Modern science for better quality control of medicinal products

“Towards global harmonization of 3Rs in biologicals” – Workshop Feedback – Case study 2

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Case Study 2 – Vet Med

• Deletion/waiving of general safety tests (ATT/GST; TABST) at VICH level and from national regulatory requirements

• Moderator: Catrina Stirling (Zoetis)
• Presenter: Harrie Glansbeek (MSD)
Overview

• Introduction – outlining the issue
• Presentation of experience
• Discussion
  – Actions
## Country acceptance

<table>
<thead>
<tr>
<th>Number of non-EU countries</th>
<th>TABST</th>
</tr>
</thead>
<tbody>
<tr>
<td>accepted waiving TABST</td>
<td>84</td>
</tr>
<tr>
<td>did not accept waiving TABST</td>
<td>8</td>
</tr>
<tr>
<td>Argentina, Brazil, Canada, India, Japan, South Korea, China and Taiwan</td>
<td></td>
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<tr>
<td>no reaction</td>
<td>15</td>
</tr>
</tbody>
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Effects of waiving TABST at MSD AH

- **Financial/logistic efforts and effects**
  - Minimal reduction in total animal costs (animal facilities + resources)
  - Extra costs due to stock building of batches with and without TABST
  - Project duration: 2 years
  - Implementation costs

- **Reduction of animal use**
  - 75% of the batches of the products in scope can be released without safety test
  - Reduction of > 600 animal tests/year
  - Saving of > 3000 experimental animals/year
Question for Discussion

- EU agreed there is limited value from TABST vs use of animals – what are the barriers to other regions adopting the same position?
- What are the concerns that drive the need to keep the test or provide at least 3 years/10 batch data before waiver?
- Scientific? If so What?
- Reduced data requirements during registration so batch testing key
- Quality concerns – different levels of GMP between regions?
- Legal – would require a change in laws? If so what is needed to facilitate this?
Barriers Identified

- Differing national quality systems – GMP etc
- Big international companies and local manufacturers active in these markets
- Not all countries require seed lot system
- Different PhV systems to EU – less post marketing control
- Countries taking different approaches for new products vs existing ones
The biggest problem

• Legal requirements
  – National Law requires the test
  – No easy way to get this changed
  – Needs lobbying at legislator level
  – Need to show how EU approached and science rationale behind
  – Try to encourage and support countries to change
Major markets identified as a challenge

- Argentina, Brazil, Canada, India, Japan, South Korea, China and Taiwan - TABST

- USA – mouse safety test
Case study 2 - proposals

• IFAH-Europe to work with industry to have a consolidated list of countries that accept TABST removal and those that don’t (and why)

• Possibly also a peer reviewed publication on the issue and approach
Case study 2 - proposals

• Find ways to lobby internationally the countries that need legal changes to move forward
  – OIE
  – Health for Animals
  – EPAA

• Suggestion for a joint workshop as a starting point
Case study 2 - proposals

• Discuss with Ph.Eur. If they could write a white paper on why they removed the TABST to be shared with other international pharmacopeias
Case study 2 - proposals

• IFAH-Europe to work with industry to have a consolidated list of countries that accept TABST removal and those that don’t (and why)