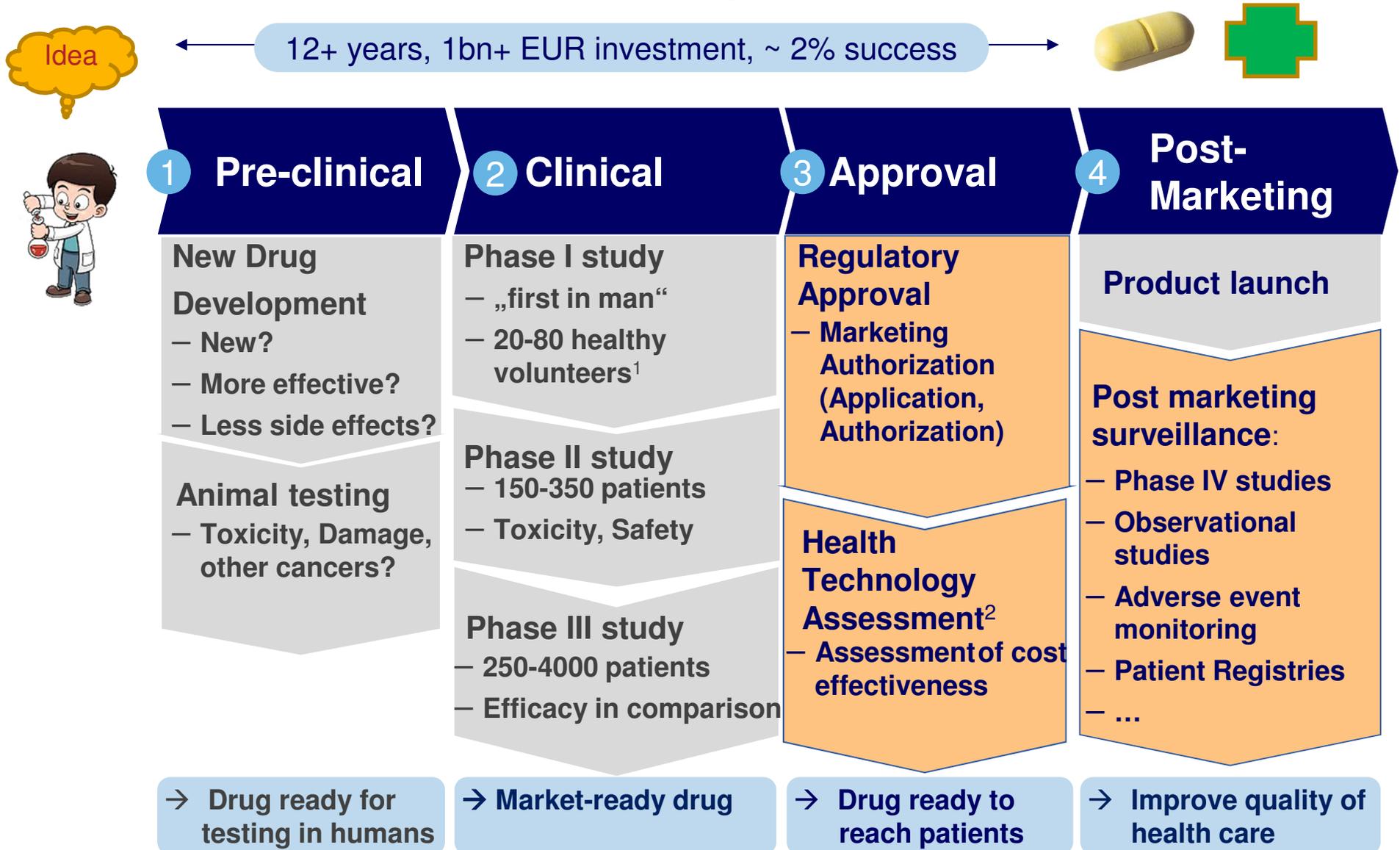




Introduction: How are drugs approved and monitored?

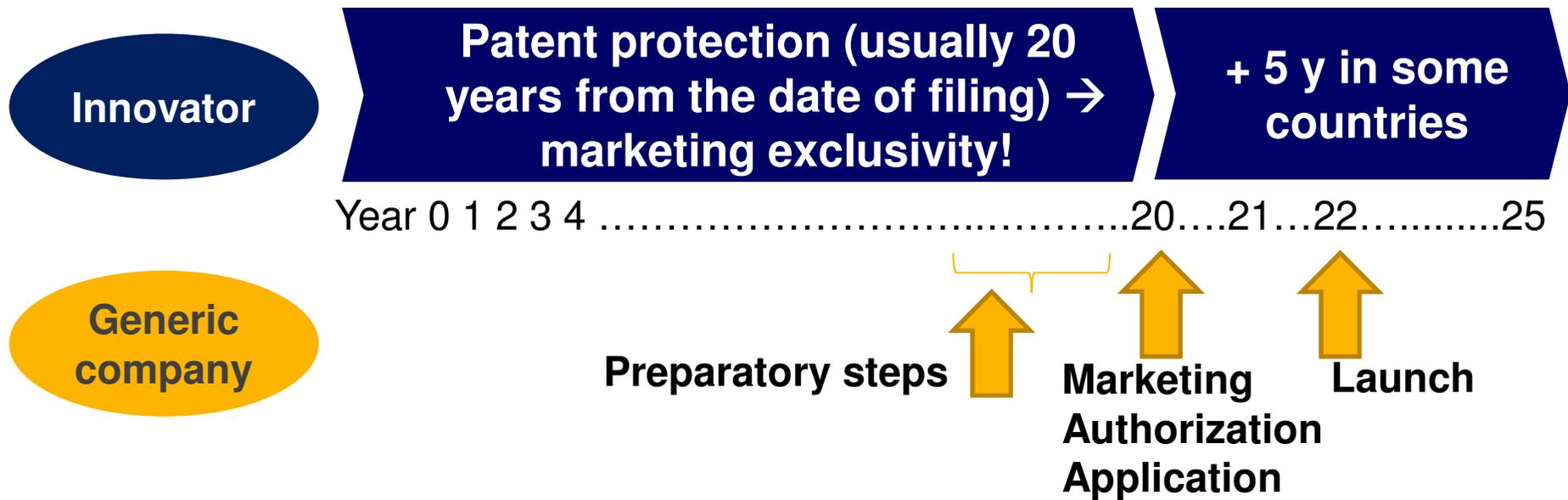
Nicole Schröter
3 May 2015

Drug development and approval process (innovator product)



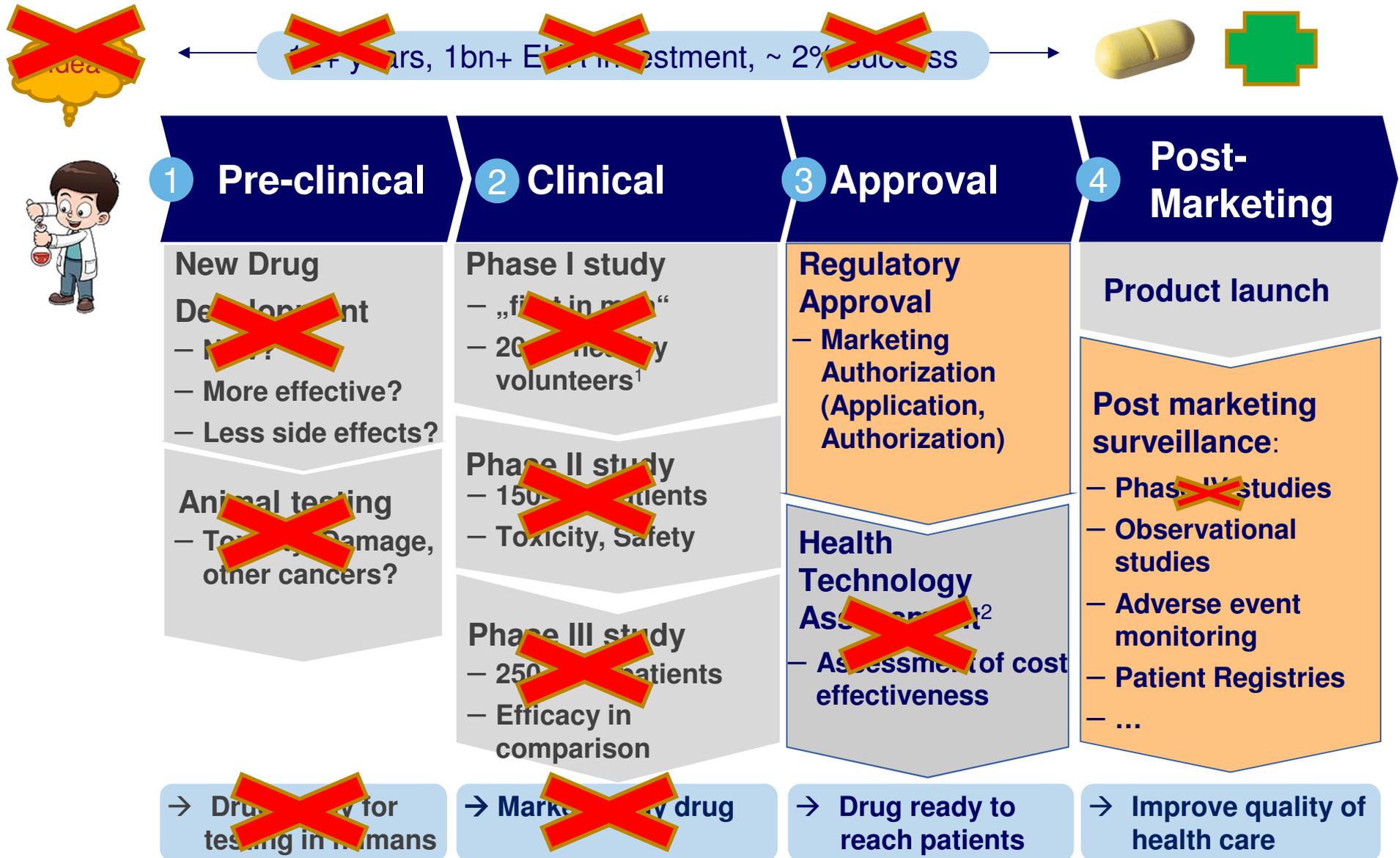
¹) Exception for cancer therapy: Late stage tumor patients included; ²) Selected countries only

When & how do generics come into play?



- **Generics can be launched at a significantly lower price**
 - Little development costs (no research)
 - No clinical trials required
 - Less marketing campaigns, as originator drug is known to doctors
 - Increased competition

Simplified process in case of generic drugs



¹) Exception for Cancer therapy: Late stage tumor patients included; ²) Selected countries only

Let's go into detail...



1) Exception for Cancer therapy: Late stage tumor patients included; 2) Selected countries only

Approval of drugs takes around 2 years in usually 6 steps



Compilation of registration dossier

1



Review Meeting¹

2



Filing of Application

3

Regulatory Approval Process

4

Application Review



5

Facility Inspection



6

Drug Approval



¹) Selected countries only, eg. USA

“The standards for quality are the same for brand name and generic products.”¹

In tightly regulated markets like EU or US, generic drugs are required to have:

- Same active ingredient, amount of active ingredient, purity
- Same pharmacokinetic & pharmacodynamic properties
- Same stability
- Same mechanism of action, safety & efficacy
- Same therapeutic indication & route of administration

What is allowed are...

- Different salts
- Different excipients
- Different manufacturing process
- Different product name & packaging

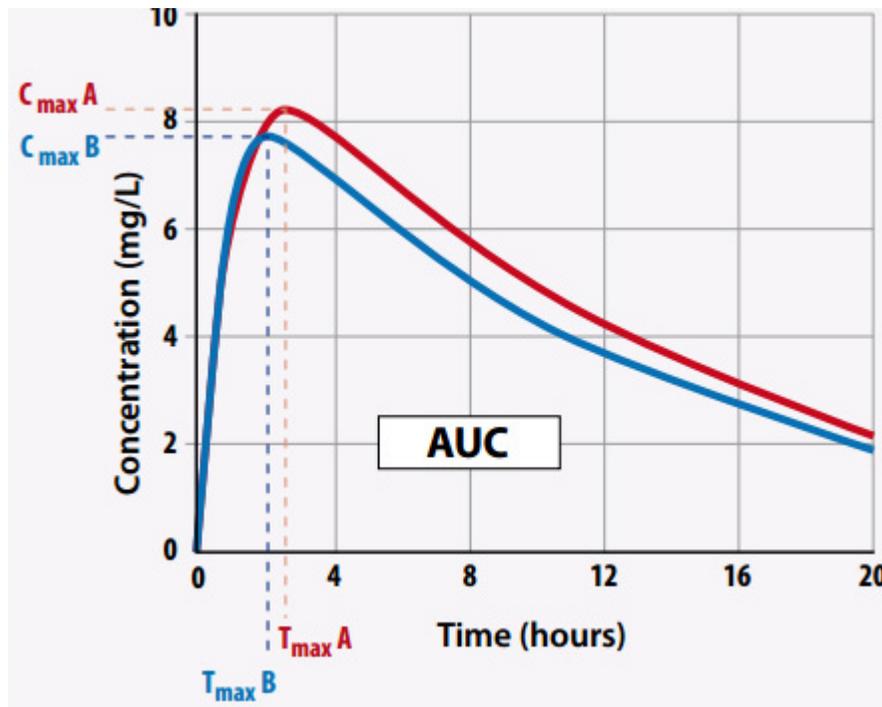
Unless they differ significantly in their safety and/or efficacy properties → in this case, the generic manufacturer has to submit further proof of efficacy and safety.

¹ Gary Buehler, Director of FDA's Office of Generic Drugs; applicable at least to US & EU

In the US & EU, approval of generics and innovator products is similar, except...

- Generics do not need to prove safety and effectiveness of the drug through animal testing, clinical trials in humans
→ **approval through referencing to originator product**
- BUT: Generic applicants must demonstrate that their product is **bioequivalent** to the innovator product
 - Most regulatory authorities require bioequivalence of the generic to be **80%-125%** of the innovator product (traditional bioequivalence limit)

Bioequivalence studies show that active ingredient in patients' bloodstream is the same in generic and innovator product



KEY: — Innovator
— Generic

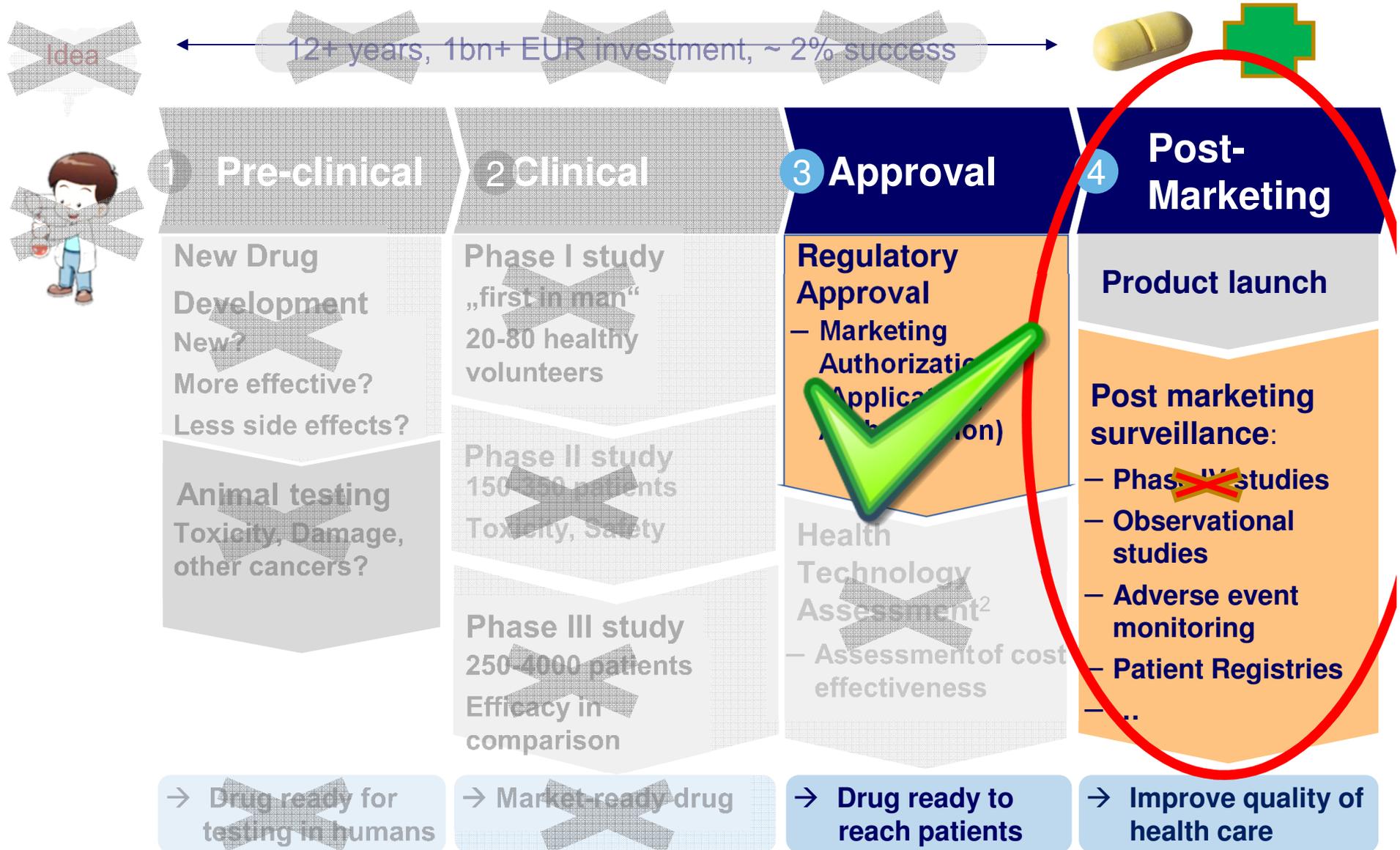
C_{max} maximum plasma drug concentration

T_{max} time required to achieve a maximal concentration

AUC total area under the plasma drug concentration-time curve

→ No significant difference between both products in terms of blood levels and time

Let's go into detail...

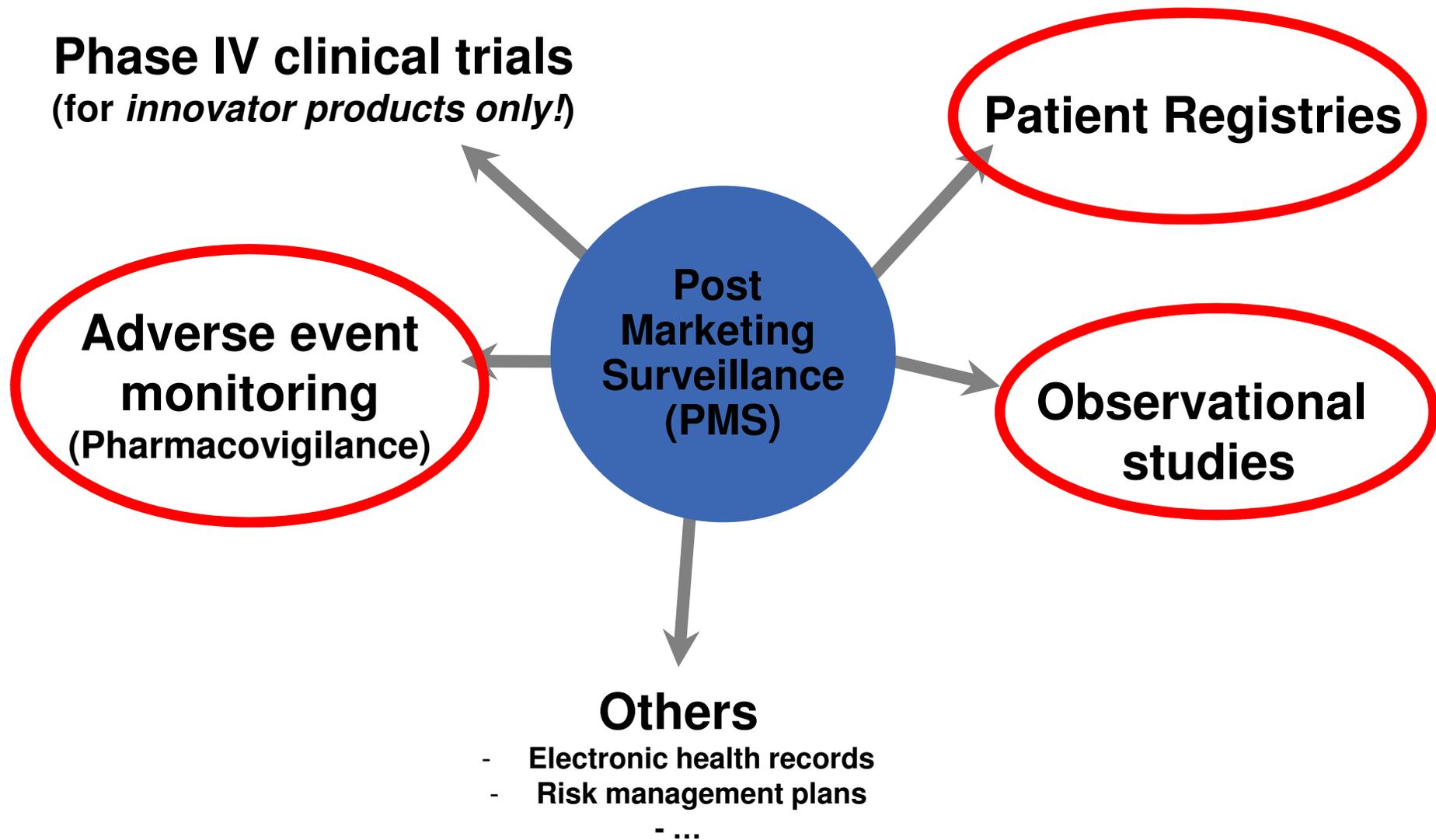


1) Exception for Cancer therapy: Late stage tumor patients included; 2) Selected countries only

Post marketing surveillance: improving safety in use of medicines

- **“Post marketing surveillance”:**
 - Monitoring the safety of a drug after market authorization, and collecting further data
- **Objective: Evaluation in a real-world setting**
 - Explore long term effects
 - Real-world data in larger populations (more variety of patients, medical conditions, comorbidities)
 - Detect all (incl. rare) adverse drug reactions, drug interactions
 - Assess new uses and therapeutic areas
 - Understand the real benefit-risk relationship

Post-marketing surveillance measures to monitor the safety of approved drugs



Observational studies provide information from a representative sample of 'real-life' patients



■ CHARACTERISTICS:

- Carried out in a routine clinical practice setting
- Less rigorous and costly than randomized clinical trials, but lower level of evidence

■ OBJECTIVES:

- Monitor effect of a drug under routine conditions and for prolonged period of time
- Provide additional details about the efficacy and safety of the drug

■ TYPICAL STUDY FIELDS:

- Different formulations, dosages, durations of treatment
- New age groups, races, types of patient (e.g. pregnant women,...)

■ REASONS:

- Requested by Regulatory Authorities
- Competitive reasons (e.g. finding new market for the drug)
- Exploring and measuring ways to improve comfort and QoL,...

Patient Registries collect standardized information about patients that share the same condition or experience

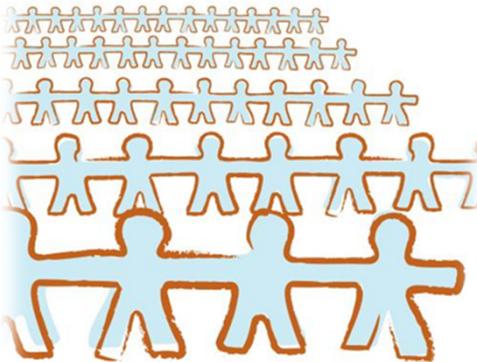


■ OBJECTIVES:

- Recruiting patients for clinical trials¹
- Study best practices in treatment and care
- Examine questions that are not being answered / looked at in clinical trials¹
- ...

■ TYPES:

- Researcher-generated: established by research institutions, academic clinical institutions, or individual research teams
- Patient-powered: established by patient advocacy organizations



¹ applies to innovator products only, not to generics!

Adverse event monitoring (*Pharmacovigilance*) - the core of post marketing surveillance

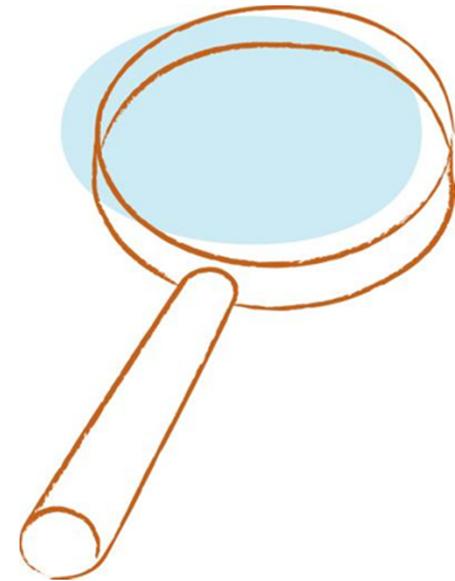
■ Etymology & definition:

- *pharmakon* (greek) = drug
+ *vigilare* (Latin) = to monitor
- “the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other drug-related problem. “ (WHO)



■ Why is pharmacovigilance (PV) so important?

- 5% of all hospital admissions in the EU are for side effects
- Side effects are the 5th most common cause of hospital deaths
- Nearly 200.000 deaths per year in the EU from side effects



The provision of good quality, safe and effective drugs is responsibility of national governments

■ PV implementing measures¹

- Requirements applying to pharmaceutical companies (extensive reporting systems, regular audits, employment of “qualified pharmacovigilance person”, etc.)
- Individual Case Safety Reports (ICSR) by companies and healthcare professionals
- Direct consumer reporting systems

¹ equally applicable to innovator drugs & generics

CIOMS FORM

SUSPECT ADVERSE REACTION REPORT										
I. REACTION INFORMATION										
1. PATIENT INITIALS (first, last)	1a. COUNTRY	2. DATE OF BIRTH			2a. AGE	3. SEX	4-6 REACTION ONSET			8-12 CHECK ALL APPROPRIATE TO ADVERSE REACTION <input type="checkbox"/> PATIENT DIED <input type="checkbox"/> INVOLVED OR PROLONGED INPATIENT HOSPITALISATION <input type="checkbox"/> INVOLVED PERSISTENCE OR SIGNIFICANT DISABILITY OR INCAPACITY <input type="checkbox"/> LIFE THREATENING
		Day	Month	Year	Years		Day	Month	Year	
7 + 13 DESCRIBE REACTION(S) (including relevant tests/lab data)										
II. SUSPECT DRUG(S) INFORMATION										
14. SUSPECT DRUG(S) (include generic name)								20. DID REACTION ABATE AFTER STOPPING DRUG? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA		
15. DAILY DOSE(S)					16. ROUTE(S) OF ADMINISTRATION					
17. INDICATION(S) FOR USE								21. DID REACTION REAPPEAR AFTER REINTRODUCTION? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA		
18. THERAPY DATES (from/to)					19. THERAPY DURATION					
III. CONCOMITANT DRUG(S) AND HISTORY										
22. CONCOMITANT DRUG(S) AND DATES OF ADMINISTRATION (exclude those used to treat reaction)										
23. OTHER RELEVANT HISTORY (e.g. diagnostics, allergies, pregnancy with last month of period, etc.)										
IV. MANUFACTURER INFORMATION										
24a. NAME AND ADDRESS OF MANUFACTURER										
					24b. MFR CONTROL NO.					
24c. DATE RECEIVED BY MANUFACTURER					24d. REPORT SOURCE <input type="checkbox"/> STUDY <input type="checkbox"/> LITERATURE <input type="checkbox"/> HEALTH PROFESSIONAL					
DATE OF THIS REPORT					25a. REPORT TYPE <input type="checkbox"/> INITIAL <input type="checkbox"/> FOLLOWUP					

Direct consumer reporting

How to report a side effect?

- **EU:**
- **Reporting of side effects** is normally carried out by **healthcare professionals**
- **But:** increasingly, **patients** are able to report suspected side effects **directly**
 - through **online patient reporting forms** hosted by **national medicines regulatory authorities**
→ *see list of national medicines regulatory authorities*
 - by **telephone.**

“The European Medicines Agency cannot accept side-effect reports directly from patients or consumers!”

http://www.adrreports.eu/docs/ADR_reporting_FINAL_EN.pdf
<http://www.adrreports.eu/en/index.html>

European database of suspected adverse drug reaction reports

Home About Understanding reports Search Medicine safety

National competent authorities (NCAs)

Country	Name	Information on safety and side-effect reporting
Österreich	Bundesamt für Sicherheit im Gesundheitswesen	Traisengasse 5 1200 WIEN ÖSTERREICH Fax: + 43 (0) 50 555 36207 Website: http://www.basg.gv.at/
België/ Belgique/ Belgien	Federaal agentschap voor geneesmiddelen en gezondheidsproducten	Afdeling Vigilantie EUROSTATION II Victor Hortaplein, 40/ 40 B-1060 Brussel Website: www.fagq.be e-mail: adversedrugreactions@faqq-afmps.be , patientinfo@faqq-afmps.be
	Agence fédérale des médicaments et des produits de santé	Division Vigilance EUROSTATION II Place Victor Horta, 40/ 40 B-1060 Bruxelles Site internet: www.afmps.be e-mail: adversedrugreactions@faqq-afmps.be , patientinfo@faqq-afmps.be
	Föderalagentur für	Abteilung Vigilanz

https://www.notificaram.es/TipoNoti.aspx

GOBIERNO DE ESPAÑA MINISTERIO DE SANIDAD, SERVICIOS SOCIALES E IGUALDAD

agencia española de medicamentos y productos sanitarios

Selecciona el tipo de notificación que desea enviar

Notificación de Ciudadano

Notificación de Profesional Sanitario

Example: Spain

Direct consumer reporting

How to report a side effect?



■ USA:

A screenshot of the FDA MedWatch website. The top navigation bar includes the FDA logo, the text "U.S. Food and Drug Administration Protecting and Promoting Your Health", and a search bar. Below the navigation bar are menu items for Home, Food, Drugs, Medical Devices, Radiation-Emitting Products, Vaccines, Blood & Biologics, Animal & Veterinary, Cosmetics, and Tobacco Products. The main content area is titled "MedWatch: The FDA Safety Information and Adverse Event Reporting Program" and features a search bar, a "Report a Problem" button (circled in red), and a "Begin Report As a:" section with "Health Professional" and "Consumer/Patient" options (both circled in red).

U.S. Food and Drug Administration
Protecting and Promoting *Your Health*

A to Z Index | Follow FDA | En Español

Search FDA

Home | Food | Drugs | Medical Devices | Radiation-Emitting Products | Vaccines, Blood & Biologics | Animal & Veterinary | Cosmetics | Tobacco Products

Safety

Home > Safety > MedWatch The FDA Safety Information and Adverse Event Reporting Program

MedWatch The FDA Safety Information and Adverse Event Reporting Program

Subscribe to MedWatch Safety Alerts

Safety Information

Reporting Serious Problems to FDA

Resources for You

- 2015 Safety Alerts for Human Medical Products

Search the MedWatch Section

Food and Drug Administration
MEDWATCH

Your FDA gateway for clinically important safety information and reporting serious problems with human medical products.

Report a Problem

Safety Information

Stay Informed

Begin Report As a:

Health Professional

Consumer/Patient

<http://www.fda.gov/Safety/MedWatch/default.htm>

Pharmacovigilance interventions

■ In case important new risks are uncovered...

- **Manufacturers** are obliged to amend their labels / leaflets or add a boxed warning on their packaging
- **Public** is informed through letters, public health advisories
- In some cases **use** of the drugs is substantially **limited**
- Every once in a while, drugs are **withdrawn from the market**



Can we fully trust generics?

→ There is no clear “yes” or “no” answer! It all depends...

- *“Doctors and patients can be confident that most generic drugs dispense in Western nations are of high quality”¹*
- *“(...) but globally there are many generic drugs for which companies offer little or no support and monitoring, and regulators don’t require generics to undergo phase IV post-marketing studies.”¹*
- *“(...)– developing countries face greater risks from lower standards (...)”¹*

(Prof. Atholl Johnston, Professor of clinical pharmacology at Queen Mary, University of London)

→ **The quality of a drug (innovator or generic) depends**

- 1. on the manufacturer AND**
- 2. on a strong and vigilant Regulatory Authority!**

¹ Generic cancer drugs that we can trust (Beishon, Cancer World Jan-Feb 2015)

What is the situation in your country?

- Is there a regulatory and safety monitoring system in place?
- Does your local authority require generic drug manufacturers to prove their drug exhibits bioequivalence to the innovator product?
- Do the same requirements apply for generic drugs as for innovator products?
- ...

GO AND FIND OUT!





**Thank you for your
attention!**

QUESTIONS



Backup slides

APPROVAL STAGE: Regulatory approval

1



Compilation of registration dossier

- EU : Marketing Authorization Application (MAA)
- US : New Drug Application (NDA) or Abbreviated New Drug Application (*in case of generics*)
- Content and format are defined by competent authorities (e.g. US/EU/Japan: CTD / eCTD¹)
- **Dossier usually includes:**
 - Extensive documentation on the drug & development (pre-clinical and clinical reports (*applies to innovator products only!*), pharmacokinetics, product characteristics, risk-benefit analysis, stability data,...)
 - Administrative documents (Manufacturing Permit, GMP²-certificate,...)
- **Additionally, companies are required to submit:**
 - Samples of finished product, proposed labelling & leaflet
 - Reagents to perform analyzes

¹ (electronic) Common Technical Document

² Good Manufacturing Practice (GMP)

APPROVAL STAGE: Regulatory approval

2 Review Meeting

Meeting between pharma company and regulatory body prior to submission of dossier

3 Filing of Application

Independent regulatory body or Specialized department in the Ministry of Health (MoH)

4 Application Review

- Review of dossier
- Review of drug labelling / content of leaflet (is information communicated to health care professionals and consumers appropriate?)
- Queries to the manufacturer and responses by staff of Regulatory Affairs Department

APPROVAL STAGE: Regulatory approval

5



Facility Inspection

- Essential part of drug quality assurance system
- Randomly and depending on the country
- **Criticism by industry:** no collaborative global approach → various inspections by various regulatory bodies at one manufacturing site, while other sites are not covered by inspection

6



Drug Approval

- Issuing of registration certificate / MA²
- **Validity:** usually 5 years (depending on the country)
- Renewal in due time
- Withdrawal if
 - MA holder does not fulfil obligations to maintain product on the market (e.g. reporting variations)
 - Product is not placed on market within defined period of time (depending on the country; EMA: “Sunset clause”)



APPROVAL STAGE: Regulatory approval

Procedure for obtaining Marketing Authorization

- **Most countries worldwide:** National procedure (national rules and requirements)
- **EU:**

Procedure	Centralized	Decentralized	Mutual recognition	National
Validity of MA	 + EEA	CMSs of choice	CMSs of choice	Country of choice
Applicable to drugs...	...for which centralized procedure is compulsory (e.g. orphan drugs, cancer/HIV-drugs,...)	...that have not been registered in any member state before	...that have previously received MA in any member state	...intended for one country only + centralized proced. not compulsory
MAA to file with...	EMA	Competent authorities of each CMS in which product shall be launched; one state acts as RMS		Competent authority of resp. CMS

CMS = Concerned Member State
RMS = Reference Member State

MA = Marketing Authorization
MAA = Marketing Authorization Application

What about comparative effectiveness: Health Technology Assessment*



■ Health Technology Assessment (HTA)

- Marketing authorization proves **safety as well as effectiveness** against a disease
- HTA **compares effectiveness to other existing drugs**,
- In some countries, HTA assesses whether **costs reflect value, or whether drug is cost effective**
- **Support health care decisions and policy making**
- **Give government and insurance companies a basis for reimbursement decisions**

■ HTA bodies (examples):

- UK's National Institute for Clinical Excellence (NICE)
- Canadian Agency for Drugs and Technologies in Health (CADTH)
- German G-BA/IQWiG

*Applies to originator drugs only, no HTA in generics!

POST MARKETING STAGE Post Marketing Surveillance

Example of a patient-powered Patient Registry

- **Host:** LRG (Life Raft Group)
- **Classification:** GIST patients
- **Source of information:** patients and caregivers
- **Main purposes:**
 - ✓ Look for treatment and response trends that can help our members reach tomorrow's cure.
 - ✓ Reduce the lethal lag-time between discoveries of important data to communication.

The screenshot displays the 'Patient Registry' software interface. The main window is titled 'Patient, Blank' and contains several sections for data entry and viewing:

- General Info:** Includes fields for Patient ID (1), Country of Birth (United Kingdom), Date of Birth (5/7/1966), Marital Status (Married), Current Age (48 Years, 2 Months), Gender (Male), Race (Black, not of Hispanic ori), and Date of Death (6/12/2014).
- Diagnosis:** Shows GIST Diagnosis Date (2/14/2001), 1st Symptoms Date (5/15/1983), and 1st Cancer Diagnosis (LMS).
- Tumor Location @ Diagnosis:** A table with one record: Event (Diagnosis), Tumor Type (Primary Tumor), and Tumor Location (Stomach).
- Tumor Mutations - Genotyping:** A table with one record: Mutation (Primary), Test Date (07/15/2006), Gene (WildType), Exon (N/A), AA (SDHB negative), and Report (checked).
- Plasma Test:** A table with no records to display.

Additional fields include 'Ist. Diagnosis' (Gist Date: 2/14/2001, Age@Diag: 34), 'Tested Stains' (C-kit: Positive, SDHB: Negative, CD34: Unknown, SDMA: Unknown, DOO1: Unknown), and 'Diagnosis Comments' (Symptoms: fainting, bloody stools, abdominal pains; Medical History: anemia, hypertension, diabetes).

<https://liferaftgroup.org/patient-registry/>

POST MARKETING STAGE Post Marketing Surveillance

Example of a research-generated Patient Registry

Go to Healthcare Professionals site > Read Important Safety Information > Learn about pregnancy complications from Herceptin®, PERJETA®, and KADCYLA® >

MotHER
The MotHER Pregnancy Registry

About MotHER

Why Enroll?

About Participation

How to Enroll?

What is the MotHER Pregnancy Registry?

The MotHER Pregnancy Registry* was established for women who have taken Herceptin® (trastuzumab), PERJETA® (pertuzumab), or KADCYLA® (ado-trastuzumab emtansine) for breast cancer during pregnancy or within seven months of becoming pregnant. The goal is to learn about the health of these women and their babies.

Learn More About MotHER

*The MotHER Pregnancy Registry is sponsored by Genentech, Inc.

- **Title:** MotHER Pregnancy Registry
- **Classification:** Pregnancy
- **Description:** Prospective, observational cohort study in women who have taken selected drugs for breast cancer during pregnancy or within seven months of becoming pregnant.
- **Main purposes:** Learn about the health of these women and their babies.

<http://www.motherpregnancyregistry.com/>

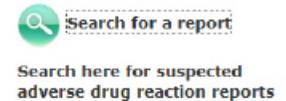
<https://patientregistry.ahrq.gov/profile?freeText=cancer&rid=1447&cnt=5>

POST MARKETING STAGE - Pharmacovigilance

■ Example: Europe

- **New EU Pharmacovigilance Legislation (effective since July 2012)**
 - **Reporting of Suspect Adverse Reaction by Healthcare Professionals and pharmaceutical companies**
 - **Direct consumer reporting:** online patient reporting forms hosted by national medicines regulatory authorities or by telephone.
 -  **Post-Authorization Module (EVPM)**
for post-authorization Individual Case Safety Reports (ICSRs)
 - **Submission of Periodic Safety Update Reports (PSURs) and Risk Management Plans (RMPs) by pharmaceutical companies**
 - **Pharmacovigilance Audits**
 - **Good Pharmacovigilance Practice (GVP):**
 - Set of measures to facilitate the performance of pharmacovigilance
 - Applies to MA-holders, EMA¹ and medicines regulatory authorities in EU Member States
- **Full implementation of the new EU Legislation estimated to save 500-5.000 lives per year & savings to society of between 250 million and 2.5 billion euros per year in the EU**

<http://www.adrreports.eu/en/index.html>



POST MARKETING STAGE - Pharmacovigilance

■ Example: USA

- **Periodic Safety Update Report (PSUR) must be submitted by pharmaceutical companies to FDA**
- **MedWatch:** The FDA Safety Information and Adverse Event Reporting Program → direct reporting of adverse side effects by consumers and physicians. See:



POST MARKETING STAGE - Pharmacovigilance

- **Pharmacovigilance requirements applicable to license holders (pharmaceutical companies):**
 - **Employing a QPPV (Qualified Person Responsible for PV)**
 - **Collection and evaluation of pharmacovigilance relevant cases**
 - **Individual Case Safety Report (ICSR) reporting**
 - **Systematic literature review and reporting**
 - **Periodic Safety Update Report (PSUR) submission**
 - **Risk Management Plan (RMP)**
 - **Pharmacovigilance System Master File (PSMF)**
 - **Standard operating procedures (SOP) on pharmacovigilance**
 - **Submission of variations**
 - **Pharmacovigilance Audits**
 - **...**

POST MARKETING STAGE - Pharmacovigilance Suspect Adverse Reaction Report Form (CIOMS¹ Form I)² for Individual Case Safety Reports (ICSR)

CIOMS FORM

SUSPECT ADVERSE REACTION REPORT									
I. REACTION INFORMATION									
1. PATIENT INITIALS <small>(first, last)</small>	1a. COUNTRY	2. DATE OF BIRTH <small>Day Month Year</small>	2a. AGE Years	3. SEX	4-6 REACTION ONSET <small>Day Month Year</small>	8-12 CHECK ALL APPROPRIATE TO ADVERSE REACTION			
7 + 13 DESCRIBE REACTION(S) (including relevant test/lab data)						<input type="checkbox"/> PATIENT DIED			
						<input type="checkbox"/> INVOLVED OR PROLONGED INPATIENT HOSPITALISATION			
						<input type="checkbox"/> INVOLVED PERSISTENCE OR SIGNIFICANT DISABILITY OR INCAPACITY			
						<input type="checkbox"/> LIFE THREATENING			
II. SUSPECT DRUG(S) INFORMATION									
14. SUSPECT DRUG(S) (include generic name)					20. DID REACTION ABATE AFTER STOPPING DRUG? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA				
15. DAILY DOSE(S)			16. ROUTE(S) OF ADMINISTRATION		21. DID REACTION REAPPEAR AFTER REINTRODUCTION? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA				
17. INDICATION(S) FOR USE									
18. THERAPY DATES (from/to)			19. THERAPY DURATION						
III. CONCOMITANT DRUG(S) AND HISTORY									
22. CONCOMITANT DRUG(S) AND DATES OF ADMINISTRATION (exclude those used to treat reaction)									
23. OTHER RELEVANT HISTORY (e.g. diagnostics, allergies, pregnancy with last month of period, etc.)									
IV. MANUFACTURER INFORMATION									
24a. NAME AND ADDRESS OF MANUFACTURER									
24b. MFR CONTROL NO.									
24c. DATE RECEIVED BY MANUFACTURER			24d. REPORT SOURCE <input type="checkbox"/> STUDY <input type="checkbox"/> LITERATURE <input type="checkbox"/> HEALTH PROFESSIONAL						
DATE OF THIS REPORT			25a. REPORT TYPE <input type="checkbox"/> INITIAL <input type="checkbox"/> FOLLOWUP						

Healthcare professionals & companies must report:

- suspected adverse drug reactions including those related to quality complaints
- suspected interactions with other medicinal products and other forms of interaction
- experience during pregnancy and lactation
- data on use in children
- lack of efficacy
- overdose (symptomatic or not), abuse and misuse (symptomatic or not)
- medication errors

Minimum criteria:

- identifiable patient
- suspect drug/substance
- suspected adverse reaction
- identifiable reporter (primary source)

¹ CIOMS = Council for International Organizations of Medical Sciences (Associate Partner of UNESCO – in official relations with WHO)

² Widely accepted standard for expedited adverse event reporting

POST MARKETING STAGE – Phase IV clinical trials¹ vs. observational studies



	Phase IV Clinical Trial	Observational study
Objectives	<ul style="list-style-type: none"> • Monitor drug's long-term effects • Provide additional details about efficacy and safety of the drug 	
Design	<ul style="list-style-type: none"> • Randomized, controlled, blind • Narrow inclusion/exclusion criteria 	<ul style="list-style-type: none"> • Routine clinic. practice setting • Less rigorous • Protocol driven
Study fields	<ul style="list-style-type: none"> • Different formulations, dosages, durations of treatment • New age groups, races, types of patient (e.g. pregnant women,...) 	
Intervention	Interventional	Non-intervent. / observational
Reasons for conducting study	<ul style="list-style-type: none"> • Requested by Regulatory Authorities • Competitive reasons of manufacturer (e.g. finding new market for the drug) • Exploring and measuring ways to improve comfort and QoL,... 	
Level of evidence	High	Lower
Cost	High	Low

¹ applicable to innovator products only!

Quality standards: The situation with generics

"The standards for quality are the same for brand name and generic products." Gary Buehler, Director of FDA's Office of Generic Drugs

(applies to all tightly regulated countries / areas such as US or EU)

Same FDA Requirements for Brand-Name and Generic Drugs

	Brand Name Drug	Generic Drug
For reformulations of a brand-name drug or generic versions of a drug, FDA reviews data showing the drug is bioequivalent to the one used in the original safety and efficacy testing.		
FDA evaluates the manufacturer's adherence to good manufacturing practices before the drug is marketed.	X	X
FDA reviews the active and inactive ingredients used in the formulation before the drug is marketed.	X	X
FDA reviews the actual drug product.	X	X
FDA reviews the drug's labeling.	X	X
Manufacturer must seek FDA approval before making major manufacturing changes or reformulating the drug.	X	X
Manufacturer must report adverse reactions and serious adverse health effects to the FDA.	X	X
FDA periodically inspects manufacturing plants.	X	X
FDA monitors drug quality after approval.	X	X

Source: U.S. Food and Drug Administration (FDA):

<http://www.fda.gov/Drugs/EmergencyPreparedness/BioterrorismandDrugPreparedness/ucm134444.htm>
(accessed 27.02.2015)

Myths and Facts about Generic Drugs

MYTH: Generics take longer to act in the body.

FACT: The firm seeking to sell a generic drug must show that its drug delivers the **same amount of active ingredient** in the **same timeframe** as the original product.

MYTH: Generics are not as potent as brand-name drugs.

FACT: FDA requires generics to have the **same quality, strength, purity, and stability** as brand-name drugs.

MYTH: Generics are not as safe as brand-name drugs.

FACT: FDA requires that all drugs be safe and effective and that their benefits outweigh their risks. Since generics use the same active ingredients and are shown to work the same way in the body, they have the **same risk-benefit profile** as their brand-name counterparts.

MYTH: Brand-name drugs are made in modern manufacturing facilities, and generics are often made in substandard facilities.

FACT: FDA won't permit drugs to be made in substandard facilities. FDA conducts about 3,500 inspections a year in all firms to ensure standards are met. Generic firms have **facilities comparable to those of brand-name firms**. In fact, brand-name firms account for an estimated 50 percent of generic drug production. They frequently make copies of their own or other brand-name drugs but sell them without the brand name.

MYTH: Generic drugs are likely to cause more side effects.

FACT: There is no evidence of this. FDA monitors reports of **adverse drug reactions** and has found **no difference in the rates** between generic and brand-name drugs.

References

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