ICMRA - Collaborative Hybrid Inspection Pilot

- The Industry Perspective

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ICMRA - Collaborative Hybrid Inspection Pilot

The Industry Perspective

ICMRA CHIP Pilot - Overview

- About the ICMRA PQ KMS Pilots
- A company's journey - The Collaborative Hybrid Inspection Pilot (CHIP)
- Opportunities, Benefits and Challenges of the Pilots
- What's Next? Materializing the Benefits of the Pilots

ICMRA

International Coalition of Medicines Regulatory Authorities

MAIN OBJECTIVES

ICMRA promotes international cooperation among medicines regulatory authorities to strengthen global dialogue, facilitate wider exchange of reliable and comparable information, encourage greater leveraging of resources and work between authorities, and advocate for better informed risk-based allocation of authorities' resources and deeper collaboration. The group also addresses current and emerging human medicine regulatory and safety challenges. These efforts aim to strengthen the quality, safety and efficacy of medicinal products globally.

WHO WE ARE

ICMRA is an informal group of leaders of medicines regulatory authorities that provides strategic directions for enhanced collaboration, improved communication and approaches to jointly address common challenges, such as the COVID-19 pandemic.

MISSION

ICMRA's mission is to safeguard public health by facilitating strategic leadership and greater cooperation of international medicines authorities on shared regulatory issues and challenges.

MAIN WORKING AREAS

There are currently several ICMRA projects on Antimicrobial Resistance (AMR), communications, drug shortages, innovation, pharmacovigilance, regulatory convergence and alignment in the global COVID-19 regulatory response, and supply chain integrity.

ICMRA Fact Sheet

- ICMRA Chair: Emer Cooke (EMA)
- 24 Member agencies incl. Australia, China, India, Japan
- 15 Associate member agencies
- 1 Observer (WHO)

Source: ICMRA Homepage and Factsheet

ICMRA - Background Information

- During the COVID-19 pandemic, ICMRA is acting as a forum to support strategic coordination and international cooperation amongst global medicine regulatory authorities.
- The aim of these activities is to expedite and streamline the development, authorisation and availability of COVID-19 treatments and vaccines worldwide.
- ICMRA members also work towards increasing the efficiency and effectiveness of regulatory processes and decision-making.
- A key event in support of these activities was the July 2021 joint (virtual) stakeholder workshop with industry on ‘Enabling Manufacturing Capacity in the COVID-19 Pandemic.

ICMRA Pharmaceutical Knowledge Management System

PQKMS - A Strategic Initiative

Following the July 2021 ICMRA-Industry virtual workshop on enabling manufacturing capacity in the COVID-19 pandemic, **ICMRA is commencing two pilot programs** focusing on:

PACMP → collaborative assessment with initial focus on chemistry, manufacturing, and control (CMC) post-approval changes &

CHIP → collaborative hybrid inspections.

The **overall aim** of these pilots is to improve manufacturing capacity for production of critical medicines and facilitate collaborative assessments and inspections by multiple regulatory authorities.

Source: ICMRA

Aim of the Collaborative Assessment Pilot

- ✓ Develop a framework, which provides a platform for multiple regulatory agencies to participate in a collaborative assessment of post-approval CMC changes including **post-approval change management protocols (PACMPs)**
- ✓ The applicants' **responses will be shared between the participating quality assessors**, who will work towards a common approach to the application assessment and decision making.
- ✓ The intention is to **deliver a single list of questions to the applicant** wherever possible, however a stated goal of the pilot is to identify misalignments, differences, and potential areas for further convergence or harmonization across regions
- ✓ Develop best practices in the quality assessment of CMC post-approval changes and share learnings
- ✓ Identify the conditions (products/ cases) where cross-regional collaboration assessment efforts should focus and make **recommendations to ICMRA for a future cross-regional CMC collaborative assessment pathway**, which may include development, initial approval and major lifecycle evaluations and make proposals to ICH for standards and guidance development

Source: ICMRA

Aim of the Collaborative Hybrid Inspection Pilot (CHIP)

- ✓ Use a **combination of on-site inspectors in the facility and distant inspectors** (through a virtual platform) to conduct a hybrid inspection/assessment
- ✓ Overcome Travel Restrictions
- ✓ Facility inclusion in the pilot will be based on the mutual interest of regulators, voluntary participation by the manufacturer and its facility, and the facility having the technology capable to support distant assessment
- ✓ **Potential for collaborative assessment of facility when applications submitted to multiple regulators**
- ✓ Evaluation of the inspection outcome and any enforcement action, if needed, should remain a matter for each participating authority
- ✓ The pilot is voluntary for regulators and industry

Source: ICMRA

Scope of Roche's PACMP & CHIP Pilot

PACMP

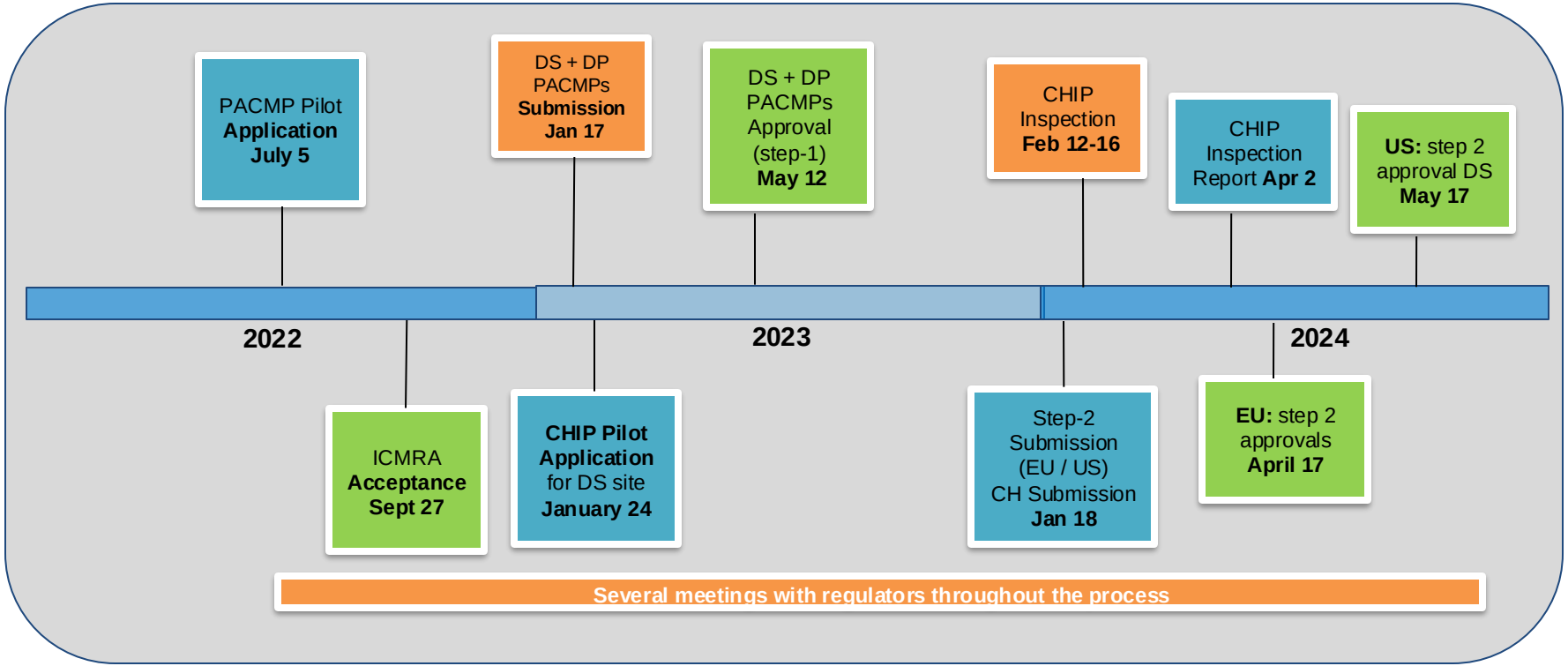
PACMP for the **EU and US** for a **monoclonal antibody** (with US-breakthrough designation) which received initial approval in an oncology indication, comprising of:

CHIP

- **Additional Drug Substance manufacturing site in Switzerland*** and process changes
- **Additional DS QC testing sites** for IPC, release and stability
  - Changes to DS IPC, release and stability specifications
- **Additional Drug Product manufacturing site** and process changes
- Additional DP QC testing site for IPC and release for US only
  - Changes to DP IPC, release and stability specifications
- Additional DP secondary packaging site for US only

*Swissmedic - Lead Inspectorate

Roche's ICMRA Pilot Journey



PACMP Pilot Experience

Benefits

- Streamlined and coordinated processes
- No significant additional work for sponsor
- Joint questions received from EMA (Lead) and FDA during the collaborative review, Japan (PMDA*) as observer
- Approval on the same day by EMA and FDA of essentially the same content and conditions for both protocols

Opportunities

- Broader scope (Products, Step 2)
- Facilitate submission through a joint IT platform

*PMDA – ICMRA PAC Working Group member

ICMRA CHIP Inspection 12 - 16 Feb 2024

Inspectorates

- **Lead on-site:** Swissmedic
- **Remote:** FDA
- **Observers:** Health Canada, EMA, Germany (RP Tübingen)

Preparations

- ICMRA detailed guidance*
- Meetings with ICMRA CHIP team and Inspectors
- Agenda and timing
- Set Up of IT logistics
- Preparation of document pre-requests

*Inspection Expectations for ICMRA Collaborative Hybrid Inspection Pilot (CHIP) Participants – 31 Aug 24

ICMRA CHIP Experience

Benefits

- Single inspection instead of multiple engagements
- Very collaborative and well coordinated
- Alignment of inspection practices
- Product specific but more general, Reliance on prior knowledge
- **One set of deficiencies, One report, One response** jointly assessed

Opportunities

- Schedule inspection and follow-up in consideration of overall assessment timeframe
- Standard set of pre-requested documents, common IT platform and CDAs

Roche ICMRA PQ KMS Pilot - Overall Experience

- Very collaborative, coordination went very well
- Very open and transparent engagement from all ICMRA regulators involved
- Regulators streamlined and coordinated their processes
- Joint questions received during PACMP review and during the inspection and its follow-up

PACMP

- Approval on the same day by FDA and EMA - is unprecedented in our experience and shows the significant value of the ICMRA pilots

CHIP

- One set of deficiencies, One report, one Response (CAPA plan) jointly assessed by Swissmedic and FDA

Regulators about the ICMRA PQKMS pilot

European Medicines Agency
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Collaborative assessments of manufacturing sites can improve supply of medicines 🏭💊

This was an international premiere: on 12 May 2023, EMA and the US FDA concluded for the first time a collaborative assessment 🤝 to add new manufacturing and quality control sites. These sites are linked to the production of the orphan medicine Lunsumio, a #cancer treatment. The collaboration could significantly contribute to the continuous supply of this medicine. The Japanese Pharmaceuticals and Medical Devices Agency, the PMDA, participated as an observer.

This work marks the beginning of an international pilot programme that aims to bring regulators together and build up regulatory reliance to allow faster supply of critical medicines. Future assessments under this pilot will involve more regulatory authorities worldwide 🌍🤝.

📌 Some key highlights of this procedure were that:

🔹 All regulators involved were open and highly collaborative;
🔹 The issues raised during the procedure were mutually agreed upon, confirming good alignment between the EU, the US and Japan;
🔹 The pilot did not cause any delays in approval timelines;
🔹 It received positive feedback from the industry.

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CDER's collaboration with global regulators on pharmaceutical quality and inspections has resulted in the approval of new manufacturing and quality control sites for five different medicines. The efforts also resulted in three hybrid inspections where one regulator was on-site and others participated remotely. A full report on the findings of these efforts will be published by the International Coalition of Medicines Regulatory Authorities (ICMRA) in the coming months.

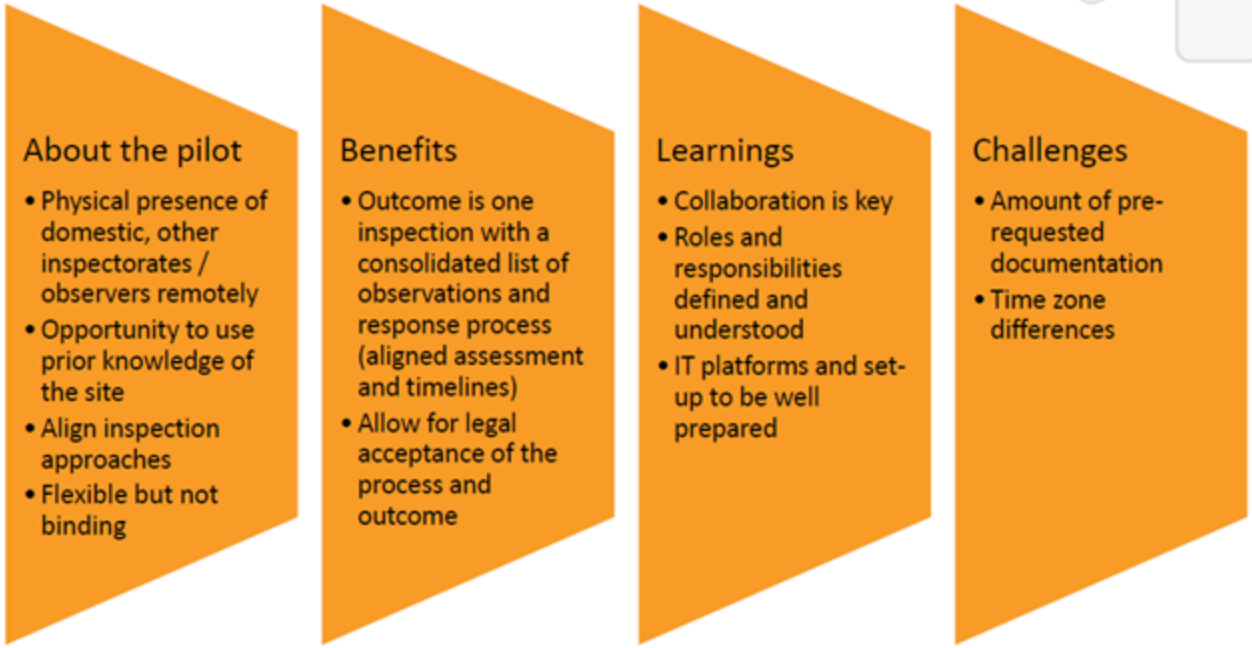
For more information on how our collaboration with global regulators benefits patients and consumers in the U.S. and worldwide read our From Our Perspective: https://lnkd.in/e4wtjkY7

Christian Schärer • 2. + Folgen
Head Inspectorate Swissmedic
1 Tag •

As part of the ICMRA CHIP (Collaborative Hybrid Inspection Pilot) project the Swissmedic inspectorate successfully conducted a joint, hybrid pre-approval inspection together with US FDA in February 2024. The Swissmedic team led the organization and implementation of the hybrid inspection and was on site at the company while the US FDA participated remotely. Observers from Health Canada the EMA and the EU also took part remotely.

The inspection was successfully concluded in a joint list of deficiencies, and one common inspection report and outcome.

Initial thoughts on learnings and future benefits



* **To fully materialize the benefits of the CHIP pilot**
  * ICMRA member countries to rely on the CHIP inspection report – *join as observer if needed*

Source: EFPIA Annual Regulatory GMP/GDP Inspection Survey 2023 Data

What's Next?

June 12 2024:

The ICMRA PQKM project has reached a major milestone with the initial phase of both pilots having been completed in May 2024.

- The pilot implementation group gathers feedback from the participants of the pilots and reflects on the experience.
- Overall feedback received so far has been positive, however, both collaborative assessments and hybrid inspections resulted in increased resource requirements for regulators.
- The group prepares summary reports with the aim of publishing the reports later this year.
- **Work is ongoing** to **explore the best path forward** for both the collaborative assessment and hybrid inspection processes, **to ensure learnings from the pilots are implemented** and support further progress **towards greater regulatory convergence and reliance**, for the benefit of patients.

Setting the scene: the EMA 'global' view

Hopes for the Future State*

- Positive experience from both regulators and industry leading to an extension of the pilot and encouragement for more industry participants
- Desire for expanded engagement from regulators for the pilot

⇒ Long term goal of global convergence and reliance for both PACs and inspections even beyond ICMRA.

Our vision for the future:

- **One** product
- **One** regulatory standard
- **One** inspection
- **One** assessment

*Susanne Ausborn PhD & Srividya Srikant – DIA Global , June 2024

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