

**VICH OUTREACH FORUM
2nd meeting
19-20 February 2013
Washington DC - USA**

SUMMARY REPORT

Session 1: Reports and discussion

1/ Opening of the meeting and chairperson's introduction

The meeting was chaired by Dr Bernadette Dunham, Director of the Centre for Veterinary Medicine – FDA, in cooperation with Dr Jean-Pierre Orand, OIE. Dr Dunham welcomed the participants to Washington DC for the second VICH Outreach Forum meeting and gave a brief summary of the VICH and its objectives.

Welcome by Dr John Clifford

In his opening remarks, Dr John Clifford, Deputy Administrator and Chief Veterinary Officer for the Veterinary Services Program at the Animal and Plant Health Inspection Service (APHIS) of the United States Department of Agriculture, and USA Delegate to OIE, touched on the functions and aims of OIE as well as those of VICH. He focused his talk on the harmonisation process and the work that the OIE is doing on harmonisation. He then wished all participants a fruitful discussion.

2/ Report by the SC on issues raised by Forum members during the 1st Outreach Forum meeting in Brussels in June 2012

The VICH Secretariat reported on the outcome of the discussions that took place at the VICH Steering Committee meeting in Brussels on the issues raised by the participants in the 1st Outreach Forum meeting.

3/ Overview of the analysis by OIE on the results of the survey

OIE presented an overview of the findings from the needs assessment survey that was conducted by OIE with the VICH Outreach Forum members after the first Outreach Forum meeting.

4/ Topics “out of the scope of VICH” – how and by which organisation should they be addressed

IFAH-Europe stressed that VICH only develops harmonised technical requirements to support the marketing authorisations for veterinary medicinal products, then explained why certain topics that

were proposed by Outreach Forum members are out of scope of the VICH activities and elaborated on which body or organisation would best handle them.

In the discussion that followed several Forum members reported that VICH GLs have been implemented in their country.

The participants recognised that the VICH Outreach Forum was providing the opportunity to develop effective communication between VICH, and non-VICH countries and regions.

Forum members highlighted the need for translations of the VICH GLs as well as the training for some countries not only on the VICH GLs but also with regards to the responsibilities or mandates of VICH, Codex, the OIE or the regulatory authorities.

It was pointed out that the VICH SC had reviewed the question of who could provide training to Forum members and the conclusion was that careful account must be taken of the mandate of each organisation and their limited resources. OIE collaborating centres are already providing training through the OIE Focal points on Veterinary Products meeting, but it was recognised that often the representatives that attend these OIE Focal Points meetings are not the experts who actually review the registration dossiers.

It was decided that the VICH Steering Committee will set up an ad hoc working group to develop an overall training strategy, comprising members of the Forum, which will work by electronic procedure only.

Post-meeting note: the members of the working group are:

Chair: FDA - S. Vaughn
JMAFF: S. Iwamoto
OIE: J.-P. Orand and S. Munstermann
FDA: M. Smith
EU : K. Grein
ANZ: tbd
IFAH-Europe: R.A. Clayton
IFAH: B. Freischem
VICH Secretariat: H. Marion
Forum members:
Y. Kosenko (Ukraine)
M. Moreo (South Africa)
Camevet: tbd

South Africa recommended that any training provided by VICH should not be kept only in the scope of VICH but rather focus on the registration processes and the requirements for quality, safety and efficacy of Veterinary Medicinal Products. Furthermore, South Africa pointed out that Forum countries need to understand what a VICH GL is, so that the data presented in a dossier based on a VICH GL is understood by the assessors and experts and that studies are not repeated unnecessarily.

5/ Discussion of issues identified in the OIE survey

Covered above

6/ Feedback on practical issues related to specific VICH guidelines arising in the Forum members' countries/regions

Questions from Argentina

In the absence of Argentina, the VICH Secretariat presented a summary of the questions raised in the presentation provided by Argentina:

Q 1/ Argentina would like to know, if it is already established how VICH's GLs would become OIE Standards.

OIE explained that the OIE 5th Strategic Plan 2011 -2015 states in paragraph 168 that "The Laboratories Commission will seek to extend the coverage of the programme on International Cooperation on Harmonisation of Technical Requirements for Registration of Veterinary Medicinal Products (VICH) to all OIE Members by encouraging the OIE to adopt, if possible, parallel standards proposed by VICH." The VICH Outreach Forum has been created to extend the coverage of VICH. OIE does not intend to develop different OIE standards, but has as its goal to make reference to VICH GLs.

Q 2/ Argentina would like to know the reasons why the observer countries haven't been incorporated yet as VICH member countries

ANZ explained that the observer status in VICH is very similar to the full member status with the exception that Observers do not have a vote: Observers participate fully in SC meetings and in the EWGs that are relevant to each Observer; Observers adopt VICH GLs to the full extent possible for them.

Korea asked how national GLs should be harmonised to meet VICH standards, for example to test the safety of products.

SC members explained that one of the goals of VICH is that an application for a marketing authorisation, with all the studies put together in one region, could be used in another country without the dossier being put together again or studies duplicated. This also helps those countries that do not have the necessary resources to repeat the scientific assessment of the studies. One of the potential outcomes of the Outreach Forum is to encourage countries to accept assessments by other countries by helping to understand how the guidelines are developed and how dossiers are assessed in other countries.

UEMOA explained that to market a product in 1 of its 8 member countries, it must have been evaluated by the UEMOA authority, as there is no national licensing authority in the UEMOA member countries.

Q 3/ Argentina would like to know whether future work of VICH will cover the experimental design for testing of residues in honey. If so, Argentina would like to know if it is possible to participate in the preparation of the guideline that will deal with that subject.

SC members confirmed that the work to develop a VICH GL on Metabolism and Residue Kinetics in honey will be launched and that Outreach Forum countries can participate in VICH Expert Working Groups if the proper expertise is available in the country. VICH has established precise criteria regarding the expertise, the fluency in technical English, the long term commitment to participate in the activities of VICH EWGs and to implement the GL.

JMAFF explained that the requirement of fluency in English is essential; Japan has therefore decided to pay for their interpreters whenever it is necessary.

Q 4/ Request for clarifications of the definitions in the Camevet Concept Paper

The representative of Camevet explained that the definitions document is a first draft that will be sent to the Camevet countries' focal points for finalisation within 3 months.

It was pointed out that it is not in the scope of VICH to define terms. Definitions of terms are established by each regulator in the countries. Regulators from VICH countries nevertheless offered their help by providing their own definitions of generics to Camevet. Several Latin American countries do not have enough laboratory capacity to carry out the required bioequivalence studies for all product concerned, but it is an issue to be solved within Camevet.

A discussion took place on the definition of a generic product and the question of how to overcome the problem of insufficient lab capacity to fulfil the required testing. The concept of using bibliographic applications was mentioned as a potential solution to overcome the lack of resources. Some countries reported that they already accept studies done in other countries. South Africa for example accepts preclinical and efficacy studies for certain compounds (anthelmintics) but evaluates on a case by case basis if additional studies are needed.

Russia questioned why the VICH GLs are not included in the OIE standards yet. OIE explained that the 5th Strategic Plan's initial long term vision was that the VICH GLs would be embraced by the rest of the world and that OIE would reflect in which way this objective could be met. It has however been an overambitious approach and it appears that there was primarily a need to consider the specific needs of the countries and the level of development of each country. Today it is no longer an OIE objective to add a new chapter to the Terrestrial Code which would include all the VICH GLs but rather to refer to VICH GLs when necessary.

Q 5/ Argentina would like to know if there is a draft VICH GL on bioequivalence
The reply was yes.

Presentation from South Africa

South Africa presented an update on the promotion/acceptance of existing VICH GLs in South Africa. The participants noted the usefulness of a survey conducted among stakeholders in South Africa and OIE recommended that other countries should also run surveys with their national stakeholders. South Africa mentioned further that it intends to organise workshops where one of the discussion topics would be the acceptance of globally recognized standards, one of which would be the VICH GLs.

Presentation from Russia

Russia detailed the registration process for vaccines

India recommended clarifying the link between VICH and Codex, as Codex is a well established and recognised body. FDA explained that the role of Codex is to establish food safety standards such as ADIs and MRLs, and some Codex guidance define how to use these ADIs and MRLs (e.g. "How to establish a residue control program"). On the other hand VICH's purpose is to develop harmonised GLs on the design of the studies needed to generate the data for the establishment of an ADI or MRL. The aim of VICH is therefore to have a harmonised approach so that when a study is generated in one part of the world, it can also be accepted in another part.

OIE added that the 3 organisations (Codex, VICH and OIE) work in parallel but talk also to each other to prevent overlaps.

IFAH-Europe referred to the VICH explanatory document that explains the differences between the 3 organisations and is available on the VICH website in several languages.

Chinese Taipei reported that translations of GLs in Chinese have been started but recognised that it is a very difficult task because of the many technical details contained in the GLs. Chinese Taipei will use VICH guidelines as references for amending its national guidelines. Chinese Taipei suggested developing VICH guidelines on the efficacy and MRK tests for disinfectants used in food-producing animals and also to set up a Q&A page for Forum members on the VICH website.

Acceptance of tests done in another VICH region

The EU confirmed that it accepts studies done in another VICH region if the studies have been conducted following the VICH GLs, or EU requirements if there is no relevant VICH GL. New tests may however be required if diseases (e.g. parasite species), animal husbandry systems or geographical conditions differ between regions, e.g. for parasiticides depending on the parasite situation in the region where the original tests were made.

FDA explained that the US require the raw data to reconstruct the studies, but the differences between the US and the EU are not significant enough to force the Market Authorisation Holder to repeat the studies; most original studies are accepted, except effectiveness studies when there are substantial differences in animal breeds or significant differences in the production management of food producing animals.

7/ Update on the promotion/acceptance of existing VICH GLs in the Forum members' countries/regions since the last meeting

Covered above

8/ Collaborating and sharing of translations of guidelines

OIE reminded the participants that the translations of several GLs are available as pdf documents on the OIE website. The OIE survey confirmed the strong demand from Outreach countries for making translations of VICH GLs available. In particular, UEMOA has asked for the translation into French of 7 GLs. It was noted that 4 of these requested GLs are already available in French. If UEMOA would agree to do a first draft of the 3 remaining ones, the French OIE collaborating center offered to check them.

Camevet will check with its member countries to see if they can provide translations in Spanish of the 3 GLs requested by Latin American countries and OIE would then review these translations.

OIE offered to translate the three priority GLs (3R, 9, 29) into Spanish.

Russia indicated that several VICH GLs will be translated into Russian in the near future.

China indicated that it will use the existing translations of the ICH quality GLs which are very similar to the VICH ones, as a starting base to translating the VICH GLs. China intends to translate further specific VICH GLs which FDA offered to check using Chinese-speaking experts in CVM.

OIE asked all Forum countries to send any translations they have done to OIE so that these can also be placed on the OIE website.

Session 2: Better understanding of VICH GLs and the VICH Process

9/ Role of VICH and VICH GLs in marketing authorizations – presentation and discussion

The EU explained the role of VICH and VICH guidelines in marketing authorisations. The presentation explained the principles for the assessment of marketing authorisation dossiers and the role the specific data play for the marketing authorisation as result of the assessment. The EU reiterated in particular that VICH provides harmonised technical requirements for registration (or

marketing authorization) which define the data to be provided to the responsible authority for the assessment and the decision on the application for registration.

In the discussion, Brazil mentioned that the Market Authorisation Holder has to prove the quality regardless of whether it is an original and a generic product.

The EU explained that an original product benefits from a certain number of years of regulatory data protection and that in principle the quality, safety (including partly the residue trials, and the environmental safety) and efficacy by bioequivalence of generic products must be confirmed.

The participants exchanged their views on the definitions of original and generic products.

IFAH-Europe mentioned that a paragraph on new and generic products is included in the description document of VICH i.e.

- A new active substance is a new product with a full dossier required
- A new product (e.g. new indication, new pharmaceutical form) with a known active ingredient must also have a full dossier
- A generic product need only prove the bioequivalence and provide the quality part of the dossier.

Moreover a generic product can only be developed at the end of the patent and/or regulatory data protection period of the original product.

FDA explained that the protection of intellectual property through patent protections and regulatory data protection/exclusivity periods are necessary to enable a pioneer product manufacturer to cover the initial investment.

It was however noted that this is not the role of VICH but of each country's intellectual property protection legislation.

The participants then discussed the legislative differences in the different countries and recognised that there are deficiencies in many basic national legislations that do not allow to set up a regulatory system as stringent as the ones existing in the EU, Japan and the USA.

OIE has the possibility to provide support to a country wishing to change its legislative systems through its Legislation Support Programme.

It was considered important that a country not only has a solid animal health act, but also has detailed legislation in place covering the registration procedures of veterinary products.

UEMOA's system is based on the harmonisation of national legislations, enabling it to give only 1 authorisation for the 8 member countries; 1 commission of experts gives the authorisation for the 8 countries, which only have the responsibility for the controls at the national level.

UEMOA has 10 experts to evaluate the dossiers and provide the conclusion of whether a product can be authorised or not.

10/ Example: overview and explanation of specific VICH GLs: Stability GLs

FDA described the specificities of VICH Quality GL3 (Revised) on Stability Testing of New Drug Substances and Products. Camevet explained that its member countries have different climate situations and therefore have developed their own requirements for stability testing.

It was proposed to extend the VICH GL3 (R) to cover the 4 climatic zones but the EU pointed out that in this case it will oblige the local manufacturers to provide data on all 4 climatic zones for each product. FDA mentioned that when a non VICH country adopts VICH GL3 (R) it must specify on the first page which climatic zone it intends to cover. South Africa suggested that a national

guidance document for a product intended to be marketed globally should cover the 4 climatic zones.

FDA pointed out, however, that VICH GLs are only recommendations to the stakeholders and a Market Authorisation Holder is allowed to deviate from the GL if he/she can provide a solid justification for the deviation.

FDA explained the development of Guidelines in general in the USA.

11/ How Forum members can comment on VICH concept papers and VICH draft guidelines, and making these comments available to VICH

The EU, JMAFF, FDA and APHIS explained how the consultation on a draft VICH guideline is organised in their region and how the comments can be collected.

Session 3: Conclusions

12/ Feedback on the meeting from Forum members and open discussion – Suggestions for topics for the 3rd VICH Outreach Forum meeting

The VICH SC members acknowledged that the results of the OIE survey are very useful and have helped the SC to clarify which topics are in the scope of VICH.

UEMOA stressed that the quality of translations is of utmost importance for the application of a full dossier as well as for variations.

The participants agreed that product quality is very important and these GLs should be translated as a priority. Regarding training, UEMOA requested training for several of its own experts, even at their own cost.

Chinese Taipei suggested that it would be useful to have a question and answer document on the VICH website, which summarises the discussions held at the Outreach Forums.

China pointed out that VICH has no recommendation to evaluate the efficacy of both biological and pharmaceutical products with multiple active ingredients (combination products).

The Chair strongly recommended that Forum members should reach out in their countries to collect comments on VICH draft GLs under public consultation.

South Africa requests comments from OIE Focal Point contacts and from a group of other stakeholders, depending on the topic of the document. Comments may or may not be provided, also depending on the topic of the document. If the draft GL is not inclusive of other regions, there will be no response. That was the case for draft GL51 (Statistical evaluation of stability data) as it concerns specific regions and not global usage. The EU pointed out that GL51 was the first GL disseminated to the Forum and OIE Focal Points, and possibly stakeholders in Forum countries had not heard of VICH before. Moreover, it is a very specialised GL that may not raise the interest of many stakeholders. FDA suggested that the SC may have to consider more that the GLs are now being written for global use and the focus in VICH has changed from the original VICH regions to many more countries.

Camevet confirmed that it will ask its main member countries (Mexico, Brazil and Argentina) to ensure that delegates from the regulators and industry attend the next Forum meetings.

UEMOA asked for the support of VICH in setting up a regional pharmacovigilance system covering the 8 UEMOA countries. The participants agreed that this could also be a topic for interest for Latin America and could be discussed further at a next Forum meeting. IFAH-Europe warned however that VICH members have developed heavy IT systems that non VICH countries may not be able to set up immediately.

It was therefore agreed that future Forum meetings could explain how GLs are implemented and which systems were developed by VICH members to implement some of these GLs.

Brazil highlighted the difficulties encountered by Latin American countries to reach a complete harmonisation of the registration processes:

- Not enough private labs are available for the clinical trials to assess the efficacy;
- Not enough experts are available to do GMP inspections;
- The pharmacovigilance is not established yet.

Multinational companies have the choice to run their trials in another country, but it is difficult for the local companies.

13/ Conclusions and Next steps

Training

The SC will set up an ad hoc working group on training including Forum members which will develop a proposal for a strategy and work by electronic procedure only.

Translations

Efforts to translate VICH GLs are a key priority for the success of the VICH Outreach activities. Countries having existing translations should make them available on the OIE website.

Concept papers and draft GLs

VICH will make the concept papers available to Forum members.

Explanations on how a concept paper is drafted will be made available to the Forum members. It was noted that the demands vary depending on each country's individual situation.

Consultation on draft GLs

In reviewing and preparing comments on draft VICH GLs countries may wish to consider their current and resulting future requirements.

How can VICH help countries' stakeholders to understand which GLs would be the most beneficial for them?

Participation in EWGs

Forum members can nominate active participants with adequate expertise and language proficiency to some VICH EWGs, provided the members have a clear intension to implement the respective guideline in the country/region.

14/ Confirmation date and venue of 3rd VICH Outreach Forum meeting

On 12 & 13 November 2013 in Auckland, New Zealand.