Global Generic Dossiers are not so Generic

Kalpana Nimkar, Ph.D.

Associate Director, Global Regulatory Affairs

Hospira, a Pfizer Company

Understanding available Regulatory Pathway(s)

- Major Agencies have a very well established regulatory framework
- Depending upon the situation, a regulatory pathway is decided for registering a generic product
- Data requirements, and timeline change significantly
- Pre-submission meetings are very common
- Agencies do communicate with the potential applicants to offer additional clarity, if needed

Regulatory Pathways in US for registering Generic products

- **ANDA**
  - Pathway for registering a Generic that is similar to RLD
- **Petitioned ANDA**
  - Pathway when proposed Generic product differs from the RLD in its dosage form, route of administration, strength, or active ingredient (in a product with more than one active ingredient),and FDA has determined that safety and efficacy studies are not necessary for the proposed drug product

Regulatory Pathways in US for registering Generic products

- **505(b)(2)**
  - Hybrid Pathway between ANDA and NDA
  - Applicant carries out some Clinical evaluation
  - To register new indications for existing approved products,
  - To register changes in dosage form, strength, formulation, dosing regimen or route of administration, New combination products, Prodrugs of an existing drug
  - In some cases, drugs with new active ingredients

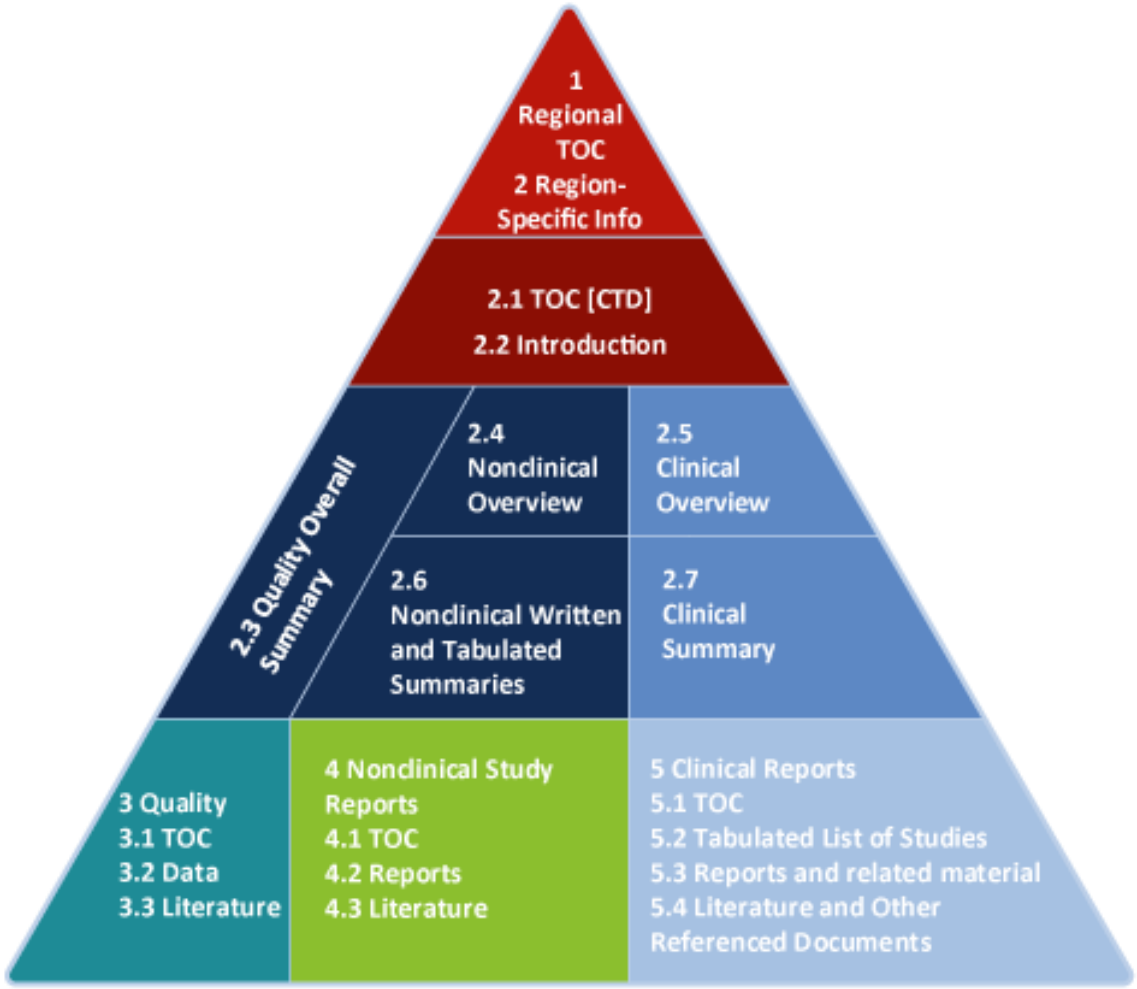
Regulatory Pathways in EU to register simple Generic product

- National filing is to register product in one single market
- Centralized Procedure (CP) is to register product in all EU member states
- Decentralized procedure (DCP) is to register product in multiple but select member states
- Mutual Recognition Procedure (MRP) to register product in multiple member states if the product is already approved in at least one member state
- Difference is intended markets, cost, review cycle, and approval timeline

Different pathways, regulations, and requirements in harmonized format

- International Council for Harmonization (ICH)
- Multi regional organization dedicated to harmonize format and expectations of a regulatory dossier
- Formalized in 1990
- EU, US and Japan
- Collaboration among industry and regulatory authorities
- To minimize redundant research and standardize technical guidelines and requirements
- Harmonized Guidance documents for Safety, Quality and Efficacy
- Standardized dossier format--Common Technical Document (CTD)

Typical structure of a Dossier in CTD format



Pfizer больше чем ОБРАЗОВАНИЕ

CTD Modules in a Dossier

- Complete Dossier contains 5 “Modules”
- Only Modules 2-5 are “CTD”
- Module 1-Region specific but always included in complete CTD structure
- Module 2-All summaries and Overviews
- Module 3- Quality (CMC)
- Module 4-Preclinical (Nonclinical such as PD, PK, ADME)*
- Module 5-Clinical

Common Technical Document

- IT IS :

  -A common harmonized FORMAT for applications for preparing marketing authorizations

  -A TEMPLATE for presenting data in the dossier.

- IT IS NOT:

  -A statement of data requirements for applications

  -Data requirements market specific and specified by Health Authorities (Ex. FDA, TGA, EMA, ANVISA, COFEPRIS, Health Canada, MCC etc.)

  -Format is harmonized but contents of CTD sections may be market specific

Highlights of CTD Format

- Developed by International Council for Harmonization (ICH)
- It is an agreed-upon common format for the “modular” presentation of data, summaries, and reports
- CTD is not a “Global Dossier”!
- CTD is organized into five sections

  -Organization of all “modules” are harmonized except Module 1

  -Module 1 houses region specific, mostly administrative information

Advantages of submitting dossier in CTD format

- More “reviewable” applications due to standardization
- Complete, well organized submissions
- More predictable format
- More consistent reviews
- Easier exchange of information
- Facilitates electronic submission
- Reduced time and resources for submission

Module 1- Administrative Documents

- Significantly varies from market to market
- Often a speed-breaker and can be a showstopper
- Requires careful strategic planning especially in emerging markets
- Upfront understanding of documents and lead time to procure, is a huge time saver
- Typical information includes
  - Forms and cover letters
  - Declarations
  - LOAs, LOCs, POAs (where applicable)
  - GMP certificates and manufacturing licenses (multiple)

Module 1- Administrative Documents

- Labeling (proposed labels, comparative labels)
- Proposed Artwork (secondary packaging)
- SmPC
- Certificate of Pharmaceutical Product (CPP)
- Supply Agreements
- Samples and related documents

Overall Organization of Module 2 in Generic Dossier

2.1	Table of Contents	
2.2	Overall Introduction to CTD	
2.3	Quality Overall Summary (QOS)	Main content of the Generic Dossier is Module 3-QOS is included
2.4	Non Clinical Overview (NCO)	Literature based NCO is required by EU, AU and some other agencies
2.5	Clinical Overview (CO)	Literature based CO is required by EU, AU and some other agencies
2.6	Summary of Non Clinical Study	Tabulated Summaries of non clinical studies by sponsor
2.7	Summary of Clinical Study	Tabulated Summaries of clinical studies by sponsor-included when BE studies are conducted by the sponsor

Questions??

Pfizer больше чем ОБРАЗОВАНИЕ