Jones P Consulting Ltd
9, Highgrove Avenue
ASCOT
Berkshire SL5 7HR
Telephone: +44(0)1344 875543
Mobile: +44(0)7976 282016
Email: pharlechjones@yahoo.com

Global Advice on Veterinary Medicines

A Report on the Proceedings of an East African Veterinary Regulatory Harmonisation Roundtable hosted by the Bill and Melinda Gates Foundation held in Zanzibar Tanzania May 15 – 16, 2016 - FINAL

1. Introduction

The 4th Global Animal Health Conference (GAHC) held in Tanzania in June 2015 concluded that harmonization and regulatory convergence in Africa can overcome obstacles to the authorization of veterinary medicines and to trade, and in turn lead to improved market control and improved market access. In Africa it was reported that many countries are experiencing, or are on the verge of experiencing rapid economic growth and yet some of these countries lack the legislative authority, trained personnel and adequate resources to advance regulatory convergence which, if not addressed can impact so negatively on the availability of veterinary medicines.

Much progress has been achieved in establishing the framework for convergence in some regions, and the success of the efforts of GALVmed funded by the Bill and Melinda Gates Foundation (BMGF) has been acknowledged in achieving this advance in harmonization. In the East African Community (EAC) training has been undertaken to ensure a core set of competences, and the establishment of technical standards and procedures which enable the necessary skills in data assessment to be applied in partner countries and results in the acceptance of assessments done by colleagues in other countries within the region

Nevertheless the actual implementation of mutual recognition of regulatory assessments on the veterinary side is not happening successfully to a sufficient extent, and appears to lack the necessary commitment at the appropriate level of authority in the various countries. The purpose of this workshop hosted by the BMFG was to capitalize on the positive feedback from the 4th Global Animal Health Conference and to determine the barriers in partner countries in the East African Community (EAC) that are obstructing progress to full veterinary medicines regulatory harmonization (MRH-vet), and

to agree a set of recommendations to address these factors. Similar workshops are being considered for other regions within Africa in the future

Although invitations to the workshop had been issued to all EAC partner countries as well as Zanzibar, attendees were from Tanzania, Uganda and a representative from Ethiopia also participated as well as colleagues from GALVMmed and Health for Animals. A list of participants is attached at the end of this report in Annex 1

2. Background

The workshop drew on the key conclusions from the 4th GAHC as a framework for discussions and reflection which can be summarized as follows:

- **There was consensus that regulatory convergence benefits the availability of veterinary medicines by increasing efficiency and reducing duplication of effort by both regulators and industry**
- **Harmonised data requirements allow industry to conduct studies just once to internally agreed standards that are accepted for submission to multiple regulatory authorities and avoid duplication and to reduce animal testing**
- **Likewise, harmonised data requirements allow regulatory authorities to conduct assessments based on internationally agreed data sets, thereby promoting mutual recognition of authorisations**
- **Regional cooperation has already been shown to be an effective method of promoting regulatory convergence in Africa. Progress has been rapid in the last few years and the prospects remain good to widen and deepen cooperation in all African regions**
- **International organisations, NGOs and Public Private Partnerships all have a role in assisting national and regional registration authorities in promoting convergence through the creation of standards, meetings, training etc.**
- **Convergence of pre-authorisation activities is only one element of an authorisation and control system for veterinary medicines. Controls on imports, market access and distribution, post-authorisation monitoring and sampling and testing are other important elements**
- **The Animal Health industry requires a predictable regulatory environment which is stable, sustainable and affordable and is ready to support necessary actions to commit to this and growing the market in Africa**

3. Overview of Regulatory Convergence by Country

Ahead of the workshop each of the participants had been requested to prepare presentations to describe their countries' perspective on the

understanding and benefits of regulatory convergence, to determine the level of commitment to MRH-Vet, as well as the extent of the current involvement/ progress in each of the countries towards convergence. In addition the colleagues were asked to consider the obstacles to the successful establishment of a functional stable regulatory system embracing mutual recognition in their countries and across the EAC

In summary there appears to be broad agreement on benefits of MRH-Vet, and harmonisation is supported by EAC partner states, contingent on agreement by Heads of State under the treaty. It was acknowledged that GALVmed has played a leading role up to now but that the focus to date has been on vaccines only, so there is an urgent need to include veterinary pharmaceuticals in future efforts to harmonise registration within EAC. It was stressed that the current unpredictable regulatory environment remains a key barrier for animal health industry investment and commitment, so that the need for greater impetus to progress implementation of convergence is an urgent one and all agreed that overcoming the necessary legal hurdles on a national and regional level are key to success. Furthermore the representatives of the countries present welcomed the commitment and support of BMGF to advance convergence

Tanzania: Dr Hiiti Sillo, Director General - Tanzania Food and Drugs Authority

- Tanzania is fully committed to, and is implementing the EAC and SADC human medicines regulatory harmonisation (MRH) programme
- Tanzania participates in EAC vet vaccines registration harmonisation initiative and has been very involved in both the Technical Working Group (TWG) and Coordinating Group for mutual recognition (CGMR) since their establishment
- Guidelines on the technical requirements for authorisation of vaccines have been developed and consultation on these guidelines continues.
- Progress is underway to advance the harmonisation of policies, laws and the overall regulatory framework but this has yet to be completed
- The major challenges will be:
    - The need to establish the legal and regulatory framework jointly between the Ministries of Agriculture and Health
    - The lack of technical capacity to facilitate MRH-Vet
    - The continued risk of divergence at national level even following joint approval of a regulatory submission
    - The complexity of setting up and maintaining collaborative review system

The future success of MRH-Vet will require a regulatory gap analysis within EAC, accompanied by a fast tracking of harmonisation of policies, laws and regulatory frameworks. Consideration should be given to a pilot programme guided by policies and procedures to manage convergence

Further training of staff and staff exchanges are key requirements with a further build up of technical resource capacity. It was stressed that a bigger level of trust is essential as a strong foundation for MR

Uganda: Mrs Kate Kikule, Head Drug Inspectorate Services – National Drug Authority

- MR has gained traction since WTO formation and the establishment of regional trade blocks e.g. EU, and Uganda understands and welcomes the benefits of convergence.
- Uganda has been actively participating in the drafting of harmonised documents for registration of veterinary immunologicals within EAC
- Uganda is using PANVAC for testing of imported vaccines
- Uganda is a member of EAC medicines regulatory harmonisation initiative programme and African Medicine Regulation harmonisation initiative and COMESA

Uganda sees a number of challenges to the future success of MRH-Vet, which are in part responsible for delays in achieving convergence within EAC. As in Tanzania, the differing regulatory frameworks in partner countries e.g. Ministries versus the drug regulatory agencies can prove obstructive and the variability in adaption of the appropriate legislation at different levels in partner countries is a real problem and must be resolved at the highest level if progress is to be achieved. In addition the extent of regulatory expert capacity is not uniform across EAC partners and this must be addressed urgently. Other factors to be considered include the challenge of a language barrier e.g French v English in one or two countries. Political obstacles such as national pride and an over adherence to sovereignty is still a risk and the matter of revenue generation (fees vs state funding?) is still a matter of concern that has to be discussed

Ethiopia: Dr Terzu Daya, Director General - Ethiopia Veterinary Drug and Animal Feed Administration and Control Authority (VDFACA)

- Since 2013 VDFACA was established as an independent veterinary regulatory authority under the Ministry of Agriculture (after 2015 Ministry of Livestock and Fishery)– independence seen as beneficial
- Benefits of MRH-VET are accepted and welcomed to increase availability of vet medicines and to help in addressing the very serious problem of counterfeit and illicit drugs
- VDFACA does not require GMP inspection in those countries with stringent regulatory authority (seen as positive for MRH-Vet)
- Ethiopia is a member of The Intergovernmental Authority on Development (IGAD) which is an eight-country trade bloc in Africa actively calling for establishment of regional regulation of medicines and harmonisation. First IGAD conference was held in Addis in 2015
- Ethiopia has been liaising with EAC with a view to collaborating on mutual recognition veterinary drug registration

Ethiopia fears the risks associated with introduction of live vaccines and this could impact on the acceptance of convergence, as well as a lack of trust with other countries' perceived poor adherence to the principles of Good Manufacturing Practice (GMP). There may yet be some doubts within the authority about the success of implementing MRH, which means negotiation can be lengthy and costly because of a very real worry that regulatory needs and approaches differ considerably in different countries: there is a need to build trust with EAC partner countries Political instability in some countries is also a real concern

4 Market Access and Mutual Recognition

Following the regulatory overview the participants considered in greater detail the status of convergence in each country represented, taking particular account of technical and financial resources available, the current legal framework, the provision (or lack of) administrative and organizational support and the prevailing political climate. The aim of this section of the workshop was to focus on, and analyse potential solutions to, barriers to progress in order to scope out the recommendations that would be included in this the final report to take forward to the agencies and relevant hierarchies in the different countries to successfully implement MRH-Vet

Technical Resources

The colleagues in Tanzania believe that ensuring the provision of adequate technical expertise is paramount to the successful outcome of MRH-Vet and recommend mapping out the availability of existing experts and where they are they located. The initiative should also examine how expertise can be shared among partner countries. Much of the work to date as previously noted has been focussed on vaccines; this now needs to extend to veterinary pharmaceutical products with an urgent need for developing technical working groups for this class of medicines to be advanced as well.

GALVmed colleagues reported that Training the Trainers sessions are being planned over for next 18 months across the whole of EAC to help with capacity building on vaccines (NOT PHARMACECUTICALS).

In Uganda veterinary technical personnel with the appropriate expertise are available but not in sufficient numbers for livestock needs; they include levels of veterinary professionals with varying expertise (vets that do regulation, information officers, pharmacovigilance); but an increase in human resources is definitely needed. There is also a need to consider ability/capacity building of laboratories for testing and the experts that are able to do this

Uganda strongly supports the Tanzania proposal in recommending a mapping analysis of experts in EAC partner countries (inclusive of Ethiopia) by EAC secretariat – use of consultants should also be considered?

In Ethiopia the establishment of a dedicated veterinary agency (VDFACA) has resulted in some veterinary expertise being provided but more is required and training is especially needed across all fields including inspectors, assessors and analysts.

Financial Resources

Tanzania highlighted the 2 areas that need to be addressed:

1. Implementation of MRH-Vet will require each country to commit financial resources to stakeholder meetings, agency involvement, and this should be coordinated through and by the EAC secretariat (invitations to meetings etc.)
2. For sustainability of the program, attention is needed very soon for a proposal for registration fees from animal health companies submitting applications, to support the newly converged regulatory process and all the testing required supported by and along with government funding.

This could best be progressed by assigning a financial oversight role for EAC Steering Committee through EAC keeping in mind a likely time frame of 3-5 years for the duration of this program/concept.

> ***•BMGF stressed at this point that key support will be directed at short term establishment of convergence mechanisms throughout EAC and not for long term sustainability***

Uganda reported that as the authority is responsible for both veterinary and human products, with only 10% of authorised medicines being veterinary ones with resources being shared between the human and veterinary side. To ensure sustainability of MRH on the human side, partner states had to allocate budget toward harmonization resources (budget code for harmonization), but it is still underfunded. It is now crucial that funding of the veterinary project is addressed urgently.

With the agency in Ethiopia being dedicated to veterinary medicines it seems adequate human capacity is not a problem but once again the urgent need for training was emphasised in the short and medium term

Legal Framework

Tanzania reported that within EAC a formal mechanism for collaboration on the veterinary side is lacking as no regional legal framework exists. National legislation which could facilitate convergence for veterinary registration appears to be in place in EAC partner countries, but there is now an urgent need for national law makers to talk to each other. A legal mechanism to facilitate trade and eliminate barriers to trade within EAC is maybe in place already; at a recent AU Summit something along these lines was passed. An EAC Medicines and Food Safety Commission (as a body) is a firm goal with a timeline envisioned to be completed by December 2016

In Uganda a National Drug Policy and Authority act is the current legislative mechanism and includes veterinary medicines, however there is a gap around lack of specific provision for mutual recognition - but this is under discussion, with a view to drafting an amendment (bill) that would allow for this. In reality the Ugandan colleagues believe that the practice of mutual recognition may be happening, certainly in the case of vaccines but as reported by Tanzanian colleagues, there is no regional articulated legal framework to mandate this.

In Ethiopia taking into consideration the benefits of MR, if products are registered in an EAC partner country, then depending on the type of products and the quality standards of the regulatory authority elsewhere, the steps for registration can be short. However to address the matter in a sustainable format a review of legal proclamation No 728/2011 is required

Administrative and Organisational Support

In Tanzania the situation is currently acceptable, but always undergoing continuous improvement, and there is an independent expert committee advising on vet medicines. On the human side there is a national coordinator in charge of implementation sitting in secretariat and if MRH-Vet proceeds then maybe this could happen on the vet side as well

In Uganda there is veterinary representation within the overall administration structure; but not on registration side only on inspector side and a quality management system is being worked on as per WHO recommendation required for prequalification for laboratories
Currently looking to organizations like Swiss Medic to support the Ugandan authority in enhancing their drug regulatory system in addition to the support from WHO

In Ethiopia mutual recognition's benefits are understood and appreciated, however, while human resources are in place there is a lack of consultants/experts to move it forward

Political Climate

All agreed that the EAC environment is supportive of this convergence initiative and that the political will is certainly present at national level. Support from international partners to help the process would certainly be welcome, but there is uncertainty as to how to succeed in engaging such partners?

A strong recommendation would be to promote the advance of an EAC Regional strategy document to serve as roadmap (including components on training and capacity building)
It was stressed that civil society organizations also must be consulted amongst stakeholders (industry, government, farmer organizations)

In Ethiopia while not a member of EAC, the political will is strong; working towards new governance at all levels nationally; agreement of standards with Europe etc. will increase potential for participation in MR

5.Summary of Discussions on Status of Regulatory Convergence

Overall Summary of the detailed analysis of regulatory convergence from the discussions on the first day of the workshop can be summarised as follows:

- Benefits of MRH-Vet are well understood and accepted by all
- Building trust is essential
- Systems are mostly in place in Tanzania and Uganda: need updates on situation in other EAC countries – how?
- Vaccines have largely been the priority – need to work more on pharmaceuticals – technical guidelines need to be reviewed again
- Agencies are Ministries of Health, Policies are Ministries of Ag; external partners can help with advocacy - but position coming from within EAC would be strongest – need for bridge building
- Regulatory capacity building is needed in all countries and exchange of expertise has to be facilitated
- Mapping out process on regulatory capacity needs to be undertaken quickly to determine capacity by country
- EAC Regional strategy document will be needed to serve as roadmap (including components on training and capacity building)
- Engagement of civil societies is important
- CSOs need to be developed and included by all EAC partner countries
- Remaining differences between Mutual Recognition procedures, guidance documents, frameworks, requirements, licensure, legislation have to be addressed; and by country; and between vaccines and pharmaceuticals. Focus on fast tracking of policies laws and regulatory framework.
- Finance mechanisms required to set up mutual recognition - external funding is necessary (vs. sustaining the system on the revenue generated from fees).
- Discussion needed with EAC to create ***financial oversight role*** for steering committee to manage this (with Partners – how to proceed?)
- BMGF to examine lessons learned from the human side of regulatory harmonization

Miscellaneous topics of concern

•Is there a reluctance to new technologies? Need to see evidence

•Industry concern about data protection / confidentiality – Participants stressed that this is not an issue in these countries specifically but a reasonable comment

•Plea that fees not be prohibitive (there must be a margin of profit) – what is reasonable?

Conclusions from the Regulatory Workshop in Zanzibar February 2016

These conclusions must be read in conjunction with the full report of the workshop and its proceedings

Dr Sillo from TFDA has kindly agreed to present the recommendations from the workshop to the EAC Steering Committee for Medicines Regulatory Harmonisation (MRH) of which he is chair. Dr Sillo will highlight the key areas requiring attention in order to progress regulatory harmonization in EAC for veterinary medicinal products (MRH-Vet) to include finances, capacity, timelines and additional requirements in the EAC partner countries. A fundamental part of the recommendations will be the need for a detailed gap analysis to be undertaken across all partner countries of such requirements

It is recommended that representation also needs to be made at the highest (ministerial) level to ensure that the necessary support will be forthcoming to achieve success

Ethiopia while not a partner country of EAC is aligned to the Community and there is a desire to come to agreement on building trust and respecting each other's regulatory approvals, especially as part of the greater effort to tackle the problem of counterfeit medicines. Action should be taken by BMGF to encourage further dialogue between EAC and Ethiopia. Dr Daya will check any other areas of collaboration between Ethiopia and EAC which could provide a template for advancing MRH-Vet

Convergence of veterinary medicines regulation has been discussed in the past in a number of fora mostly focusing on vaccines, but progress has been slow. In EAC there is now however a better understanding of what was historically impeding progress, and partner countries are now willing to commit to allocating responsibilities within their authorities to make better progress in future

The establishment of the EAC Secretariat for MRH in human medicines is seen as a significant step forward and attempts should now be made for the EAC secretariat to take up the mantle of advancing MRH-Vet. Efforts should now be made to identify an appropriate officer in EAC Secretariat to assume this role. It is essential that to succeed in this endeavour, all partner countries must agree to come on board with this project from the start. Dr Sillo's intervention at the EAC Steering Committee is seen as pivotal in achieving this outcome

To date much of the work on achieving regulatory convergence on the veterinary side has been focused on vaccines. The workshop agreed that significant efforts must now be directed at MRH Vet for pharmaceutical

products. There is also a risk that a lack of progress on the pharmaceutical side will impede further progress and importantly commitment for vaccines.

The global animal health industry represented at this workshop by Health for Animals signaled that it is becoming more optimistic that a stable, sustainable regulatory environment, is becoming established in the EAC. If MRH-Vet can develop and proceed in a manner envisaged at this workshop within a sound legal framework, there is good reason to expect that global animal health companies would be prepared to submit regulatory dossiers for new and innovative products for veterinary medicine in this region which they will consider an attractive market

Participants agreed that the support of the OIE is important to the successful outcome of the objectives being pursued at this workshop. The responsibility of OIE in setting standards for global veterinary medicine means that their endorsement of what is being pursued in MRH-Vet will be very complementary to the efforts being undertaken. Dr du Marchies Saarvas of Health for Animals agreed to meet with the new Director General of OIE Dr Monique Eloit to explore opportunities for further collaboration

Other countries within EAC not represented at the workshop include Kenya, Burundi and Rwanda as well as the Zanzibar authorities. It was agreed that representations now need to be made to the authorities in these countries to inform and brief them about the workshop and its recommendations, with the objective of gaining their support and commitment to the project of MRH-Vet.

Dr Mesenhowski of BMGF will arrange to visit these countries in the near future to meet with the relevant colleagues in those countries. Mrs. Kikule of the Ugandan Drug Inspection Service agreed to provide a list of contacts in all countries so that the report of the workshop can be communicated to all the EAC Heads of Agencies in parallel with Dr Sillo's intervention at the EAC Steering Committee

It was also agreed that Dr Sillo would be invited to communicate with the Zanzibar authorities. Dr Mesenhowski will also arrange to meet Dr Karim Tounkara the newly appointed OIE Regional representative for Africa to discuss collaboration with OIE

BMGF reiterated its commitment to providing the support and financial resources to establish MRH-Vet in EAC and beyond while expressing its preference for being the sole provider for such the initiative rather than in partnership with others.

The involvement of GALVmed in MRH-Vet has to date been mostly funded by BMGF in association with the UK Department for International Affairs and has focused on the harmonization of technical regulatory requirements for vaccines. The workshop agreed that significant efforts must now be directed at MRH-Vet for pharmaceutical products and BMFG will undertake

discussions with GALVmed to consider expanding the latter's responsibilities to extend to pharmaceutical products as well.

In time BMGF is committed to advancing regulatory convergence in other parts of Africa with IGAD and UEMOA and also in S E Asia.

Peter G. H Jones
Director

2nd May April 2016

Appendix 1 Participants

Hitti Sillo | Director General, Tanzania Food & Drug Authority
Kate Kikule | Ag Executive Director, Uganda National Drug Authority
Tezu Daya | Director General, Ethiopia Veterinary Drug & Animal Feed Administration & Control Authority
Jeremy Salt | Senior R&D Director, GALVmed
Lois Muraguri | Director of Policy &External Affairs, GALVmed
Carel du Marchie Sarvaas | Executive Director, Health for Animals
Peter Jones | Independent Contractor <better affiliation?>
Samuel Thevasagayam| Interim Director, Agricultural Development, Bill & Melinda Gates Foundation
Kendra Curtin | Program Assistant, Bill & Melinda Gates Foundation
Shannon Mesenhowski|Programme Officer Bill and Melinda Gates Foundation