Scientific Operations Management Section
Scientific Evaluation Branch
Therapeutic Goods Administration
Electronic Submission

21 March 2019

Dear Sir/Madam,

Consultation: Reforms to the generic medicine market authorisation process – consultation paper

Vifor Pharma Pty Ltd welcomes the opportunity to comment on the reforms to the generic medicines market authorisation process in Australia, in particular transparency and clarity in the assessment of complex medicines to ensure that appropriate and harmonised science-based approval and post approval standards for complex medicines are introduced globally, for patient safety and benefit.

Vifor Pharma is a world leader in the discovery, development, manufacturing and marketing of pharmaceutical products for the treatment of iron deficiency. The company's goal is to continue its leadership in iron deficiency, nephrology and cardio renal therapies and strives to help patients around the world with severe and chronic diseases to lead better, healthier lives. In Australia, Vifor Pharma is located in Melbourne and is classified as a small-medium size company.

As a leader in the treatment of iron deficiency, with its leading product ferric carboxymaltose (Ferinject®) and iron sucrose (Venofer®) TGA approved nanomedicines, we support TGAs statement to develop guidance similar to the guidance materials recently established by the EMA and FDA.

Our submission is focused on creating the most appropriate regulatory pathway for the assessment of nano-medicines, with our core comments stated below. In considering the comments it is important to align on the need to have a hybrid pathway, a pathway for which will be reflected in comparable overseas regulators and ensuring a harmonised science-based approval that puts patient safety and benefit as a priority.

Complex Medicines / Nanomedicines: For complex medicines and especially their follow-on products we believe it is important to ensure transparency and clarity in the assessment of complex medicines to ensure that appropriate and harmonised science-based approval and post approval standards for complex medicines are introduced globally, for patient safety and benefit. One class of complex medicines relates to pharmaceutical products that have a dimension in the nanoscale – nanomedicines. Due to their size, they are different from small molecules as their properties cannot be fully characterised by physicochemical analytical means, and minor changes in manufacturing can affect their size and/ or morphology, influencing their quality, biological properties and therapeutic profiles. Clinical differences have been observed with nanomedicine follow-ons, demonstrating challenges in making identical (pharmaceutically equivalent and bioequivalent) copies of nanomedicines. As a result of this it is important that TGA provides clarity and transparency on the criteria used to approve nanosimilars.

Strong need for a new pathway: A "generic" pathway is inappropriate. The "biosimilar pathway" is no option as nanomedicines, by definition, are not biologic. A new hybrid pathway is required to make appropriate and harmonised scientifically-based assessments for complex generics.

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"Hybrid" Pathway: EU regulatory agencies have started to approve nanomedicines based on Article 10(3) of Directive 2001/83/EC. This pathway is also known as a "hybrid'' application, for applications of generics for which bioequivalence cannot be shown or which differ from the originator product (in EU terms, reference medicinal product) in therapeutic indication, strength, pharmaceutical form, or route of administration.

Hybrid applications under Article 10(3) differ from generic applications in that the results of appropriate pre-clinical tests and clinical trials will be necessary in the following three circumstances:

1. Where the strict definition of a 'generic medicinal product' is not met;
2. Where the bioavailability studies cannot be used to demonstrate bioequivalence;
3. Where there are changes in the active substance(s), therapeutic indications, strength, pharmaceutical form or route of administration of the generic product compared to the reference medicinal product

These applications will thus rely in part on the results of pre-clinical tests and clinical trials for a reference product and in part on new data such as additional analytical (in vitro), non-clinical or clinical data (justification).

International Collaboration: Vifor Pharma acknowledges the TGA International Engagement Strategy (Operations Plan 2018-219) articulates the collaboration with International Pharmaceutical Regulators Forum (IPRP) to promote convergence of regulatory requirements for new chemical and biological entities and complex generic medicines such as nanomedicines. Two of the core members of IPRP are EMA and FDA, two agencies Vifor Pharma is engaged with globally to discuss the nanosimilar pathways. As an organisation we are willing to bring experts to Australia to discuss a "hybrid" pathway and for the TGA to make an independent assessment.

Additional consultation: Vifor Pharma welcomes additional consultation on the structure and the approach to a "hybrid" pathway, including:

1. Determining the critical quality attributes
2. More focus on pharmacovigilance
3. Determination on substitution and interchangeability

Alignment with Non Biological Complex Drugs Working Group: Vifor Pharma further supports and is aligned with the Non Biological Complex Drugs Working Group submission to this consultation.

As an innovative pharmaceutical company, Vifor Pharma is committed to help patients around the world with severe and chronic diseases to lead better, healthier lives - we put patients first and providing patients with confidence and improved access via regulatory pathways for the assessment of nano-medicines is one of our commitments.

If you have any questions or comments on the above, please do not hesitate to contact me directly on (03) 9686 0111 or via email on Vanessa.stevens@viforpharma.com

Your sincerely

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