Instituto de Salud Pública
Ministerio de Salud
Gobierno de Chile

132 años 1892 - 2024

Starting the reliance pathway for biological products The ISP Chile experience

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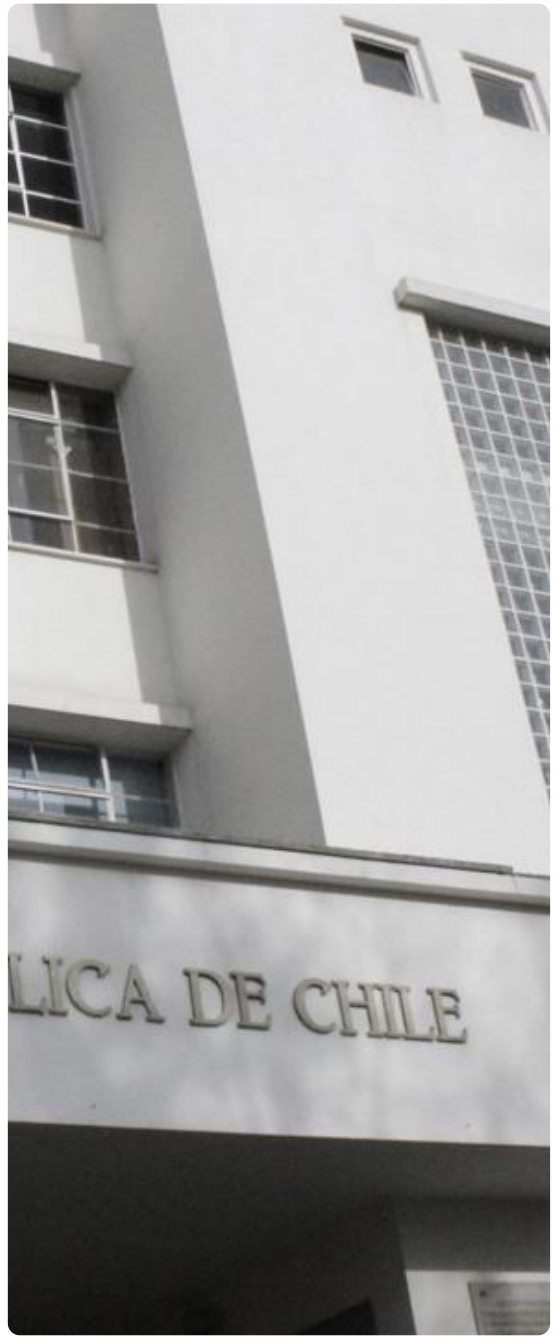
Disclaimers

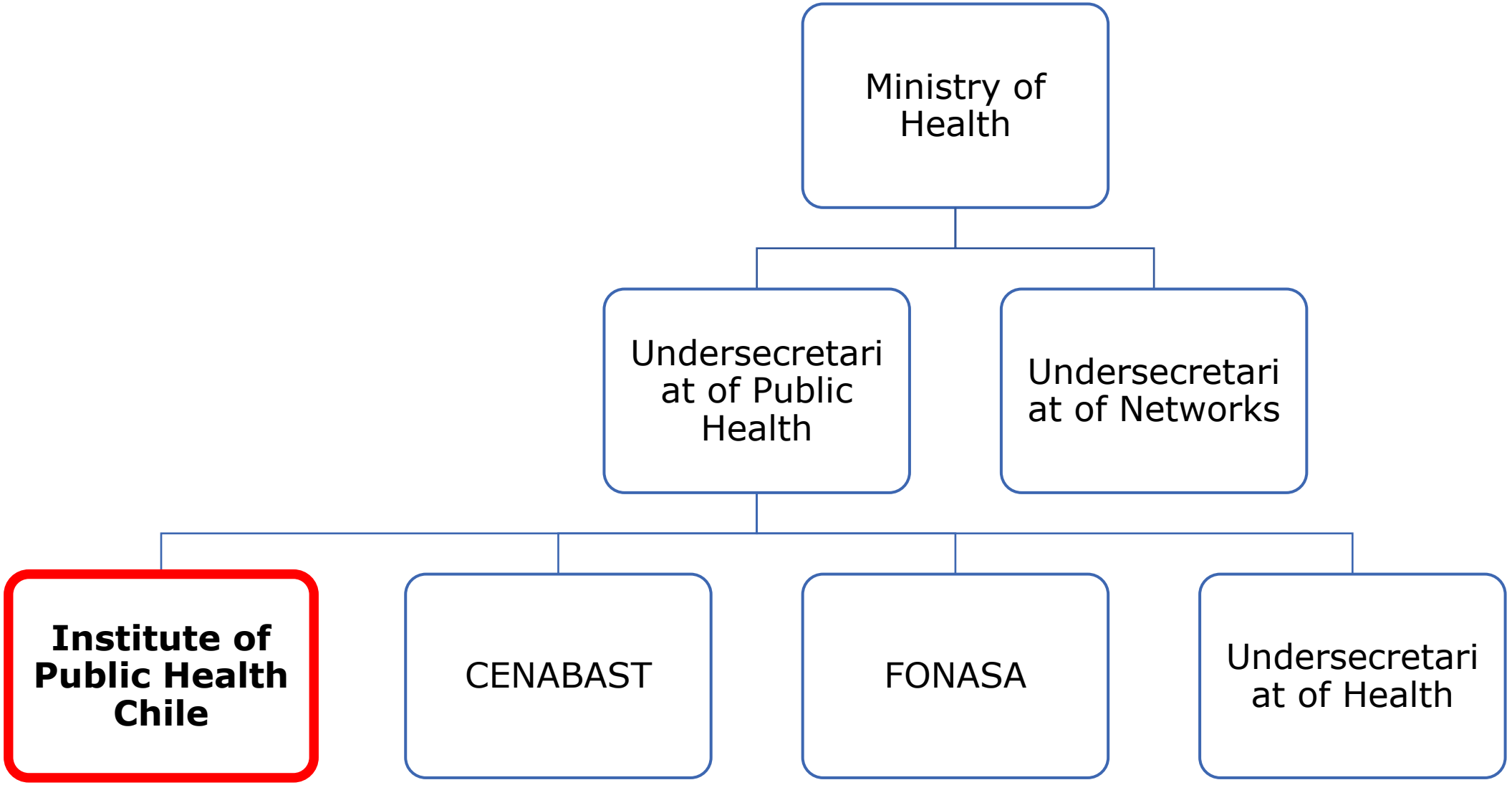
- The views expressed in this presentation do not convey official ISP Chile policy or opinions.
- The information in this presentation relates to biological products and the pilot plan of reliance launched during October 2024.

Outline of the session

- ✓ ISP Chile.
- ✓ Evolution of biological products evaluation in Chile.
- ✓ The biological products team right now.
- ✓ Challenges.
- ✓ The current legislation in Chile.
- ✓ The reliance pilot plan.



ISP Chile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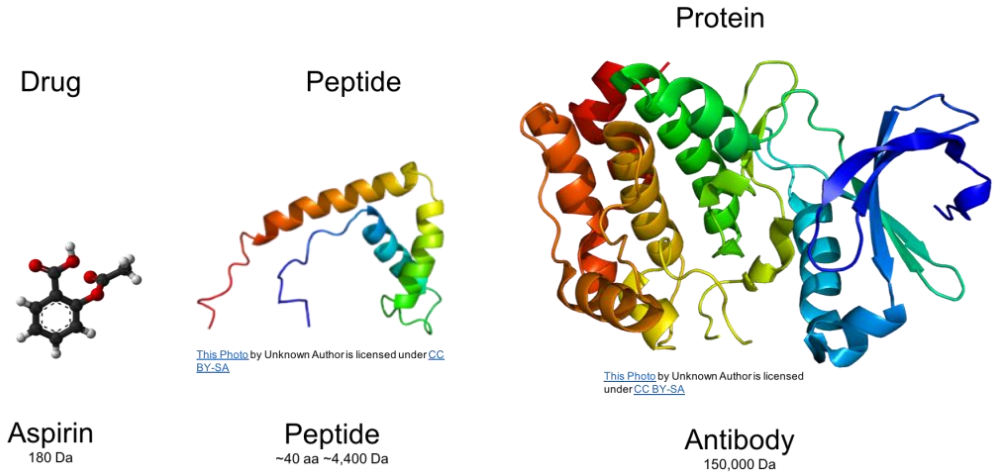
Evolution of biologics through time

- ✓ In the 80’s there was no specific regulation about biologics.
- ✓ In the 90’s the D.S. 1876/95 define biological products.
- ✓ Our current legislation (D.S. 3/10) classified different biological products and biotherapeutics.
- ✓ During 2014 a specific regulatory framework for marketing authorization was created.
- ✓ After two years the biologics team was created, driven by PAHO recommendation.
- ✓ In 2020 we created a full biologics team, including the CMC, safety and efficacy review.

Team of marketing authorization for biological products

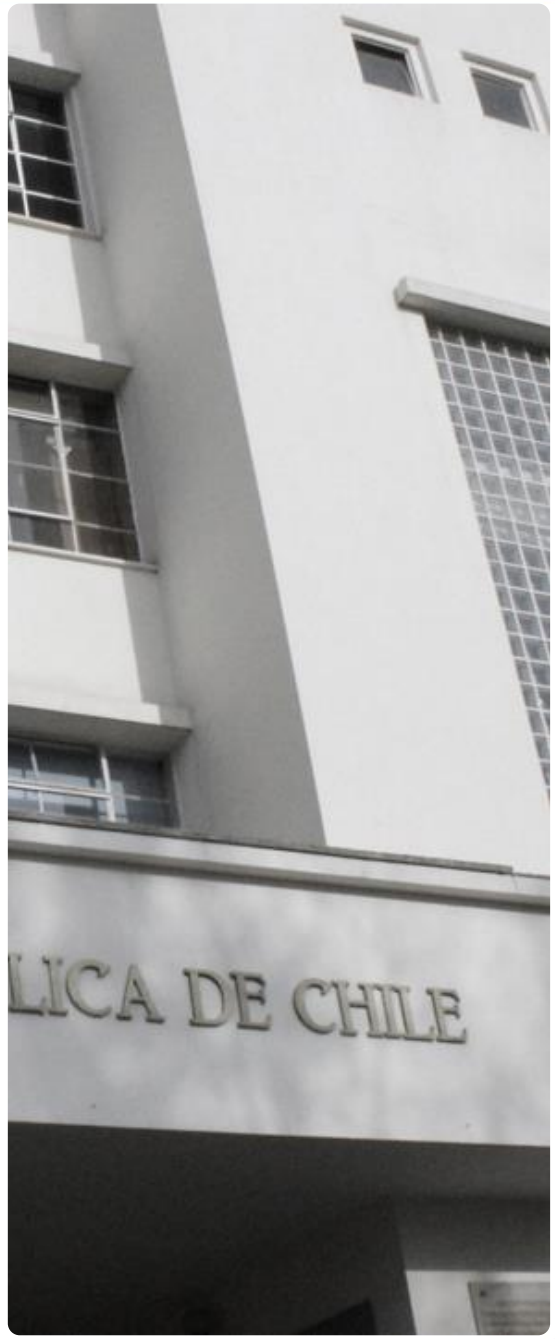
- 4 reviewers of safety and efficacy
- 6 reviewers of CMC
- In charge of the evaluation of all products considerer biologicals in Chile: Vaccines, monoclonal antibodies, blood products, proteins, antibiotics, and gene therapy products*



*The legislation in Chile do not include advance therapies yet, gene therapy is the only one included

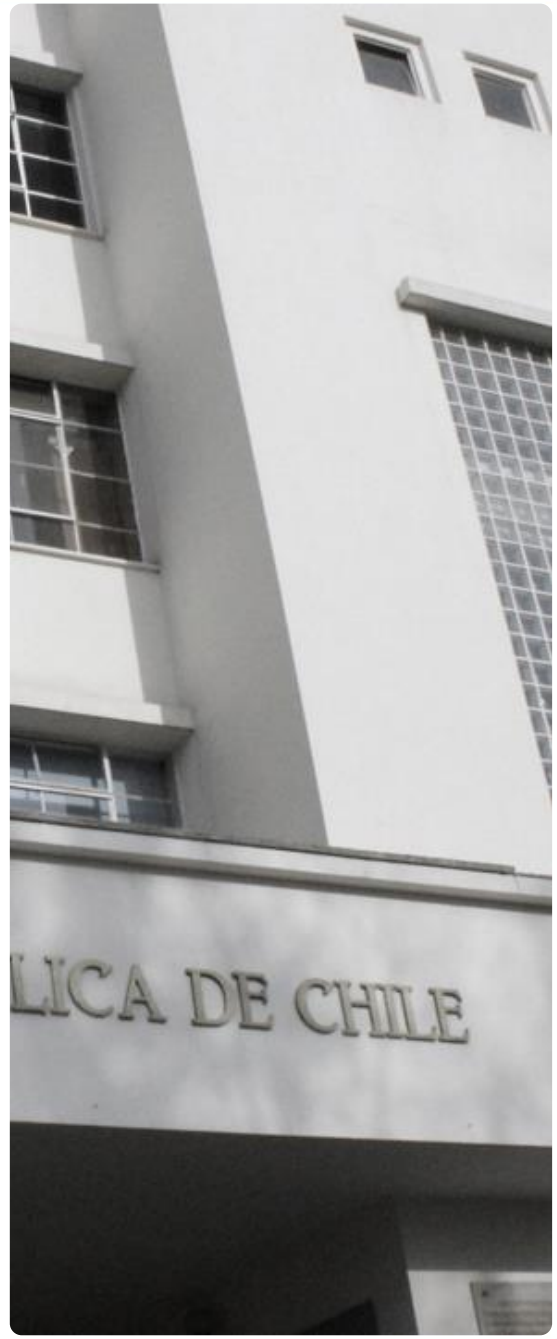
Functions of the team

- ❑ Marketing authorization.
- ❑ Post-approval changes
- ❑ Exceptional authorizations
- ❑ Other functions



The problems we are facing

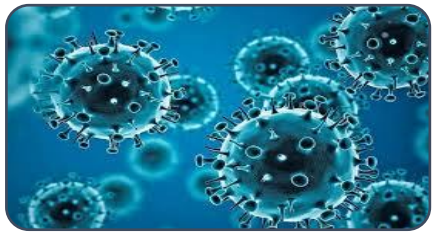
- Huge delay in the review of marketing authorization.
- Currently, we are not capable of reviewing the number of products that enter every year.
- Stressed work environment due to this delay
- Other functions of the unit are also experienced delay



Reasons for the delay

Not enough staff

- The number of biological products that come in cannot be evaluated by the team (by the law we have 6 months for all types of products)



Pandemic

- Review of COVID-19 vaccines

Products complexification

- Advanced therapies, ADC, bispecific antibodies, inmunocheckpoint, etc.

Low salaries at ISP compared with industry

- Migration of trained colleagues

One of the possible solutions: RELIANCE

WHO Good Reliance Practices

The act whereby the regulatory authority in one jurisdiction takes into account and gives significant weight to assessments performed by another regulatory authority or trusted institution, or to any other authoritative information in reaching its own decision.

- Importance of **international cooperation** to ensure the safety, quality and efficacy/performance of locally used medical products
- **Make best use of available resources and expertise**, avoid duplication and concentrate regulatory efforts and resources where most needed

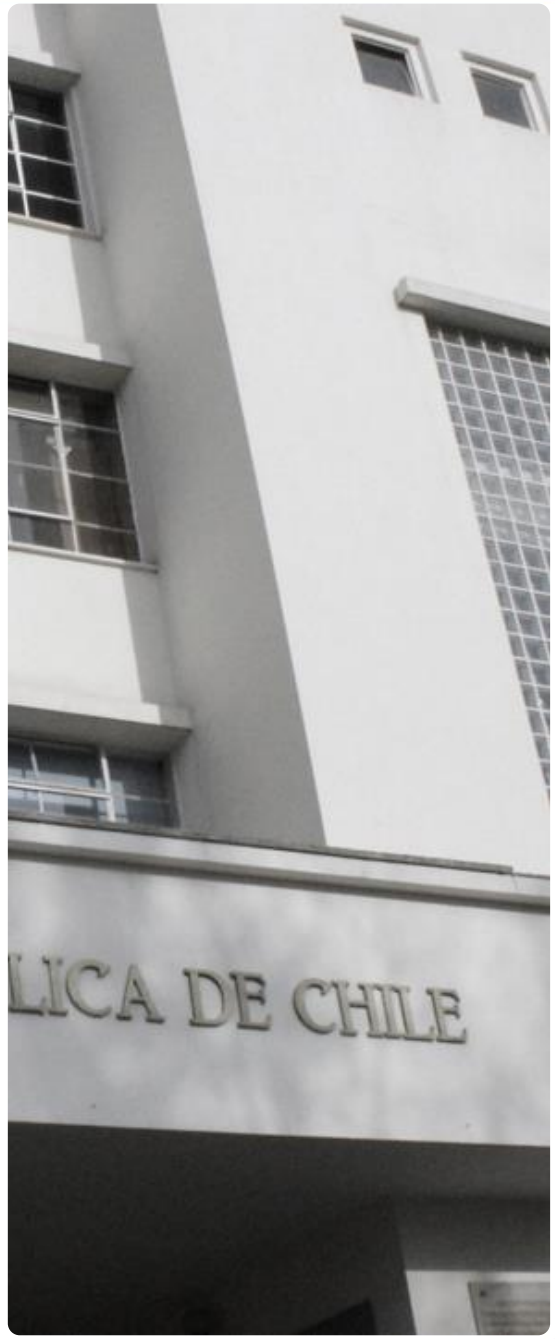
https://www.who.int/publications/i/item/55th-report-of-the-who-expert-committee-on-specifications-for-pharmaceutical-preparations

Which authority do we considered first

- In 2022 they published RDC 750 which established a temporary optimized review.

- Not applicable for:
  - Vaccines
  - Biological products with clinical trials phase 2 or with not completed phase 3.

- During July 2024, this method was derogated by the RDC 886.



https://www.gov.br/anvisa/pt-br/assuntos/noticias-anvisa/2024/anvisa-aprova-norma-para-aproveitamento-de-avaliacoes-de-autoridades-estrangeiras-equivalentes

We had to keep looking

HSA
Health Sciences Authority

MHRA
Regulating Medicines and Medical Devices

TGA Health Safety Regulation

Comparison between these regulatory agencies

Applicability

Parameters	HSA, Singapore	TGA, Australia	MHRA, United Kingdome
Reliance method	Verification	COR A: < 1-year post-approval reference NRA COR B	A: application submitted up to 2 years post-approval by NRA of reference. B: application submitted up to 10 years post-approval by NRA of reference.
Applicability:	• New product application • Complete approval, not conditional.	• New product, biotherapeutics, and biosimilar • Complete approval, not conditional.	• Biotherapeutics and biosimilars approved by the reference NRA. • Complete approval, not conditional.
Not considered:	•Vaccines •Withdrawn or cancelled products.	•Product whose application was delayed, deferred, rejected, denied or withdrawn in any of the countries where it is registered.	•Products approved by reliance or recognition •Products approved by emergency authorization. •Withdrawn or cancelled products.

Comparison between these regulatory agencies

Information requested

Parameters	HSA, Singapore	TGA, Australia	MHRA, United Kingdome
References NRAs	Health Canada, TGA, PMDA, HSA , Swissmedic, MHRA, FDA, EMA		
Information to be presented	**CTD format, modules 1 to 4; the same evaluated by the reference NRA.** **Questions and reports generated by the reference agency** **Reports of post-approval changes** **Official approval letter** **Public domain reports are not accepted.**		
Review times	•Admissibility: 50 business days. Review: 60 business days.	•COR-A: 120 business days. •COR-B: 175 business days.	•Admissibility= 14 days •Review: Via A: 60 calendar days. Via B: 110 calendar days.

PROPOSAL TO THE INFORMATION TO BE PRESENTED IN CHILE

1. CTD format, modules 1 to 4; the same evaluated by the reference NRA.
2. Questions and reports generated by the reference agency
3. Reports on post-approval changes
4. Official approval letter
5. Public domain reports are not accepted.

1. We are proposing the creation of 3 groups (1, 2 and 3), based on the time of the approval in the reference NRA:
2. Group 1: Full reliance
3. Group 3: Verification
4. Group 3: Normal review

Final considerations

- ✓ The need for implementation of mechanisms to diminish review times of medicines (especially biologics) by small NRAs.
- ✓ Reliance cannot be used for all products.
- ✓ Explore and advance in different pathways such as conditional approval or rolling review
- ✓ Communication and support between NRAs of our region, and around the world.
- ✓ The need for training of regulators because of the increase of complex products such as cell and gene therapies.

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- Jaqueline Campos

Chile *tiene* al ISP

Thank you!