doi.org/10.1007/s11060-013-1098-2> [Epub 2013 March 4].
- [28] Grill J, Geoerger B, Gesner L, Perek D, Leblond P, Canˆete A, et al. Phase II study of irinotecan in combination with temozolomide (TEMIRI) in children with recurrent or refractory medulloblastoma: a joint ITCC and SIOPE brain tumor study. *NeuroOncol* 2013;15(9):1236–43, <http://dx.doi.org/10.1093/neuonc/not097> [Epub 2013 July 14].
- [29] Connor E, Cure P. 'Creating hope' and other incentives for drug development in children. *Sci Transl Med* 2011;3:1–4.