

The new EU rules on veterinary medicines - *Quo vadis?*

CDG Animal Products – pig meat sector
Brussels, 28th May 2019

Rick Clayton
Technical Director
AnimalhealthEurope



Animal Health Europe members

12 corporate members



17 national associations in 19 countries

- Belgium
- ☐ Czech Republic
- Denmark
- ☐ Finland
- France
- Germany
- Greece
- ☐ Hungary
- Ireland
- Italy
- Netherlands
- ☐ Norway
- Poland
- Portugal
- ☐ Slovakia
- Spain
- Sweden
- Switzerland
- United Kingdom

Representing over 300 companies both originators and generics - 135 of which are small and medium sized enterprises (SMEs)

90% of European sales

Background



The pathway
to new

Veterinary medicines

Developing new medicines and vaccines requires extensive research and testing



THE VOICE
OF THE ANIMAL
MEDICINES INDUSTRY



2 years

3 years

2–3 years (seasons)

1–2 years

→ = 8–10 years



DISCOVERY

Hypothesis
development and
early research



PRE-CLINICAL LAB DEVELOPMENT

Early testing in labs

Safety and
quality including
environmental safety



CLINICAL FIELD TRIALS

Testing safety and
efficacy in animal
patients



REGISTRATION

Product approval

Evaluation and
assessment by
regulatory authority



MANUFACTURE AND DELIVERY

Getting approved
products to people
or veterinarians
to enable them to care
for their animals



Market entry



Marketing authorisation - data requirements

Quality data

manufacturing

Safety data

In addition for
VMPs:

Consumer safety
(maximum residue
limits)

**Environmental
safety**



Clinical data,

field trials



Registration procedures

1. Centralised procedure

- European Medicines Agency

12 products p.a.
Innovative and biotech
products

2. De-centralised / mutual recognition procedures

- National agencies cooperating

220 products p.a.
88% generic products

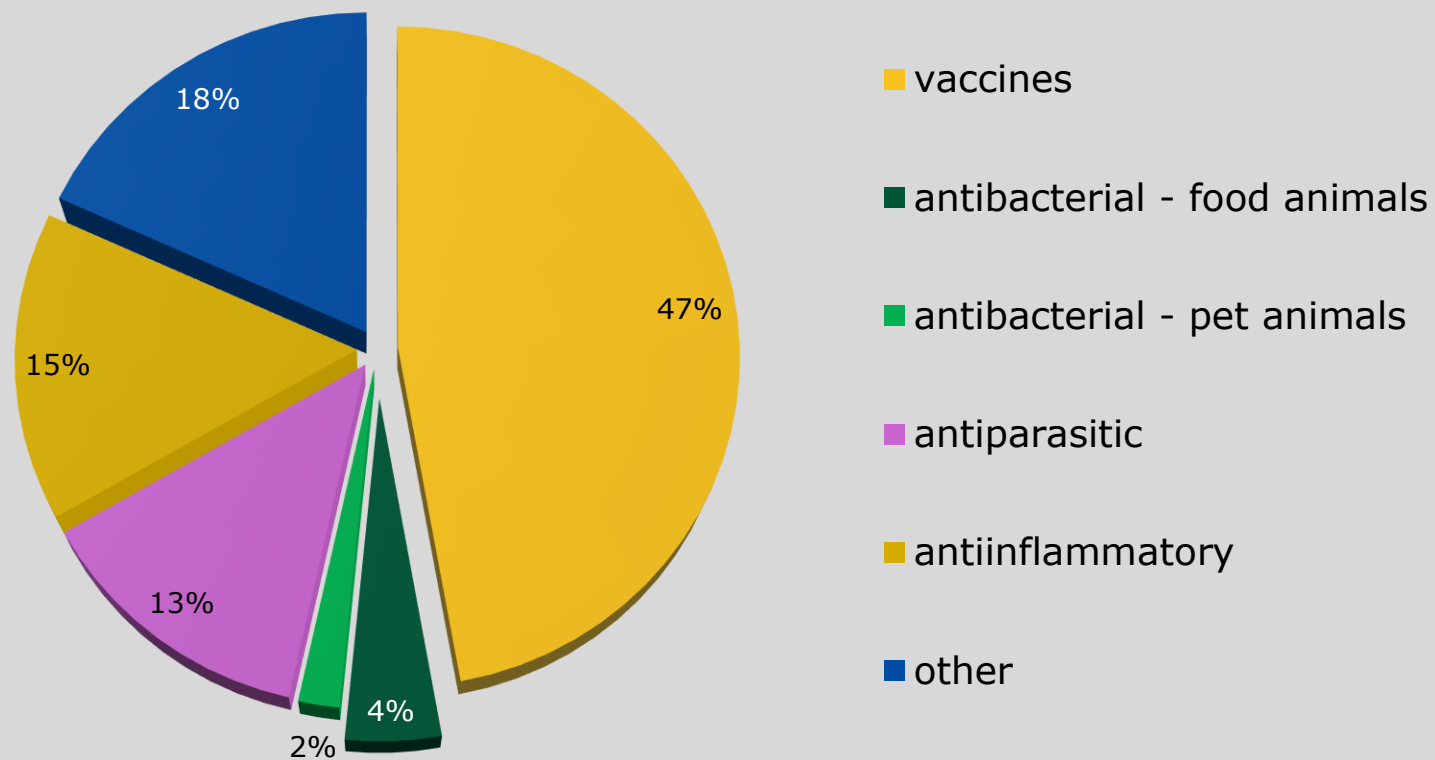
3. National procedure

- National agency/authority

few? products p.a.



Centrally authorised products





Our legislation

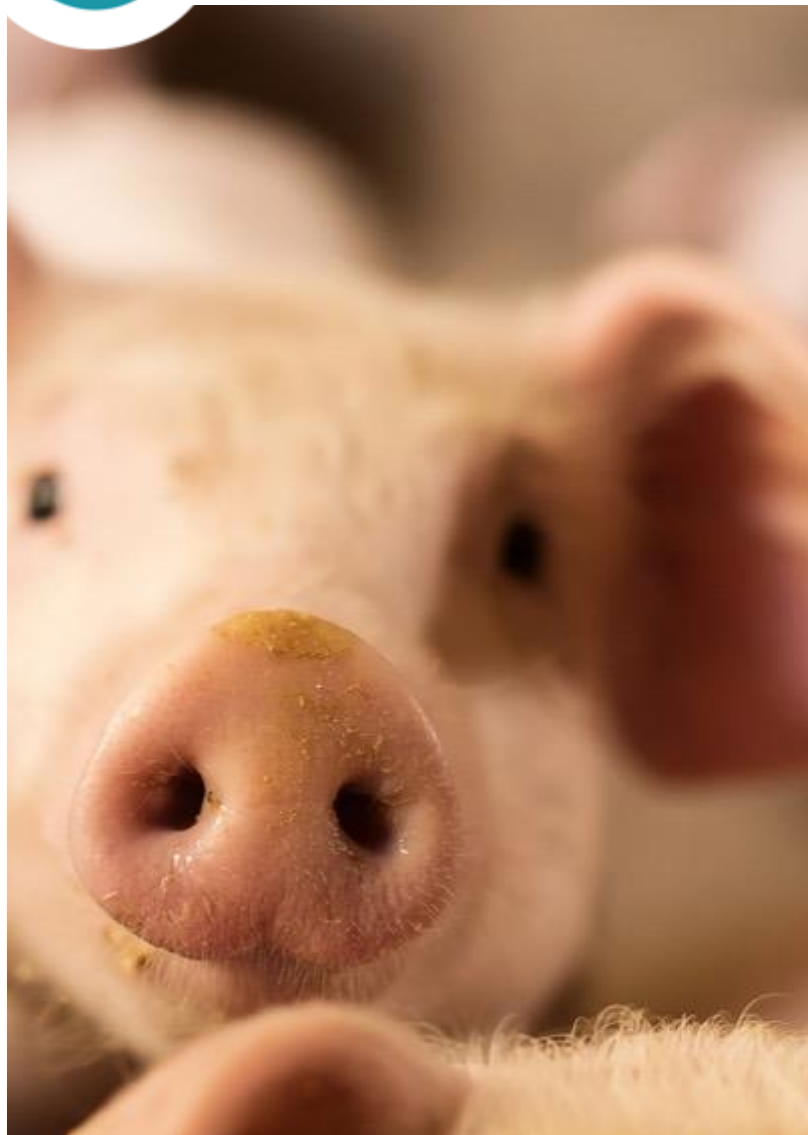
2004

- Human medicinal products Directive
- Veterinary medicinal products Directive
- Joint Regulation on European Medicines Agency and centralised procedure

Review and update of the legislation

Problem definition





Review of the VMP legislation

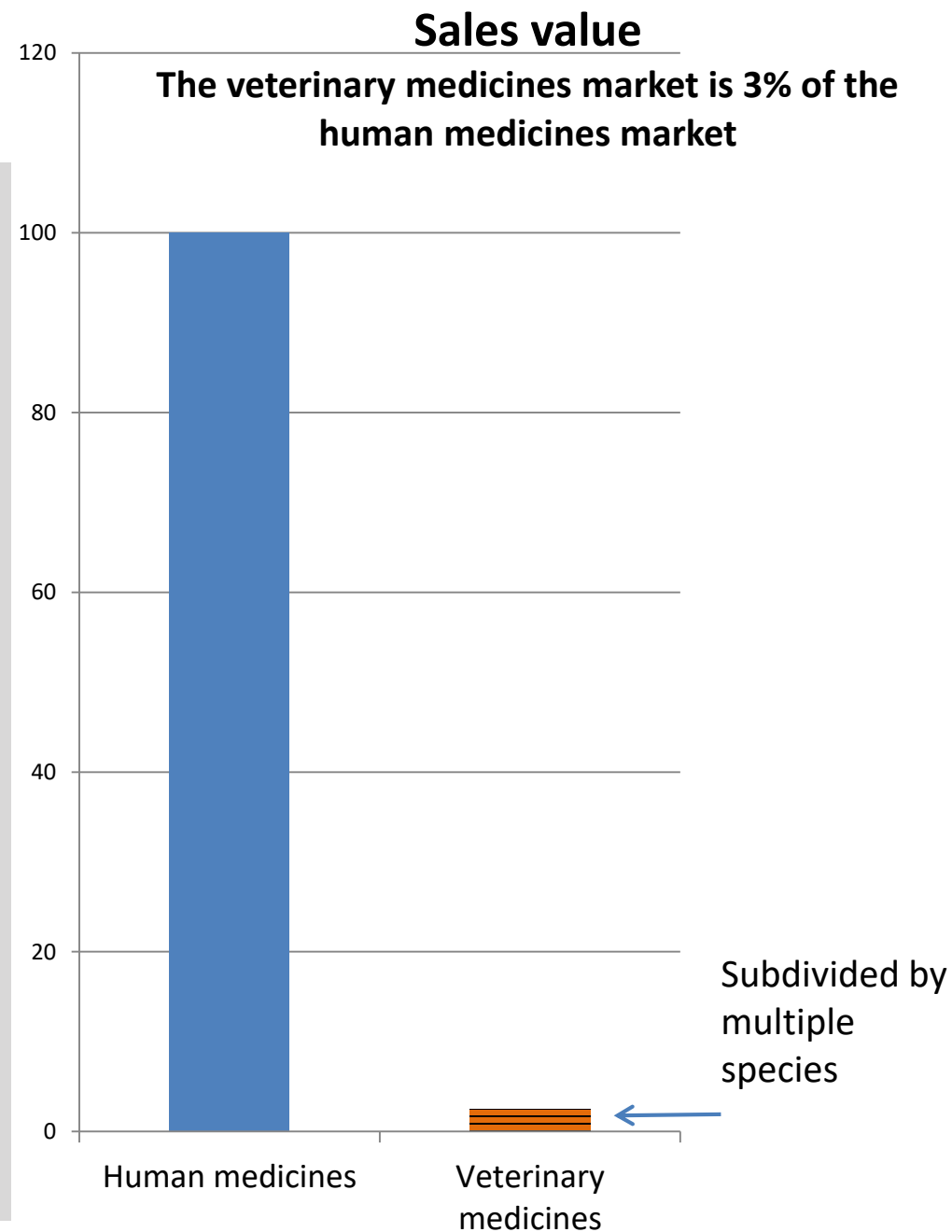
- Prior Impact Assessment 2011
- COM proposal 2014
 - Objectives
 - Increase availability of veterinary medicinal products
 - Improve the functioning of the internal market
 - Stimulate competitiveness and innovation
 - Reduce administrative burden
 - Address the public health risk of AMR
- Co-decision procedure: COM proposal 2104, EP/Council
- New Regulation published 7th January 2019

VMP sector market place

Market size

Small fraction of the human medicines market

Further fragmented by multiple species



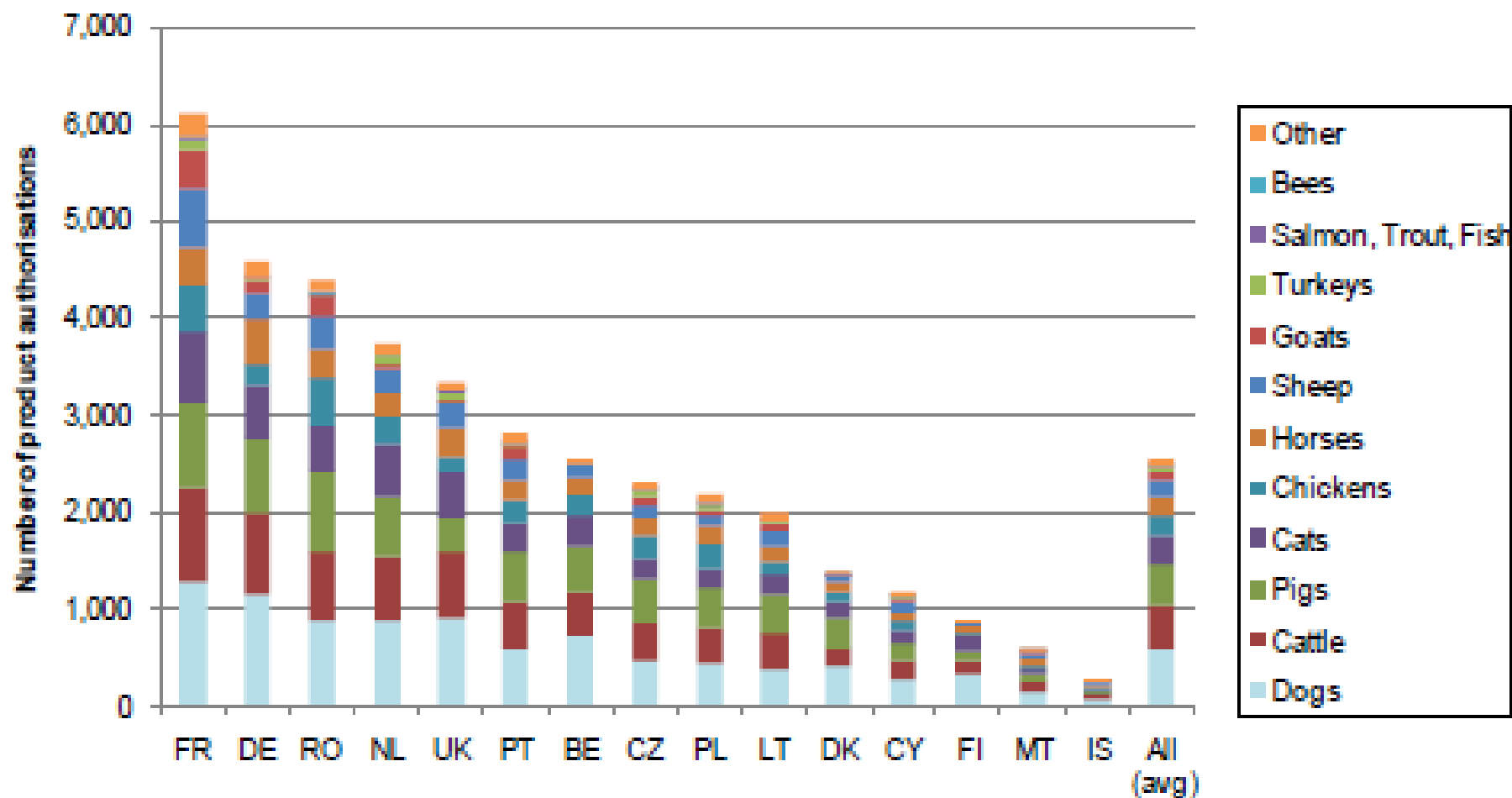


Objective: Improved availability & internal market

Background

Major variance in availability - countries / species

Few products for 'minor' species

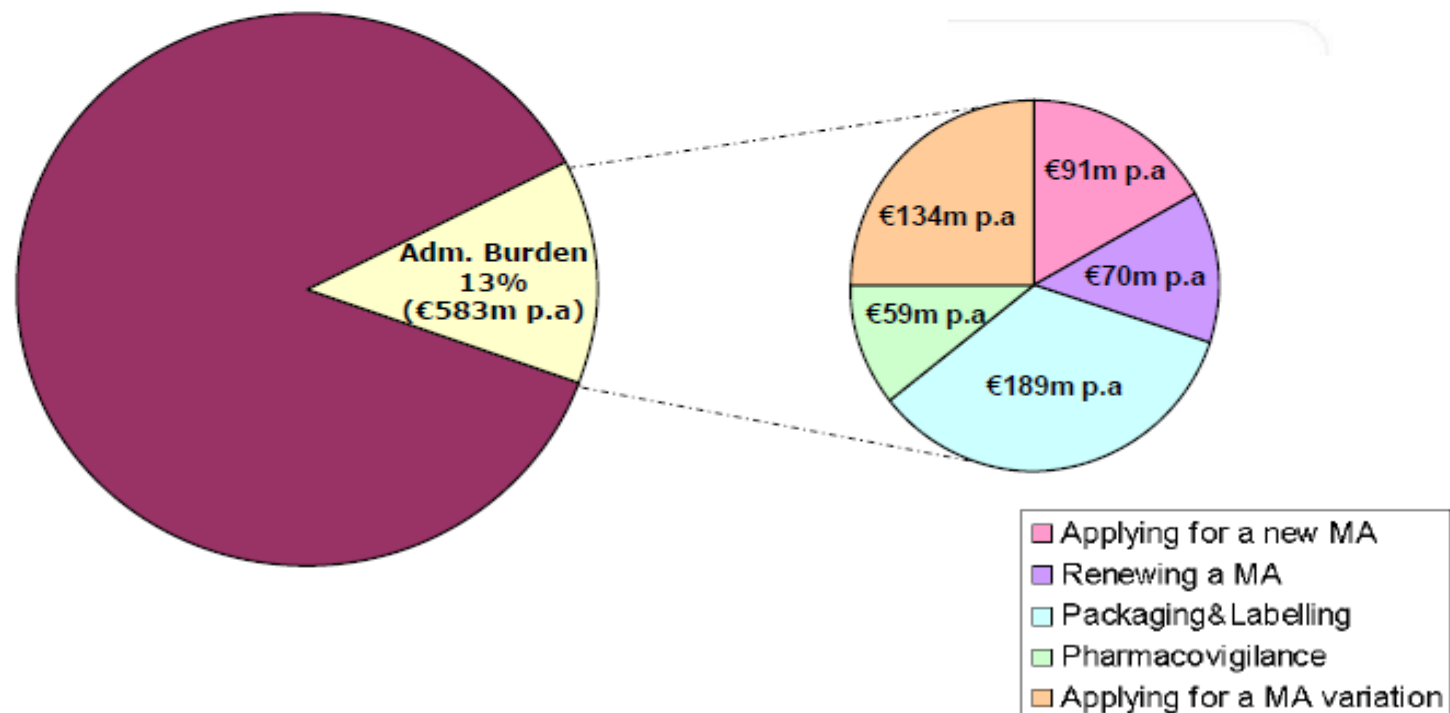


Source: Impact Assessment for the review of the legislation, 2011

Objective: reduce administrative burden



Problem definition: *administrative burden* Sector's Annual Turnover



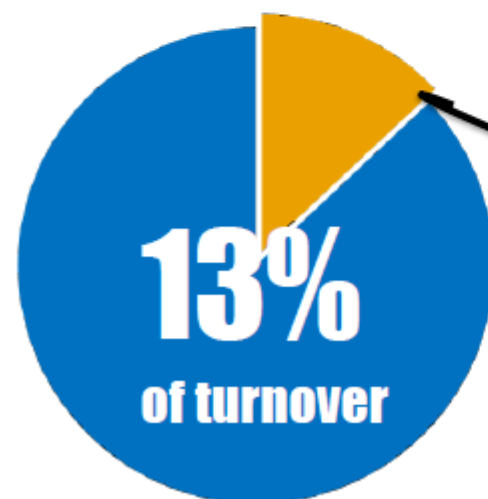
Background

Very high for
veterinary
medicines

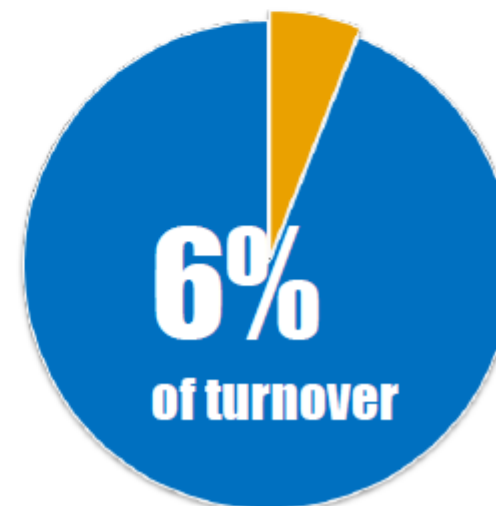
The Administrative Burden

Vet/human comparison

Veterinary Medicines – admin costs



Human Medicines – admin costs



Double!!

Source: Impact Assessment for
the review of the legislation 2011



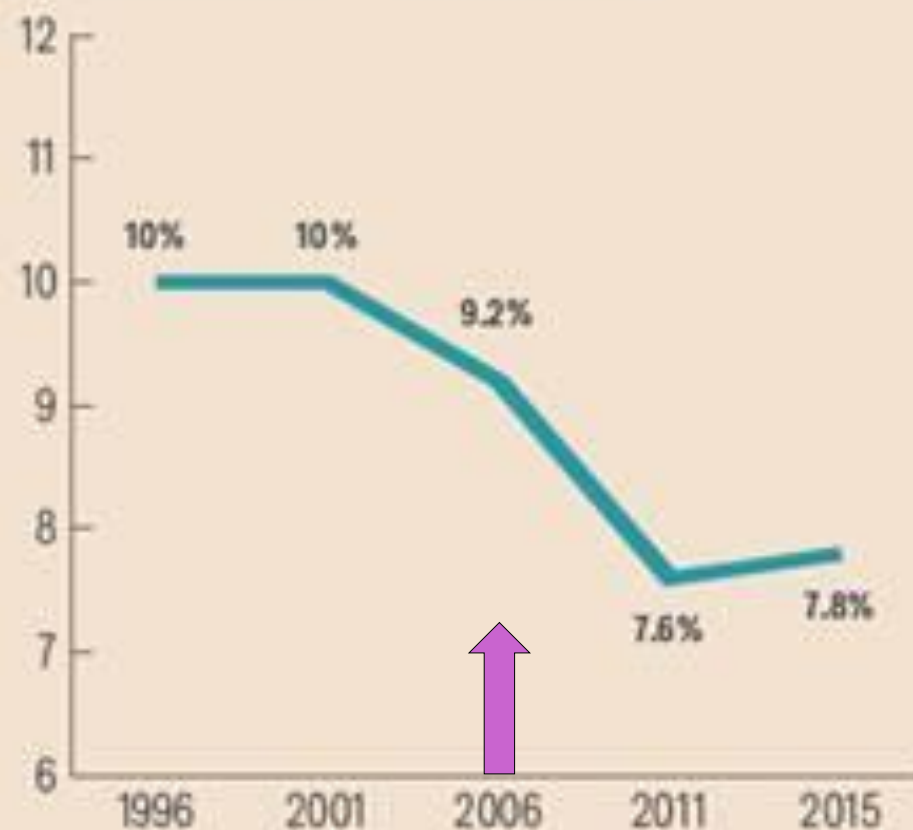
Obj.: Stimulate competitiveness and innovation

Background

Global Benchmarking
Survey 2015

Decline in investment in
regulated veterinary
medicines

R&D as percentage of turnover



Source: Benchmarking the Competitiveness of the Global Animal Health Industry 2015 Survey

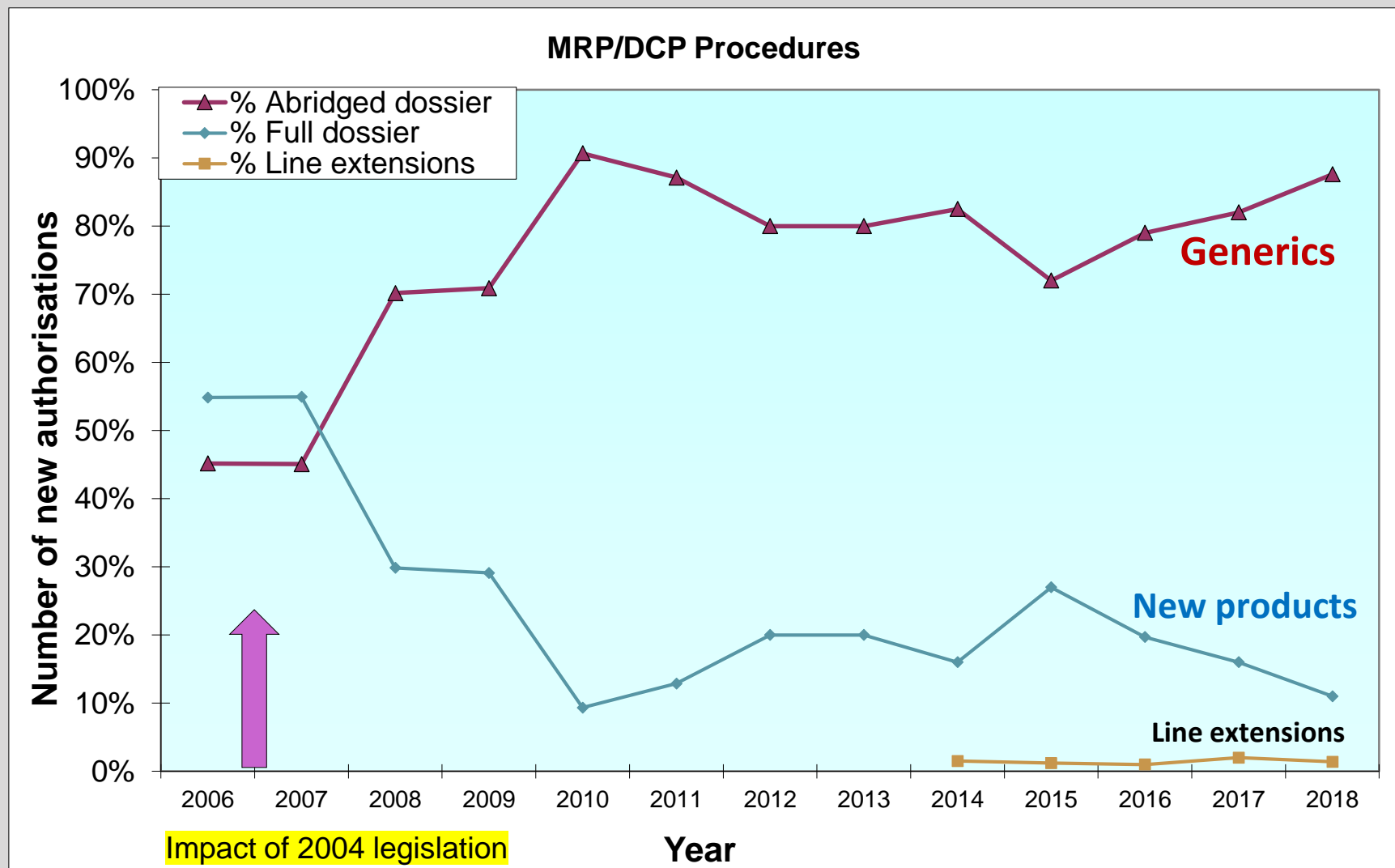
Stimulate competitiveness and innovation

Background

The switch to
generics

Decline in
investment

Unintended
consequences?

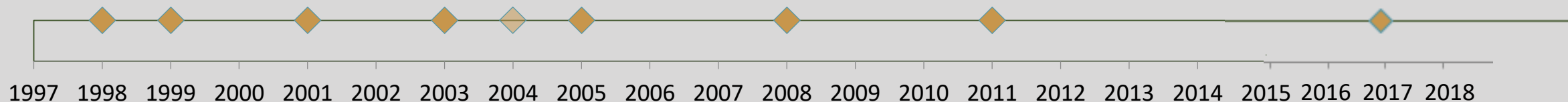




Obj.: Stimulate competitiveness and innovation

Background

- **Decline in innovation in new veterinary antibiotics**
 - Increase in data requirements, decrease in market size, political uncertainty
- **Centralised procedure - for innovative products**
 - 9 livestock antibiotics are registered (22 years - 1996 to 2018):



Review and update of the VMP legislation

Main outcomes





VMP legislation covers:

1. Scope and definition
2. Data requirements to obtain a marketing authorisation
3. Regulatory procedures to obtain a MA
4. Keeping up-to-date - post-authorisation regulatory work
5. Pharmacovigilance - in market safety surveillance
6. Manufacturing controls
7. Use, distribution, retail
8. Inspections, controls and penalties



New VMP Regulation - outcome summary

Separate Regulation for the VMP sector

Published January 2019 – becomes applicable Jan. 2022

Good progress towards the objectives

Overall impact on manufacturers is uncertain

More focus on controlling antimicrobial resistance and on environmental protection

In cauda venenum



Impact - largely unpredictable

- Depends how the legislation is implemented
- 25 implementing measures on the details
 - 17 Implementing Acts
 - 8 Delegated Acts
 - 15 to be adopted in next 3 years (January 2022)
- Major new systems
 - Pharmacovigilance
 - A completely new chapter (harmonisation of product summaries)
 - IT infrastructure - databases, electronic submission, single e-submission portal, data management systems (SPOR)
 - Major impact! - but positive or negative on admin burden depends on how it is implemented



vs Objectives

Improved availability / single market?

Encouraging,
Many small but significant changes

- Stimulating investment in new products?
 - Novel therapies - clear regulatory route encourages innovation
 - Improved protection of (incremental) innovation
 - AMs: more restrictions on use and reasons to refuse authorisation
- Centralised procedure opened up - more EU wide products?
- Packaging and labelling - more multi-lingual packaging?
- No renewals & sunset clause ↓ admin burden / product losses
- More harmonisation (SmPC) - annual prioritised list of products



vs Objectives

Improved availability / single market ?

- **Distribution & retail**
 - Wholesale/distribution licence valid throughout the Union
 - *Implementing Acts on 'Good Distribution Practice'*
 - Vet prescriptions valid throughout the Union
 - On-line sales permitted (only for non-prescription products)
 - Parallel trade better defined



vs Objectives

Support for innovation

Encouraging, but not overly ambitious
Good for minor species

- Global MA concept still remains 😞
- Stimulus for minor species
- No stimulus for line extensions for major species
- Some stimulus for new antibiotics
- Some stimulus for some innovation on existing products
- Reduced requirements for exceptional circumstances, limited markets
- Improved route to market for novel therapies



vs Objectives

Administrative burden

Mixed bag – depends on good implementation

- **No renewals** - reduction in administrative burden ✓
- **No sunset clause** - but marketing status into product database ✓
- **E-submission mandatory** - all procedures, 1 common template ✓
- **Labelling** - clearer rules, less discussion on wording? ✓?
- **DCP + MRP** - issue resolution not simplified = longer time-lines ✗
- **EC decision making procedure** - timelines no longer transparent ✗
- **Pharmacovigilance** - no DDPS, no PSURS; signal management ✓??
- **Variations** - minor variations via database updates, but closed list ✗?
- **EU databases** - potential for single data entry and re-use data ???

European Platform for the Responsible Use of
Medicines in Animals



EPRUMA best-practice framework
for the use of antibiotics
in food-producing animals
REACHING FOR THE NEXT LEVEL

vs Objectives

Measures to control AMR

Impact on use and on product development costs and admin costs
Impact on AMR – to be determined

- Ban on preventive use except in exceptional circumstances
- Restrictions on metaphylactic use
- List of antimicrobials reserved for human use
- Re-stated ban on use of antimicrobials for growth promotion
- Mandatory collection of sales and use data
- Possibility to restrict use in the prescribing ‘cascade’
- Ban on promotional samples
- Member States may further restrict use

Major changes for veterinarians



- **Prescriptions and use**
 - common format, electronic, valid throughout EU; quantity prescribed limited to treatment needs; restrictions for antibiotics and use of autologous vaccines
 - Prophylaxis - only in exceptional cases; metaphylaxis - only if high risk of disease
- **Prescription cascade**
 - simplified, but always veterinary product before human medicinal product; restrictions for antibiotics, including no antimicrobials reserved for human use
- **EU databases giving access to product and pharmacovigilance info**
- **Mandatory collection of use data for antimicrobials**
 - First for livestock
 - Later will be extended to other species and other medicines
- **Implementing measure on rules for oral medication**
 - via drinking water or top dressing

Labelling and packaging

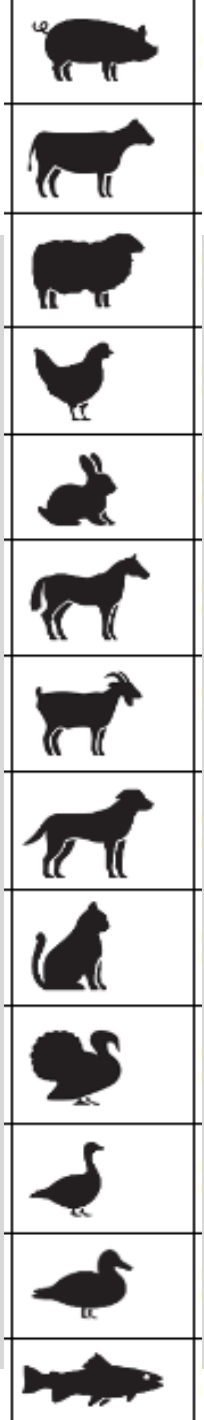
Objectives

- Improve availability of veterinary medicines
 - Particularly for small markets
- Reduction of administrative burden
- Improve single market



Facilitate multi-lingual labels
Reduce text on label

Pictograms
Std. abbr.



Packaging & medicines availability

Current label example

- multilingual labels difficult to read



The image shows a multilingual label for the vaccine Improvac. The label is divided into two main columns of text, with the product name 'Improvac' prominently displayed in the center. The text is provided in French, Dutch, and German. The French text on the left describes the vaccine as a GnRF conjugate, provides administration instructions (subcutaneous), and mentions a 300µg/2ml concentration. The Dutch text on the right provides similar information in Dutch. The German text on the left provides information in German. The label also includes a QR code, a barcode, and the Pfizer logo. The bottom of the label indicates the volume '125 Dos. 250 ml'.

Improvac®

French:
 Analogue du GnRF conjugué à une protéine min. 300µg / 2 ml.
 Voie d'administration: Utilisation sous-cutanée
 Temps d'attente: Zéro jour
 L'auto-injection accidentelle est dangereuse.
 Consultez la notice avant utilisation.
 GnRF-analoog-protéïne conjugaat min. 300µg / 2 ml.
 Toedieningsweg: Voor subcutaan gebruik
 Wachtijd: Nil dagen
 Accidentele zelfinjectie is gevaarlijk.
 Lees vóór gebruik de bijsluiter.
 GnRF-Analagon, mit Trägerprotein konjugiert min. 300µg / 2 ml.
 Art der Anwendung: Subkutane Anwendung
 Wartezeit: Null Tage
 Eine versehentliche Selbstinjektion ist gefährlich.
 Lesen Sie vor der Anwendung die Packungsbeilage.

Dutch:
 Oplossing voor injectie voor varkens
 Injectieoplossing für Schweine
 À usage vétérinaire / Uitsluitend voor
 diergeneeskundig gebruik /
 Für Tiere
 Après ouverture, à utiliser dans la journée de
 travail (>10 heures) / Na openen binnen één
 werkdag (>10 uur) gebruiken / Nach Anbruch
 innerhalb von einem Arbeitstag (>10 Stunden)
 anwenden.

German:
 125 Dos.
 250 ml

Pfizer

QR Code: 63400002

Barcode: 63400002

Manufacturer: Pfizer Limited, Ramsgate Rd, Sandwich, Kent CT13 9NJ - UK
 EU/2/03/105/002

Lot:
Exp:

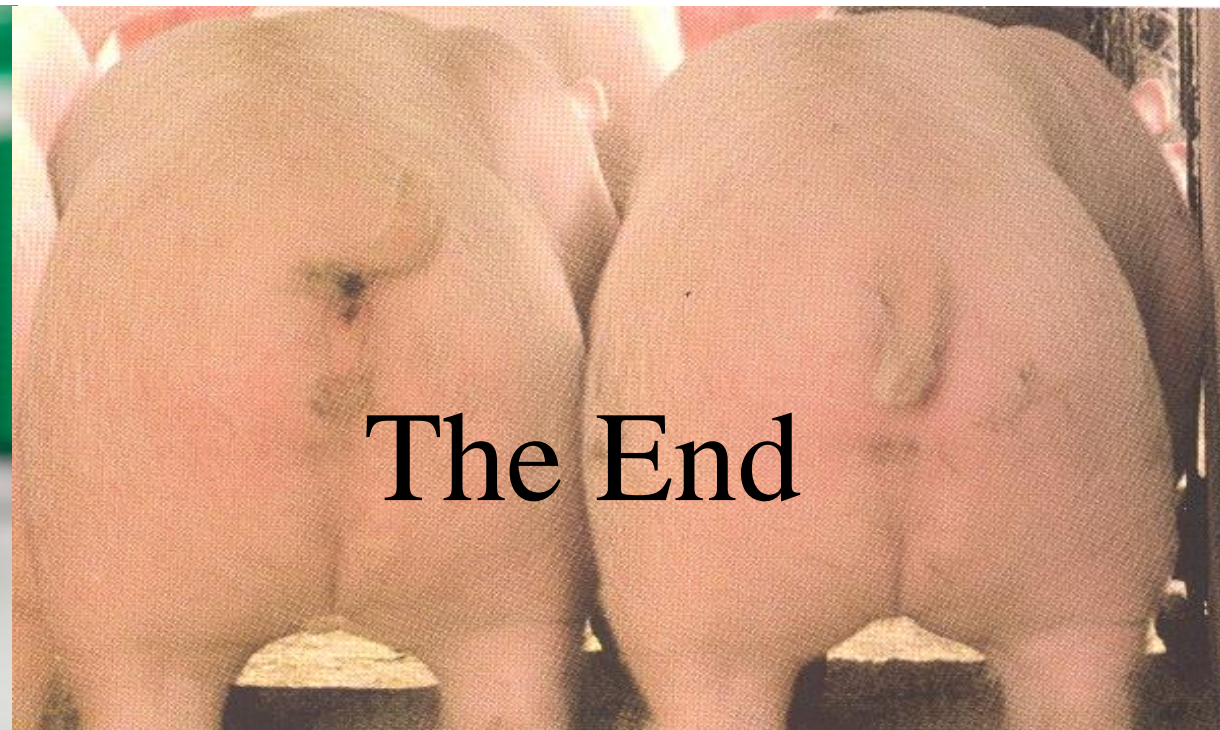
Packaging & medicines availability

Minimum mandatory information for the immediate pack label



N.B. the layout and size of the pictograms have not been optimised; this is a mock-up only.

More information on the carton
All instructions for use to be in the package leaflet,
including explanation of pictograms



@animalhealthEU



WeCare.petsEurope

www.animalhealth europe.eu