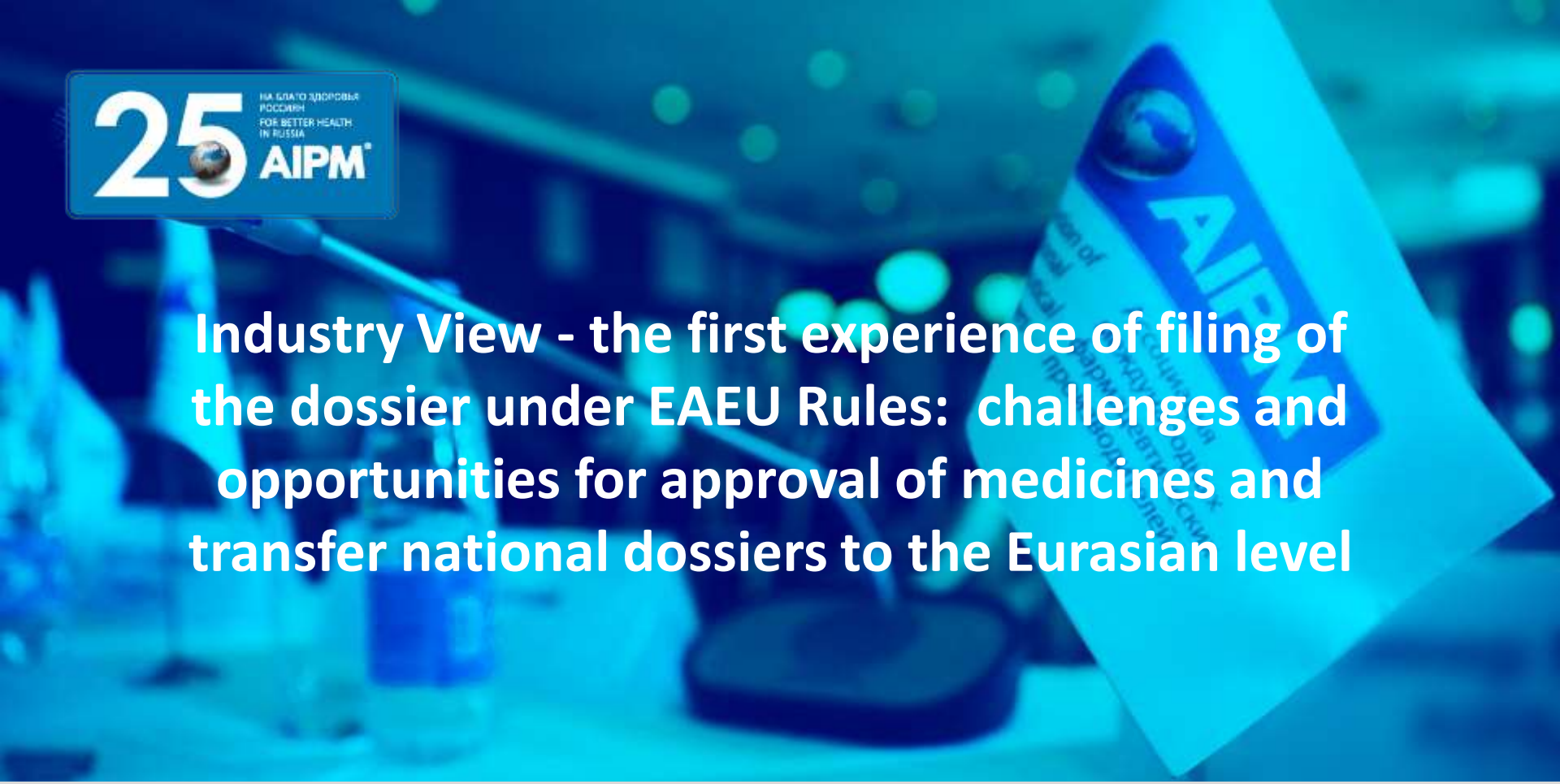

Industry View - the first experience of filing of the dossier under EAEU Rules: challenges and opportunities for approval of medicines and transfer national dossiers to the Eurasian level

22 October 2019

2019

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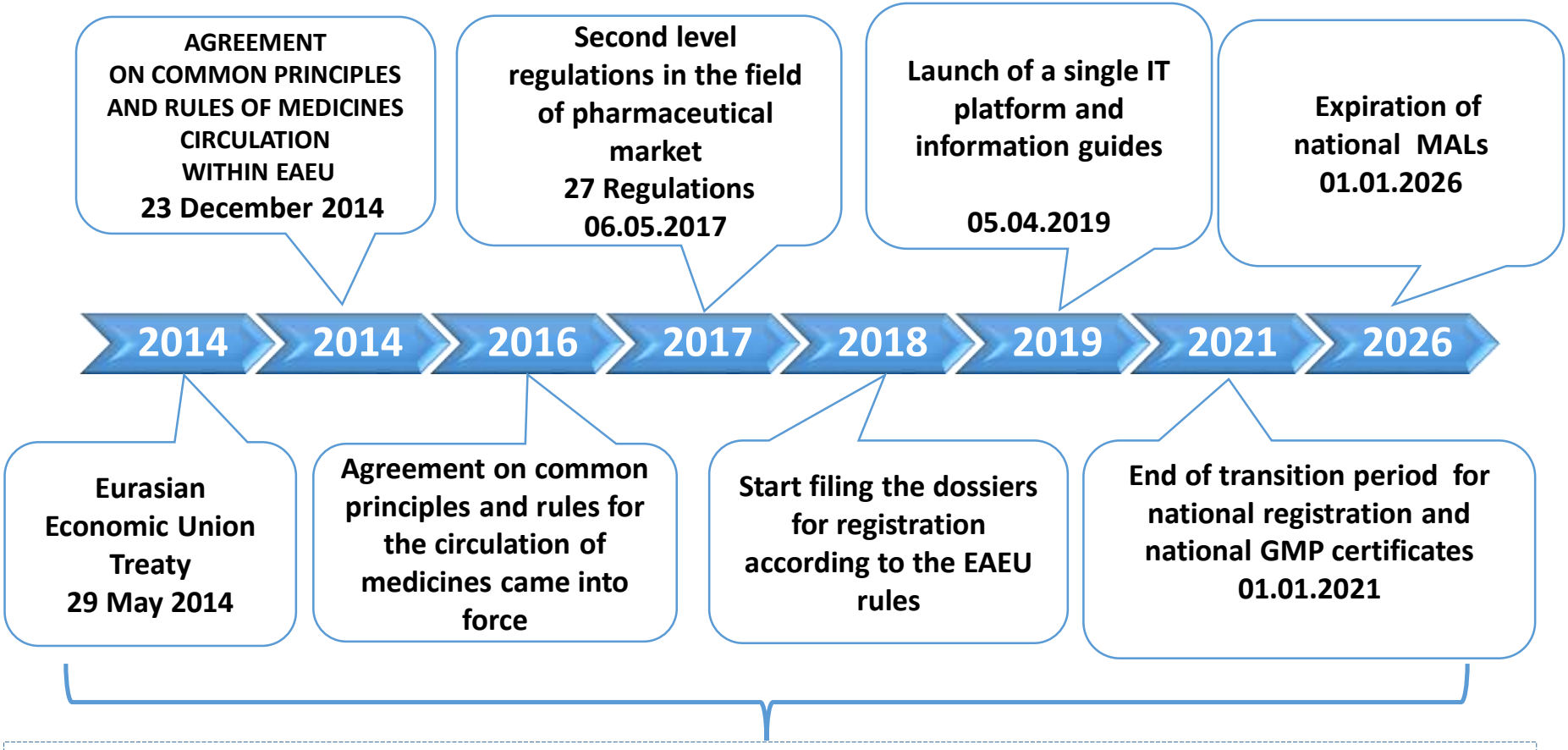
VICE CHAIRMAN OF REGULATORY AFFAIRS COMMITTEE
ASSOCIATION OF INTERNATIONAL PHARMACEUTICAL MANUFACTURERS

MILESTONES



«Member States of the EAEU <…>, establishing goal to promote the health of the population of the Member States by providing access to safe, effective and quality medicines <…>, aiming for creation of optimal conditions for the development of the pharmaceutical industry, improving the competitiveness of the pharmaceutical products manufactured in the territories of the Member States and for the entrance to the world market, seeking to eliminate unreasonable restrictions in mutual trade <…>»

The industry considers the implementation of the EAEU common medicines market as:

- ✓ the development of more modern, science-based, harmonized with international regulatory standards
- ✓ ensuring greater accessibility of necessary medicines to the population of EAEU countries
- ✓ creation of modern tools for managing regulatory information and the life cycle of medicines
- ✓ opportunity of industry and regulatory bodies resources optimization aimed at developing of new regulatory areas and increasing the availability of medicines with high regulatory standards

Regulatory dossier in electronic format – important points

✓ Need to develop the detailed requirements and technical specifications for dossiers filling
✓ Need to develop unified requirements to dossier validation
✓ Validation of dossiers between Member States according to a single standard
✓ Possibility of dossiers self-validation by applicants before filing
✓ Establishment of a validation protocol for applicants by the regulatory authority

Features of EAEU submission

✓Difference in application requirements in Member States despite uniform format
✓ Reassessment of the "benefit-risk" during the procedure of bringing into compliance with EAEU requirements
✓Need for a personal account of applicants in Member States with the ability to track the status of dossiers under the EAEU procedure

NORMATIVE DOCUMENT - BASIC CHARACTERISTIC FOR LIFE CYCLE OF PRODUCT

Concept of Normative Document is different on national and EAEU level

National level		EAEU
More focused on laboratory testing		Quality by design concept
Technical details are needed to reproduce the methods	≠	Harmonized with ICH Module 3
National Pharmacopeia requirements		•EAEU Pharmacopeia requirements, Guidelines of 3rd level •GMP inspection

DIFFERENCE BETWEEN NORMATIVE DOCUMENTS IN COUNTRIES-MEMBERS

Specifications

- Specification limits differ for release & shelf life specifications
- Specifications in the ND differ from country to country & all differ from the manufacturer' specification

Parameters

- Additional parameters in accordance with local requirements
- Compliance to National Pharmacopoeias

Analytical procedures & description of analytical procedures

- Description of analytical procedures in accordance with local requirements
- Standard samples

EXAMPLES OF DIFFERENCES IN SPECIFICATIONS

	RU	KZ	BY
Description	Biconvex tablets oval in shape, film-coated of white color with a risk on one side	Oval coated tablets of white color with a risk on one side	Oval white tablets with a notch on one side.
Identity	HPLC	HPLC	Absence
Identity	AAS	AAS	Absence
Titanium dioxide	Absence	Quality reaction	Absence
Assay	HPLC 50 - 82,5 ME (100 - 165 % of labeled claim)	ВЭЖХ 50.0 - 82.5 ME/tabl	HPLC 90 %–165 % (45 ME – 82.5 ME)

HARMONIZATION OF NORMATIVE DOCUMENT LEADS TO EXPERTISE

Harmonization of ND can be provided by two ways

- preliminary variations submissions in reference country in case of harmonized ND development before EAEU submission
- variations submission in reference country before recognition in case of national ND EAEU submission

↓

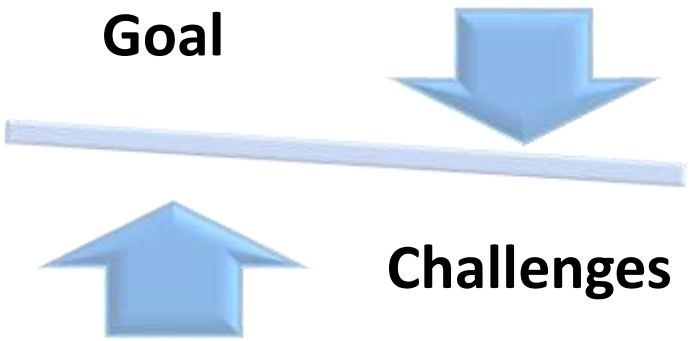
Both variants lead to expertise with possible reassessment profit-risk ratio

↓

- Additional workload for applicant
- Additional workload for Health Authorities

TRANSITION FROM NATIONAL SYSTEMS TO THE GxP PRACTICE LEVEL

✓ Confirmation of compliance to GxP practices (GMP, GVP)
✓ Harmonization of regulatory dossier – single format
✓Unification of product life cycle tracking
✓Unification of PIL and SmPC makes it comfortable for patients and HCPs
✓ Reassessment of the "benefit-risk" ratio shouldn't be required (except in certain cases)



✓Volume of data for medicines that have been circulating in the markets of Member States for a long time
✓Using of different reference medicines
✓ Reassessment of risk-benefit
✓ Need to conduct laboratory expertise

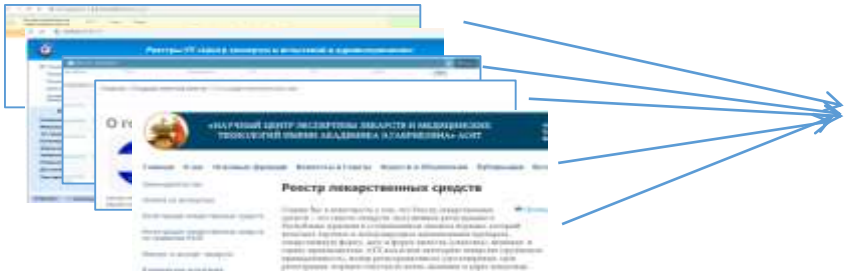
Obstacles

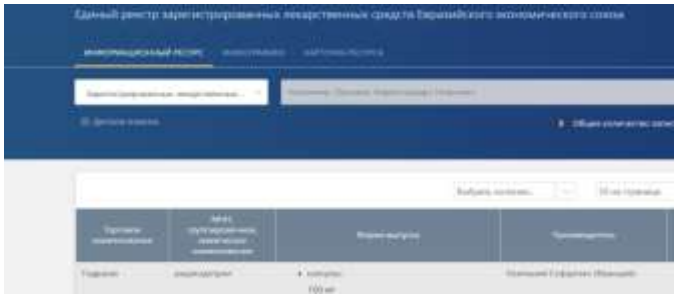
✓Great burden on the industry and regulatory bodies
✓ Effect on patient accessibility
✓ Inefficient use of resources

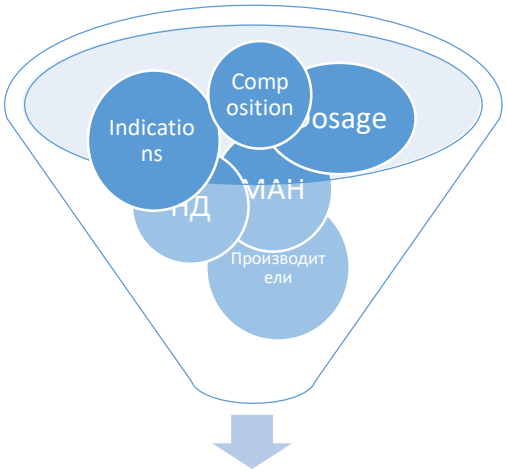
REASONABLE BALANCE BETWEEN POSSIBILITIES, NEEDS AND EXPEDIENCY IS REQUIRED

Continuity of national medicines Registries and the EAEU Registry

Data from national Registries should be automatically, sequentially and correctly pulled into the EAEU Registers while maintaining the transition period opportunity for the uninterrupted supply







Single MAL and single ND

Date of EAEU marketing authorization

Transition period is needed to transfer the MAL smoothly

INSPECTION ON EAEU GMP REQUIREMENTS COMPLIANCE

National GMP certificate

GMP EAEU certificate

GMP EAEU certificate

01.01.2021

ПРИЛОЖЕНИЕ № 2
к протоколу шестьдесят шестого заседания
рабочей группы по формированию общих подходов
к регулированию обращения лекарственных средств
в рамках Евразийского экономического союза
от 5 сентября 2019 г. № 8/лек

Сведения о ходе работ по регистрации и инспектированию лекарственных средств в соответствии с правилами Евразийского экономического союза

	Республика Армения	Республика Беларусь	Республика Казахстан	Кыргызская Республика	Российская Федерация
Принятые к рассмотрению заявления о проведении фармацевтических инспекций в соответствии с актами Евразийской экономической комиссии	**1**	**40** 11 – проведены; 10 сертификатов выдано	**0**	**1**	**0**

- ✓Transition to one inspection system according to EAEU rules
- ✓ Efficient allocation of resources to one system
- ✓ Risk-based approach to avoid duplication

Amount of EAEU GMP applications – 40 in BY and 1 in KG

CONCLUSIONS

- The industry positively assesses the transition of the regulatory system to the EAEU rails - to modern requirements, harmonized with international,
- Launch of new procedures requires an open dialogue between applicants and regulators as well as between regulators of the EAEU countries, openness and common approaches to the interpretation of legislative provisions
- It is necessary to observe the principle of reasonable expediency in matters of conducting an examination, which makes it possible to level administrative barriers to provide patients with modern, effective and safe medicines
- Early transition to a single supranational regulatory system will reduce the burden on both the applicant and the regulatory authorities
- Full-fledged launch of GMP inspection according to the EAEU requirements is the main risk for the development of the EAEU regulatory system and the availability of medicines for the population of the EAEU countries
- Integration of the EAEU regulatory system into the modern global regulatory agenda is the basis for the development of modern healthcare and medicines supply systems in the EAEU member states

THANK YOU FOR ATTENTION!