ICDRA

18th International Conference of Drug Regulatory Authorities

"Smart Safety surveillance:
A life-cycle approach to promoting safety of medical products"

The 18th International Conference of Drug Regulatory Authorities (ICDRA) was held in Dublin, Ireland from 3 to 7 September 2018. The event was co-hosted by the Health Products Regulatory Authority (HPRA) of Ireland and the World Health Organization (WHO).

More than 300 delegates from regulatory authorities of WHO Member States participated in the 18th ICDRA. The recommendations as presented at the end of the conference are set out on the following pages. They are reproduced here as provided by the moderators in the closing plenary sessions and finalized following the consultations with the participants. Feedback, particularly from non-participating authorities, is welcome.

Several common cross-cutting themes emerged from the discussions. These can be further grouped and consolidated and include *e.g.* promoting regulatory collaboration, convergence and harmonization throughout the products life cycle; improving coordination, risk-based prioritization of investments, reliance, work- sharing and use of regional networks; promoting greater transparency, awareness and communication; enabling regulatory preparedness for public health emergencies; enabling access to innovative medical products; development of international standards; and provision of technical assistance to support implementation.

WHO intends to further develop a more concise iteration of these recommendations in the form of a work plan, integrating any feedback received and ensuring greater alignment and consistency across the various work streams. This work plan will be prepared in 2019, and the outcomes of the deliverables will be presented to the 19th ICDRA in 2020.

► 18th ICDRA website: http://www.icdra2018.ie

Information on past ICDRA conferences is available at:
www.who.int/medicines/areas/quality_safety/regulation_legislation/icdra/en/

THEME: Regulatory collaboration, convergence and harmonization

Recommendations to WHO

1. Regulatory collaboration, convergence and harmonization activities should incorporate not only initial authorization but also life-cycle management and pharmacovigilance.

2. WHO should provide a toolbox with all the available options for regulatory collaboration, convergence and harmonization and increase awareness to facilitate selection of the appropriate mechanisms by member states.

Recommendations to Member States

1. When sharing assessment or inspection reports, Member States should share unredacted reports, where possible, which is important to build trust and to optimize reliance on outcomes from other regulators.

THEME: Certification of Pharmaceutical Products (CPP)

Recommendations to WHO

1. WHO should advocate for the use of an electronic CPP template by issuing and receiving authorities to expedite the process and mitigate against any further need for “legalization.”

2. WHO should advocate for the CPP standard procedure specifying that value-added, unredacted documents either accompany the CPP or are provided upon request by any receiving agency.

3. The CPP template should be updated to reflect current manufacturing situations by including: (a) the sites of manufacture with addresses, and (b) a reminder that the receiving country should check that the product being shipped to it is exactly the same as the product being certified by the issuing country.

THEME: Regulatory preparedness for public health emergencies)

Recommendations to WHO

1. WHO should facilitate communication between stakeholders (manufacturers of IVDs, vaccines and therapeutics) and regulators on needs for products, development work and risk assessment work. This should be facilitated by WHO setting up a pre-Emergency Use Listing scheme.

2. WHO should encourage the use of regulatory networks such as ICMRA in the case of public health emergencies and should support effective transition from emergency use to in-country approval.

Recommendations to Member States

1. Member States should consider the feasibility of “conditional approvals” for PHE products with strengthened pharmacovigilance and long-term monitoring after outbreaks.

THEME: Enabling access to innovative medical products in resource-limited settings

Recommendations to WHO

1. WHO is asked to rapidly finalize the good regulatory practice suite of guidance, with a particular focus on developing practical advice options, and best practices to promote regulatory collaboration and reliance for the whole lifecycle management of medical products, both for individual National Regulatory Authorities and for regional networks.

2. WHO is asked to use its position in the various international regulatory harmonization forums to help promote alignment of regulatory application dossier formats, including elimination of unnecessary differences in the national and regional CTD requirements.

Recommendations to Member States

1. While fully recognizing that there are different languages and different regulatory systems, Member States are urged to review their current application dossier formats to ensure that all requirements are scientifically justified and better aligned with internationally agreed harmonized standards.

THEME: Benchmarking of Regulatory Systems: towards mature regulatory systems

Recommendations to WHO

1. Continue support for regulatory systems strengthening to Member States utilizing the Global Benchmarking Tool which has proven to be effective in promoting one global standard for regulatory systems.

2. Support regulatory systems strengthening to Member States at different maturity levels in a strategic manner.

3. Further develop the process for designating WHO Listed Authorities with input from Member States.

4. Further clarify the role of WHO Listed Authorities at Maturity Level 3 or Maturity Level 4 and describe how this information can be utilized by Member States to support and advance their regulatory work.

Recommendations to Member States

1. Invest resources to strengthen regulatory systems utilizing the Global Benchmarking Tool and work towards attaining at least Maturity Level 3 while implementing principle of continuous improvement for all maturity levels.

2. Explore approaches to utilize concept of reliance and collaborative decision-making to increase timely access to safe and effective medical products.

THEME: Future direction of WHO Prequalification (PQT)

Recommendations to WHO

1. Recognizing PQP's demonstrated effective contribution to UHC by facilitating access to quality assured medical products, WHO should expand the scope of products eligible for PQ assessment and diversify the pathways to PQ product listing to include increased reliance on WLAs and on quality assured assessments by regulatory networks.

Recommendations to Member States

1. Member states should where possible take advantage of opportunities offered by WHO through its Prequalification Programme by signing up and using the collaborative registration procedures and utilizing the practical training and capacity building opportunities offered through PQT.

THEME: Regional regulatory networks: progress and challenges

Recommendations to WHO

1. Support trust building by providing or using existing platforms for exchange of information to avoid having to rebuild a system for each regional network/collaborative initiative.

Recommendations to Member States

1. National Regulatory Authorities/regional networks should engage with stakeholders to ensure that the added value and strength of the network is presented and understood, and to build confidence among all National Regulatory Authorities.

THEME: Regulators role in containing antimicrobial resistance (AMR)

Recommendations to WHO

1. Continue to support member states to implement Global Action Plan (GAP) in particular, improve awareness and understanding of AMR and monitor/support countries in implementing national action plans.

Recommendations to Member States

1. Regulators should consider ways that will facilitate the development of new antibiotics and diagnostic tools such as harmonized technical standards, scientific advice, accelerated pathways and incentivized research.

2. Member States/regulators should promote the implementation of national action plans including awareness and understanding of AMR, surveillance of AMR and the rational use and prescribing of medicines.

THEME: Local production

Recommendations to WHO

1. Maintain local production as a discussion topic for further ICDRAs.

Recommendations to Member States

1. Members States are encouraged to promote communication and transparency between regulators and the industry to overcome the challenges in local production of medical products in assuring quality, efficacy and safety.

THEME: Changing procurement models (in countries transitioning from support provided by Global Health Programmes)

Recommendations to WHO

1. WHO should develop options on how to provide advice and support in terms of strategic and practical aspects of adaptation of procurement practices.

2. WHO should continue to encourage/advocate procurement agencies and donors to adhere to national regulatory requirements.

Recommendations to Member States

1. Member States should raise awareness on selection, prices, supply systems, sustainable financing and regulatory systems.

2. Member States should encourage all stakeholders to be involved and coordinated on national level, from industry and donors to regulators in the process of procurement.

3. Member States should put the focus on quality-assured essential medicines and simplify the pathways for getting them to the patients.

THEME: Promoting medical products safely: supply chain integrity

Recommendations to WHO

1. WHO should support Member States with guidelines on implementation on risk-based post market surveillance.

2. WHO should support the Member States to build the capacity to implement the risk-based post market surveillance.

Recommendations to Member States

1. Member States should plan and implement risk-based post market surveillance programmes.

2. Member States should put in place a system for effective response in surveillance to address serious public health threats related to Substandard and Falsified (SF) medical products.

THEME: Smart safety surveillance – a shared responsibility

Recommendations to WHO

1. WHO should develop guidance and a toolkit to support Member States in the implementation of the Smart Safety Surveillance strategy, one that embraces a risk-based prioritization of investments, work-sharing, joint activities and reliance for maximum return on investment for all medical products.

Recommendations to Member States

1. Member States should further explore the concept with a view towards WHO Smart Safety Surveillance strategy.

THEME: WHO Strategic approaches to improving access to safe medical products

Recommendations to WHO

1. WHO RHT strategy should ensure a comprehensive approach to improve patient access for all medical products, including for blood and blood components.

2. WHO Coalition of Interested Partners model should be used as a collaborative platform to advance “Smart” approaches, reliance and work-sharing among stakeholders for effective regulation.

Recommendations to Member States

1. Member States should work with harmonized systems, across product streams, supply chains and public health programmes, to ensure data are shared with the regulator, to inform policies, and for quality of care.

THEME: Safety of medical products throughout the product life cycle

Recommendations to WHO

1. Support countries to proactively assess risks and benefits of medical products throughout the product life cycle.

2. Develop guidance and document best practice for effective communication on risk and benefit of all medical products (including vaccines).

Recommendations to Member States

1. Train and prepare all policy makers and other stakeholders on effective communication of both benefits and risks of medical products, including vaccines, based on robust scientific data.

2. Accumulate evidence and build evolving risk management plans from early stages of medical product development.

THEME: Collaboration in the area of regulation of medical devices (including IVDs)

Recommendations to Member States

1. Reliance mechanisms should be developed and integrated in the medical devices regulations to avoid duplication of work.
2. Regulatory capacity for medical devices should be established in Africa to convert the Pan-African Harmonization Working Party into a continental expert working group, under the AMRH initiative, building on existing regulatory models and available guidance.
3. More efforts should be invested in medical devices post-market surveillance as a critical element of regulations.

THEME: Risk based inspections

Recommendations to Industry

1. In support of transparency, companies should consent to the sharing of full information amongst regulators and procurement agencies on inspections.

Recommendations to Member States

1. NRAs should embed the use of reliance procedures in their regulatory decision processes relating to inspections.
2. NRAs should monitor foreign inspections and support desk-top assessments with defined conditions

THEME: Regulation of clinical trials: focus on patient safety

Recommendations to WHO

1. Facilitate exchange of safety information from clinical trials and other related activities at local, regional, and global level.

Recommendations to Member States

1. Implement any existing WHO guidance for inclusion of vulnerable populations, children, pregnant women and women of child bearing age in clinical trials to gain knowledge of safety in these populations in a controlled setting. This will facilitate access, if benefit/risk is favourable, in these populations to important medical products.
2. Utilize opportunities for collaboration through networks such as AVAREF to assess clinical trial applications and develop processes for monitoring and follow up on safety data.

THEME: Harmonization, work-sharing and reliance in pharmacovigilance

Recommendations to WHO

1. WHO should coordinate Member States efforts to develop a platform for sharing best practice and emerging data in pharmacovigilance.

Recommendations to Member States

THEME: Regulation of advanced therapies

Recommendations to WHO

1. WHO to develop with Member States a "current state of the art" document capturing areas where agreement among experienced regulatory authorities exists, noting where harmonization has yet to be achieved, and documenting existing areas of uncertainty; areas covered could include definitions, quality attributes, standards, and clinical development pathways.

Recommendations to Member States

1. Member States are encouraged to develop national guidance and legislation on advanced therapies.

THEME: Regulation of biosimilars

Recommendations to WHO

1. WHO should keep organizing implementation workshops to accelerate use by Member States of the WHO guidelines on biosimilars, focusing more on analytical comparability than on comparability in clinical data, and emphasizing the importance of regulatory oversight throughout the entire life cycle of biosimilars.

Recommendations to Member States

1. Member States are encouraged to collaborate, to use existing resources in more efficient manner and to improve transparency by making Public Assessment Reports (PARs) detailed enough, particularly on comparability, and publishing PAR for both approved and rejected biotherapeutics.

2. Member States should, in accordance with their respective mandates, define prerequisites for interchangeability and substitutability of biosimilars, which is a national responsibility.

THEME: Safety of blood and blood products

Recommendations to WHO

1. WHO should support the establishment of national hemovigilance systems in Member States through the facilitation of education and training opportunities at the regional level.

2. WHO should take steps to ensure standardization, harmonized terminology and common good practices for national, regional and global hemovigilance database systems.

Recommendations to Member States

1. Member States should take steps to establish or strengthen their national hemovigilance system in accordance with the 2016 WHO guide.

2. Member States should engage in self-assessments and external assessments of their national hemovigilance systems using the WHO Global Benchmarking Tool, integrating the WHO Assessment Criteria for National Blood Regulatory Systems.

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