To: Barry Meade, ACVM Programmes and Appraisals
barry.meade@mpi.govt.nz
Submission: Temperature sensitive veterinary medicines
Date: 24 August 2023
Submitter: Jeff Howe, Technical Manager Animal Health
Organization: Animal and Plant Health New Zealand
Address: Equinox House, 111 The Terrace, Wellington
Phone: 027 280 2765
Email: jeff.howe@aphanz.co.nz

APHANZ SUBMISSION ON THE PROPOSAL FOR TEMPERATURE SENSTIVE VETERINARY MEDICINES

1. Introduction and general comments

1.1 Thank you for the opportunity to comment on the proposed approach for managing temperature excursions as outlined in the AVMC paper dated 19 July 2023.

1.2 APHANZ supports the intention of providing greater clarity around the management of temperature excursions and supports there being a clearer framework and guidelines that will enable self-management of variations without the need for BSVs where this is supported by stability data. Our comments below seek further clarification of how this approach would be implemented to avoid duplication and unnecessary procedures.

2. Specific comments

Temperature sensitive definition

2.1 We consider “temperature-sensitive” needs to be more clearly defined. Does this only apply to cold-chain products? Cold-chain is mentioned in the “Purpose” section, but then “temperature-sensitive” is used throughout. If it applies to cold-chain products, the guidance is reasonable.

24-hour timeframe

2.2 It is not clear what the proposed 24-hour temperature limit is based on. Is the 24-hour limit defined by data e.g., ICH guidance on stability studies? Or was it chosen as a “reasonable threshold” for most products? We note that products vary significantly in their temperature sensitivity and for some, this is extreme, while for others, it's comfortably within the acceptable range.

Registration/dossiers

2.3 The final paragraph before “RECOMMENDATION” seems to imply that data could be submitted during registration, but it’s not clear whether this means temperature excursion data should be part of the routine dossier, or optional data to allow self-management of increased excursions. This also raises the question whether a registrant could submit data during registration (or in a C2 variation) to allow longer excursions than 24 hours to be self-managed?

2.4 APHANZ’s preferred approach would be for registrants to be required to have the stability data on file that supports their decisions when self-managing temperature excursions without a BSV, but that this does not need to be added to the registration dossier. Requiring this will trigger a large number of C2 variations, which will put a significant administrative burden on registrants and the veterinary medicine assessment team. A substantial transition period to enable these C2 variations to be approved would be needed before such an approach is implemented to avoid registrants having to submit batch-specific variation applications for every minor short-term excursion that may occur while waiting for these approvals (based on the current AVMC practice as outlined in the paper).

2.5 APHANZ’s view is that if registrants have the required stability data, then the proposed cumulative temperature excursion time of ≤ 24 hours should not apply and registrants should be able to make their own decisions based on that data, without the need for an arbitrary excursion time limit. ACVM will have the ability to review the release to market documentation during GMP audits.

Transport method

2.6 In order to allow self-assessment of temperature excursions, the paper notes that evidence of validation/qualification of the transport method including packaging must be available. Some parts of existing transport of cold-chain products are well-established, without specific validation/qualification, such as shipment in reefer containers with data loggers. It does not seem reasonable to expect additional validation of these parts of transportation.

3. Conclusion

3.1 APHANZ believes that registrants are well-equipped to evaluate temperature excursions and determine product release if they have the stability data that can be used to produce informed self-assessments and, in such situations, the 24-hour cumulative temperature excursion time limit should not apply.

3.2 Our preference would be for the guidelines to state that the stability data to support self-assessment must be held on file by the registrant. However, if a registrant does not have sufficient data on file, we have no objection to the 24-hour cumulative temperature excursion time limit being used.

3.3 If supporting stability and temperature excursion data needs to be submitted in the dossier then a substantial transition period will be needed to enable the ensuing C2 variations to be processed and approved before implementing any changes. The length of the transition period needed will vary based on application processing times.