

FIFARMA Position Paper - Unlocking the Potential of Advanced Therapies for Patients in Latin America

FIFARMA members represent the innovative pharmaceutical industry and national trade associations in the Latin America Region.

FIFARMA is committed to engage in the development of policies that foster the access to high quality pharmaceutical innovations that prolong, preserve and improve life for patients in Latin America.

Introducing Advanced Therapies into the Latin American Region – the importance of regulatory systems

Advanced Therapies are medicines for human use that are obtained from cells (cell therapy), genes (gene therapy), or tissue (tissue engineering). Some may contain one or more medical devices as an integral part of the medicine (“combined advanced therapy”). These groundbreaking new therapies are pushing the boundaries of science and challenging expectations of what medicine can achieve. Advanced Therapies have the potential to address major unmet health needs, changing the courses of diseases by alleviating the underlying causes and even potentially curing certain conditions.

However, the benefits of these products bring with them novel regulatory challenges, as a result of the breadth of therapies covered, the innovative science and a high level of complexity throughout the development and manufacturing of these technologies. This requires changes in mindset and approach by all stakeholders, which can be addressed by regulatory system strengthening.

- Government and Healthcare systems would be able to address ethical and reputational risks where currently licensed products or therapies lack demonstrated benefits, efficacy, and safety, and the uncertainties for the centers that administer such products.

- National Regulatory Authorities and Industry would gain from effective, flexible and innovative regulatory processes and oversight to manage these complex regulatory submissions and global supply constraints while receiving science-based approvals.

- Patients and Healthcare providers are able to understand the benefits and have access to safe, effective and quality advanced therapies.

FIFARMA recognizes that strengthening regulatory systems for these medicines offers this opportunity for all stakeholders in the region.

Issues facing regulatory systems when considering Advanced Therapies

(I) the need to adapt regulatory frameworks including guidance and practices to the unique specificities of advanced therapies, i.e. complex manufacturing, small population studies, surrogate outcomes, conditional approvals, pharmacovigilance including long-term follow up,

(II) lack of harmonized international guidance documents with aligned terminology, regulatory standards, and evidence requirements,

(III) a high level of complexity requiring training to generate expertise across the diversity of technologies,

(IV) manufacturing considerations, such as difficulties in the collection and handling of source material,

(V) the necessity to use novel evidence generation strategies often results in a smaller submission package due to early and compelling data that addresses significant unmet needs when compared to other medicines.

FIFARMA Recommendations for strengthening regulatory systems for Advanced Therapies in the region

FIFARMA supports the recent "PANDRH Regulation of Advanced Therapy Medicinal Products: Concept Note and Recommendations", welcomes its proposed recommendations (see Appendix 1) and looks forward to supporting national regulatory authorities as they begin to implement these recommendations in the region.



FIFARMA sees three key areas of opportunity to strengthen regulatory systems for these medicines in the region:

- **Establishment of Regulatory Frameworks:** the lack of regulatory frameworks or the existence of divergent regulations across the region can delay access to safe, effective and quality Advanced Therapies. The set-up of regulatory frameworks that allow for adequate regulation of these therapies, recognizing the diversity of technologies, while allowing sufficient flexibilities to accommodate advances in science and growing experience in the field may be challenging.

FIFARMA supports the adoption of international regulations and guidelines. If a national regulatory framework will be developed, FIFARMA supports convergence to international scientific standards to achieve harmonization of standards, guidelines, regulations, and implementation mechanisms. A risk-based approach should be applied whenever feasible, while maintaining a robust set of key criteria to ensure patient safety and efficacy.

- **Adoption of Reliance Procedures:** ensure the safety, quality and effectiveness of these products can require a high resourced enterprise and skilled human resources.

FIFARMA calls for Latin America regulatory agencies to adopt reliance procedures to increase efficiencies and improve regulatory capacities. The use of reliance procedures should span the entire product lifecycle (inspections, regulatory review, post-approval changes).

- **Regulatory Capacity Building:** capacity and capability within regulatory authorities for these complex products poses an immediate challenge to the development of both guidance and subsequent review.

FIFARMA supports a multi-stakeholder partnership approach in delivering capacity training for regulators, officials and health care professionals and recommends APEC Centre of Excellence/PAHO/PANDRH developed training activities for national health authorities on Advanced Therapies.





Conclusion

Advanced Therapies are a rapidly evolving field, with an inherently high level of complexity and recognized challenges. FIFARMA sees three key areas of opportunity to strengthen regulatory systems for these medicines in the region aligned with PANDRH activities to ensure the use of approved advanced therapies and prevent risks to the population. FIFARMA calls for Latin America regulatory agencies to (i) ensure convergence when establishing regulatory frameworks, (ii) adopt reliance procedures, and (iii) embrace capacity training. All stakeholders should engage on an open dialogue and continue efforts to ensure the availability of Advanced Therapies for Patients in Latin America.



FIFARMA is the Latin American Federation of the Pharmaceutical Industry created in 1962.

We represent 14 research-based biopharmaceutical companies and 11 local associations dedicated to discovering and developing innovative, quality and safe health products and services that improve the lives of patients in Latin America and the Caribbean and advocate for patient-centric, sustainable health systems characterized by high regulatory standards and ethical principles.

Appendix 1: RECOMMENDATIONS FOR REGULATORY AUTHORITIES

The Ninth Conference of the Pan American Network for Drug Regulatory Harmonization recommends to the regulatory authorities

1. Strengthen the regulatory systems for medicines, health technologies, and products of human origin through:
 - a. Review of national regulatory frameworks by NRAs, and recognition of the existence of such products;
 - b. Adoption of specific regulations for the introduction of advanced therapies, considering the Guiding Principles on human cell, tissue and transplantation and the Principles on the donation and management of blood, blood components and other medical products of human origin, both established by WHO and other international guidelines;
 - c. Use of international standards for approval of these therapies, registration of products, and licensing of establishments that manipulate or administer them (including but not limited to: clinical trials of effectiveness, safety, and efficacy; monitoring of good manufacturing practices; bio pharmacovigilance, etc.);
 - d. Authorization (including licensing or when appropriate), supervision and surveillance of the centers or facilities in those cases where it is demonstrated that approved cell therapy techniques are used, in order to avoid fraudulent activities.

2. Improve information mechanisms in regulatory authorities in order to:
 - a. Inform the community about the uses, risks, and benefits of therapies based on the current scientific evidence in order to prevent misleading advertising;
 - b. Urge physicians and patients not to use unapproved stem cells for therapeutic purposes, given the possible risks of such therapy;
 - c. Expand the network for communication between regulatory agencies, investigators, centers, and other interested parties in order to maintain continuous communication and coordination to achieve the harmonization of standards, guidelines, regulations, and implementation mechanisms, and improve the production of data on the regulation and use of these products and the exchange of information on safety.

1. Pan American Health Organization. Regulation of Advanced Therapy Medicinal Products: Concept Note and Recommendations. Ninth Conference of the Pan American Network for Drug Regulatory Harmonization (PANDRH). (San Salvador, October 2018). Washington, D.C.: PAHO; 2019.