Predictability and Transparency to facilitate Reliance Schemes: APAC Insights

22 April 2025

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Agenda

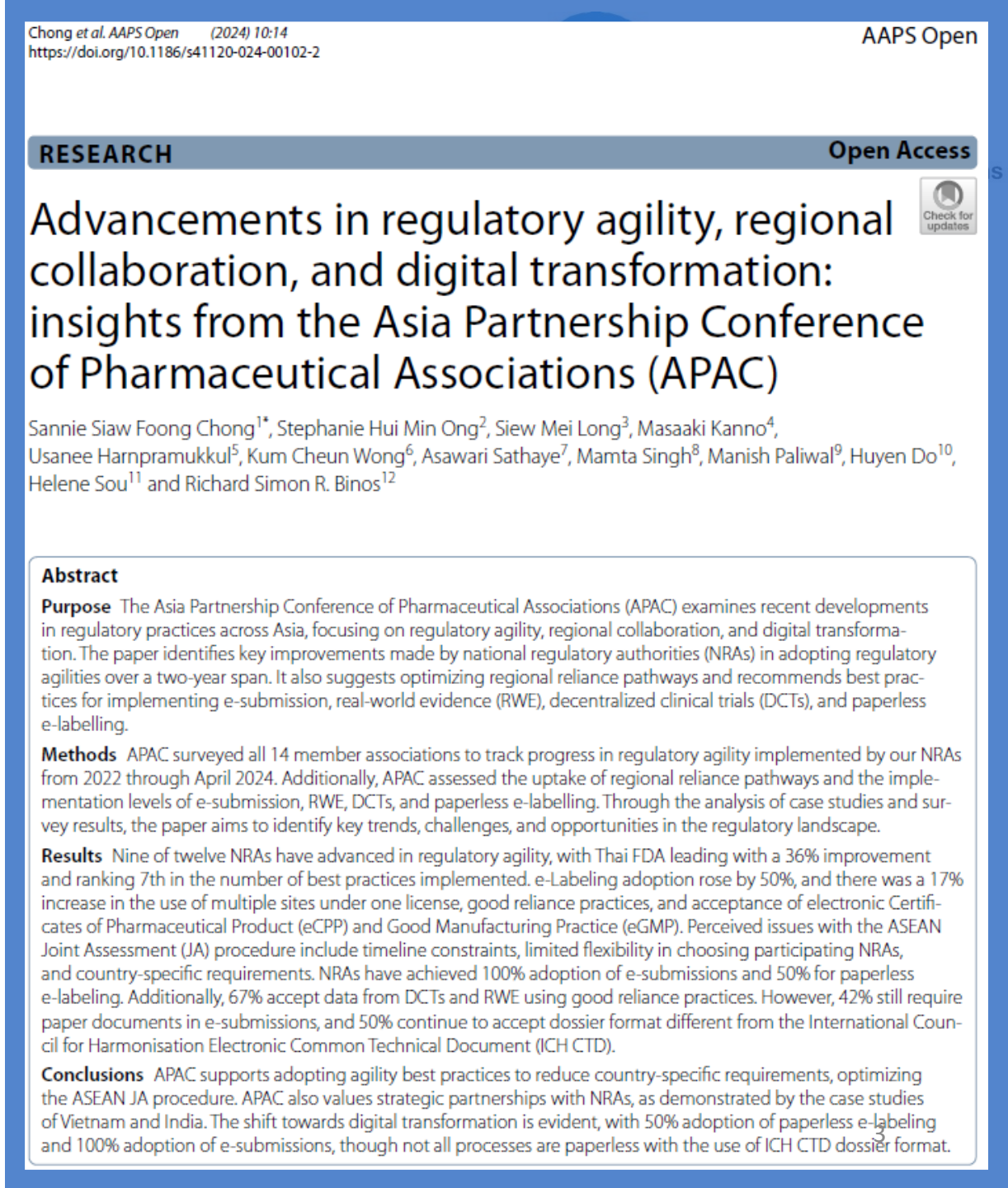
- Current regulatory environment & Trends
- Reliance pathways & Opportunities for enhancing predictability and transparency:
  - ASEAN
  - Vietnam
  - India
- Key takeways & Conclusion

Acknowledgment of APAC Paper

This presentation is based on insights from the APAC 2nd Paper published online via AAPS Open on Dec 17, 2024:

- The paper provides key findings on regulatory reliance, digital transformation, and regional collaboration.
- Case studies from **ASEAN, Vietnam, and India** have been incorporated to highlight best practices and challenges.
- Industry perspectives align with APAC's recommendations on reliance frameworks and process improvements.
- **For more details, please refer to:** https://rdcu.be/d3OXr

- Please stop by the poster in the hall and speak with the authors!



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AAPS Open

RESEARCH Open Access

Advancements in regulatory agility, regional collaboration, and digital transformation: insights from the Asia Partnership Conference of Pharmaceutical Associations (APAC)

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Abstract

Purpose The Asia Partnership Conference of Pharmaceutical Associations (APAC) examines recent developments in regulatory practices across Asia, focusing on regulatory agility, regional collaboration, and digital transformation. The paper identifies key improvements made by national regulatory authorities (NRAs) in adopting regulatory agilities over a two-year span. It also suggests optimizing regional reliance pathways and recommends best practices for implementing e-submission, real-world evidence (RWE), decentralized clinical trials (DCTs), and paperless e-labelling.

Methods APAC surveyed all 14 member associations to track progress in regulatory agility implemented by our NRAs from 2022 through April 2024. Additionally, APAC assessed the uptake of regional reliance pathways and the implementation levels of e-submission, RWE, DCTs, and paperless e-labelling. Through the analysis of case studies and survey results, the paper aims to identify key trends, challenges, and opportunities in the regulatory landscape.

Results Nine of twelve NRAs have advanced in regulatory agility, with Thai FDA leading with a 36% improvement and ranking 7th in the number of best practices implemented. e-Labeling adoption rose by 50%, and there was a 17% increase in the use of multiple sites under one license, good reliance practices, and acceptance of electronic Certificates of Pharmaceutical Product (eCPP) and Good Manufacturing Practice (eGMP). Perceived issues with the ASEAN Joint Assessment (JA) procedure include timeline constraints, limited flexibility in choosing participating NRAs, and country-specific requirements. NRAs have achieved 100% adoption of e-submissions and 50% for paperless e-labeling. Additionally, 67% accept data from DCTs and RWE using good reliance practices. However, 42% still require paper documents in e-submissions, and 50% continue to accept dossier format different from the International Council for Harmonisation Electronic Common Technical Document (ICH CTD).

Conclusions APAC supports adopting agility best practices to reduce country-specific requirements, optimizing the ASEAN JA procedure. APAC also values strategic partnerships with NRAs, as demonstrated by the case studies of Vietnam and India. The shift towards digital transformation is evident, with 50% adoption of paperless e-labeling and 100% adoption of e-submissions, though not all processes are paperless with the use of ICH CTD dossier format.

Increasing Use of Reliance Pathways

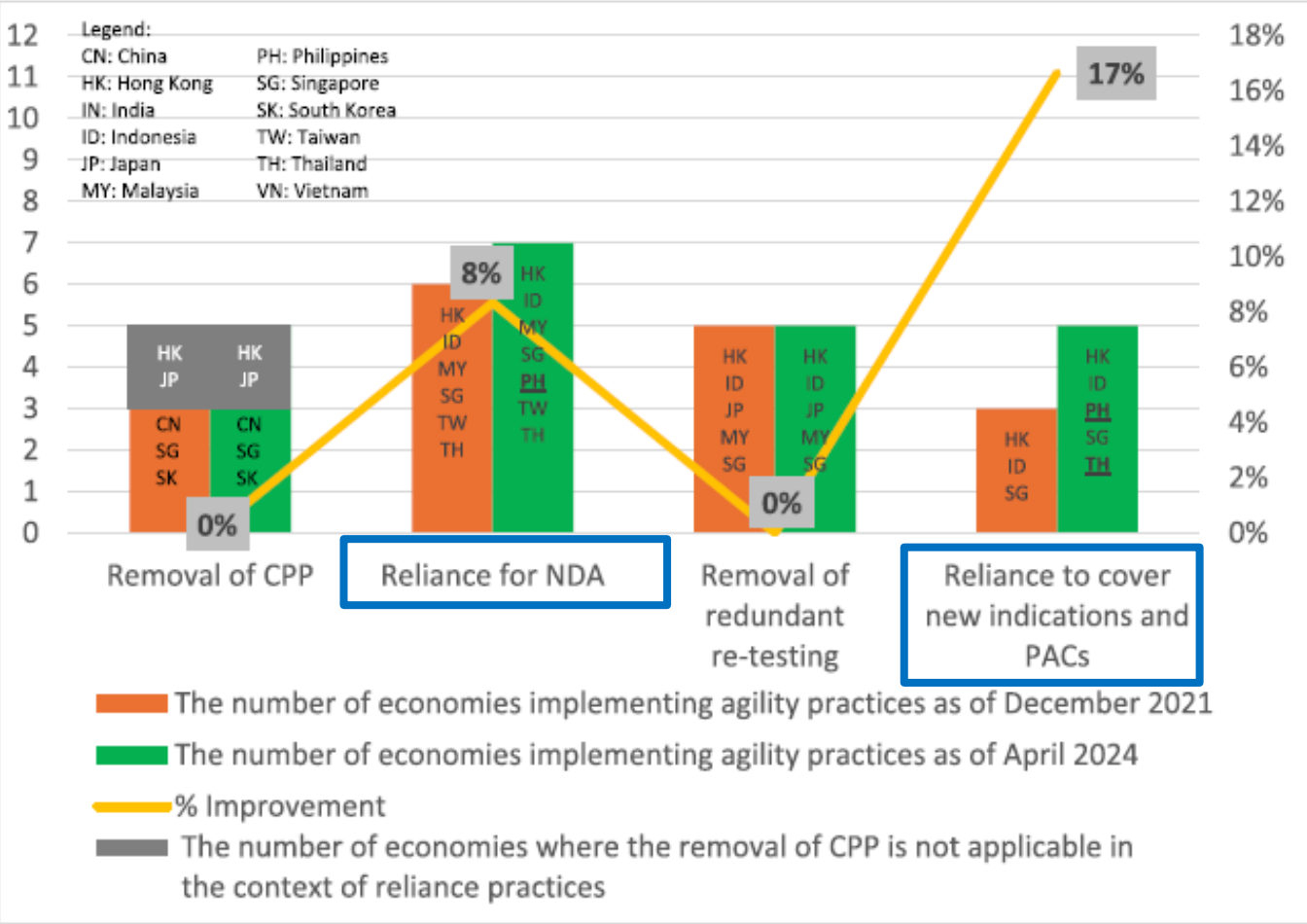
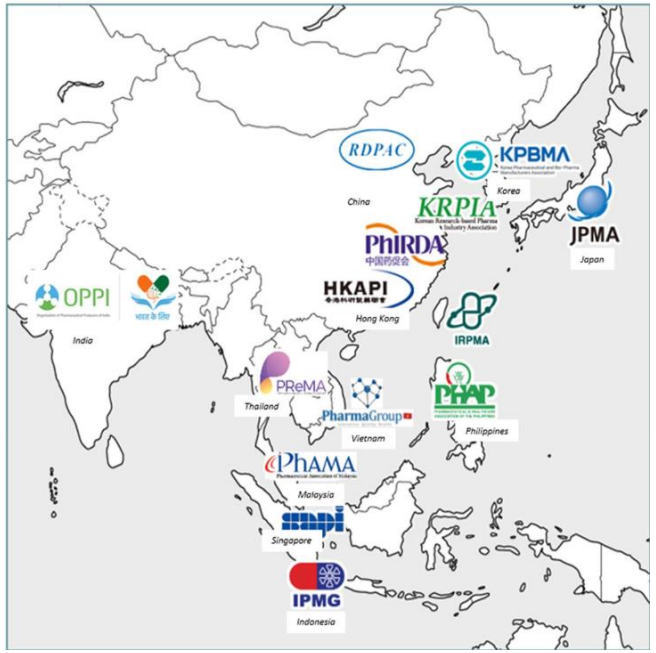


Figure 1(a) Adoption of reliance improved by 17% for new indications and PACs, and by 8% for NDAs

Survey to 12 APAC member associations between December 2021 and April 2024



→ An increased number of reliance pathways for New Drug Applications (NDAs), new indications and Post-Approval Changes (PACs)

Towards More Regulatory Convergence

- Varying regulatory requirements and country-specific requirements such as:
  - Site-specific stability data, limitation of number of manufacturing sites per licence
  - Different dossier formats and structures

- APAC Insights:
  - Overall progress in streamlining regulatory requirements over past 2 years.
  - All accept electronic submissions.
  - Some National Regulatory Authorities (NRAs) still require physical documents.

Recommendations:
- Keep convergence with global regulatory standards
- Fully paperless e-submissions
- Accelerate ICH eCTD adoption

→ To help increasing <u>predictability</u> of reliance pathways

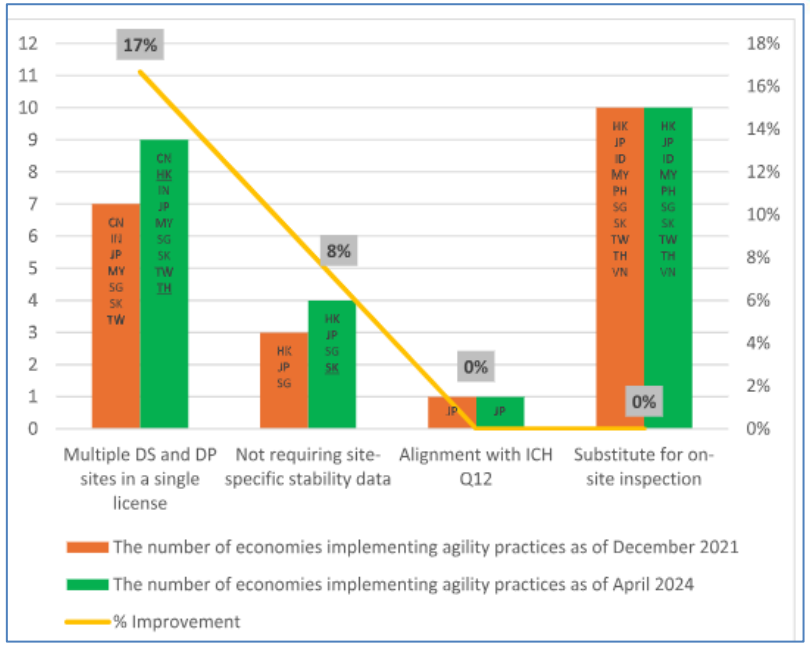


Figure 1(c): Adoption of multiple manufacturing DS and DP site in a single licence improved by 17%
and by 8% for not requiring site-specific stability data

Fig. 5: 58% of NRAs implement entirely paperless e-submission

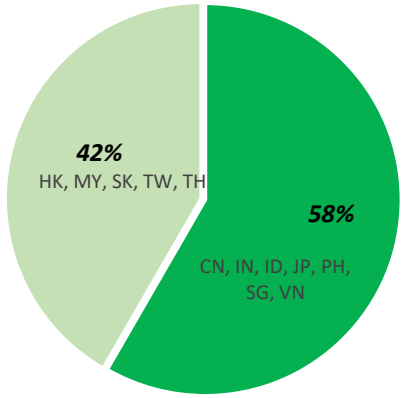
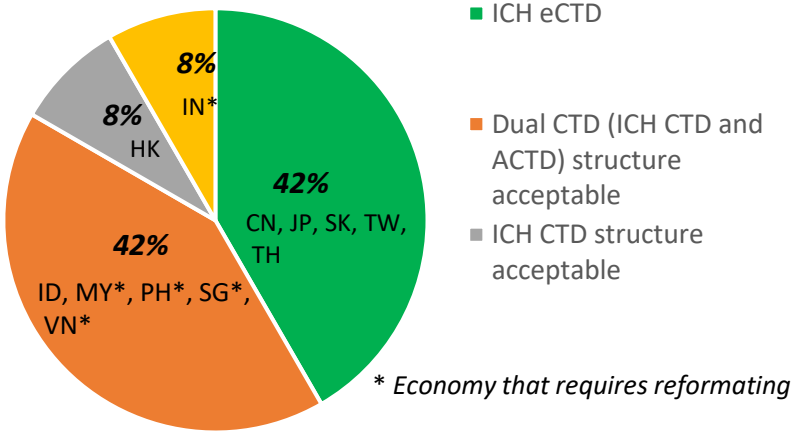


Fig.6: 42% of NRAs accept ICH eCTD



* *Economy that requires reformating*

Yes, completely paperless Yes, but physical documents still required

Towards More Engagements about RWE and DCT

- APAC Insights:
  - Majority of economies can approve applications with DCT or RWE datasets using reliance pathways
  - Most do not have a formal DCT or RWE guideline in place
  - 42% APAC member associations ranked RWE and DCT as priority topics for engaging with local regulators to develop guidelines over the next 1 to 3 years

→ To help increasing transparency and predictability in review processes, incl. in reliance pathways

Decentralized data (DCT)

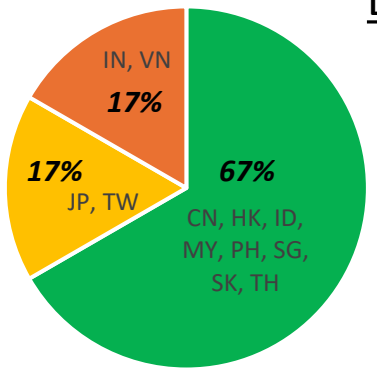


Figure 11: 67% NRAs can approve NDAs with DCT elements through good reliance practice

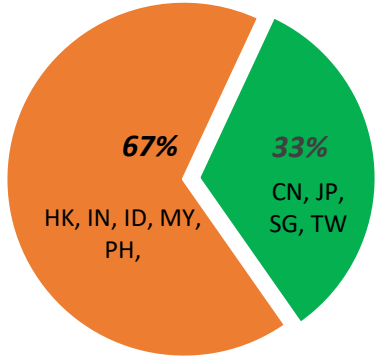
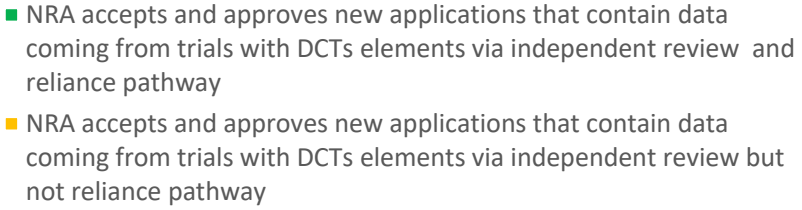
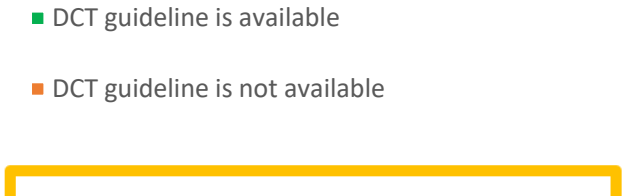
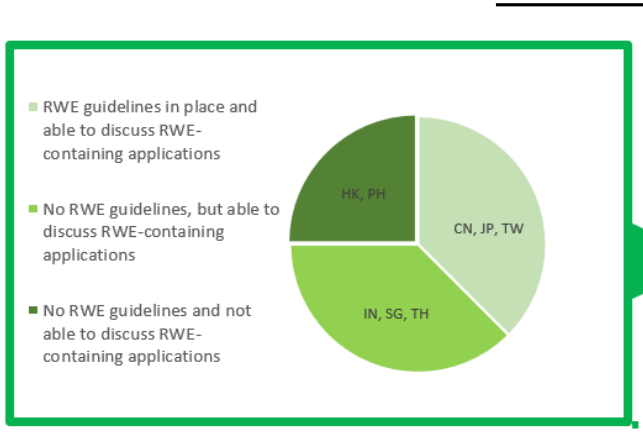


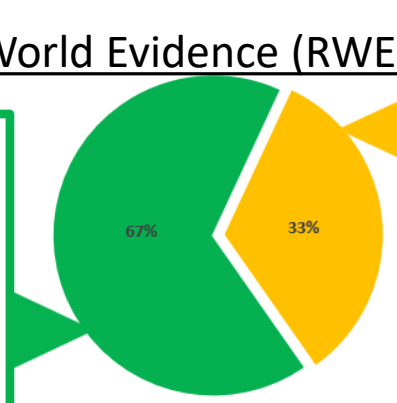
Figure 10: DCT guidelines are available in 33% of NRAs

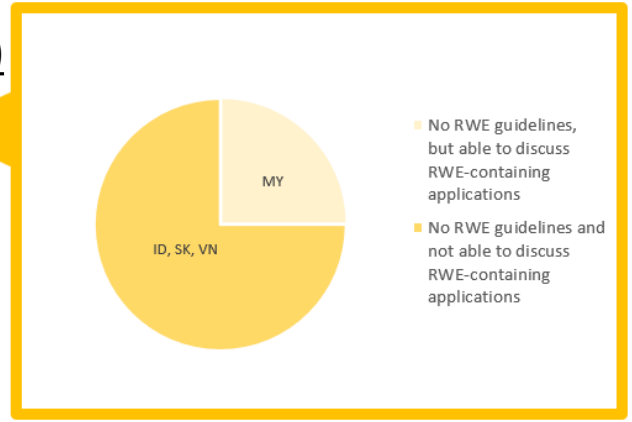




Real-World Evidence (RWE)







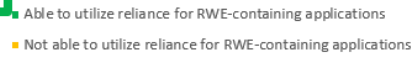


Figure 9: Reliance practices are applied by 67% of NRAs to applications that include RWE datasets

REGULATORY RELIANCE PATHWAYS

ASEAN, VIETNAM AND INDIA

ASEAN Joint Assessment Procedure (ASEAN JA)

- Established in 2017, open to all 10 ASEAN members states on a voluntary basis
- Regional Collaborative Joint Assessment of a new product approved by at least one reference agency
- Supported by World Health Organization (WHO)

ASEAN JA Challenges & Opportunities

Asia Partnership Conference of Pharmaceutical Associations

a) Industry-perceived Challenges

Lack of predictability

Lack of transparency & predictability

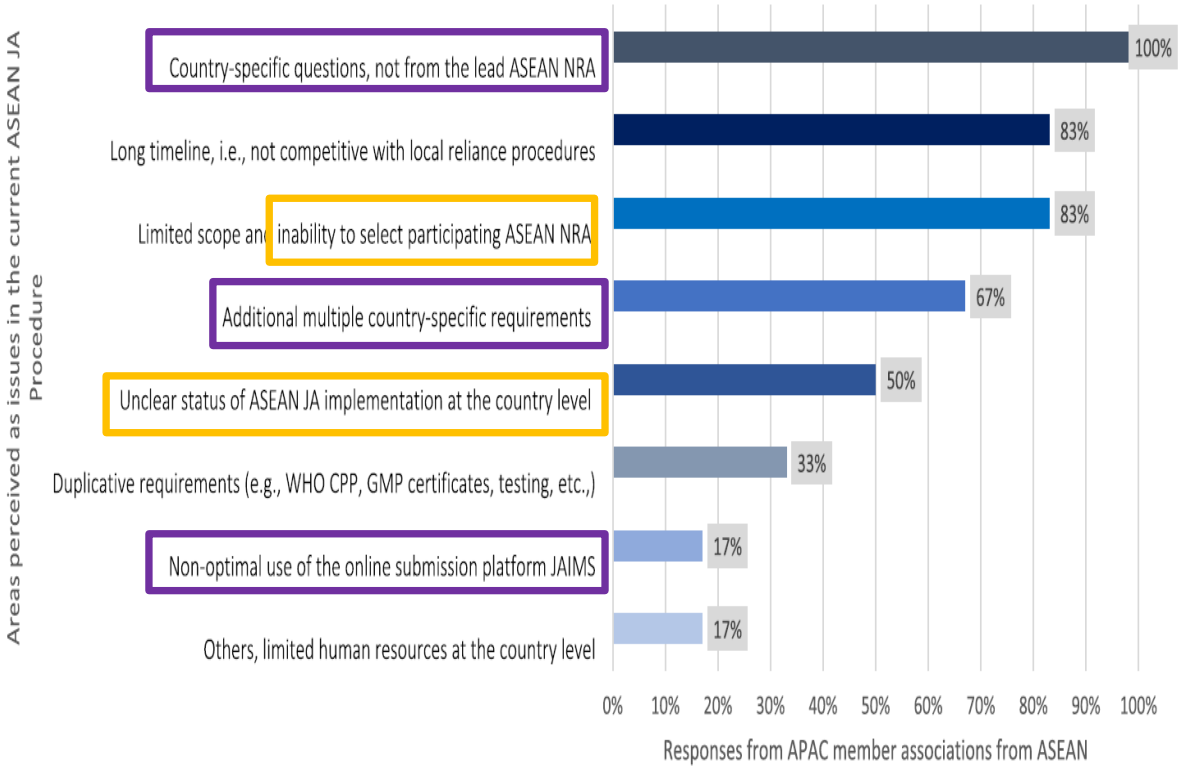


Figure 3: More than 80% of APAC member associations from ASEAN perceived country specific-requirements, timelines, scope and lack of flexibility to select participating NRAS as major challenges

b) Industry Proposed Recommendations

To increase predictability

To increase transparency & predictability

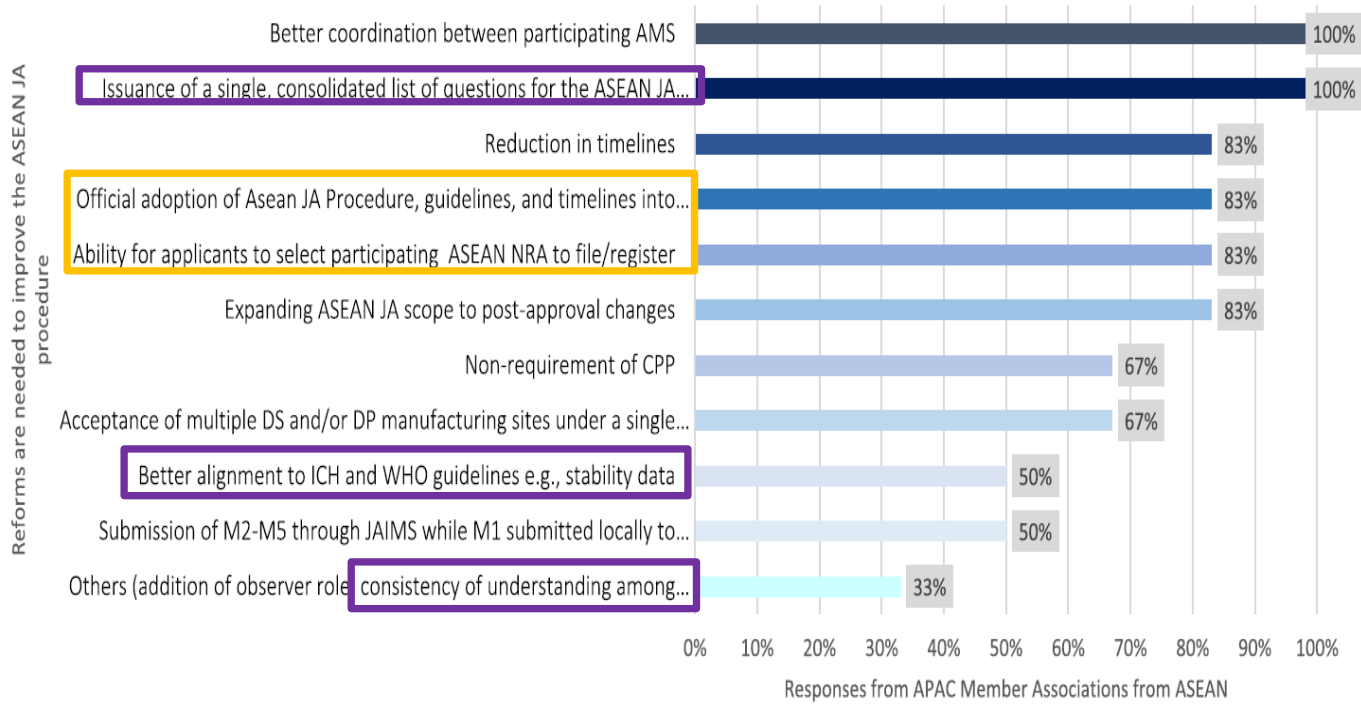
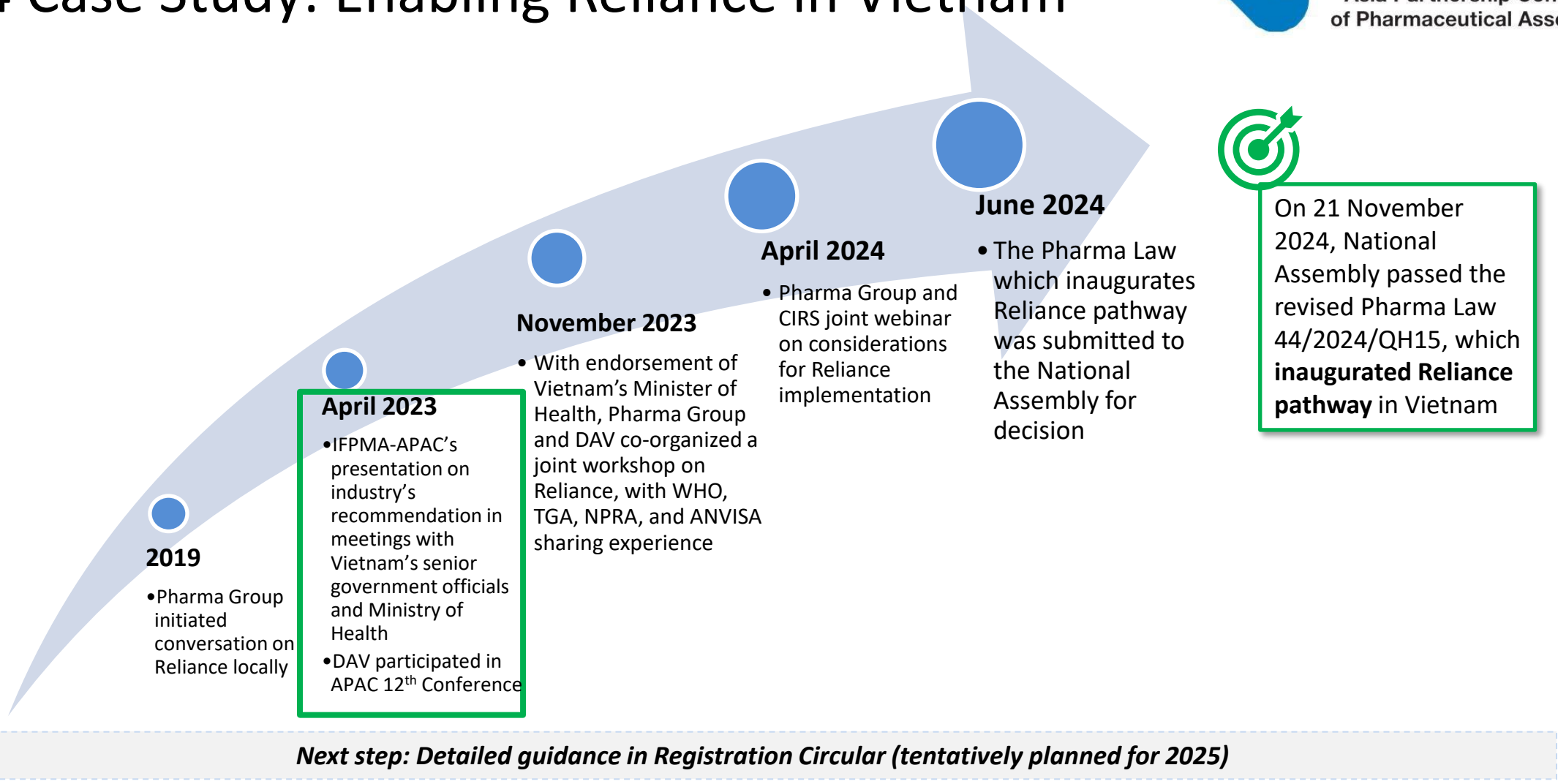


Figure 4: More than 80% of APAC member associations recommended better coordination with issuance of a single list of questions, reduction in timelines, national adoption, PAC, flexibility to select participating NRAs, CPP removal, and multiple sites in a license as top reforms to improve the current ASEAN JA procedures

ASEAN JA Progress

- WHO ASEAN Joint Assessment Meeting, 15 November 2024, Jakarta, Indonesia
- Majority of ASEAN Member States (AMS) have incorporated the ASEAN Joint Assessment (AJA) into their respective NRAs' legal frameworks for new registration applications.
- Pilot project on Post Approval Changes (PAC), which is projected for completion by Q2/Q3 2025.
- Flexibility for the industry to select participating AMS at the time of product selection. AMS not selected may still join the process as observers.
- A consolidated List of Questions (LOQs) is issued during the AJA review, covering aspects related to quality, safety, and efficacy via the JAIMS platform. Country-specific queries, however, are sent to applicants by individual NRAs.

2024 Case Study: Enabling Reliance in Vietnam

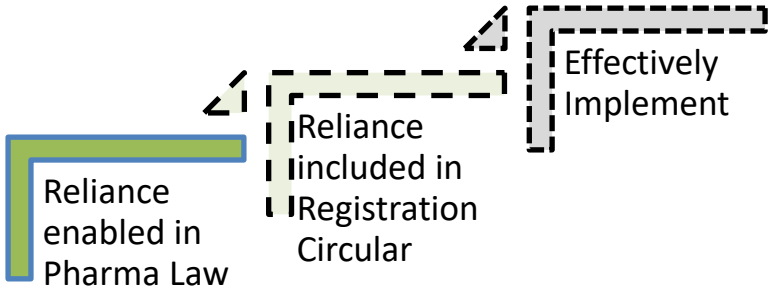


Next step: Detailed guidance in Registration Circular (tentatively planned for 2025)

Ref: Advancements in regulatory agility, regional collaboration, and digital transformation: insights from the Asia Partnership Conference of Pharmaceutical Associations (APAC), Chong *et al,* AAPS Open (2024)

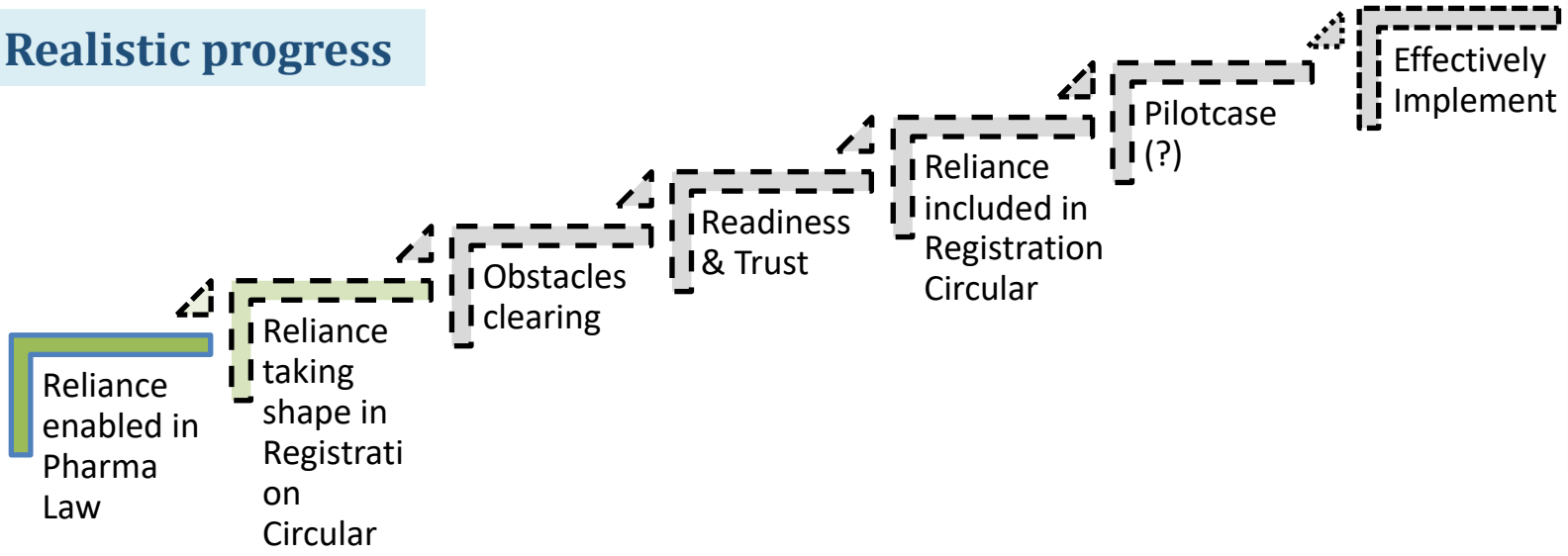
Reliance | Beyond enabling policy

Ideal



Beyond enabling Reliance in policy, preparation for readiness must happen in tandem for all stakeholders involved

Realistic progress

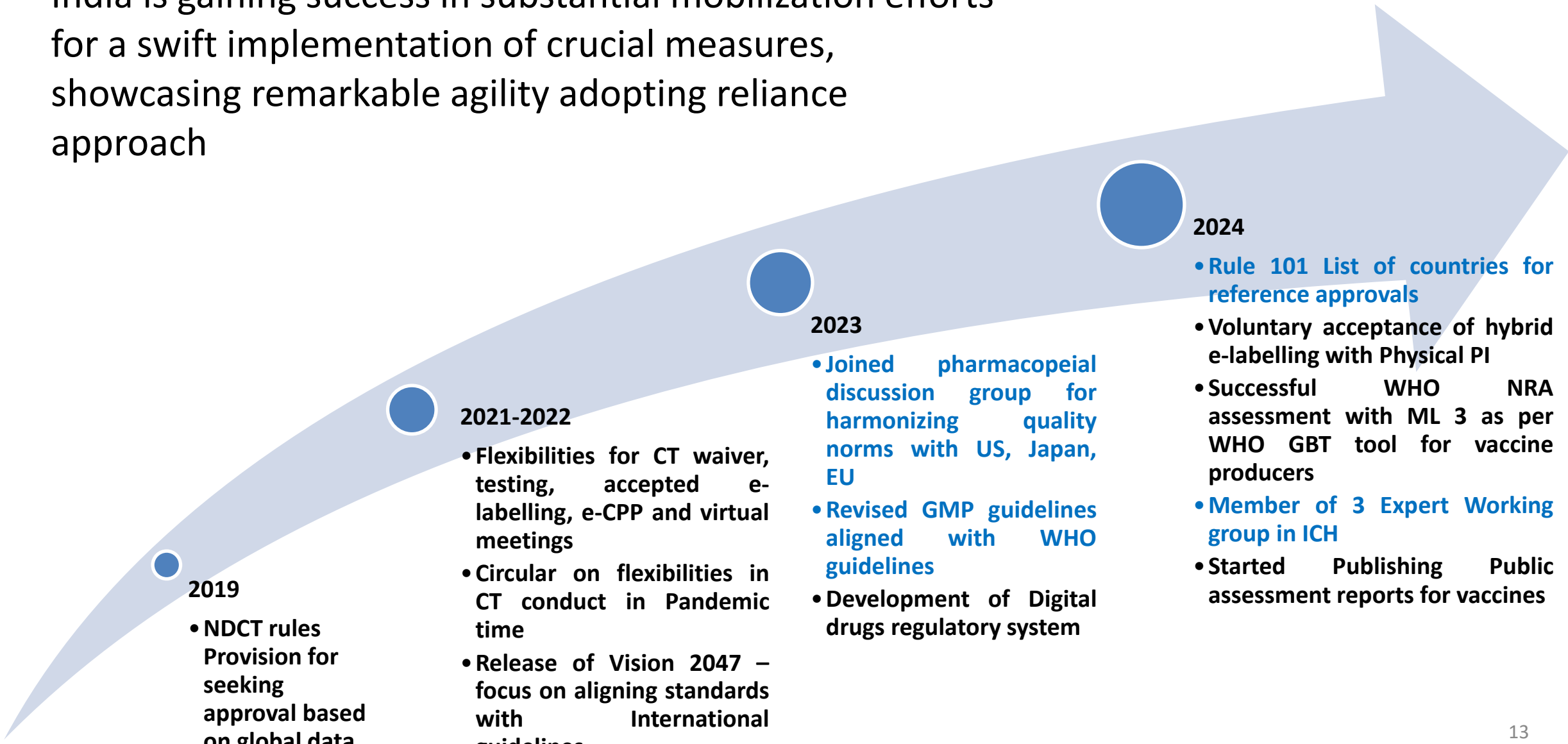


Industry recommendations

- **Informed reliance:** Further utilize opportunities (such as dialogues with WHO, other NRAs and industry, APAC, DIA) to ensure regulations are close to international best practice
- **Predictability and Resource optimization:** Construct implementable regulations, process and work-flow organization
- **Transparency and cooperation**: consider screening and pre-consultation meetings with registrants before dossier submission

India Reliance Case Study

- India is gaining success in substantial mobilization efforts for a swift implementation of crucial measures, showcasing remarkable agility adopting reliance approach



OPPI Recommendations

- **Increased use of reliance**
  - Both unidirectional and bidirectional reliance bring benefit to patients and should be used more as regulatory systems evolve. (e.g. ASEAN Joint Assessment (AJA) and ACESS Consortium, WHO Collaborative Registration Procedure (CRP) and Project ORBIS)
  - Reliance is not a “one size fits all” concept. It can be across the entire life-cycle of a product.

- **Global regulatory convergence**
  - Promote the harmonization/rationalization of standards utilizing platforms such as ICH and PIC/S
  - Collaboration platforms, capacity building forums and pilots can be useful to test concepts, but these should be translated in into working models that can be implemented at national level

- **Digital collaboration tools**
  - Secure collaboration platforms, such as cloud-based platforms, enable dynamic, real-time interactions between NRAs and industry, fostering better communication, alignment, and quicker consensus-building in the regulatory process.

- **Data analytics and Real-World Evidence (RWE)**
  - RWE can support reliance-based decisions, particularly for post-market surveillance and risk management, providing insights into a product's performance beyond clinical trials.

Conclusion

Asia Partnership Conference of Pharmaceutical Associations

What does Predictability & Transparency in Reliance schemes mean for the industry?

1. **Clear scope and well-defined processes for Reliance pathways**
   - Industry needs a transparent and well-defined framework outlining when and how reliance can be applied consistently
   - Predictable review timeline and milestones ensures efficient submission planning and appropriate resource allocation.
   - Reduces uncertainties and unexpected delays that impact global launch timelines.

2. **Convergence of Requirements with International Standards (e.g., ICH, WHO*, APEC-RHSC)**
   - Increases confidence that reviews follow consistently WHO Good Reliance Practices (GRP) and APEC Good Registration Management (GRM) principles, leading to a more predictable approval processes.
   - Reduced country-specific requirements leads to a more streamlined process and better predictability.

3. **Efficient Communication Channels**
   - Clear mechanisms for addressing inquiries from applicants, including early interactions such as pre-submission meetings.

4. **Adoption of Digital Tools to facilitate reliance-based processes**
   - Leverage digital tools to increase efficiency and predictability
   - Collaboration platforms to facilitate information-sharing and increase transparency

* WHO TRS 992 - Annex 9 “Good Review Practices: Guidelines for national and regional regulatory authorities” , WHO TRS 1033 - Annex 10 “Good reliance practices in the regulation of medical products: high level principles and considerations” and WHO TRS 1033 - Annex 11 “Good regulatory practices in the regulation of medical products”

APAC Mission: To expedite the launch of innovative medicines for the people in Asia

- Aligned with its mission, APAC is fully committed to supporting effective implementation of regulatory reliance initiatives in Asia
- Continuing engagement & collaboration between regulators and industry are key to achieve successful outcomes

Thank you for the tremendous collective work and congratulations on the progress made so far!