SADC Collaborative Medicines Registration Initiative (Zazibona)

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Presentation Outline

- Brief Background
- Objectives of the Collaborative procedure
- ZAZIBONA Process
- Achievements
- The Future

Brief Background

- SADC is a regional economic group with 15 Member States (MS)
- Varying regulatory capacities in the region
  - 11 MS actively issue marketing authorizations
- Harmonisation of registration of medicines
  - Directive issued by SADC Ministers of Health in 1999
  - Work focused on development of technical guidelines (> 22 guidelines developed)

1

Public Health

SADC Protocol on Health 1999

- SADC Pharmaceutical Business Plan 2015 - 2019

2

Economic & Industry Interests

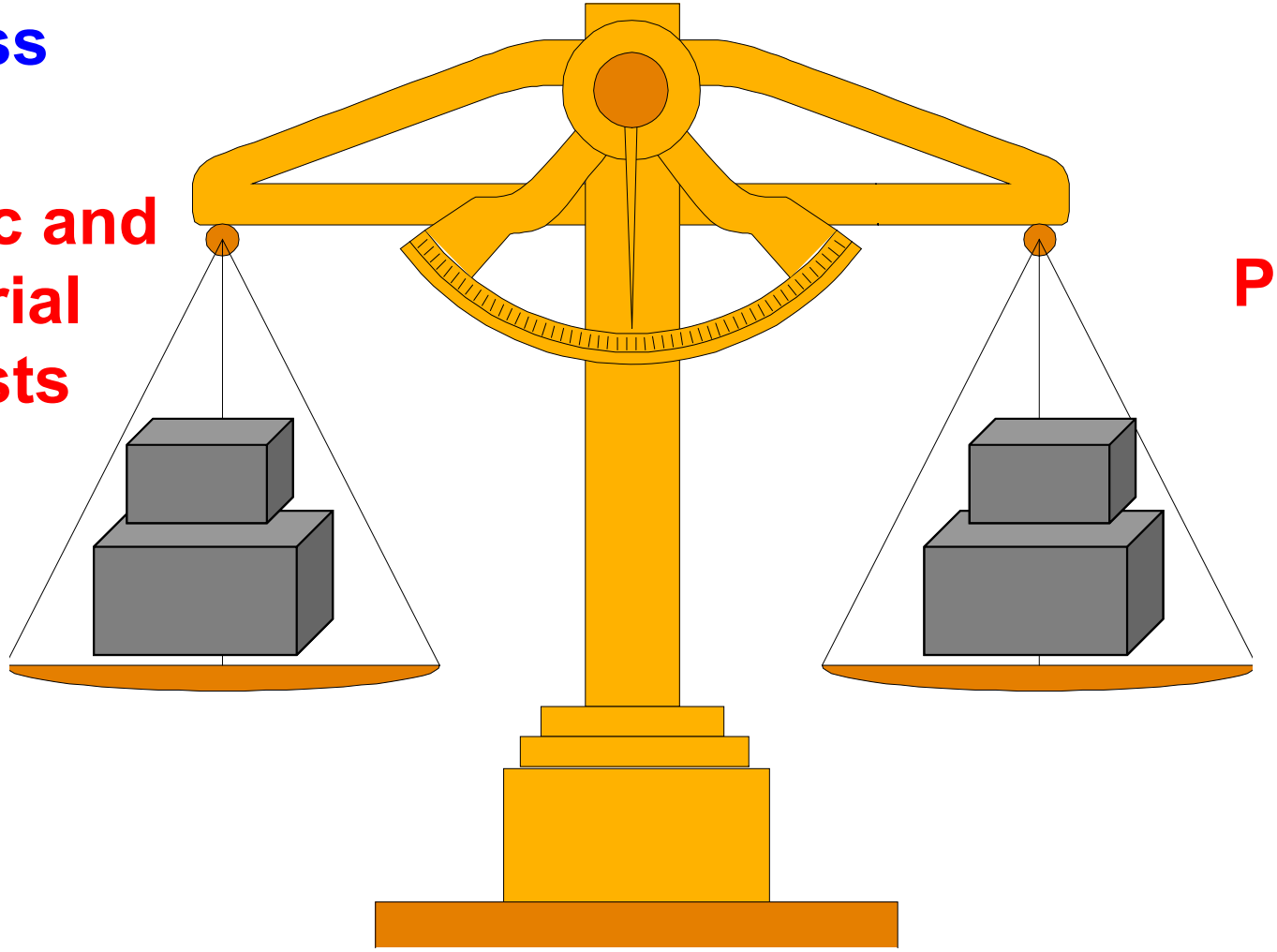
SADC Industrialization Strategy and Roadmap 2015 – 2063

- Strategy on Regional Manufacturing of Essential Medicines and Health Commodities (2016-2020)

The challenge is to achieve balance

Access

Economic and industrial interests



Market Control

Public health

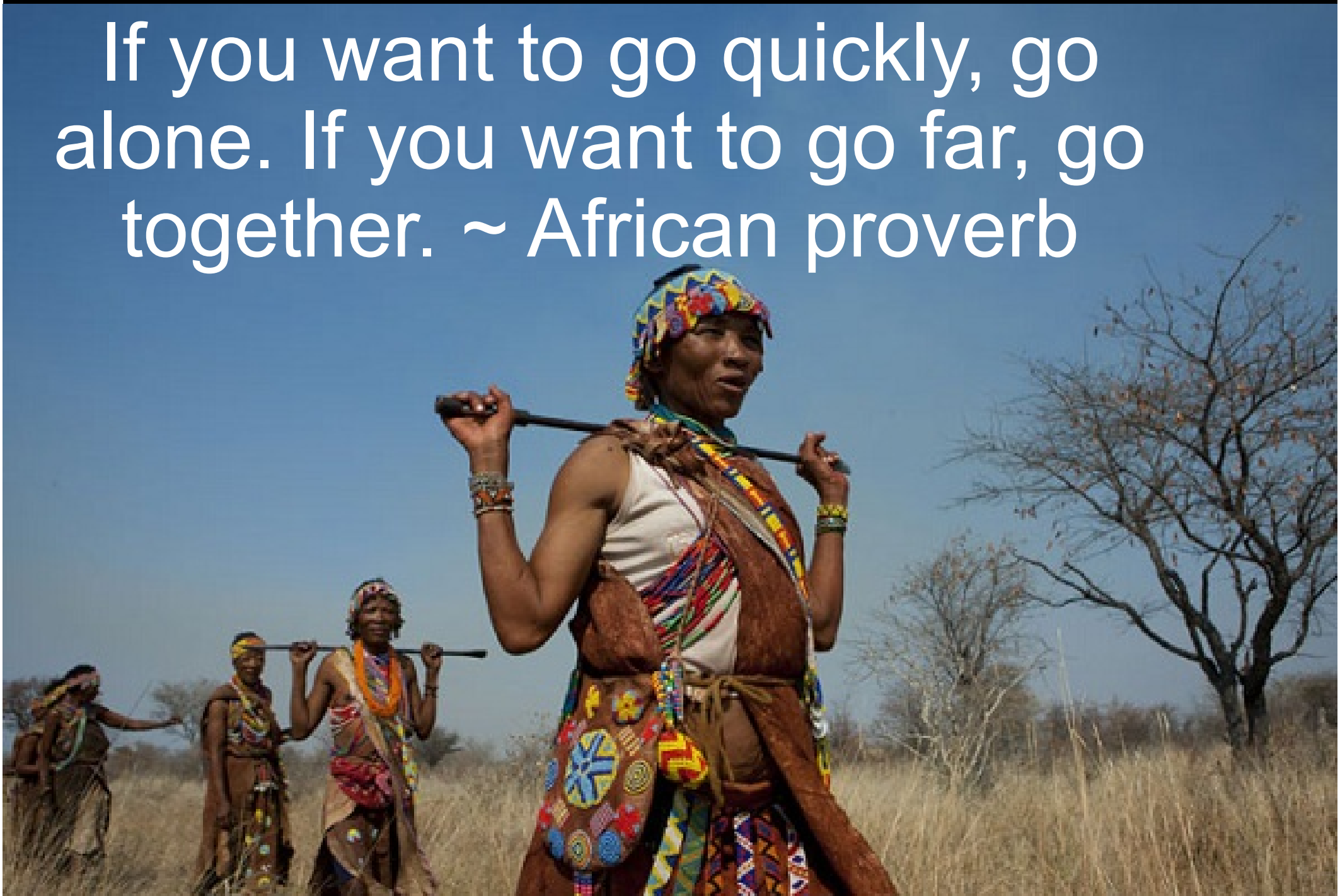
WHO prequalified

Reviews & inspection by each NMRA

Duplication of effort

#1

Approved by well-resourced Authorities


If you want to go quickly, go alone. If you want to go far, go together. ~ African proverb

A single stick may smoke, but it will not burn. ~ African proverb

SADC – Collaborative Medicines Registration Initiative (Zazibona)

- Endorsed by SADC Ministers of Health & Ministers Responsible for HIV & AIDS in January 2015
  - Expand to other SADC Member States beyond the 4 founding Member States
- **5 Active Participating Member States**
  - Botswana
  - Namibia
  - South Africa *(joined June 2016)*
  - Zambia
  - Zimbabwe
- **1 non-active participating Member State**
  - Swaziland *(joined Nov 2016)*

Objectives

- Initiative to collaborate in assessment and inspections for medicines registrations with objectives to:
  - Reduce workload
  - Reduce timelines to registrations
  - Develop mutual trust and confidence in regulatory collaboration
  - Platform for training and collaboration in other regulatory fields

How does this work ?

Common Submission

Essential medicine

Manufacturer's Consent

Consensus

Consolidated Assessment reports (CAR)

Consolidated list of Q to applicant (CLOQ)

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1 Primary Assessment + 5↑ Countries = 5 CAR + 

Timelines

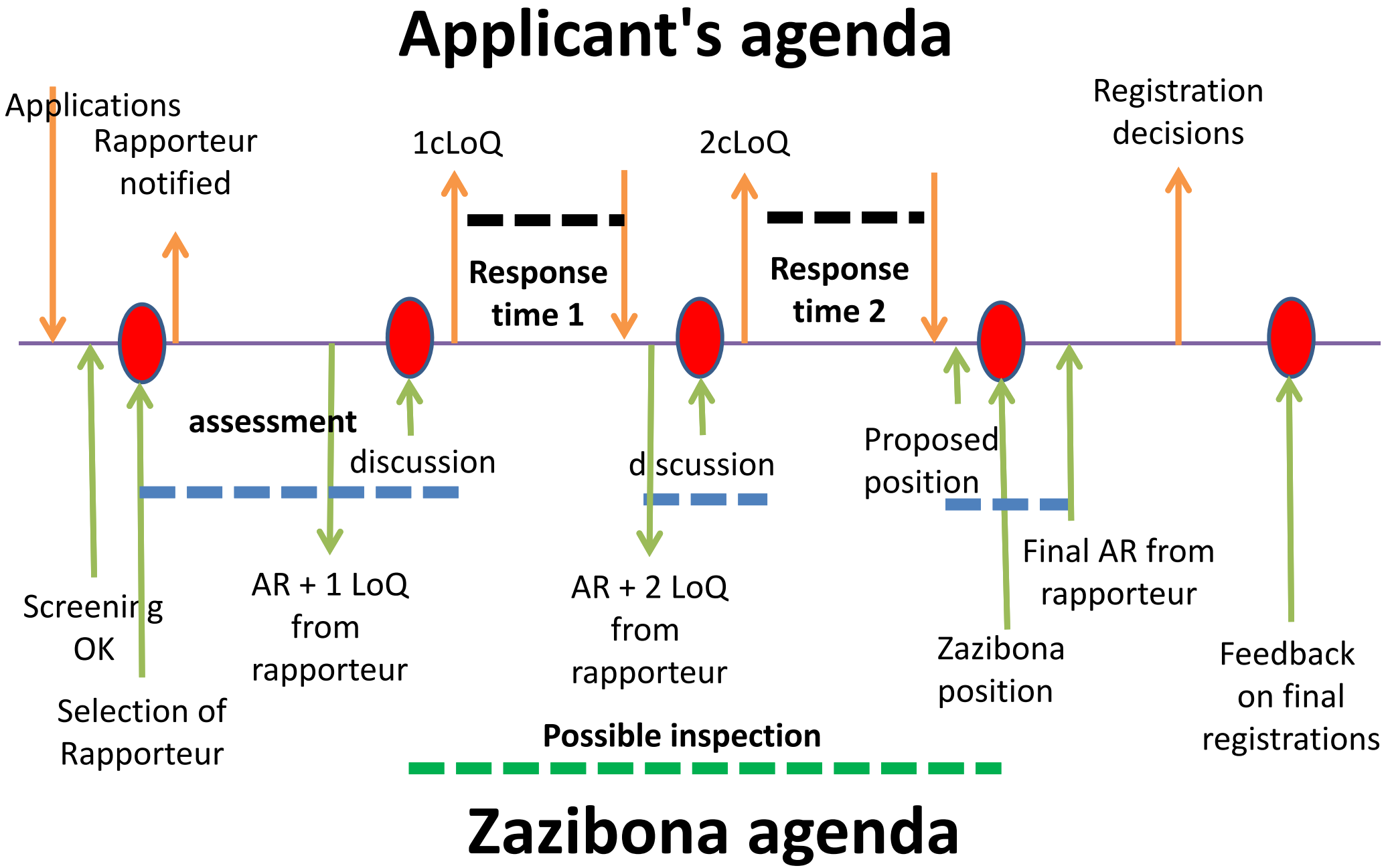
- **Day 0** of Zazibona process: Meeting 1: Agreement on Rapporteur, assumed that screening in countries is OK
- **Day 75**: Rap circulates the AR1 to Zazibona NRAs and reviewer, reviewer assesses the AR1 and LoQ1
- **Day 90** = Meeting 2: Discussion and common position

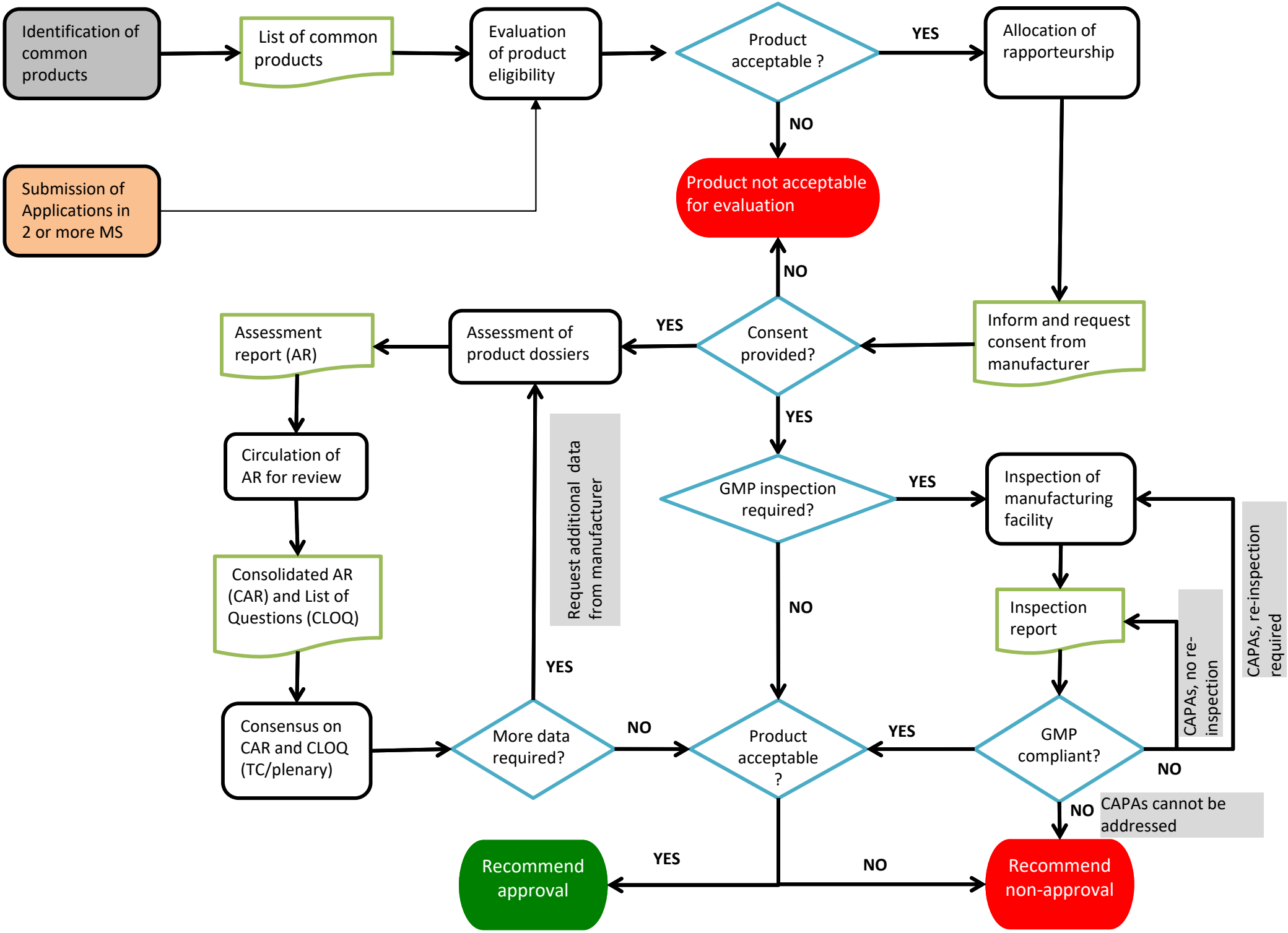
  Position on compliance and inspection triggers
- **Day 105:** LoQ1 forwarded to the applicant, response time 45 days (90 days maximum)
- **Day 150:** Rap receives Responses1 from the applicant and starts assessment
- **Day 165**: Rap circulates AR2 (assessment of responses1) and LoQ2 to Zazibona NRAs and reviewer, reviewer assesses the AR2 and LoQ2
- **Day 180**: Meeting 3: Discussion and common position

Timelines

- **Day 195:** LoQ2 forwarded to the applicant, response time 45 days (90 days maximum)
- **Day 240:** Rap receives Responses2 from the applicant and starts assessment
- **Day 255**: Rap circulates AR3 (assessment of responses2) and proposed position on registration to Zazibona NRAs and reviewer, reviewer assesses the AR3 and proposed position
- **Day 270**: Meeting 4: Discussion and adoption of position on non/recommendation of registration
- **Day 285**: Rapporteur circulates final Zazibona position
- **Day 330**: Countries are expected to decide on registration and reject/register
- **Day 360**: Meeting 5: Collection of information on national registrations (differences recorded) and dates

Zazibona process design




Identification of common products
List of common products
Evaluation of product eligibility
Product acceptable ?
YES
Allocation of rapporteurship
NO
Submission of Applications in 2 or more MS
Product not acceptable for evaluation
NO
Inform and request consent from manufacturer
Consent provided?
YES
Assessment of product dossiers
Assessment report (AR)
Circulation of AR for review
Consolidated AR (CAR) and List of Questions (CLOQ)
Consensus on CAR and CLOQ (TC/plenary)
Request additional data from manufacturer
YES
More data required?
NO
YES
GMP inspection required?
NO
Product acceptable ?
YES
Inspection of manufacturing facility
Inspection report
GMP compliant?
CAPAs, no re-inspection required
CAPAs, no re-inspection
NO
NO
CAPAs cannot be addressed
Recommend approval
YES
NO
Recommend non-approval

- **WHO PQT-m performs QA on the Assessment Reports**

- **Outcomes of Assessments and Inspections would be made available (Transparency on Decision Making)**

ZAZIBONA: Real Work Sharing in Practice!

Since 2013

2 | meetings/Year of Heads of Agencies (HOA)

10

Training Sessions

13

# of Assessment Sessions: 4 | year

13

Manufacturers inspected for GMP compliance: 4 schedules | year

12 | Average # of products per session

ZAZIBONA

56% Positive vs 33% Negative vs 11% Withdrawn

154 in Total (Nov 2016) = 64 Pending Responses from Manufacturers + 90 Product Finalised

Results continued…

- **Median time** to recommendation: 9 months

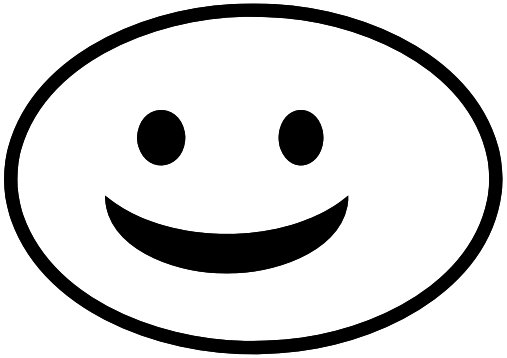
  (*including regulators and manufacturer/ applicant's time to respond to queries*) [Target is 270 days (9 months)]
- The **mean review cycles** were 2.5 per product [target is 2 cycles]
- **Average response time**: 3 months for manufacturers to respond to queries [target is 3 months]
- **Median time for final approval** at the national level (after Zazibona process) was 1.5 months (range 0.2 – 6 months) [target is 2 months]. (*based on data from two countries*)

What ZAZIBONA is not…

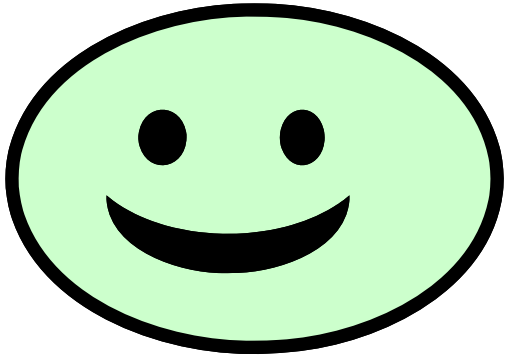
- Replacement of the NMRAs
  - Only focuses on the review and inspection process
  - Actual registration is done at the national level i.e., requires actual submission of product application to the countries following applicable national requirements i.e. application fees *etc.*,
- Centralised procedure
  - There is no central single submission (…yet)
  - But same dossier submission to all the countries based on the SADC CTD and registration guidelines

Concluding Points

- Potential mechanism for improving the regulatory systems in LMICs
  - Efficiency & effectiveness
- Sustainability & Ownership
  - Costs effectiveness (value for money)
    - Average cost of the process **USD$4, 500 per product** *(i.e. for the Zazibona meetings excluding NMRA costs, GMP costs and coordination costs)*
  - Reduce the number of assessors per Zazibona session from **three** to **two** per country for 2017
  - Meetings (incl. the conferencing costs) organised and hosted by Member States
- Risk based approach
- Transparency
- Regulatory capacity



Regulators



Patients

Manufacturers

Acknowledgements

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