ASSESSMENT OF THE REGULATORY PERFORMANCE OF THE ZAMBIA MEDICINES REGULATORY AUTHORITY

By Constance Sakala Chisha | *Supervisors: Dr Stephanie Leigh and Professor Stuart Walker*

UNIVERSITY OF THE WITWATERSRAND, JOHANNESBURG

Outline of the Study

- Introduction
- Objectives
- Methods
- Recommendations
- Results

Introduction

- Zambia Medicines Regulatory Authority (ZAMRA) is a statutory body mandated by law to regulate and control the manufacture, sale and use of medicines in Zambia.
- It is a founding member of the Zazibona initiative.
- Strengthened regulatory systems for medicines are critical for a well functioning health system.
- Many low to middle income countries lack the capacity to effectively and efficiently regulate medicines.

Rational of the ZAMRA study

- Timely accessibility of the quality, safe and efficacious medicines is key in any health care system.
- National medicines regulatory authorities are responsible for the assessment of medicines within the targeted timelines.
- Currently there is no documented evidence of the regulatory performance of the Zambian Authority in terms of the review process of medicines.
- This study has reviewed the elements of regulatory performance for ZAMRA.
- It will form the benchmark for further assessment.
- The gaps identified will help improve the review process and patients' access to medicines.

Good Review Practices (GRevP) Implemented by ZAMRA – Quality Measures

INDICATOR	STATUS	
Internal quality policy	✓	
Good review practice system	✓	
Standard operating procedures (SOPs) for guidance of assessors	✓	
SOPs for the advisory committee consulted during the review process	✓	
Assessment templates	✓	
Assessment report	✓	
SOP for completing the assessment report	✓	
SOPs for any other procedures in the regulatory review process (e.g., validation)	✓	
Dedicated quality department	✓	
Scientific committee	✓	
Shared and joint reviews	✓	

Aim and objectives

Aim: To assess the performance of the Zambia Medicines Regulatory Authority as a means of strengthening its regulatory systems and its role in relation to the newly established African Medicines Agency.

Objectives include:

1. Assessing the current regulatory review process of the Zambia Medicines Regulatory Authority.
2. Identify the key milestones and target timelines achieved in the review process.
3. Evaluate the overall performance for the review models and different product types approved in Zambia during the period 2020–2023.
4. Assess the Zambia Medicines Regulatory Authority's compliance with good review practices and quality decision-making practices employed in the review process.

Methods

- This study will assess the current regulatory review process in the Zambia Medicines Regulatory Authority.
- A validated questionnaire has been used to map key milestones and activities associated with the review process.
- It describes the organizational structure, the type of review models used, review practices and the decision-making process used in the review process.

OpERA – Optimizing Efficiencies in Regulatory Agencies

- Part 1 - Organisation of the agency
- Part 2 - Types of Review Models
- Part 3 - Key Milestones in the Review Process
- Part 4 - Good Review Practices (GRevP): Building quality into the assessment and registration process
- Part 5 – Quality Decision-Making Processes

Results

- Currently, ZAMRA implement three review models to evaluate New Active Substances (NASs) as well as generic products.
- These include the verification model which was mainly used to review products prequalified by WHO or approved by a Stringent Regulatory Authority, the abridged process for products approved by an SRA and a full review for both NASs and generic products that were not previously reviewed or prequalified by WHO.
- A fast-track application was used to expedite the review process for products of high public health concern which include mainly antimalarials, anti-cancers and anti-tuberculosis drugs. The Authority receives mostly generic products as compared to NASs

GRevP Implemented by ZAMRA – Transparency and Communication Parameters

INDICATOR	STATUS	
Feedback to industry on submitted dossiers	✓	
Details of technical staff to contact	✓	
Pre-submission scientific advice to industry	✓	
Official guidelines to assist industry	✓	
Industry can track progress of applications	✓	
Summary of grounds on which approval was granted	✓	
Approval times	✓	
Advisory committee meeting dates	✓	
Approval of products	✓	

GRevP Implemented by ZAMRA – Continuous Improvement Initiatives

INDICATOR	STATUS	
External peer review	X	
Internal peer review	✓	
Internal tracking systems	✓	
Review of assessors' feedback	✓	
Reviews of stakeholders' feedback	✓	

KEY		
	✓	Formally implemented
	✓	Informally Implemented
	X	Not Implemented

GRevP Implemented by ZAMRA – Training and Education

INDICATOR	STATUS	
Training programme for assessors	✓	
International workshops/conferences	✓	
External courses	✓	
In-house courses	✓	
On-the-job training	✓	
External speakers invited to the authority	X	
Induction training	✓	
Sponsorship of post-graduate degrees	X	
Placements and secondment in other regulatory authorities	✓	

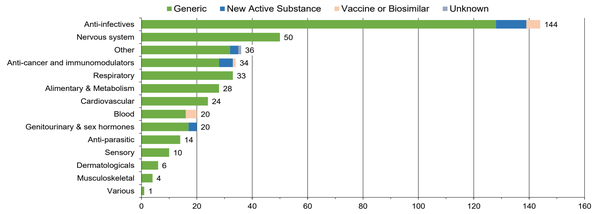
Characteristics of Products Approved – 2020-2023

Characteristic		Approval Year				
		2020	2021	2022	2023	2020-2023
Overall		118	142	87	77	424
Compound Type*	New Active Substance	3	6	5	8	22
	Generic	109	136	82	64	391
	Biosimilar	0	0	0	5	10
	Vaccine	5	0	0	0	1
Review Type	Verification	3	4	7	12	26
	Abridged	62	87	40	41	230
	Full	53	51	40	24	168

Results

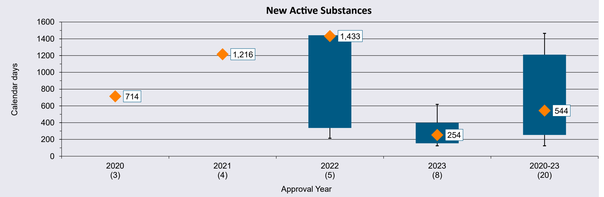
- A total of 424 products were approved during the period 2020-2023, which included 22 NASs and 391 generics. The overall approval time regardless of the type of model of review was 29, 39, 35 & 33 months in 2020, 2021, 2022 and 2023 respectively for the total number of generics and NASs.
- This reflects the queue time of 18 months as well as the fact that most applicants exceeded the set target timeline of 120 days by up to 6 months to respond to the questions thereby prolonging the overall review time. However, WHO PQ generics were reviewed within 90 days using the verification route.

Therapeutic Area of Products Approved by Compound Type – 2020-2023



Data are shown for applications that were approved ("Marketing Authorisation Granted Date") between 01/01/2020 and 31/12/2023. n = number of drug applications.

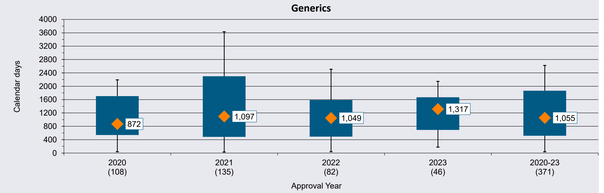
Overall Approval Time – "Dossier Receipt Date" to "Marketing Authorisation Granted Date" by Approval Year



Data are shown for applications that were approved ("Marketing Authorisation Granted Date") between 01/01/2020 and 31/12/2023. (n) = number of drug applications.

◆ = Median. Where (n) is less than 5, only the median is displayed.

Overall Approval Time – "Dossier Receipt Date" to "Marketing Authorisation Granted Date" by Approval Year



Data are shown for applications that were approved ("Marketing Authorisation Granted Date") between 01/01/2020 and 31/12/2023. (n) = number of drug applications.

◆ = Median. Where (n) is less than 5, only the median is displayed.

Recommendations

1. ***Target Timelines:*** These need to be established for each milestone based on the review model and the type of the product.
2. ***Good Review Practices:*** These need to be standardized for the review process.
3. ***Transparency:*** This could be enhanced by publishing the summary of the evaluation reports and the decisions made for each product approved.
4. ***Reliance:*** To shorten the review times and ultimately the overall approval time there is need to implement a reliance model especially for NASs that have been approved by the SRA or ML-4 Agencies.
5. ***Implement Benefit Risk Assessment:*** This is an important consideration to be included in the review process.
6. ***Have a well-structured quality decision making framework that*** would support consistency in the review process.

CONCLUSION: The Zambian Authority is currently working towards attaining the World Health Organisation's Maturity Level 3 as assessed by the Global Benchmarking Tool, so the implementation of these recommendations would be key to securing this recognition and status.