Guide to Completion/Implementation

Introduction

The IPRP Biosimilar Working Group (IPRP-BWG) has proposed development of a template to assist Competent Authorities (CAs) – referred to as National Regulatory Authorities (NRA) in making available a summary of the assessment (review) of biosimilar (Similar Biotherapeutic Product - SBP) applications in their jurisdiction / country in a common language (e.g. English).

For Competent Authorities who already publish assessment reports following the review of medicinal product applications in their country, these are often in the local language and as a result are not easily accessible to the wider (global) community. The proposed Public Assessment Summary Information for Biosimilar (PASIB) is intended to increase transparency and to facilitate the transition from a local assessment report to one prepared in the English language. The PASIB includes key information and summarised details of the SBP review. The template and it's use has been designed to reduce local translation effort by the National Regulatory Authority (NRA) to a minimum and should be completed in accordance with local requirements, however, if found to be helpful the applicant / sponsor for the SBP can populate data elements of the document in English, as part of the process.

The PASIB is an optional tool and may be less relevant for National Regulatory Authorities who already publish assessment reports in English, however, may still be helpful to optimize their current content with the recommendations made here (sharing assessment summary information in another language could also be helpful, however, English is preferred). It is proposed that the first authority to authorise a biosimilar product in a new substance class will prepare a PASIB for publication.

The PASIB uses WHO terminology and includes three sections:

PART A - ADMINISTRATIVE INFORMATION
Mainly completed by the applicant / sponsor.
Contains particular details of SBP and Reference Biotherapeutic Product (RBP), normally considered helpful to ensure accurate description of the products, application details (e.g. indications applied for), compliance with legal requirements and local reference links to additional information published by the National Regulatory Authority.

PART B - SUBMITTED DATA AND REVIEWER SUMMARY
Dossier / data content aspects completed by the applicant / sponsor.
Assessment / Review details completed by the National Regulatory Authority.

Contains high level summaries of the data and assessment / review. The aim is to give a transparent understanding of which data / studies have been submitted to the National Regulatory Authority and how these were seen in light of the assessment process and contributed to the final regulatory decision.

PART C - REVIEWER CONCLUSIONS
Final conclusions on approvability completed by the National Regulatory Authority.

Contains high level conclusions on the overall assessment / review and whether the Similar Biotherapeutic Product has been approved.

General Administration of PASIB via IPRP website

The PASIB template, guide and relevant examples will be published on the IPRP website.

It is hoped that National Regulatory Authorities who are participating in the publication of PASIB should inform IPRP secretariat and will then be identified on the IPRP website. This would serve as a landing point for those interested in navigating the global community and give directions (e.g. URL) to where each National Regulatory Authority publishes their PASIB reports.

How to complete the PASIB template

1) How much information

Examples have been prepared for biosimilar products which are of different complexity. These are published on the IPRP website. The intention is not to replicate detailed assessments which often contain many pages. Instead the aim is to condense the key information as much as possible while still allowing stakeholders to follow the NRAs thinking and decision making. This can be achieved in under 10 pages and shorter reports (around 6 pages) are preferred. The target audiences are regulatory authorities, industry and interested stakeholders.

2) Information to be included – initial assessment.

The template should be completed in accordance with local requirements, however, if accepted by the NRA, the Sponsor can populate the fields which are designated as MAH (i.e. Marketing Authorisation Holder) in order to facilitate the process and provide this at the time of application. If this has not been provided, the National Regulatory Authority may wish to ask for a completed template at some stage during the review procedure, however, the PASIB is not mandatory and a suitable mechanism to achieve this should be found at local level. This may also apply to any interaction to update a template with additional information provided during a procedure.

With appropriate (informal) agreement from the Sponsor, the National Regulatory Authority may provide a local language assessment to the Sponsor for assistance in translation. The NRA may also complete the whole PASIB document without help from the Applicant / Sponsor.

The MAH or NRA that completes the relevant fields in column 3, should be identified in the final PASIB (i.e. column 1 should be maintained in the final report). Similarly column 2 should not be modified and should remain in the final report.

The National Regulatory Authority specific text is highlighted in red.

3) Information to be included – post approval (lifecycle).

It is foreseen that a biosimilar will be subject to changes during its lifecycle. If a variation / supplement is filed for the biosimilar, the PASIB template can also be used for these situations. For each variation a new section B&C can be prepared and attached to the original (initial application) PASIB as an appendix. The title of Section B can be adjusted for variation applications, with high level identification of the type of variation procedure. While it is helpful to have a comprehensive oversight of variations for the biosimilar, the NRA may choose to add only those where significant changes have occurred, e.g. requiring further comparability assessment (ICH Q5E), new presentations, etc. or updates to clinical (safety / efficacy) information and risk management activities.

Section A should give a current (living) view of the biosimilar authorisation and can be updated during a variation application if changes are necessary. In these situations, the previous Section A information should be replaced in order to retain current version of this front page information.

4) What if certain information is confidential
The aim of the PASIB is to achieve a high level of transparency. It is recognised that different jurisdictions will have their own regulatory framework and may not be able to populate all parts of the PASIB to the same extent. If certain fields would conflict with legislation, in these cases the Competent Authority can state "Confidential – Not Released".

5) Standardisation of the PASIB report.
It will be helpful that in future, with the growing availability of PASIB reports, they are relatively consistent, assisting with comparisons and avoiding linguistic challenges during translation.

Template fields where text has been enclosed in arrowheads: < … > indicates that the appropriate text should be entered OR a choice should be made from the relevant options listed in the template.

Certain parts of the document contain standard sentences and these can be used as written (as far as possible) in order to achieve consistency between reports and NRA's.

Formatting: limited formatting of the final PASIB can be undertaken to improve readability and layout: e.g. modification of text size, column width and page breaks.

6) What if my National Regulatory Authority does not currently publish assessment reports.
The PASIB may serve as a tool to begin the process of transparency. If a detailed assessment report has not already been (or will not be) published by the NRA, then a PASIB in the local language may also be helpful. It will be important to ensure that an English language version is also made available.

Completed PASIB reports

Finalised reports (in English) should be published on the National Regulatory Authority (or relevant) website location and the address to find this location should also be made available on the IPRP website.

If an application is withdrawn before approval (or non-approval is determined), the National Regulatory Authority may wish to publish the assessment up to that stage of the procedure.

Additional information for specific Sections of PASIB

The template comes with generally self-explanatory fields for completion. Some additional information has been identified below, which can be adapted as experience with PASIB evolves.

PART A - ADMINISTRATIVE INFORMATION

Substance category: **http://www.who.int/medicines/services/inn/BioRev2014.pdf**
e.g. 4.20: monoclonal antibodies.

Quantitative Composition - Strength: This should be expressed as labelled for the reference biotherapeutic product, expressed in units, mass or concentration per dosage unit, as appropriate.

PART B - SUBMITTED DATA AND REVIEWER SUMMARY

Quality data – Analytical methods can be identified at a high level, NRAs should aim for the highest level of transparency, respecting confidentiality issues. Tables may be used to format quality information, however, they should not dominate the final appearance of the PASIB document.

Nonclinical data – most information will be considered suitable for inclusion. Certain assays may only be identified at a high level, respecting confidentiality issues.

Clinical data – all clinical data is considered suitable for inclusion.

Where the expression "study design" is used, information such as (e.g. number of patients/healthy volunteers, equivalence/comparability margin, etc.) should be included.

PART C - REVIEWER CONCLUSIONS

The conclusion are generally concise to convey the basic information, i.e. that the biosimilarity exercise has been carried out and is considered to be acceptable. Areas where the review raised issues can be highlighted briefly and if the full claims of the Applicant / Sponsor have not been realised (e.g. extrapolation not accepted, etc.), sufficient reasoning should be included in the PASIB to convey the outcome to a knowledgeable reader.

Interchangeability: conclusions on the interchangeability of the biosimilar and the reference biotherapeutic product are optional, since this aspect may or may not be within the remit of the Competent Authority. If data on interchangeability are provided, these are included in Section B. In the Conclusions (section C), the following sentence may be used if the National Regulatory Authority has made an assessment of interchangeability:

The NRA has determined that the biosimilar product <trade name > was considered to be interchangeable with the reference biotherapeutic product <trade name > .

Disclaimer:

This document reflects the views of subject matter experts participating in the IPRP Biosimilars Working Group (BWG) and should not be construed to represent the official views of any given regulatory authority participating in the IPRP.