PHARMACEUTICAL REGULATORY FRAMEWORK IN INDONESIA: Experience in Global/Regional Regulatory Networks

Togi J. Hutadjulu
Director of Drug, Narcotics, Psychotropic, Precursor and Addictive Substance Standardization
Indonesian Food and Drug Authority (FDA) / Badan POM
Republic of Indonesia

Presented in CMC Strategy Forum Japan 2019
Tokyo, 11 – 12 December 2019
1. Regulatory Framework in Indonesia

2. Indonesian FDA’s Supports in Pharmaceutical Industry Development

3. Regulatory Convergence at Global/Regional Level

4. Supporting New Innovation, including Biologics
1. Regulatory Framework in Indonesia
REGULATORY FRAMEWORK IN INDONESIA

Scope of WHO-NRA Benchmarking (for producing country)

1. National Regulatory System
2. Registration & Marketing Authorization
3. Vigilance (PML)
4. Market Surveillance and Control (MSC)
5. Licensing Premises (LIC)
6. Regulatory Inspections (RI)
7. Laboratory Access and Testing (LAT)
8. Clinical Trial’s Oversight (CTO)
9. NRA Lot Release

Drug Development & Establishment of Manufacturing Facility

- IND regulatory system
- Clinical Trial Authorization
- GCP Inspection

Marketing Authorization

- Manufacturing facility’s certification
- GMP certification & inspection

Drug evaluation system for MA

Post Marketing Surveillance & Control

- Regulatory inspections (GMP & GDP)
- Post Market Sampling & Laboratory Access
- Pharmacovigilance
- Drug labelling & advertisement control
- Lot release (Vaccine & biologics)

Pre Market Control

Post Market Control

Lot release (Vaccine & biologics)
ROLES OF INDONESIA FDA IN PRE AND POST MARKET CONTROL

In Pre Market Process
From Pre to Post Market
From Post to Pre Market

PRE-MARKET

R n D
INDUSTRY

PRODUCT
FOOD & DRUG REGISTRATION
PRODUCTION FACILITY
GMP CERTIFICATE

POST-MARKET

MARKETING AUTHORIZATION
SAMPLING OF PRODUCT & LAB TESTING
MONITORING OF ADVERTISEMENT, PROMOTION & LABEL
INSPECTION OF FACILITY

CONSUMER

PHARMACOVIGILANCE

PHARMACEUTICAL SERVICES FACILITY

Dashboard Tracking Autentification

Dashboard Tracking Identification

• Ease of Doing Business
• Digital Signature

Online Single Submission (OSS):
- e-Registration
- e-GMP
- e-CDOB
- e-BPOM (Export-Import)

Digital based monitoring:
- SIPT
- SmartBPOM
- BPOM Mobile
- Halo BPOM

Illegal Product Prevention
GAP ANALYSIS OF REGULATOR & INDUSTRY IN DECISION MAKING PROCESS

*) Source: The Centre for Innovation in Regulatory Science (CIRS), presentation of Dr LLiberti TOPRA Annual Human Medicines Symposium 2017, London, UK

Note: Organisational-level agency and company responses were mapped against the 10 quality decision-making practices.
2. Indonesia FDA’s Supports in Pharmaceutical Industry Development
To enhance the competitiveness of local pharmaceutical industry by supporting pharmaceutical industry development.

**MANDATES FOR INDONESIAN FDA**

1. To facilitate the development of drug in order to support access and availability of drug for public as an effort to improve health services within the National Health Insurance framework.

2. To support investment on pharmaceutical industry sector by certification of production facility (GMP) and drug assessment.

3. To encourage the business party to improve compliance to regulation and standard in order to ensure the safety, quality, and efficacy as well as the competitiveness of pharmaceutical industry.
DIRECTION FOR DEVELOPMENT on PHARMA SECTOR

Government Direction 2019-2024

- Economic Development
  - Infrastructure development
  - Simplification of regulation
  - Simplification of bureaucracy
  - Human resource development

INVESTMENT ON MEDICINE

- Regulatory Assistance
  - Regulatory Assistance on GMP Implementation
  - Regulatory Assistance on Drug Registration
  - Regulatory Assistance of downstreaming of research results

Ease of Licensing

- Simplification of the licensing process and reduction of timeline
- Digitalization (e-registration; e-certification)
- Integration to the OSS
- Integration with Simfonifi for payment of fee (PNBP)

INVESTMENT ON MEDICINE

INVESTMENT ON MEDICINE
**STRATEGIES TO ACCELERATING DRUG REGISTRATION**

**SIMPLIFICATION ON BUSINESS PROCESS OF PRE-MARKET EVALUATION**

- **LOGIN**
- **INPUT & UPLOAD DATA**
- **PROCESS & EVALUATION**
- **SENDING OF DOCUMENTS**
- **APPROVED**
- **MARKETING AUTHORIZATION**

Only applicable for:
- Imported products
- Existing branded and generic drugs
- Existing toll manufacturing drug
- Change of production facility that has no implication on labeling and quality

**RELIANCE MECHANISM**

3 COUNTRIES → 1 COUNTRY

Applicable for:
- Variation registration for quality of New Drug and Biological Products
- New registration and major variation registration related to new indication/posology of New Drug and Biological Products

**ACCELERATING REGISTRATION TO SUPPORT PHARMACEUTICAL INVESTMENTS IN INDONESIA**

- 100 WD: Registration of Investigational New Drug
- 300 WD: First registration of new drug invested in Indonesia
- 150 WD: Registration of generic drug invested in Indonesia
- 10 WD: Renewal

Regulation of BPOM No. 15 Year 2019 as revision of Regulation of Head of Badan POM No. 24 Year 2017 on Criteria and Procedure of Drug Registration
Accelerated Registration Process for New Drugs, including Life-saving and Orphan Drugs

2 Steps:

✓ Pre-Registration Step (40 WD):
  To determine the registration category, evaluation path/timeline, registration fee

✓ Registration Step:
  Submission and evaluation of dossier according to the registration category

Pharmaceutical Industries located in Indonesia

100 WD

• Drug(s) for life saving;
• Orphan drug
• Drug(s) for national program;

120 WD

Drug(s) which has been approved by mature agencies

300 WD

Drugs which are not included in path 100WD and 120 WD category

Pharmaceutical Industries located in Indonesia
IMPLEMENTATION OF RELIANCE SYSTEM FOR MARKETING AUTHORIZATION

Has been starting since 2017 to use 3 reference countries and in July 2019 was revised into 1 reference country’s assessment report for decision making of marketing authorization of medicines

- Accelerating MA process
- Efficiency in registration process
- Avoid duplication
3. Regulatory Convergence at Global/Regional Level
Why Convergence?

Regulatory harmonization

The pre-market review of generics makes a mounting pressure on health regulatory authorities around the world due to increasing workload and risks associated with complex global supply chains. This has led various regulatory authorities to launch the International Generic Drug Regulators Pilot (IGDRP) with the aim of regulatory convergence and cooperation. The IGDRP pilot entails a series of concrete measures to facilitate the timely authorization and availability of safe, effective and quality generic medicines.

Benefits of the IGDRP pilot will include establishing a more permanent information and sharing among participants in the international efforts related to regulation of medicines. The initiative will require the support of the industry as well as other stakeholders interested in promoting access to affordable, quality generic medicines.

Benefits to the collaborative process

- Improved operational efficiencies
- Reduction in overall regulatory burden and less duplication of effort
- Potentially faster and more consistent review and approval process
- Greater alignment of industry submission practice
- Greater regulatory oversight and peer review
- Greater availability of generics that may otherwise not be registered in certain markets
- Fewer parallel registration
- Promotion of regulatory science and the strengthening of Regulatory Authorities
- Mutual learning and consistency in applying international guideline
- Regulatory convergence, promotion of regulatory science and the strengthening of Regulatory Authorities
- Lower regulatory and product development costs/times
REGULATORY CONVERGENCE INITIATIVES AT GLOBAL AND REGIONAL LEVELS

ASEAN

ASEAN Technical Guidelines
Mutual Recognition Agreement (MRA)
Joint Assessment

ACCSSQ-PPWG

ASEAN Technical Guidelines

APEC HARMONISATION CENTER (AHC) ACTIVITIES

APEC RHSC CoE Workshops:
- Biotechnology Products
- MRCT
- Good Clinical Practices (GCP) Inspection
- Good Registration Management (GRM)
- Pharmacovigilance
- Advanced Therapy Medicinal Products (ATMPs)

OIC

CoE for Vaccines and Biotechnology Products, 2018

1st Meeting of OIC Heads of NMRAs (November 2018) : JAKARTA DECLARATION
ASEAN Consultative Committee on Standards and Quality-Pharmaceutical Products Working Group

ACCSQ-PPWG

<table>
<thead>
<tr>
<th>ASEAN Common Technical Dossier/Requirements</th>
<th>ASEAN Technical Guidelines</th>
<th>Mutual Recognition Arrangement (MRA)</th>
<th>Joint Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety</td>
<td>Analytical Validation</td>
<td>GMP Inspection</td>
<td></td>
</tr>
<tr>
<td>Efficacy</td>
<td>Process Validation</td>
<td>BE Study Report</td>
<td></td>
</tr>
<tr>
<td>Quality</td>
<td>Stability Studies</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>BA/BE Studies</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4. WAY FORWARD
STRATEGIC FRAMEWORK AT NATIONAL LEVEL: SUPPORTING NEW INNOVATION, i.e. BIOLOGICALS

VACCINES
- Urgently needed by Public Health, such as:
  - Rotavirus
  - Pneumococcal
  - Conjugated Typhoid
  - Novel OPV type 2

BIOTHERAPEUTICS/BIOSIMILAR
- GL on Biosimilar Product → Adapt WHO SBPs GL (TRS 977/2009) and EMA guideline)
- Such as:
  - Erythropoietins, insulin

BLOOD PRODUCT
- Establishment of Plasma Fractination Facilities
- Potential Candidates, such as:
  - Albumin, Factor VIII, Factor X

CELL THERAPY PRODUCTS
- Effectiveness of cell-based therapies: Regenerative Medicine → Stem Cell
- R & D including Clinical Trial of Stem Cell Products
FUTURE CHALLENGES

NRA

- Insufficient regulatory capacity
- Limitation of resources (HR & Budget) to conduct timely and cost-effective evaluation process
- Lack of harmonized approaches for the regulation of medical products

National Government

- Limited health-care resources
- Challenges in ensuring improved public health outcomes through greater availability of quality assured medicines

Patients

- Need for
  - Quicker access to more affordable, quality assured medicines
  - Assurance that available medicines are safe and NOT F/S one

Manufacturers

- Need for
  - Greater transparency & reduced regulatory burden
  - Timely approval of Clinical Trial Authorization and Marketing Authorization
  - Improved access to regional market

*Source: Lucky S. Slamet, 2019:*
The Way Forward: Approach to Accelerate Pharma Development for Self-reliance of Medicines

**Strengthening infrastructure**
- Development and/or revision of current regulations and procedures to accelerate access to medicine and other health products of assured QSE.
- Enhancing the capacity of regulatory oversight on quality, safety and efficacy of medicinal products as to enhance health outcomes and facilitate the international trade of medicinal products.
- Utilize IT based-system.

**Facilitating Research and Development**
- Providing regulatory assistance to support drug development.
- Promoting clinical trials nationally that meet international standards.

**Collaborating with Stakeholders**
- Enhancing synergistic coordination and collaboration among ABGC (academia, business, government and community) to support and expedite research for commercialization.
Thank You

Gracias

Terima Kasih

Merci