**Training course on veterinary legislation of OIE national focal points**

**Gaborone, 31 October – 2 November 2011**

# Veterinary legislation on Veterinary products

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# Introduction

- Good veterinary governance is the overriding principle that needs to be applied to VMP
- The animal health policies need to include policies regarding the manufacturing, registration and use of VMPs
- VMPs as a public good are of main concern to the OIE, and are included in its 5th Strategic Plan
- The application of these principles are only possible within a legal framework covering VMPs!
- This legal framework must be well integrated into the legal structure of the country and **must be reinforcable!**
- It must have a budget attached to implement it!

# Introduction:
# General considerations

Why do we need legislation for the use of VMP*?

| | |
|---|---|
| Positive | direct impact on animal and human health |
| Associated risk | residues in animal products |
| Health products | VMPs are termed "health products" |

and need to be regulated by the State!

Legislation has to be worded with the benefits for those in mind:

- Animal Health policies
- Protection of the Food chain
- Safety of the products
- Control of their use
- Environment

*VMP = Veterinary Medicinal Products, include drugs and vaccines

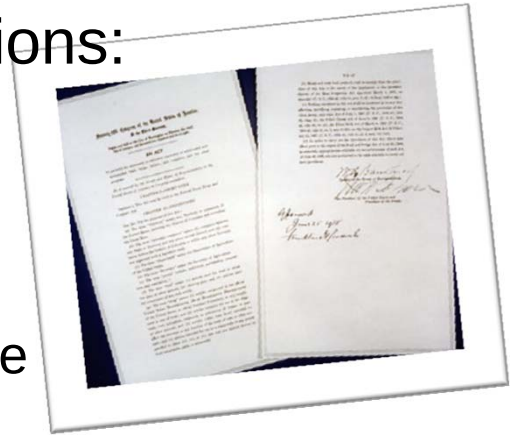
# Introduction: History

- It is only in the 2nd half of the 20th Century that national laws covering VMP were imposed,

  → required that precisely defined techniques were used to manufacture VMPs

Followed by efforts to harmonise these regulations:

- first in Europe
- USA 1906 Pure Food and Drug Act
- Federal Food, Drug and Cosmetic Act
- FSMA -Increasing collaboration and info exchange



globally: OIE Manual since 1989

# Objectives of a legislation

Avoid the presence of harmful residues in the food chain

Legislation on distribution and traceability must be included

Avoid a risk to human health by using VMPs

Guidance on responsible and prudent use of antimicrobials

To have VMPs available that are safe, efficient and of high quality

The following explanations are based on the

***OIE Guidelines for legislation for VMPs***

http://www.oie.int/fileadmin/Home/eng/Support_to_OIE_Members/docs/pdf/A_Guidelines_VetLeg.pdf Part 9

# Legislation has to cover: General measures

- Definition of VMPs, e.g.
  - Immunological VMP
  - Allergen
  - Homeopathic VMP
  - Generic VMP
  - Pre-Mix for medicated feed etc.
- Importation, manufacture, distribution and use

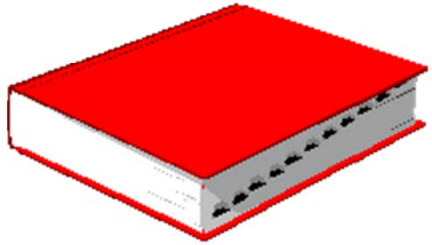
  ⟶ make sure that legislation covers the entire chain from manufacture to use and that all elements are well linked

# Stages to be covered by legislation

Pre MA

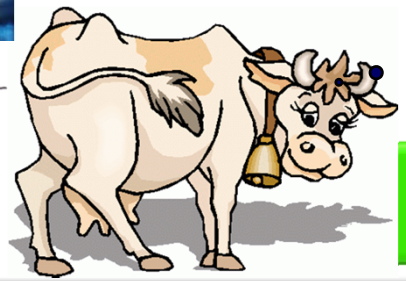
MA

or



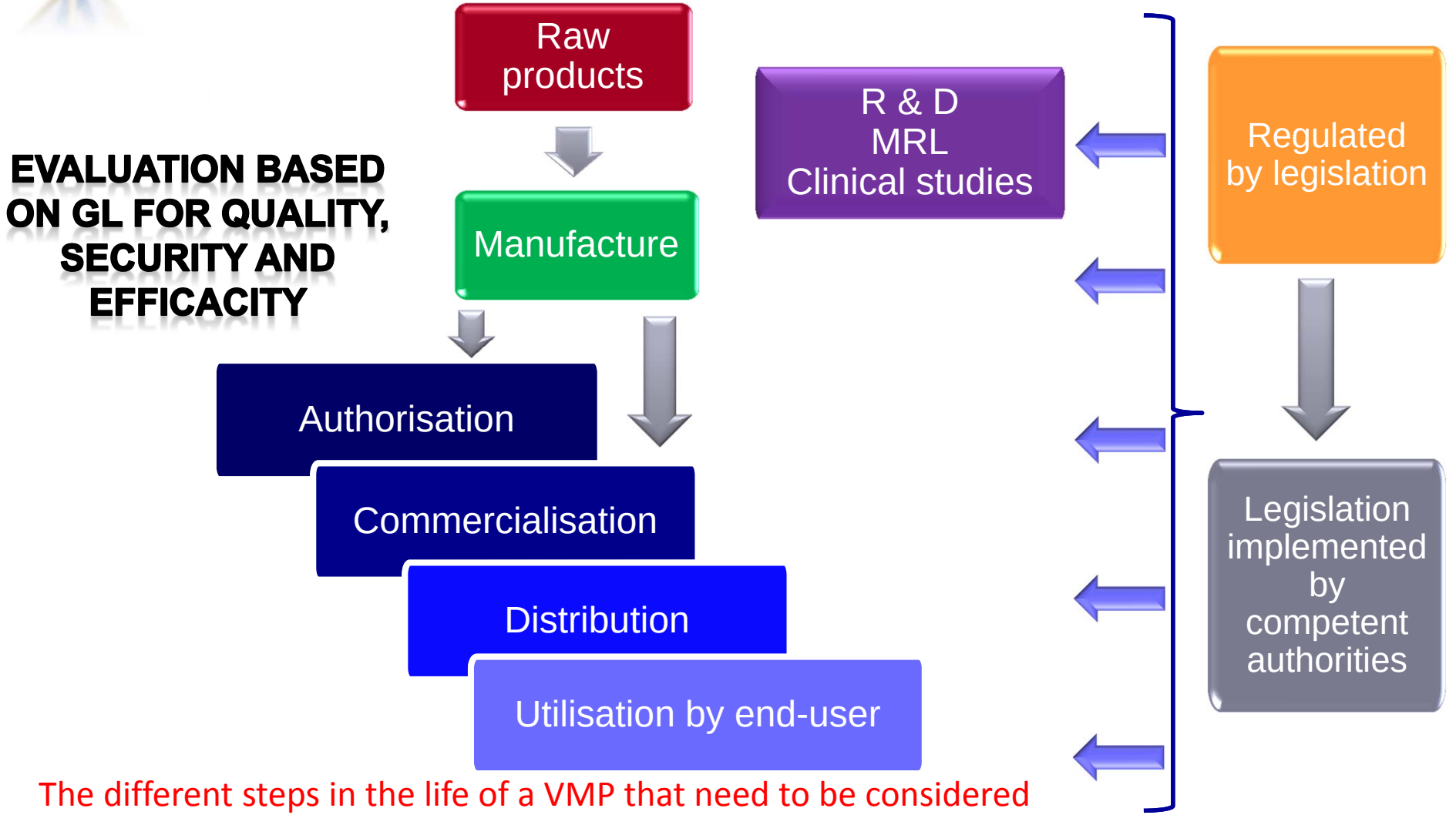

Distribution

Ouch!



Post MA

# Steps to be covered by legislation



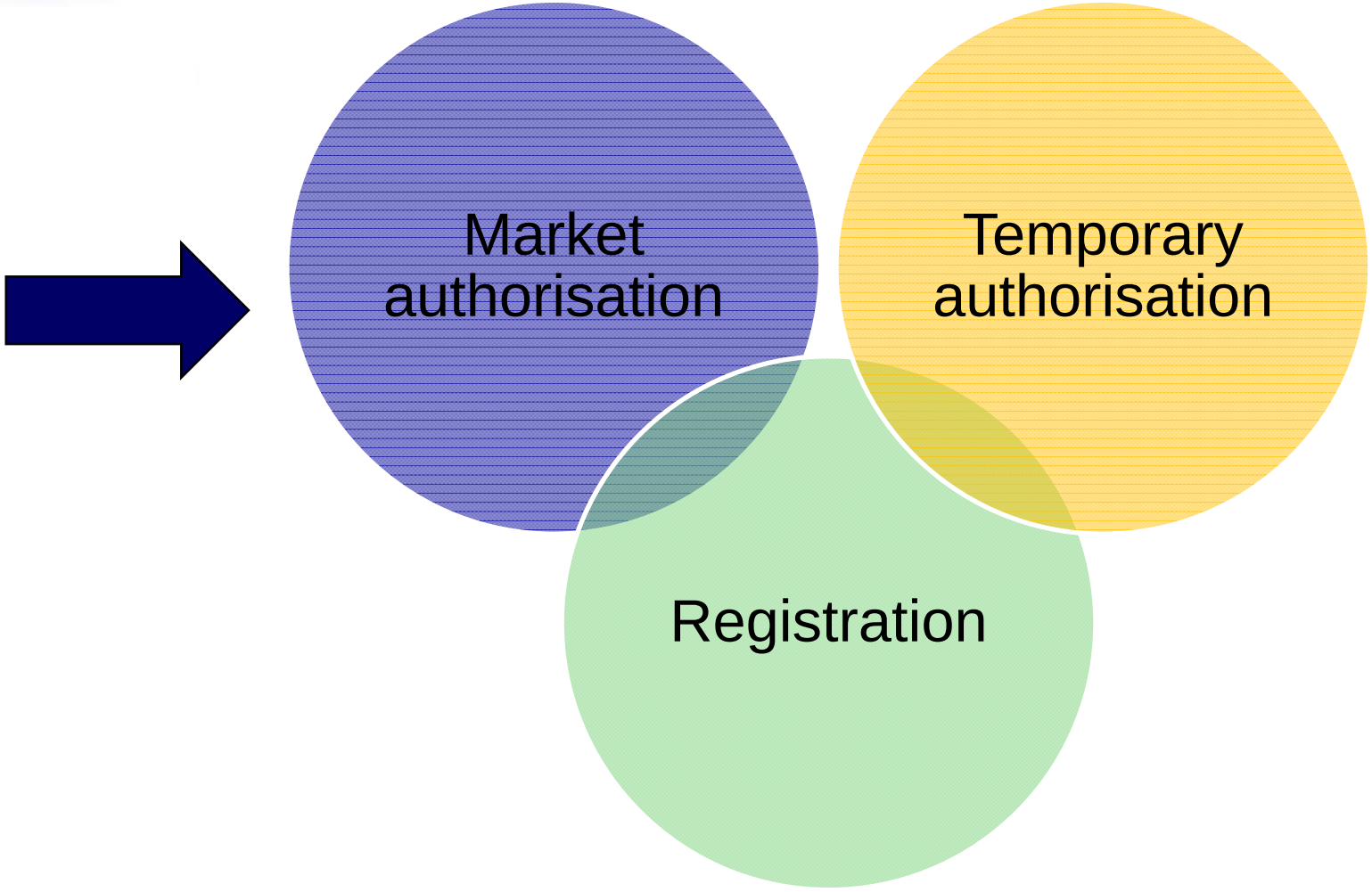

**EVALUATION BASED ON GL FOR QUALITY, SECURITY AND EFFICACITY**

The different steps in the life of a VMP that need to be considered when drafting a legislation for VMPs

# 1. Step:
# Raw materials

- Quality standards of raw materials (must not pose a risk)
  - Including active ingredient, excipients and adjuvants
  - Must comply with the specifications in the pharmacopoeia
- Withdrawal periods
  - Are normally covered in the Marketing Authorisation (MA)

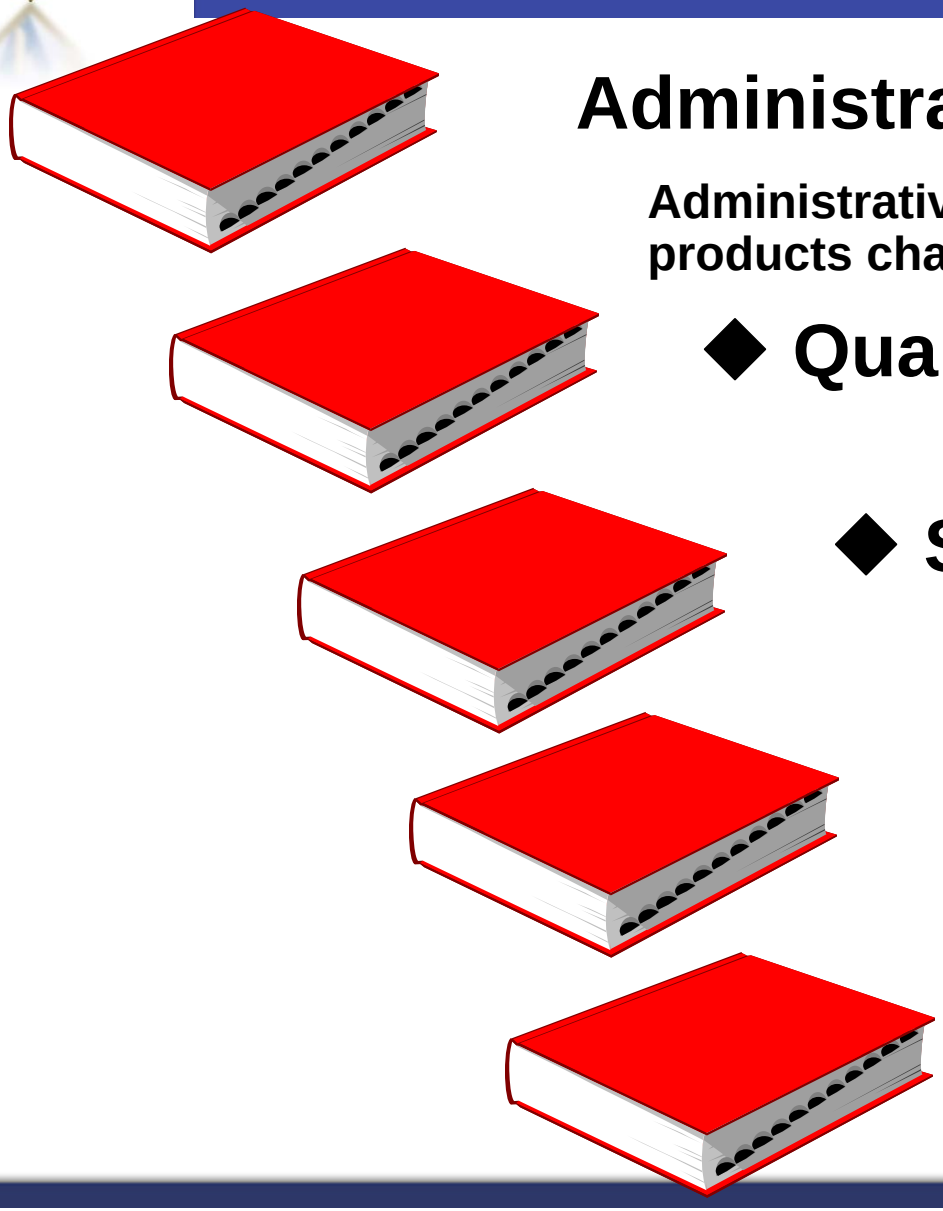
# 2. Step:
# Different categories of Authorisation



# 3. Step:
# Marketing Authorisation (MA)

- Covers all aspects of **safety**
  - VMP without risk for residues and interference with veterinary health programmes
- Granted to applicants established on national territory or in a State with the same or equivalent veterinary legislation
- A MA issued by another State can be recognised if considered reliable

# Marketing autorisation dossier



## Administrative part

**Administrative informations, Summary of products characteristics Labelling**

- **Quality part**
- **Safety part**
- **Residue part**
- **Efficacy part**

# MA contd

- Regulations shall cover:
  - Technical (Quality, safety, efficacy, residue part)
  - Administrative (product characteristics, labeling)
  - Financial (budget for the dossier assessment_

  Conditions  associated with:
  - Granting
  - Refusal
  - Withdrawal of MA

# Granting a MA

- Prove that
  - Clinical trials in accordance with GCP have been carried out
  - Non-clinical trials in accordance with GLP have been carried out, with the laboratory inspected and controlled
  - Labeling of product is complete and correct
- US perspective
  - Outsourcing clinical research becoming more common
  - Best interest of FDA to assist foreign regulators
  - Half of all African clinical trials conducted in Southern Africa
  - Recent GCP training in Botswana for SADC

# A little side-step: VICH

- A MA is a lengthy, complex and expensive procedure
- Harmonisation of scientific guidelines for a group of countries, e.g. EU, can mitigate the need for national MAs
- EU, Japan, USA founded VICH* in 1996, with support from OIE
- Objective: to harmonise the studies and data requested by the authorities of VICH member countries for VMP MAs.
  - 49 Guidelines available, majority on Pre-approval, some also on Pharmacovigilance
- Facilitates constructive dialogue between regulatory authorities

*International Cooperation on Harmonisation of Technical Requirements for Registration of VMPs

# An Example:
# Good Clinical Practice - VICH GL 9

- International scientific quality standard fo designing, conducting, monitoring, recording, auditing, analyzing and reporting clinical studies evaluating veterinary products

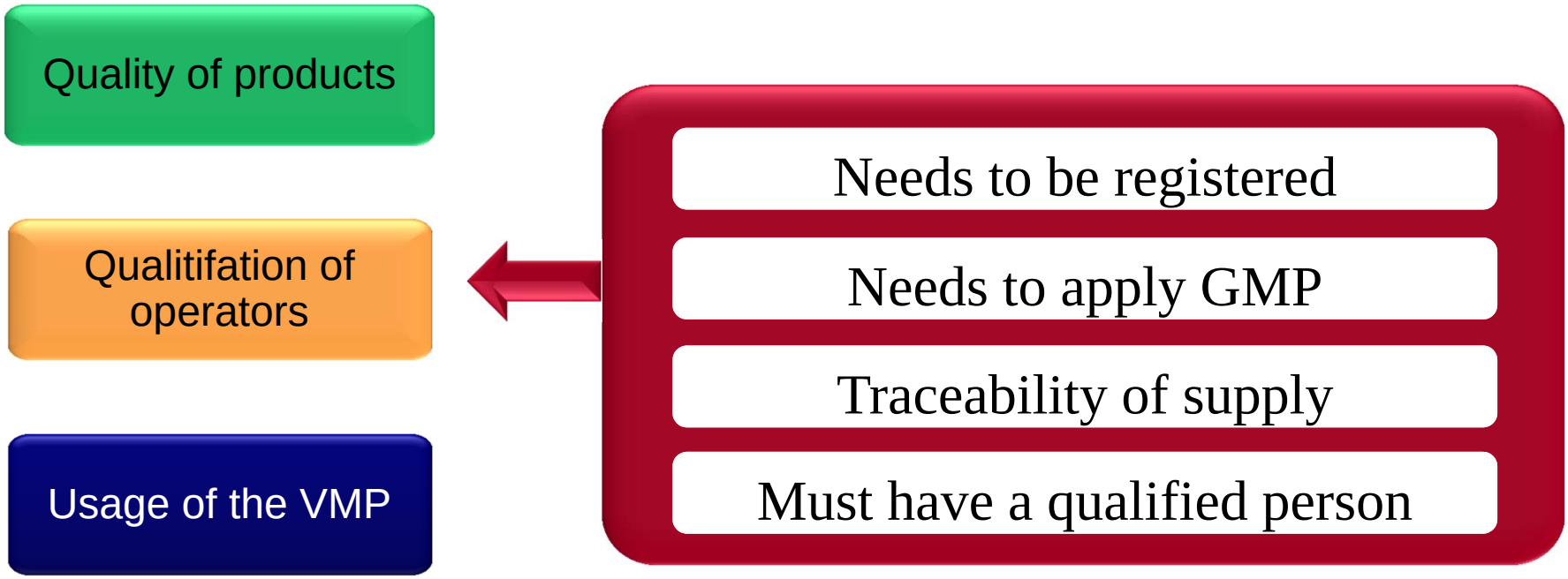

- Ensures the accuracy, integrity and correctness of data

# Refusal of MA

- On inspection of the dossier there is evidence of:
  - Danger to animal or human health
  - Therapeutic effects not achieved under the conditions of use
  - Risk associated with VMP
  - Doubtful composition
  - The effect not proven for intended species
  - Withdrawal time not sufficient
  - Labeling not satisfactory
  - Interference with veterinary health programme

# Recall:
# Consumer Safety

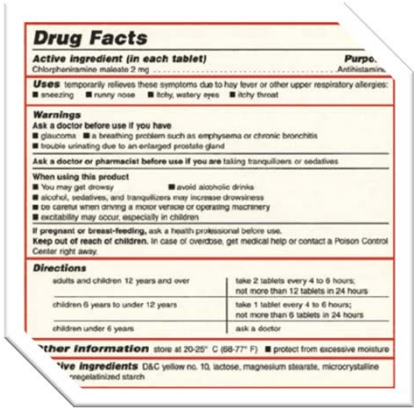
Legislation is there to assure Safety of the consumer – the three important pillars are:



# 4. Step: Commercialisation and distribution

- Traceability and conditions of use
- Prescription and provision to end user
- Restriction of commerce to authorized professionals
- Supervision of organisations, e.g. Producer groups, by professionals
- Restriction on trade with VMPs
- Regulation of advertising

# Labeling also part of commercialisation




- Indications
- Effects
- Dosages
- Routes, methods, and frequency and duration of administration
- Relevant hazards, contraindications, side effects and precautions
- Identifying lot or control number
- Expiration date and storage specification

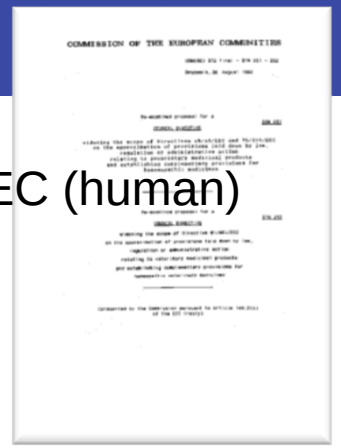
# 5. Step: Performance evaluation of Competent Authority

- Set criteria to evaluate
- Administrative performance
  - Good governance
  - Relations with stakeholders
  - Risk management
- Technical and scientific performance
  - Resources, competences, decision process, coordination between inspection and production
- Inspection and control of laboratories
  - GLP, resources, traceability of lots, inspection and control records

# 5. Step contd

- Control of distributors and retailers
- Surveillance (pharmacovigilance)
  - Surveillance plan, sample and data collection and analysis, resources

# Example: EU legislation



- Started in 1981 with adoption of D 81/851/EEC (vet)and 81/852/EEC (human)
  - Common requirements for manufacture and MA
  - Details on tests for quality, safety and efficacy
- Consolidated into D 2001/82/EC (vet) and 2001/83/EC (human)
  - Describe how dossiers for MA should be compiled and what they should contain (both modified in 2004 ⟶ 28 (vet) and 27 (human)
- At this stage the procedures were harmonised, but granting of MA remained at national level
  - Created discrepancies on decisions on same product in different countries
- Since 1995 EMEA in place (EMA since 2004 with CHMP (human) and CVMP (vet)
  - Evaluation of MA requests
  - Establish MRLs for substances used in animals (CVMP)

# Directive 2001/82/EC


- Can serve as a reference document for countries that wish to set up their VMP legislation!
  - Manufacture must be supervised by inspectors (details in Directive 91/412/EEC) on principles of GMP
  - Inspection and certifications of GMP for “starting materials” for VMPs
  - Qualitative and quantitative analysis of active ingredients for imported VMPs
  - Defines the compliance with monographs in European Pharmocopoeia

# Directive 2001/82/EC (consolidated)


- 4 procedures in place in the EU to grant MA:
  - National MA
  - Centralised: 1 MA valid for all EU MS
    - Mainly for hightech products as listed; vaccines for prophylactic measures at EU level; optional for innovative VMP
  - Mutual recognition: a national MA can be accepted by another MS on the basis of mutual recognition
  - Decentralised: brings national and mutual recognition together
- The Reference document per se is the European Pharmacopoeia
  - 17 EU MS and 18 non-EU States adhere to it
  - UEMOA MS advised to use it, too!

# Example: US legislation

- Federal Food, Drug, and Cosmetic Act (FFDCA)
- Gives the FDA legal authority to approve and regulate drugs for both people and animals
- Drug sponsor is responsible for collecting all the information about a new animal drug and submitting to CVM for review
- Sponsor can be any organization or even one person; usually pharmaceutical company
- Must go through New Animal Drug Application (NADA) process

# Example: US legislation
# Major Technical Sections for NADA review

- Target animal safety
  - Identify harmful side effects
  - Establish margin of safety
- Effectiveness
  - Drug must work in target species when used according to the label
- Human food safety
- Chemistry, manufacturing, and controls
- Environmental impact

# Example: US legislation

- NADA is approved if the information submitted by the drug sponsor
  - Meets the requirements for approval
  - CVM is satisfied that the drug is safe and effective if it is used according to the label
- Veterinary adverse event reporting for manufacturers – paper or electronic
  - Requirement to establish and maintain records and make reports of data related to drug use

# Conclusions

- The OIE Member countries need a strong legislation and regulatory framework for VMPs in order to:
  - Safeguard human and animal health
  - Comply with animal health policies
  - Guarantee efficacy, safety and quality of VMPs
  - To face new disease threats
- OIE actions assist its members to achieve this objective:
  - Guidelines for the development of VMPs legislation available
  - Nomination of Focal points for VMPs in all countries
  - Trainings for FP for VMPs per region
  - Legislation missions – assistance with the analysis of existing legislation and proposals for revision

# Annex:
# FDA is Collaborating Centre for VMP since 2011

- 3 OIE Collaborating Centers:
  - ANSES, Fougères, France
  - NVLA, Tokyo, Japan
  - FDA, USA
- FDA is seeking laboratory twinning opportunities

# Thank you for your attention!