U.S. FDA Reflection Paper: Further Opportunities for Harmonization of Standards for Generic Drugs

-Update-

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FDA's Reflection Paper on Generic Drug Harmonization

- After Kobe meeting in June, FDA revised the reflection paper
  - A new Version 2.0 was drafted
- In September, FDA discussed the draft with input/comments from a small group formed following the June ICH meeting
  - EMA, PMDA, Health Canada, Swissmedic, TFDA, China FDA, IGBA, JPMA, EFPIA
- In October, FDA sent the new draft reflection paper to ICH Assembly for comments
- FDA made further revisions to the reflection paper
- Latest version of the reflection paper was sent to the ICH Assembly in mid-Oct
- The reflection paper will be discussed at the November ICH Assembly Meeting
- If the paper is endorsed by ICH
  - An informal discussion group will be formed

Outline of the Reflection Paper

- Proposes to develop a series of ICH guidelines on standards for demonstrating equivalence (e.g., bioequivalence) for
  - (1) non-complex dosage forms
  - (2) more complex dosage forms and products
- Proposes to establish a generic drug discussion group
  - To assist in assessing the feasibility of harmonization of standards for generic drugs
  - To prioritize work areas

Target at scientific and technical standards for generic drugs

Current Landscape of ICH Guidelines for Generic Drug Development

- Existing ICH guidelines will be surveyed
- Preliminary assessment indicates that the development of the ICH M9 and M10 Guidelines on *Biopharmaceutics Classification System-based Biowaivers* and *Bioanalytical Method Validation* represent the first step towards harmonization of standards for generic drugs.
- Subsequent work can build on these guidelines and further expand to additional topic areas including standards for demonstrating equivalence
  - Possible new topic proposals will be submitted to ICH in December

ICH: Possible Remits of the Discussion Group

- Revising the reflection paper based on regional input
- Establishing an overarching vision for the harmonization of generic drug standards under ICH
- Recommending new topics for harmonization of generic drug standards
- Surveying existing ICH guidelines to identify any gaps in guidance for generic drugs
- Prioritizing areas for harmonization and making recommendations to the ICH Management Committee

Other Groups

- Leverage existing international collaborative initiatives on issues relating to generic medicines, for example,
  - IPRP BEWGG and IPRP QWGG
    - Regulators
  - Global Bioequivalence Harmonization Initiative (GBHI) Conferences
    - Regulators (FDA, EMA), Academia, and Industry (convened by professional societies such as AAPS and EUFEPS)
- Establish and continue scientific and technical engagement and communication between experts to advance harmonization of guidance for generic drugs

GBHI Conference as an Example

- Provide a platform for open scientific exchange on selected BE topics
  - A broad range of stakeholder engagement
- Help identify BE topics for potential ICH harmonization

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Review

Summary report of second EUFEPS/AAPS conference on global harmonization in bioequivalence

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GBHI Conference as an Example

- GBHI discussed BE topics → potential ICH BE topics

Mar 2015 GBHI topics
BCS based biowaiver
BE assessment of different strengths
Food studies and administration conditions for IR products

Sep 2016 GBHI topics
Prodrugs and compounds with pre-systemic extraction
Scaling procedure and adaptive design(s)
Exclusion of PK data in BE assessment

→ ICH M9

→ 2016 BE topic → FDA ICH new topic proposal


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