Realizing the Objectives of the ICMRA Postapproval Change Collaborative Assessment Pilot

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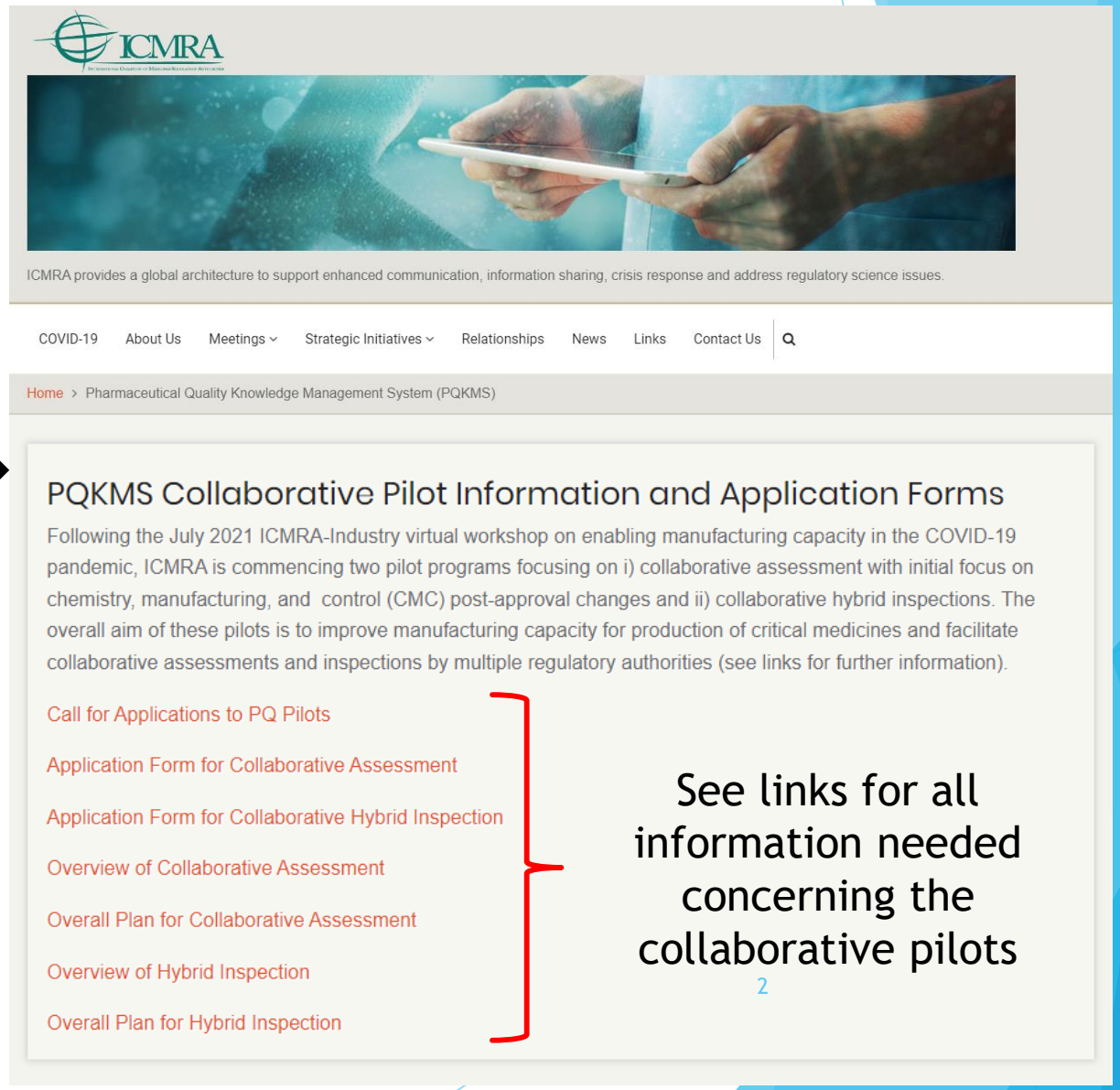
The 12th Asia Partnership Conference of Pharmaceutical Associations
April 18, 2023

PAC Sub-Working Group

Collaborative Pilots: CMC-Related PACs and Hybrid Inspections

Scan the 2D barcode using your phone for further information



Main Workshop Goals

held on 07-08 July 2021

- Opportunity for an **exchange of views between regulators and the pharmaceutical industry** on the regulatory flexibilities introduced to enhance the manufacturing capacity of COVID-19 products

- **Identification of key enablers and bottlenecks** limiting the use of regulatory flexibilities, in addition to the most effective mechanisms that enabled increased manufacturing capacity

- Workshop will serve as a **catalyst…leading to greater convergence and further efficiencies** in global chemistry, manufacturing, and control (CMC) assessment and inspection activities

ICMRA-Industry Virtual Workshop Report on Enabling Manufacturing Capacity in the COVID-19 Pandemic

https://www.icmra.info/drupal/sites/default/files/2021-10/covid-19_manufacturing_capacity_ws_report.pdf

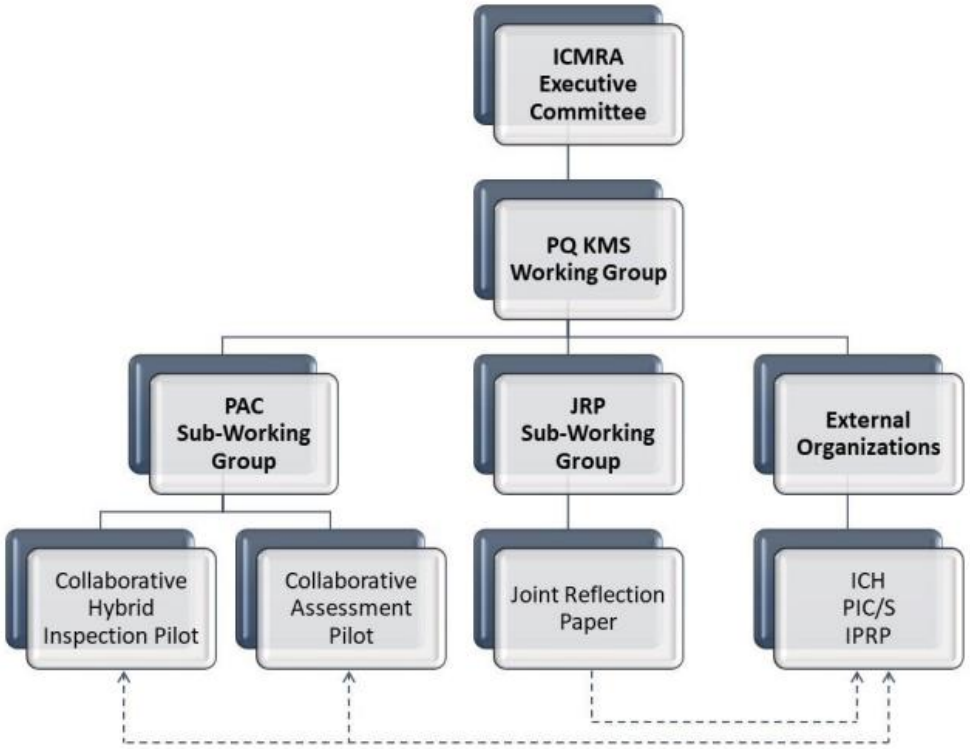
Vision:

- **Advance international regulatory effort through strategic partnership** among regulatory agencies and industry to facilitate faster access and continuous supply of high-quality medicines to patients across regions considering that the development, manufacture, and supply of medicines is global

- The ICMRA workshop highlighted the need for more **convergence on CMC aspects between regions** to allow faster supply of critical medicines to patients and the need to overcome logistic challenges related to quality assessment and inspection.

Key Objectives of Pilots

- **Develop and share an initial framework** for collaborative assessment, which provides a platform for multiple regulatory authorities to participate in a collaborative assessment of post-approval CMC changes and participation of hybrid inspections
- Identify **misalignments, differences,** and potential areas for **alignment or harmonization** across regions
- Providing industry with **experience submitting the same CMC information** for the same product and manufacturing facilities to multiple regulators
- Identifying types of products where **“early wins”** are likely to be most achievable.
- **Increasing confidence** among both regulatory authorities and industry regarding the Pharmaceutical Quality Knowledge Management System (PQ KMS) capabilities that could be operationalized and how to approach regulatory collaboration to achieve the greatest success



ICMRA Pilot Program for Collaborative Assessment of CMC Post-approval Changes

Aim of the ICMRA Collaborative Assessment Pilot

- Develop a framework, which provides a platform for multiple regulatory agencies to participate in a collaborative assessment of post-approval CMC changes including post-approval change management protocols (PACMPs)
- The applicants' responses will be shared between the participating quality assessors, who will work towards a common approach to the application assessment and decision making.
- Deliver a single list of questions to the applicant wherever possible, however a stated goal of the pilot is to identify misalignments, differences, and potential areas for further convergence or harmonization across regions
- Develop best practices in the quality assessment of CMC post-approval changes and share learnings to build further collaborations in assessment

Regulatory Submission Considerations for the Collaborative Assessment Pilot:

- The proposal should be based on a planned CMC post-approval change(s).
- Products that are distributed under an emergency use mechanism and not a marketing application should not be considered.
- The product(s) involved should be intended for the treatment of patients with COVID-19, breakthrough/PRIME products, or medically necessary.
- The changes should be intended to be submitted to multiple regions concurrently.
- The submission should ideally involve an area where there is an opportunity for regulatory convergence.
- A common dataset should be provided to all participating agencies.
- There should be no restrictions on sharing data among the regulatory agencies participating in the pilot.
- There should be agreement to publicly share some high-level data and results of the collaborative assessment.
- Industry representatives are willing to participate in a virtual discussion meeting to have open dialogues with regulators from multiple regions on technical and regulatory issues related to their applications.

Early engagement with Industry

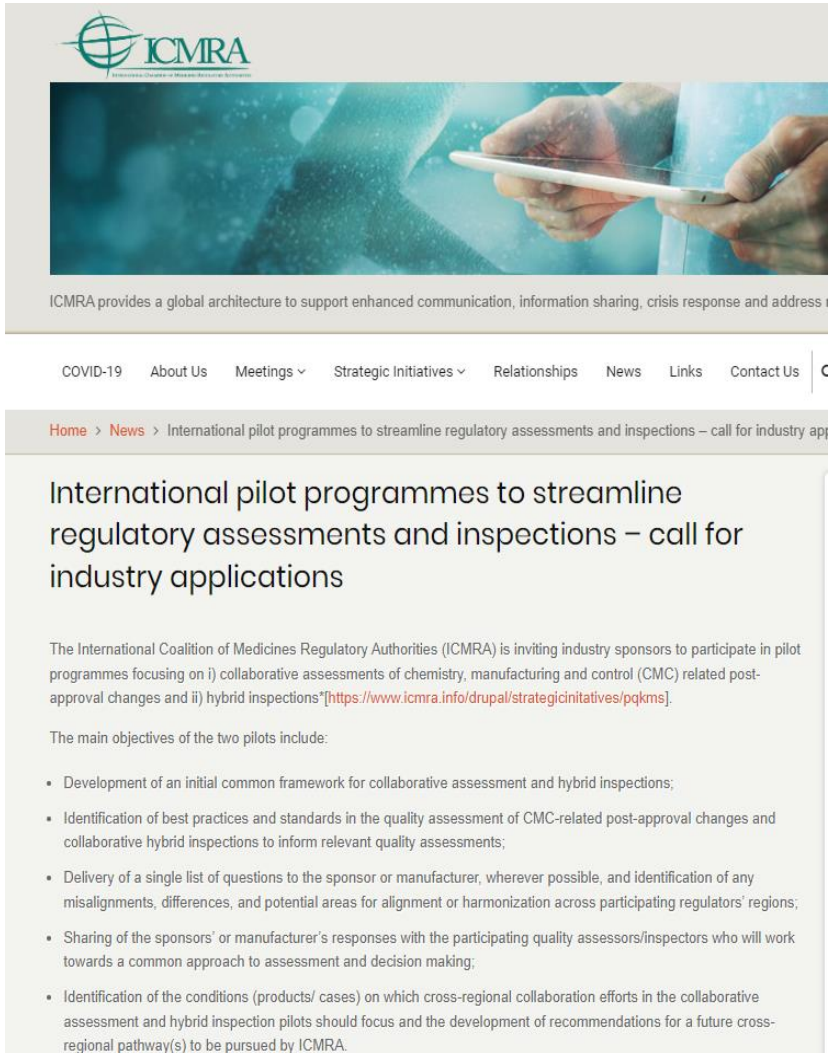
- Established a partnership between regulatory authorities and industry to accomplish our ambitious vision
- Raised awareness of the pilot scope and overall aim and clearly communicate what is feasible to achieve
- Shared first outline of the proposed pilot – Sept. 2021
- Invited input and suggestions from industry to improve and fine tune the details of the pilot, ensuring we learn from past experiences and other ongoing efforts – Feb. 2022
- Requested that industry give an early signal if they foresee any obstacles to the successfully running of the pilot which have not been considered by regulators – Feb. 2022
- Early flag for timely identification of candidate cases

Realistic Expectations:

- Harmonisation and the desired convergence cannot be achieved only through the few pilot cases
- Whilst the aspiration is to achieve a single outcome in each case, unless there are different regional legal/ regulatory requirements, the focus will be to pave the path for the future, rather than solely the case outcomes
- Each region is still bound to its existing Regulatory / legal framework; any differences cannot be bridged through this pilot

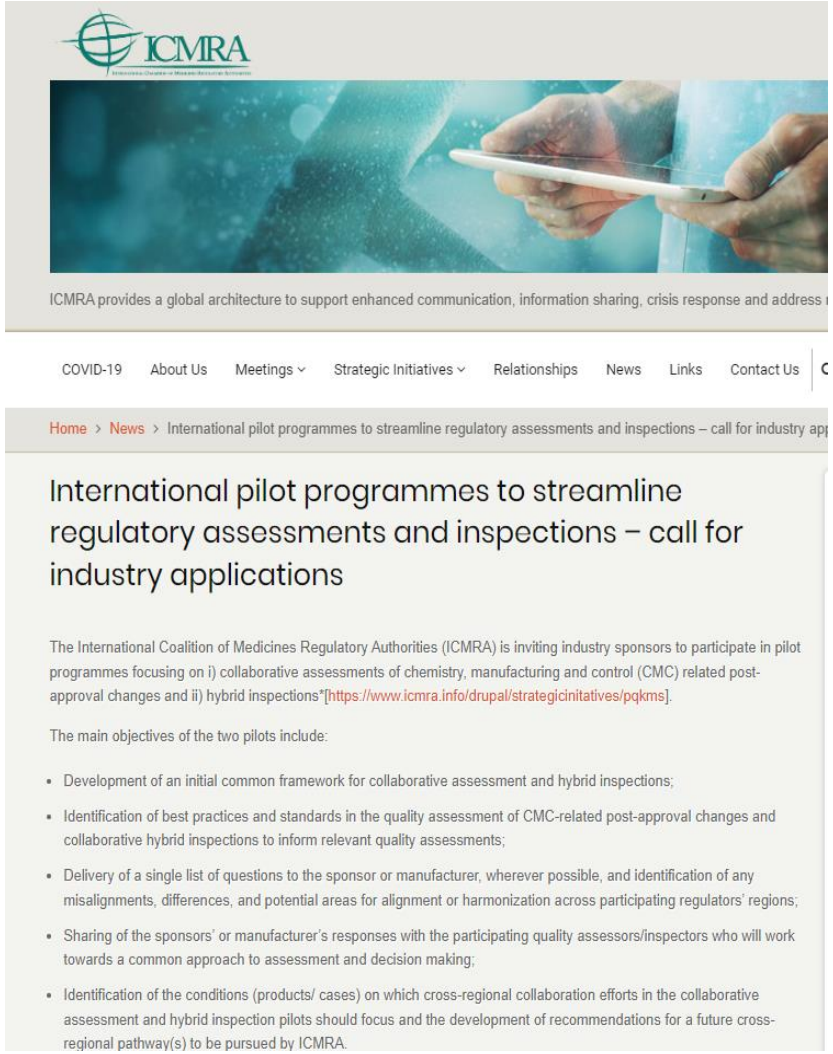
Progress of ICMRA Pilots

- Open call to Industry for both pilots since June 2022
- 7 proposals submitted for the collaborative assessment
  - ✓ Expect to accept three proposals
  - ✓ **Two proposals have been accepted**
- The pilots remain open - encourage new proposals



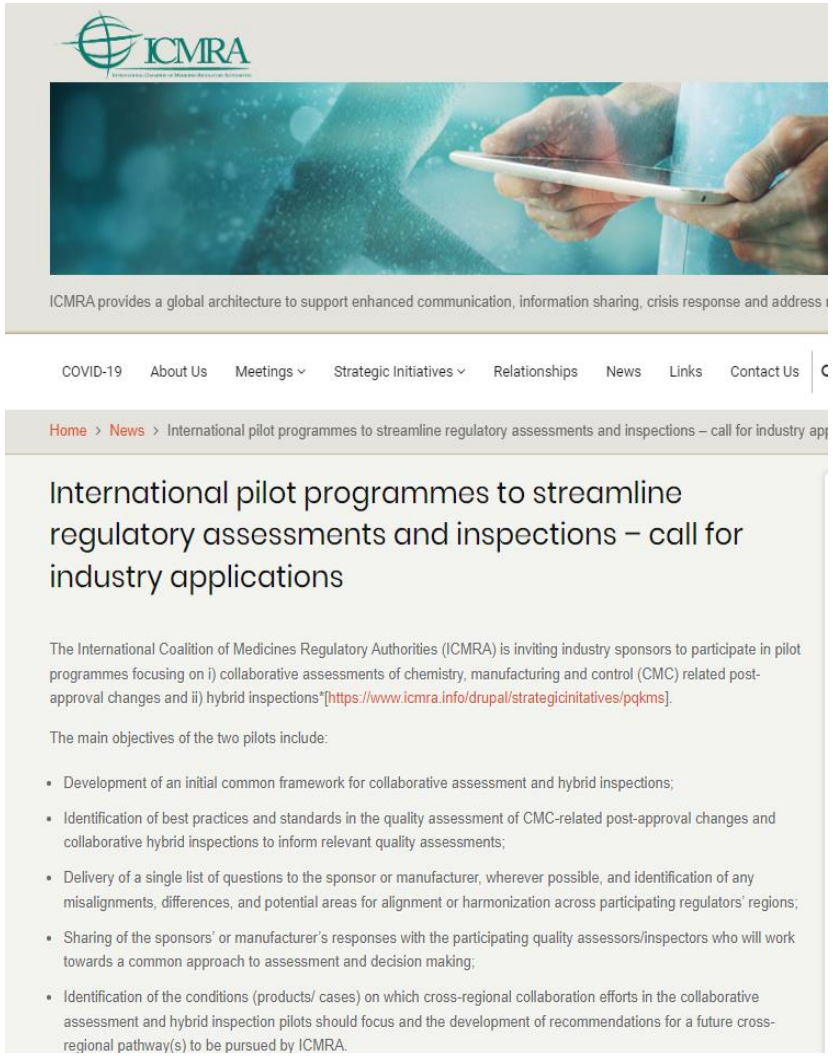
Progress of ICMRA Pilots

- 1st accepted collaborative assessment proposal
  - PACMP for addition of new DP manufacturing and testing sites for a biological molecule
  - Up to 6 participating regulatory authorities
  - Regulatory submission expected in April 2023
- 2nd accepted collaborative assessment
  - PACMP for DS/DP/QC site transfer for a biological molecule
  - 2 participating regulatory authorities initially
  - Regulatory submission received in January 2023
  - 1st set of common information requests sent in March 2023



Learnings of ICMRA Pilots

- Positive and productive collaboration
- A lot of effort taken to align regulatory processes and timelines for ICMRA collaborative assessment pilot among different regulatory authorities
  - Generally use the most aggressive timeline
- Lack of a common IT platform for information sharing and collaborative assessment
- Regional requirements
  - PACMP DS – 1 out of 16 comments/questions
  - PACMP DP – 1 out of 13 comments/questions



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QUESTIONS?