Guideline for Application for Reliance Pathway for Laboratory Testing of Medical Products for Human Use

2024

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1. History Table

Date	Version Number	Summary of change
12/12/2022	**01/2022**	Initial Release
28/11/2024	**02/2024**	• Revision of Annex I: Required Documents • Addition of Annex II (Application Form) and Annex III (CMC Differences Form) • Revision of eligibility criteria

2. Introduction:

In alignment with the Egyptian Drug Authority's strategic objective to strengthen its regulatory capacity and achieve harmonization with WHO listed authorities, EDA adopts reliance practices in various stages throughout the product's life cycle.

The EDA Chairman Decree no. 780 for the year 2022 promulgates the application of the principle of reliance on reference regulatory authorities in the registration and laboratory testing of imported medical products for human use for products that have been granted a Certificate of Pharmaceutical Product by one or more of the NRAs listed in the Technical Committee's approved list of reference authorities. This document elaborates the reliance practices adopted in the Central Administration of Drug Control in the laboratory testing of said medical products, and the eligibility criteria and requirements for acceptance of applications for the reliance pathway.

3. Scope

The guideline detailed in this document applies to shipments of finished medical products for human use approved by reference regulatory authorities, which enter the Egyptian market for any purpose, throughout the product life cycle.

Applications for implementation of reliance are accepted for products collected by the Central Administration of Operations, through lot sampling from ports of entry, and submitted to CADC for quality testing.

4. Abbreviations

4.1 CADC: Central Administration of Drug Control

4.2 CTD: Common Technical Document

4.3 NRA: National Regulatory Authority

5. Definitions

5.1 Reliance:

As per WHO Good Reliance Practices, reliance is defined as "The act whereby the NRA in one jurisdiction may consider and give significant weight to assessments performed by another NRA or trusted institution, or to any other authoritative information in reaching its own decision. The relying authority remains independent, responsible and accountable regarding the decisions taken, even when it relies on the decisions and information of others".

5.2 Verification of Sameness:

The product submitted for assessment and the product approved by the reference regulatory authority should be essentially the same in terms of qualitative and quantitative composition, strength, pharmaceutical form, intended use, manufacturing process, suppliers of active pharmaceutical ingredients and quality of all excipients. Additionally, the results of supporting studies of safety, efficacy and quality, indications and conditions of use should be the same.

5.3 Abridged Regulatory procedures:

Whereby reliance is applied to reach a regulatory decision, and while ensuring EDA'S standards of regulatory oversight are maintained through technical assessment and evaluation of documents submitted for review coupled with selected laboratory tests, reliance on data and decisions of the reference authority will be used to save time.

6. Main Topic:

6.1Eligibility criteria for application of reliance:

For products fulfilling the following criteria, an application for reliance pathway may be submitted:

6.1.1 The product in question must be approved by NRAs listed in the Technical Committee's approved list of reference authorities**.**

6.1.2 The applicant must be the license holder, a legally authorized representative or marketing authorization holder.

6.1.3 Imported products that are not approved by reference authorities shall default to the regular pathway, as per CADC's guidelines and procedures.

6.2 Application for Reliance pathway

6.2.1 Applicants shall submit the application, along with the attached requisite documents, via EDA'S electronic services platform.

6.2.2 A pre-submission assessment step is provided by the Administration of Technical Assessment and Evaluation to assist applicants in determining the eligibility of their products for implementation of reliance.

6.3 Abridged Assessment of products

6.3.1 Verification of sameness shall always be assured before proceeding to assess the submitted products.

6.3.2 For products fulfilling the criteria specified in the abovementioned sub clause **6.1:**

6.3.2.1 The documents specified in **Annex I** shall be required.

6.3.2.2 An abridged assessment of the product shall apply, whereby the product specifications approved by the reference authority will be relied on, and selection of the tests to be performed will be subject to technical assessment of the documents submitted by the applicant, and a risk-based evaluation of the product.

6.4 Failure to provide documents

In case of the applicant's failure to provide any of the requisite documents and information, CADC reserves the right to revert the application to a different pathway, including the default procedure.

6.5 Issue of Final Reports

The Final Report shall be issued and forwarded to the Central Administration of Operations (responsible for the regulatory inspection function), and in certain cases, as required, to other EDA Administrations. A copy is also e-mailed to the product owner/manufacturer.

6.6 Timeframe for Release of Final Report

The timeframe for analyzing the submitted samples and releasing the Final Reports for the reliance pathway is 21 working days, after fulfillment of assessment requirements.

7. References

7.1 WHO Expert Committee on Specifications for Pharmaceutical Products; 55th Report: Annex 10; Good reliance practices in the regulation of medical products: High-level principles and considerations.

7.2 EDA Chairman Decree No. 780 for the year 2022, promulgating the application of reliance on reference regulatory authorities in the registration and laboratory testing of imported medical products for human use that have been granted a Certificate of Pharmaceutical Product by one or more of the NRAs listed in the Technical Committee's approved list of reference authorities.

8. Annexes

8.1 **Annex I:** Required Documents
8.2 **Annex II:** Application Form
8.3 **Annex III:** CMC Differences Form

Annex I

Required Documents

1. Application form **(Annex II)**
2. A declaration letter by the license holder stating that all aspects of the product's quality, safety and efficacy are identical to the currently approved by the reference authority including:
- The same qualitative and quantitative formulation.
- The same manufacturing site (s) for the drug substance and finished product, including specific block (s)/unit (s), manufacturing chain , processes , control of materials and finished product .
- The same specification for the excipient (s), drug substance and finished pharmaceutical product.
- The same essential elements of product information for pharmaceutical products.

N.B. Any difference should be listed and justified

3. CMC differences compared to the reference NRA Form for new registration submission (**Annex III),** in case of presence of any difference.
4. Declaration of any recalls in the past three years related to products with quality defects and any warning letter or equivalent regulatory action (if found submit the report of root cause & CAPA).
5. Valid CPP/E-CPP
6. Valid GMP certificate/Online EUDRA
7. Registration license/box approval with covering letter to confirm the company intent to submit for registration in case of pre- submission assessment request with commitment to update CADC team in case of any changes to the previously assessed dossier before going to actual sample analysis for the product.

N.B. The final approval for reliance will not be completed until submission of the registration license.

8. Worldwide marketing status.
9. Legalized letter of authorization in case of different applicant from the license holder.
10. Full access P-part of the Quality Module 3 of the CTD dossier.
11. All chromatograms and data of analysis, including the In- Process Controls and batch record (if applicable) for specific batch, to be submitted at least once in case of new registration, major variation, random sampling in case were not submitted before for any reason or upon further request to clarify certain query.
12. Certificate of analysis of the submitted batch.
13. Full assessment report (if applicable) along with other relevant supporting documents from the reference regulatory agency such as:
- Final assessment report approved by the reference drug authority.
- Question & Answer documents between the applicant and the reference authority with all Annexes.

14. Cold chain storage & transportation procedures for products requiring specific conditions, or submission of declaration letter from license holder declaring that the product is stable during transportation and storage.

Annex II

Application Form

Trade name *:	
Generic name:	
License holder:	
FPP manufacturer for the reliance batch:	
Applicant:	
Batch number of the submitted batch:	
Reference Regulatory Authority: *(FDA, EMA or Reference country only)*	
Date of authorization at country of origin	
Submission type *(Registration, variation or random)*	

*Please indicate if there are different trade names for the product

Annex III

CMC Differences Form

CMC differences compared to the reference NRA		
Module 3	**Dossier sameness as compared to Reference NRA (Yes/No)**	**Justification for the difference**
3.2. P. Drug Product		
3.2.P.1 Description and Composition of the Drug Product		
3.2. P.2. Pharmaceutical Development		
3.2.P.3: Manufacturer		
3.2.P.3.1: Manufacturer		
3.2.P.3.2: Batch Formula		
3.2.P.3.3: Description of Manufacturing Process and Process Controls		
3.2.P.3.4: Controls of Critical Steps and Intermediates		
3.2.P.3.5: Process Validation and/or Evaluation		
3.2.P.4: Control of Excipients		
3.2.P.4.1: Specification		
3.2. P.5. Control of Drug Product		
3.2.P.5.1: Specification		
3.2.P.5.2: Analytical Procedures		
3.2.P.5.3: Validation of Analytical Procedures		
3.2.P.5.4: Batch Analyses		
3.2.P.5.5: Characterization of Impurities		
3.2.P.5.6: Justification of Specification		

Name:
Job Title:
Signature:
Date: