Upcoming CMC Strategy Forum Latin America: CMC Conversations - CASSS

Changes post approval of biological products in Perú: Regulation and challenges

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DIGEMID, Perú

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DIGEMID

- National authority for pharmaceutical products, medical devices and health products referenced in Law 29459.
ORGANIZATION OF THE REGULATORY FRAMEWORK FOR CHANGES POST APPROVAL OF BIOLOGICAL PRODUCTS

LAW

- Law 29459 : Sanitary Registry (SR) and Conditional Sanitary Registry (CSR)
  Art. 14.- Updating Sanitary Registry (SR)

REGULATION

- Supreme Decree: 016-2011-SA and amendments (Sanitary Registry)
  Art. 36° Pharmaceutical product changes
- Supreme Decree: 011-2016-SA (Biotecnological products)
- Supreme Decree: 011-2016-SA (Biosimilar products)
- Ministerial Resolution N° 893-2019/MINSA : Major changes in pharmaceutical products with health registration
- Supreme Decree: 002-2021-SA and amendments (Conditional Sanitary Registry)
- Supreme Decree: 020-2021-SA (Vaccines)
- Supreme Decree: 011-2023-SA (Other Biological products)- Valid until November
ROUTE OF AUTHORIZATION

SANITARY REGISTRY

- 5 years and renewable.
- Pharmaceuticals, medical devices and Health Products (NSO) with complete data (*).
- 1 Manufacturer and country
- Post registration changes

CONDITIONAL SANITARY REGISTRY

- 1 year and renewable up to 4 times
- Medicines and biological products with fase III in course
- > 1 manufacturer /country
- Post registration changes and specific obligations

(* Orphan drugs in HSC phase II in course is acceptable with annual obligations)
BIOLOGICAL PRODUCTS

IMMUNOLOGICAL PRODUCTS
- Vaccines, allergies and serums

BIOTECHNOLOGICAL PRODUCTS
- DNA Recombinant techniques
  - Monoclonal antibody and hybridoma techniques
  - Other methods determined by the ANM in accordance to the advance of science

DERIVED FROM HUMAN BLOOD AND HUMAN PLASMA

OTHER BIOLOGICAL PRODUCTS

Legal Requirements
- CMC of API and finished product.

RMP
- Preclinical and clinical studies.

CTD Format
- Module 3, 4 and 5 in English

Biosimilar applications

International Recommendations

Reduce time evaluation for specific products approved in HSC/EMA/WHO (180 days)

ADVANCE THERAPIES
BIOLOGICAL PRODUCTS APPROVED

RESULT

488 BIOLOGICAL PRODUCTS APPROVED UNTIL AUGUST 2023

- 396 approved with CTD
- 66 in renewal
- 24 authorized for health interventions (international cooperation organizations)

HIGH HEALTH SURVEILLANCE AUTHORITIES
- 264 products are from EMA
- 57 products are from the United States
### Classification of Changes

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Assessment Deadlines</th>
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</thead>
<tbody>
<tr>
<td>Changes of minor importance</td>
<td>Changes that have minimal or no impact on the Quality, safety or effectiveness.</td>
<td>Automatic “communications format” (*)</td>
</tr>
<tr>
<td>Changes of major importance</td>
<td>Changes that may have significant impacts on Quality, safety or effectiveness</td>
<td>60 days</td>
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</tbody>
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- Change of manufacturer of API and Finished Product (SCR)
- Manufacturing process change
- Change in the shelf life
- Change in packaging material
- Change of technical specifications
- Change of labeling

(*) Changes not included in communications format are evaluated case by case

**Minor or major change case by case**
INTERNATIONAL RECOMMENDATIONS

Vaccines, Biotechnological products, Biosimilar
Other biological products
CHANGES ATTENDED OF BIOLOGICAL PRODUCTS

CHANGES OF MAJOR IMPORTANCE ATTENDED BY YEAR

- In 2022, 94% of the total changes were attended.
- In 2023 there is progress of 50%.
In 2022, 100% of the total changes were attended.

In 2023 there is progress of 76%.
ACTIONS TO ADDRESS CHANGES POST APPROVAL APPLICATIONS

- Hiring human resources for the evaluation of changes
- Meetings of orientation to Marketing Authorization Holder (MAH).
- Prioritization of changes related to batch release, re-registrations, conditional sanitary registry
- Assignment of changes related to the same product or types of products to the same reviewer
- Regular communication with MAH during the evaluation of applications
CHALLENGES ADDOPTING WHO GUIDELINES

Differences in the classification of changes in DIGEMID, EMA and WHO

Requirements in the law of general administrative procedure and regulatory quality analysis that make it difficult to adopt the WHO guidelines

<table>
<thead>
<tr>
<th>DIGEMID - PERÚ</th>
<th>OMS</th>
<th>EMA</th>
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<tbody>
<tr>
<td>Minor</td>
<td>Minor</td>
<td>Type IA (Minor)</td>
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<td>Mayor</td>
<td>Moderate</td>
<td>Tipo IB (Moderate)</td>
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<td></td>
<td>Major</td>
<td>Tipo II (Major)</td>
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“Supporting data (requeriments) depends on description and conditions”
CHALLENGES IN THE EVALUATION OF POST APPROVAL CHANGES

There is no specific regulation for description and specific requirements of post-registration changes.

We are finalizing a regulatory transition that involves the registration of biological products with CTD format.

Regular meetings with Marketing Authorization holders due to observations in applications.

Companies don’t submit the same documentation with which the change was authorized in HHSA.

Most of the Human Resources are allocated to the evaluation of the Registration and Re-registration processes.
PERSPECTIVES

- Modification of our regulation with a view to regulatory convergence.
- Improve the capability of human resources with the cooperation of agencies with more experience.
- Incorporate reliance procedures for products approved in HHSA (attention to requests in less time).
- Facilitate information related to recognition through digital resources.
- 100% of Biological products approved with CTD
- Provide orientation to MAH in webinars, meeting, etc.
THANK YOU!
Muchas gracias!

Inquires/Questions:
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