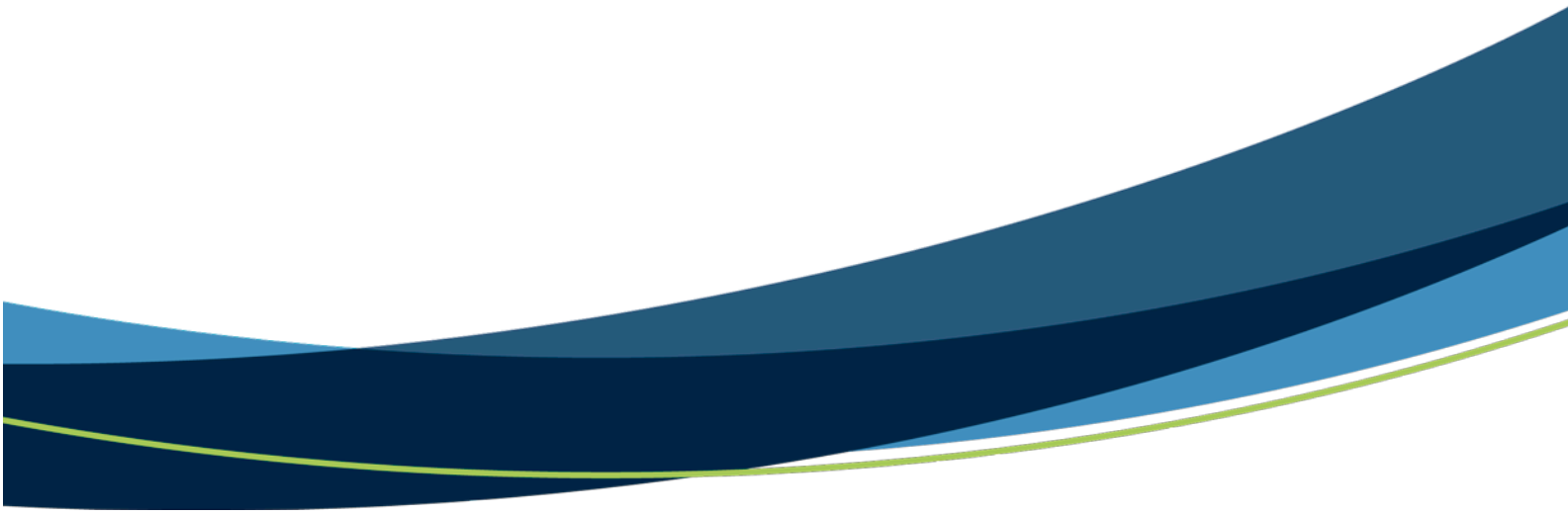
Australian Government

Department of Health
Therapeutic Goods Administration

Pharmaceutical Subcommittee

Consolidated Minutes
Meeting 161
Tuesday 24 March 2015



Pharmaceutical Subcommittee
Meeting of 24 March 2015
from 09:30 am

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Item 3 Matters Arising from Previous Meetings and Request for PSC advice

Item 3.1 Request for Advice On Preservatives In Single-Use Syringes

3.1.1 Summary of Delegate / Evaluators request for advice

Recently, the TGA has received requests to register generic medicines for single-use injectable products that contain preservatives. In all these instances, the Australian reference product also contained the same preservative in the same concentration as that in the proposed generic product. The Australian reference product for these generic medicines have been registered and supplied in Australia and internationally for many years and no regulatory action has been taken post-approval of these medicines by either the TGA or any of its global counterparts to discontinue the registration or supply of these medicines.

Previously, the PSC and ADEC (now ACPM) recommended that single dose injectables should not contain preservatives and suggested the following wording be included in the evaluation / questions to Sponsors:

> *"The company should be made aware that the Pharmaceutical SubCommittee has expressed the view that single use injectable products should not contain preservatives. Recommendation No. 955 from the 50th meeting (1996/5) states that:*
>
> > *As stated previously (Recommendation 768), the PSC has an in principle objection to the inclusion of a preservative in the formulation of single use injectable products. This matter should be brought to the attention of the TGA with a request that it be*

discussed with other regulatory agencies and also communicated to the APMA (now Medicines Australia)".

At meeting 52 (1997/1) of the ADEC the committee agreed in principle with PSC recommendation (No. 955) that any new vaccine should be preservative free. In addition, the TGA should be requested to inform the appropriate overseas regulatory agencies of the ADEC position, with the long-term intention of influencing the manufacturers of such products to comply with this requirement.

3.1.2 Specific Advice and PSC Discussion

The TGA is seeking the Committee's advice in relation to a matter relating to generic medicine applications for single-use parenteral medicines as follows:

1. Does the PSC have any objections to the Delegate approving a generic medicine for a single-use injection that contains the same preservative in the same concentration as the reference product, which has been considered to be safe and effective by the TGA, and continues to be included on the ARTG?
    a. If the Committee has no objections, should the Delegates be required to request that sponsors justify the inclusion of the preservative in their formulation, or request this in cases where it is not provided?
    b. If the Committee has objections, should the TGA consider taking appropriate regulatory action against the Australian reference products on the ARTG?

The PSC re-affirmed its previous decision that single-use injections should not contain any preservatives and should be manufactured with appropriate sterile manufacturing practice. Claims that the additive/s is included for other reasons, such as use as a solubiliser, should be justified scientifically, together with justification of concentration. Claims that inclusion of the preservative is justified based on an extended time period after opening during which the product is administered should be justified scientifically, together with a description of this in the Product Information (PI).

2. Does the PSC have any objections to the Delegate approving a generic medicine for a single-use injection that contains a different preservative to the one included in the Australian reference product?
    a. If the Committee has no objections, should the Delegates be required to request that sponsors justify the inclusion of the preservative in their formulation, or request this in cases where it is not provided?
    b. If the Committee has objections, please provide a clear rationale for this objection.

The PSC advised that approval should not be given to any single-use injection that contains a different preservative to the one included in the Australian reference product as it is not current best-practice that single-use injections contain preservatives.

3. Does the PSC have any objections to the Delegate approving a generic medicine for a single-use injection that contains an ingredient that is not included in the Australian reference product that serves a dual function, one of which is as a potential preservative?
    a. If the Committee has no objections, should the Delegates be required to request that sponsors justify the inclusion of the preservative in their formulation based on its function as a preservative and/or on its other function, or request this in cases where it is not provided?

b. If the Committee has objections, please provide a clear rationale for this objection.

The PSC re-iterated that single-use injections should not contain a preservative. If an ingredient is added for a reason other than use as a preservative, then the sponsor should provide scientific justification for inclusion at that concentration.

3.1.3 PSC Recommendation

The PSC resolved to recommend to the TGA that:

RECOMMENDATION NO 2378
The PSC re-affirmed its previous decision that single-use injections should be preservative-free.

The PSC advised that if an ingredient is added for a reason other than use as a preservative, then the sponsor should provide scientific justification for inclusion at that concentration.

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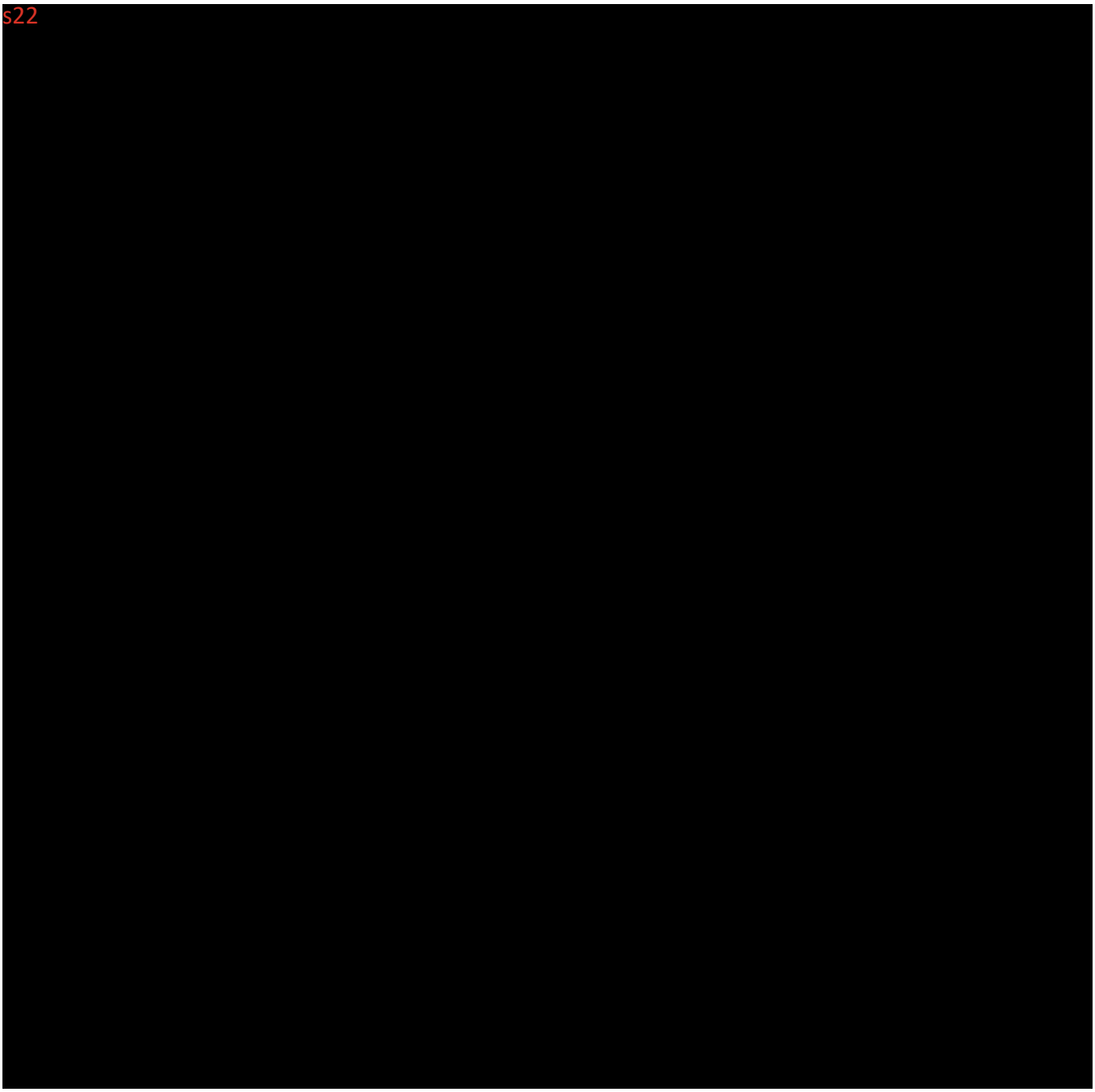

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