SOUTH AFRICAN HEALTH PRODUCTS REGULATORY AUTHORITY

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Subject: Request for comment on draft Professional Information (PI), Patient Information Leaflet (PIL), Clinical, Pharmaceutical & Analytical (P&A) guidelines, and Summary of Critical Regulatory Elements (SCoRE) document

Date: 15 April 2019

Comment period: 15 April – 15 May 2019
Comment submissions: backlog@sahpra.org.za
Subject line for email: [Comments on Draft Guidelines] Organisation name

One of the critical priorities of the South African Health Products Regulatory Authority (SAHPRA) is to clear its inherited backlog of new medicine registration and variation applications. SAHPRA's Board has committed to achieving this objective within 2 years. In addition, SAHPRA also needs to ensure that such a crisis does not arise again. It is thus imperative that SAHPRA designs and implements new evaluation policies and models for evaluation.

SAHPRA has a mandate to ensure the safety, quality, and efficacy of medicines available in South Africa. Part of this responsibility is revising its guidelines to reflect global regulatory best practices and to appropriately manage the regulatory burden on our industry partners.

After consultation with our industry partners, the SAHPRA management team has decided to harmonise certain SAHPRA human medicine policies and procedures with those of the European Union (EU). Harmonisation will align South Africa with global best practices and enable increased collaboration with foreign regulators.

This harmonisation exercise commenced in 2018 with the revision of SAHPRA's key guidelines for the registration of orthodox human medicines. The revisions started with 3 months of intensive review by workshops of SAHPRA employees. After these workshops, SAHPRA launched a previously-announced pilot with selected applicants. The pilot had three objectives:

1. Test and provide feedback on the draft guidelines, policies, and procedures
2. Allow SAHPRA the time to create an operational strategy to capture the process efficiencies from the new guidelines, policies, and procedures
3. Time piloted evaluations to ensure process efficiencies are achieved and identify areas for further improvement

To re-iterate prior SAHPRA policy, no applicant has received or will receive a market advantage from participating in the pilot process.

Key learnings from the pilot have been incorporated into the following documents, which SAHPRA is releasing for public comment:

1. Professional Information (PI) and Patient Information Leaflet (PIL) guidelines
2. Clinical guideline
3. Clinical cover letter

4. Pharmaceutical and Analytical (P&A) guideline
5. Summary of Critical Regulatory Elements (SCoRE) document

These documents are DRAFT documents. SAHPRA has a dedicated team of internal evaluators who are editing these documents on a weekly basis. SAHPRA may change components of these documents prior to the public comment period ending.

1. Professional Information (PI) and Patient Information Leaflet (PIL) guidelines

SAHPRA will fully adopt the EMA format for the PI and PIL, barring certain exclusions due to South African legislation (for example, headings for the scheduling status, name of the medicine, and the holder of certificate of registration). Adopting the EMA format aligns South Africa with global best practice and enables the use of reliance pathways for evaluation. Given the overlap between the EU guidelines and legacy MCC guidelines, the Clinical unit has initially issued harmonised guidelines for the PI and PIL.

Changes to the South African PI format will require edits to SAHPRA's governing act, the Medicines and Related Substances Act 101 of 1965, as amended. SAHPRA has submitted a Regulation 11 amendment to the Minister of Health that would give SAHPRA the authority to determine the format of the PI, but not change the minimum content requirements.

2. Clinical guideline

The Clinical guideline outlines the qualification criteria for the various review types, as well as the associated submission requirements and details of reliance pathways for Clinical evaluations. SAHPRA has committed to increased use of abridged and verified reviews to expedite evaluations. Note that going forward, the Summary Basis for Registration Application (SBRA) will be submitted as part of the Summary of Critical Regulatory Elements (SCoRE). There are more details on the SCoRE document below.

3. Clinical cover letter

This document provides more context on updates to the PI, PIL and Clinical guidelines. The cover letter should be read with these guidelines.

4. Pharmaceutical & Analytical (P&A) guideline

SAHPRA will adopt the EU guidelines for quality and bioequivalence, although Section 5.1 of SAHPRA's current Biostudies guideline will remain relevant. The P&A guideline outlines which other SAHPRA guidelines remain relevant after adoption of EU guidelines and details other requirements specific to South Africa. In addition, SAHPRA will adopt the EU excipient guidelines, replacing the current Alcohol Content of Medicines and Labelling of Medicines Containing Sugar guidelines.

5. Summary of Critical Regulatory Elements (SCoRE) document

The SCoRE is a new summary document designed to facilitate more efficient evaluation of all backlog applications. It serves as the evaluation starting point for reviewers, reducing the need to navigate through the dossier. Applicants will be required to update the SCoRE document and its amendment history when submitting subsequent variation applications, enabling more efficient product lifecycle management.

In addition, the above documentation mentions other guidelines and templates that are still under revision. Outstanding documents will be published for comment shortly, and include the following:

6. Administrative and technical screening checklists
7. eCTD and eSubmission guidelines
8. Good Manufacturing Practice (GMP) guideline

6. Administrative and technical screening checklists

Applications will be thoroughly screened to ensure only high-quality dossiers proceed to evaluation. Applicants will be required to complete and sign checklists that state they meet the requirements for evaluation. Any application that does not meet the requirements will not be evaluated.

7. eCTD and eSubmission guidelines

All backlog applications will need to be resubmitted electronically, either in eCTD or eSubmission format. Updated guidelines will detail the requirements for these submissions, but will only be finalised once the implementation of SAHPRA's new digital system is completed.

8. GMP guideline

Lastly, SAHPRA has updated GMP guidelines to increase the scope of reliance, reducing the number of site inspections required. In order to facilitate rapid clearance of the backlog, SAHPRA will not be conducting international site inspections. International sites require valid GMP certificates from SAHPRA, a PIC/S member state, WHO PQ or Zazibona in order to obtain GMP approval. Dossiers requiring international site inspection will need to be resubmitted and evaluated under business-as-usual processes.

Comment period

SAHPRA requests industry comment on the guidelines attached. Please supply written comments to backlog@sahpra.org.za by 15 May 2019. More communication on implementation timelines will be provided in due course.

SAHPRA looks forward to continued support from all stakeholders to achieve our shared goal of clearing the backlog in two years and establishing an efficient, effective and sustainable health products regulator.

Yours faithfully,

Ms. P Nkambule

Acting Chief Executive Officer