

Four Pillars of a Sound PMTA Strategy

Legal, Science, Manufacturing and Marketing.

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Objectives

- + Premarket Tobacco Application
- + PMTA Strategy- Pillars
 - Legal Considerations
 - Scientific Foundations
 - Manufacturing Process
 - Marketing
- + Strategy Tips
- + Integrating the Pillars- Strategy

PMTA

Premarket Tobacco Applications

+ Regulatory Requirement

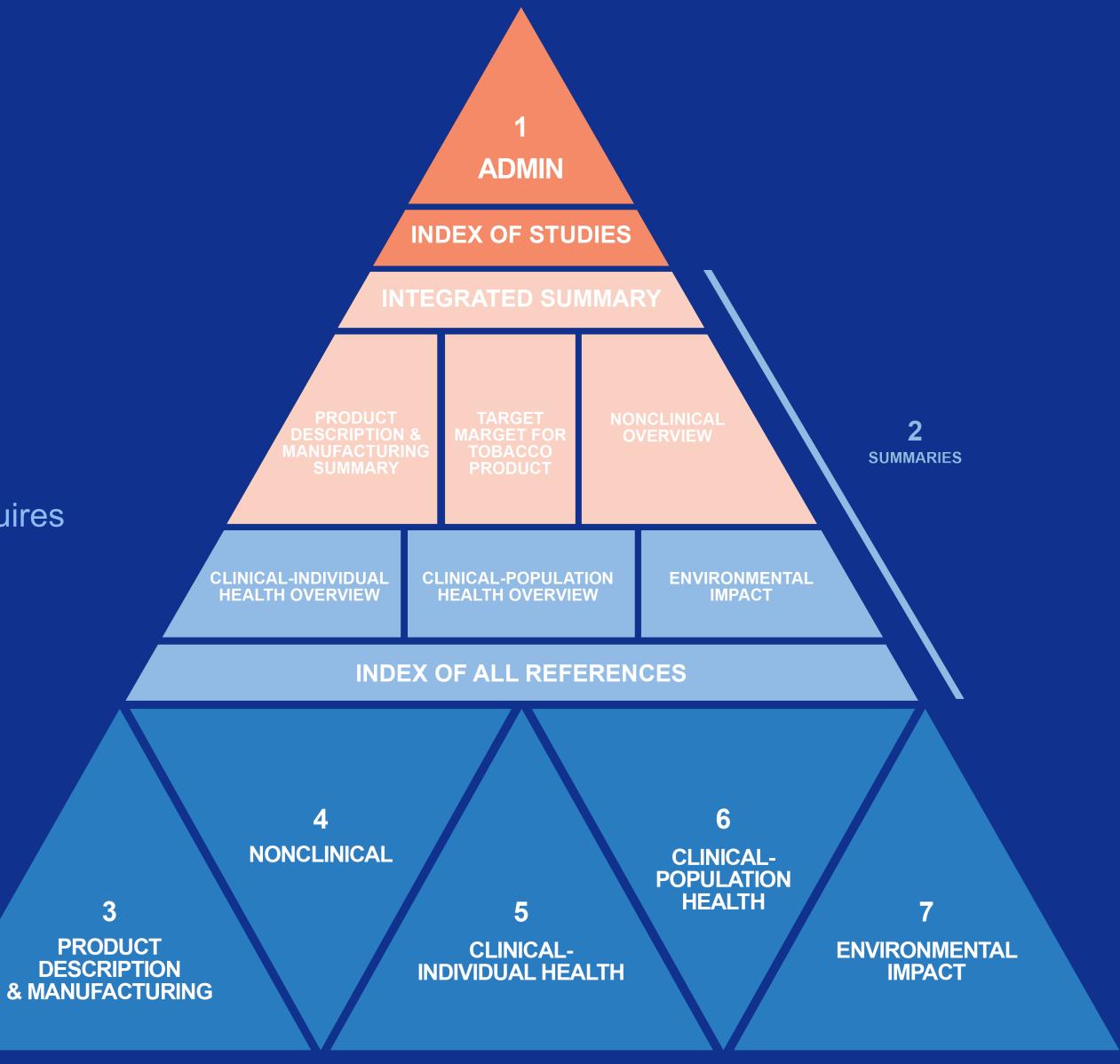
To legally market a new tobacco product in the US, requires a PMTA submission and a marketing order from FDA.

What Goes Into a PMTA

- Product Information,
- Product Testing Data
- Clinical Studies
- Manufacturing Controls
- Marketing Plan

+ FDA's Public Health Standard

 Determines if the product is Appropriate for the Protection of Public Health.





Importance of a Robust PMTA Strategy

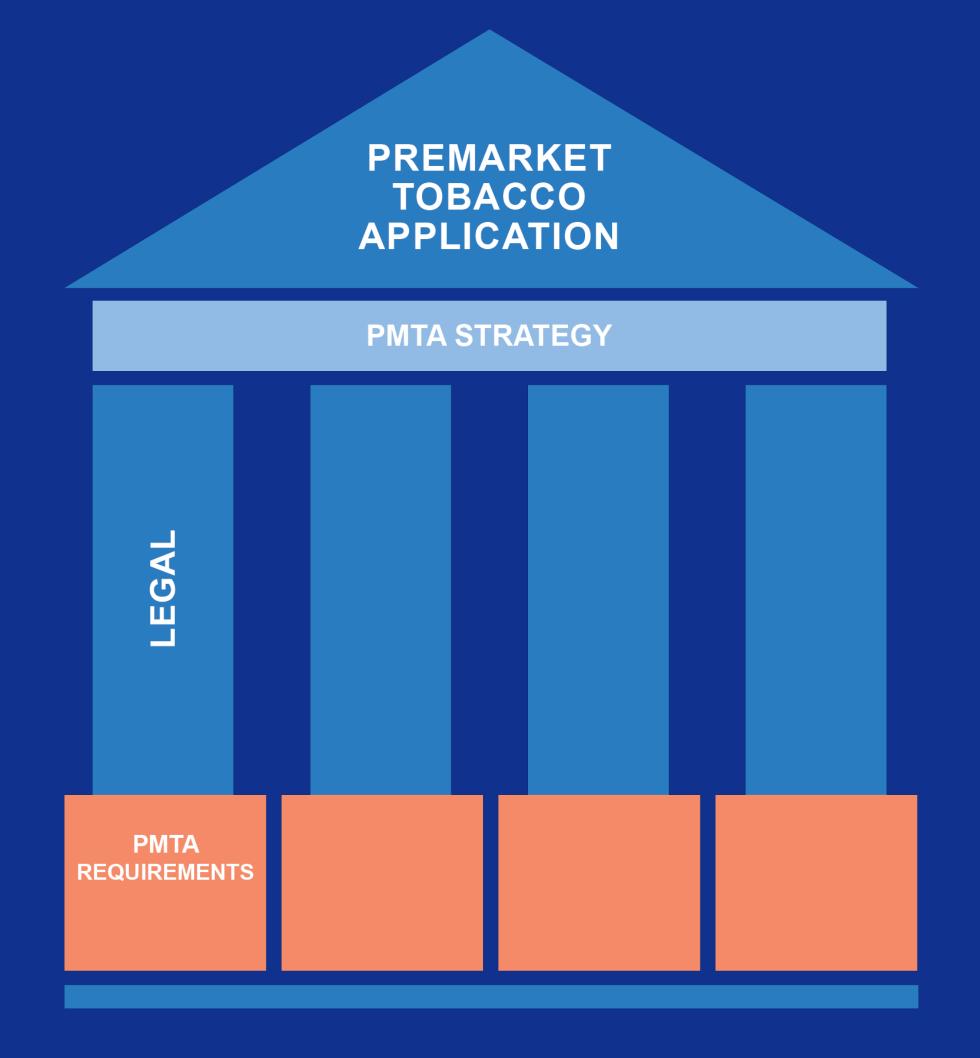
- + Compliance
- + Market Access
- + Risk Management
- + Brand Reputation



PILLAR ONE:

Legal Considerations

- + Regulatory Framework for PMTA
 - Tobacco Control Act- Section 910
 - Premarket Tobacco Application and Recordkeeping Req.
- + Responding to FDA's Decisions
- + FDA Enforcement

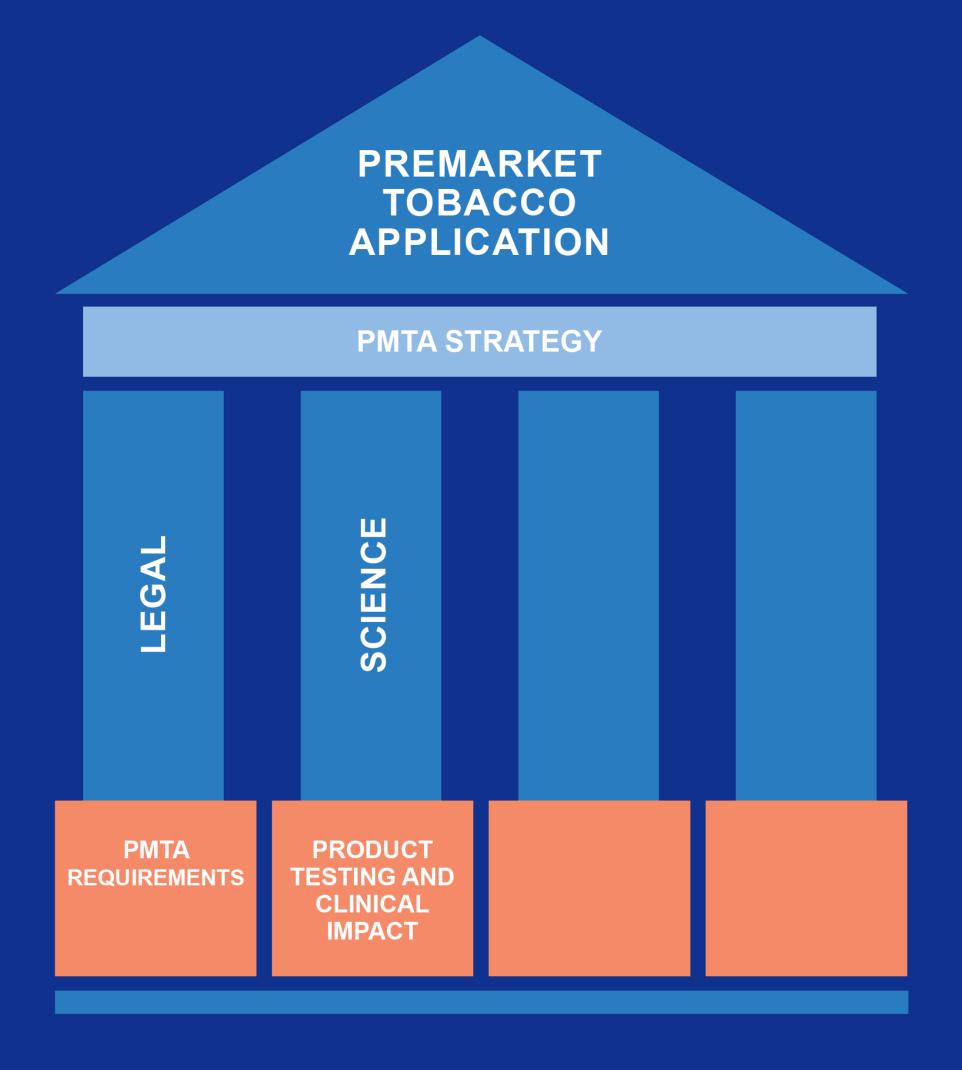


PILLAR TWO:

Scientific Foundations

- + Non-Clinical Testing
 - Ingredients
 - Safety Profile
 - Extractables
 - Genotoxicity& Cytotoxicity

- + Clinical Investigations
 - Abuse Liability
 - Actual Use
 - Perception and Intention Studies
- Switching studies



Develop a Robust Product and Clinical Testing Plan

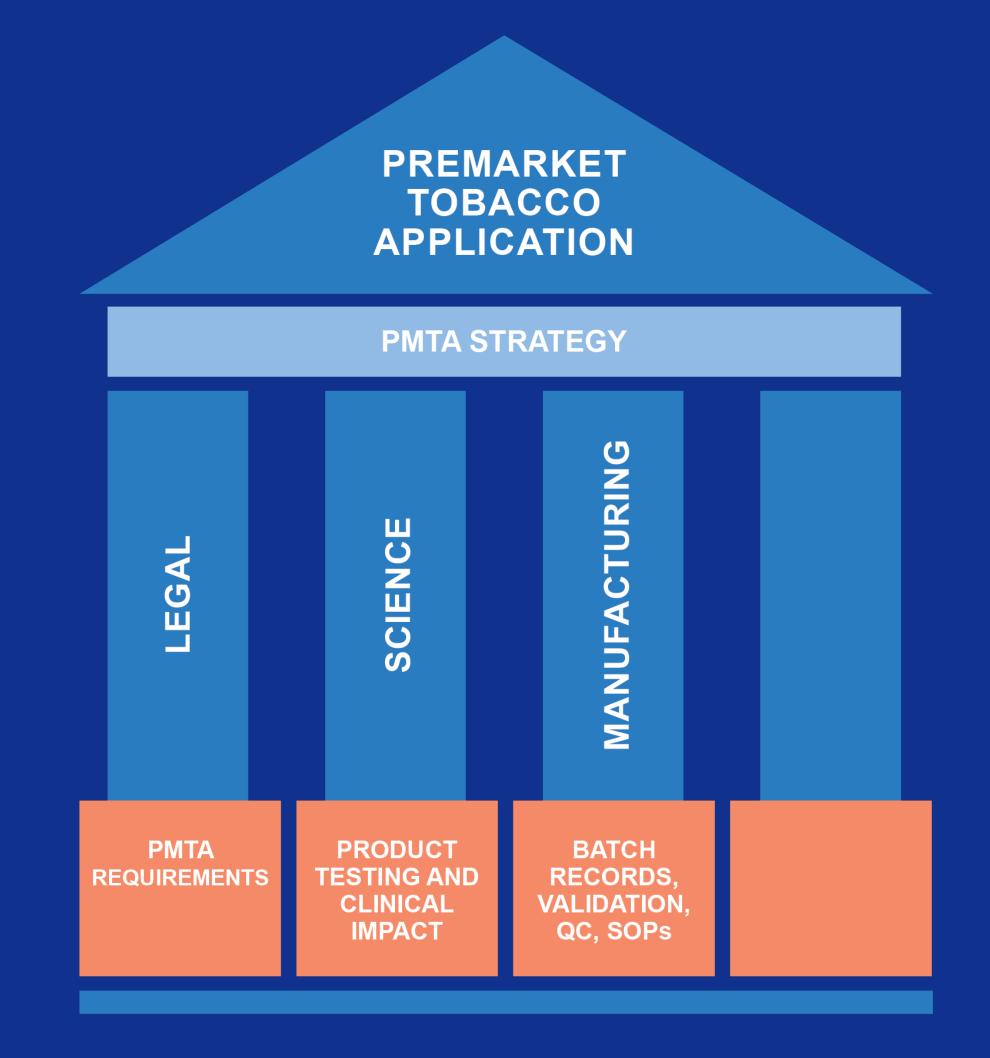


PILLAR THREE:

Manufacturing Processes

Full description of the methods used in, and the facilities and controls used for, the manufacture, processing, and, when relevant, packing and installation of ...

- + Consistently manufacture products
- + Validation
- + Environmental Impact
- + Documentation



Tobacco Product Manufacturing Practices

+ Who Needs to Comply with TPMP?

- Foreign & Domestic finished tobacco product manufacturers
- Foreign & Domestic bulk tobacco product manufacturers
- Specification developers
- Contract manufacturers
- Importers

Who Will Be Indirectly Impacted?

- Suppliers
- Distributors
- Contract Testing Laboratories







Anticipated Final Rule Publish November 2024

Compliance Period with >350 employees
November 2026

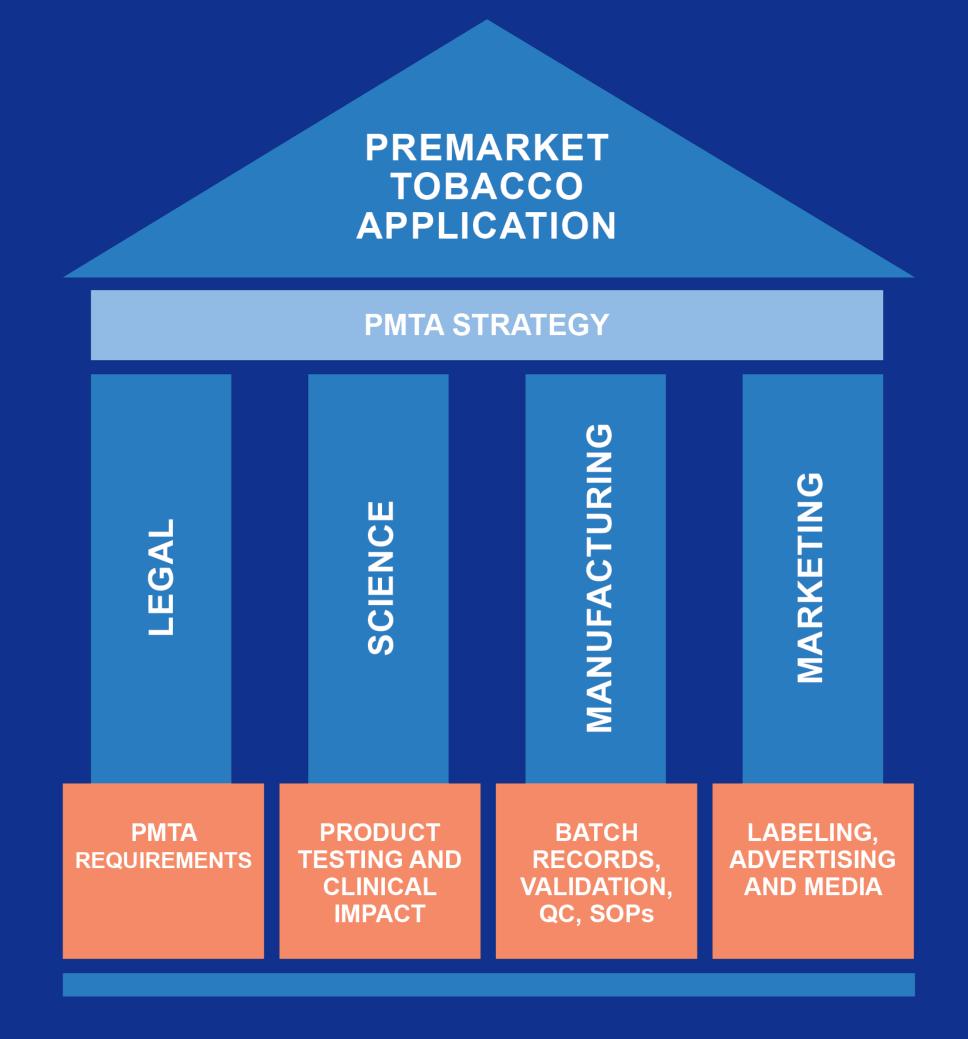
Compliance Period with <350 employees
November 2030



PILLAR FOUR:

Marketing

- + Marketing Restrictions
- + Robust Marketing Plan
- + Compliant Labeling and Advertising





Integrating Strategies



PMTA Strategy Tips

- + Organizational Commitment
- + Cross-functional Collaboration
- + Risk Assessment And Mitigation
- + Engage External Experts
- + Adaptability
- + Staying Informed And Updated

Questions?



Thank You

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