UPDATES ON GUIDANCE DOCUMENT FOR BIOLOGICAL LOT RELEASE IN MALAYSIA

Dialogue with the Lot Release Stakeholders
12 November 2019

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National Pharmaceutical Regulatory Agency

OBJECTIVES OF TODAY'S DIALOGUE

1) **GUIDANCE DOCUMENT FOR BIOLOGICAL LOT RELEASE IN MALAYSIA**

   To share the updates & amendments made to the existing Vaccine & Plasma Product Lot Release Guidance Document

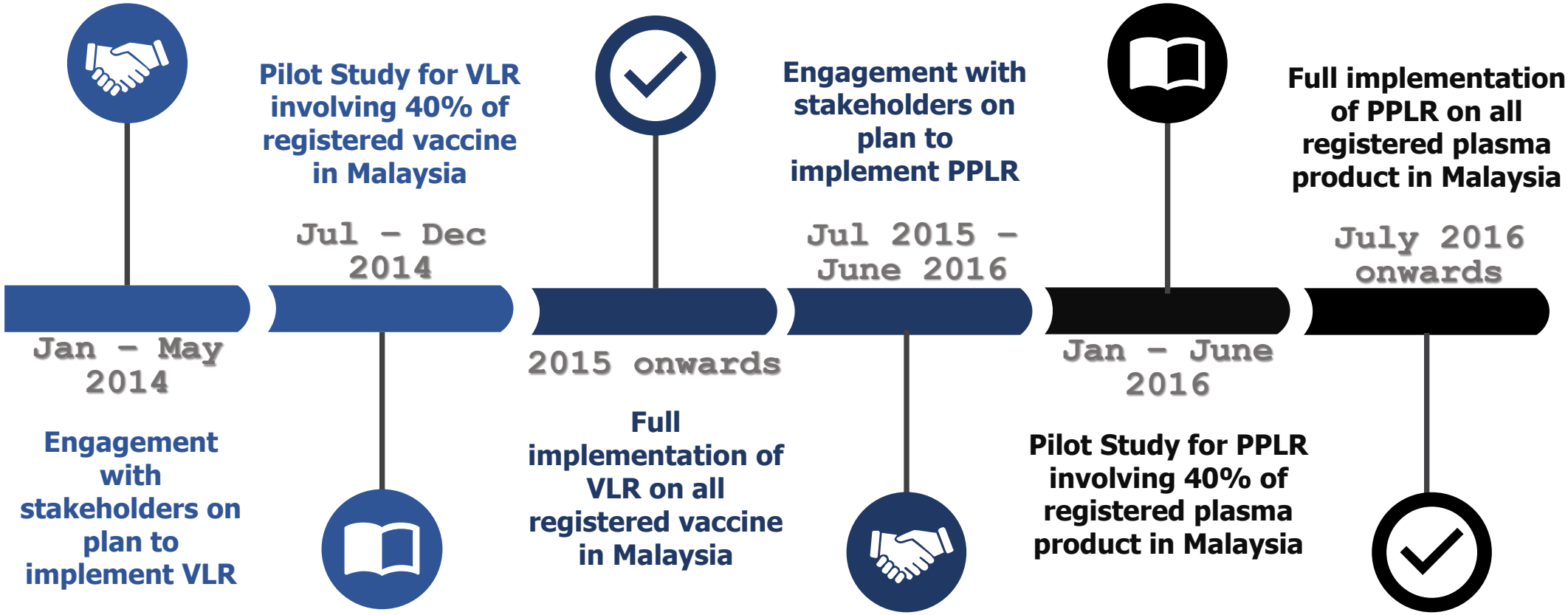
2) **PRODUCT TESTING FOR LOT RELEASE**

   To discuss the concern raised by stakeholders during Unified Public Consultation on the implementation of product testing for Lot Release

3) **PILOT STUDY**

   To conduct pilot study prior to implementing product testing for Lot Release

MILESTONE OF LOT RELEASE IMPLEMENTATION



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GUIDANCE DOCUMENT FOR BIOLOGICAL LOT RELEASE IN MALAYSIA

A revised version of existing Guidance Document for Vaccine & Plasma Product Lot Release

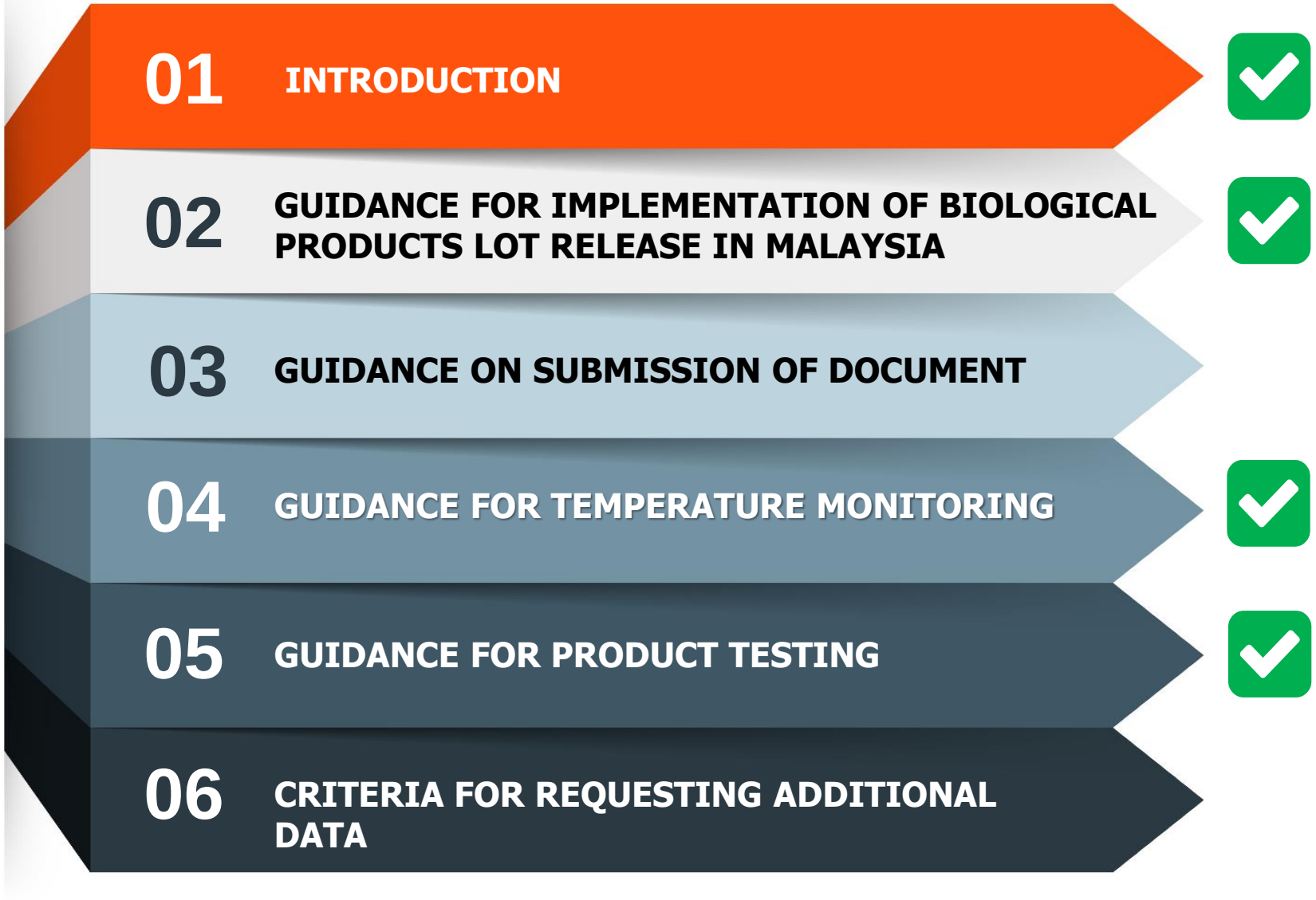
To share with the stakeholders on WHO references used for the implementation of Lot Release

Inclusive of the new requirement of product testing for Lot Release

To serve as the main reference upon implementation

To describe in detail all requirements for Lot Release which was not previously addressed in existing Lot Release Guidance Document

THE CONTENT OF THE GUIDANCE DOCUMENT



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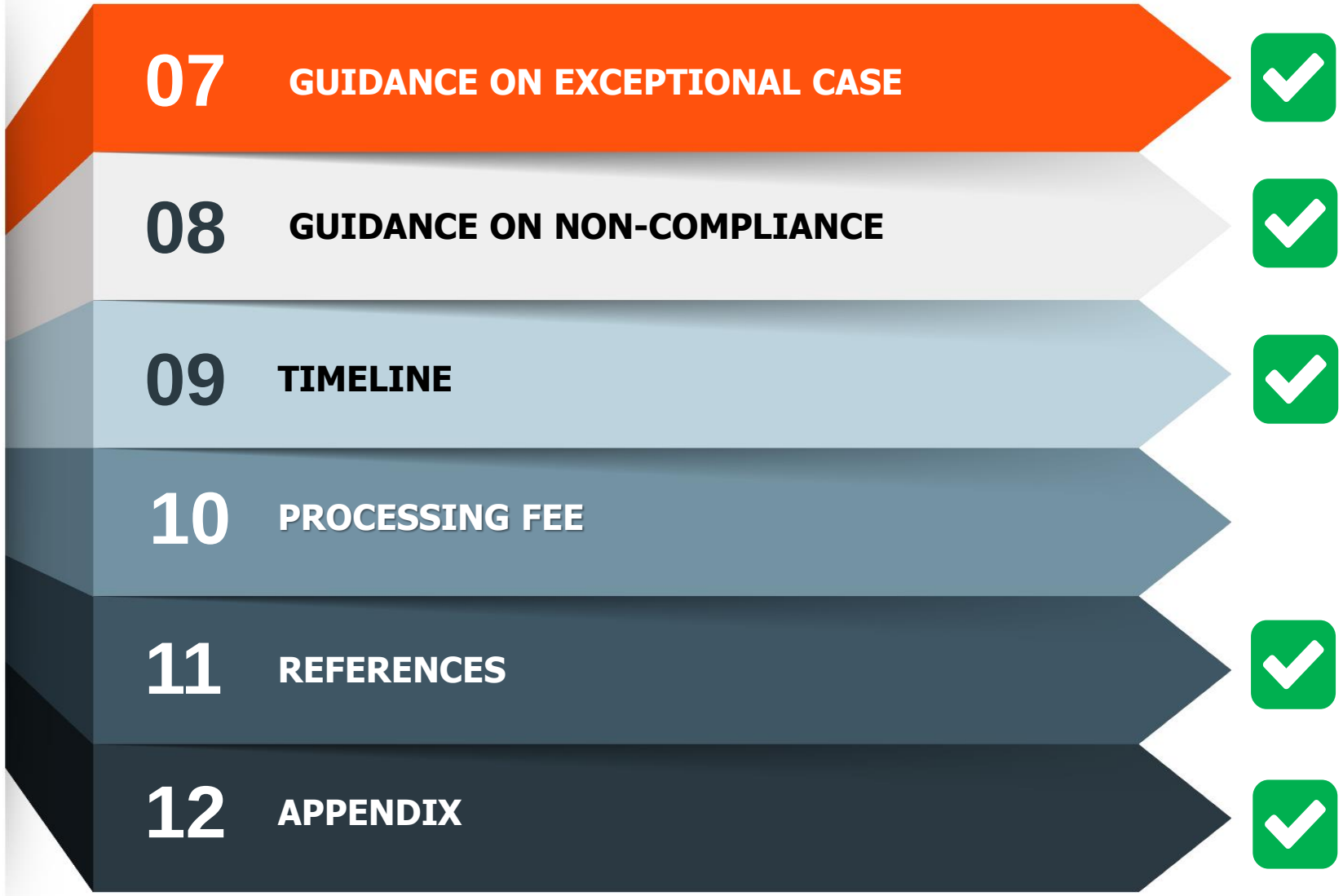


1. INTRODUCTION

The importance of conducting lot release on vaccine & plasma derived medicinal product

WHO recommendation on independent assessment for self-procured biological product

Scientific guidelines applicable to Biological Product Lot Release

2.GUIDANCE FOR IMPLEMENTATION IN MALAYSIA

- Scope
- Lot Release in Malaysia
- General Procedures for Lot Release in Malaysia

2. LOT RELEASE IN MALAYSIA

Recognition/ acceptance of release certificate from responsible NRA or national control laboratory (NCL)	Review of manufacturer's summary protocol based on product dossier which has been approved by NPRA during product registration	Inspection upon arrival in the warehouses	Test conducted on the products

SCOPE: Vaccine & Plasma Derived Medicinal Product

PROCEDURE FOR LOT RELEASE IN MALAYSIA

*Timeline for application submission: 14 working days before vaccine and plasma product arrival in Malaysia

**Timeline for cold chain inspection: within 2 working days after re-palletisation in warehouse

***Timeline for issuance of Lot Release Certificate: Within 6 working days after product arrival at warehouse

3. GUIDANCE ON THE SUBMISSION OF DOCUMENTS

a) Application form

b) Lot Summary Protocol

c) Lot Release Certificate

d) Plasma Pool Certificate (For Plasma Derived Medicinal Products only)

e) Certificate of Analysis (CoA) for Finished Product and Diluent

f) Importing Packing List*

g) Air Waybill*

*may be submitted 2 working days before product arrival

4. GUIDANCE ON TEMPERATURE MONITORING ✅

HANDLING OF TEMPERATURE EXCURSION:
Responsibility of manufacturer & PRH to assess if the available stability data are sufficient to address the potential temperature excursions

TRANSPORT OF DILUENT:
- All diluent shall not be frozen during transportation
- To be transported according to approved storage temperature

PACKAGING & SHIPPING VALIDATION:
To submit to NPRA before importation or if changes are introduced in the current packaging and/or shipment procedures

TYPES OF PACKAGING SYSTEM:
- Active
- Passive

TEMPERATURE MONITORING DEVICE:
- Mandatory to have at least one electronic data logger in each shipping carton
- Use of CCM card, VVM and freeze tag indicator solely is not allowed
- For transportation using dry ice; CCM card is required for each shipping carton

5.GUIDANCE FOR PRODUCT TESTING

Will be described in detail in the next presentation

6. CRITERIA FOR REQUESTING ADDITIONAL DATA:

- Insufficient information
- Deviation of information from the approved product specification
- Deviation of information from the approved product label
- Unreliable data
- Out of trend during trend analysis

7. GUIDANCE FOR EXCEPTIONAL CASE

- Shall only apply during emergence of crisis
- Not applicable as an alternative plan to support improper supply planning and handling of stock by Product Registration Holder
- Approval to use this procedure could only be granted by the Director of NPRA
- The particular lot will be given priority review, inspection and product testing
- Timeline for document/sample submission will not apply

8. GUIDANCE ON NON - COMPLIANCE

DECISION MAKING

Appeal against Notification of Non-Compliance issued shall be forwarded to Director of NPRA

NON-COMPLIANT PRODUCT

- Product shall not be released onto the market & disposed in Malaysia
- Submission of proof of disposal within 90 days after collection date
- PRH shall ensure the product supply for local use is not disrupted

NON-COMPLIANT PRODUCT IMPORTER / WHOLESALER

Failure of importer/wholesaler to meet GDP requirement may result in a revocation of import/wholesale licence

8.GUIDANCE ON NON - COMPLIANCE

Product shall be rejected under conditions including but not limited to:

- 01 Failure to include temperature monitoring device
- 02 Failure to use a WHO prequalified temperature monitoring device
- 03 Failure of the temperature monitoring device to monitor the temperature of whole journey
- 04 No supporting data for temperature excursion
- 05 Release of products (including quarantined products) without approval from NPRA
- 06 Testing results fail to meet specification
- 07 Failure to provide additional data requested
- 08 The product information leaflet and label are not updated accordingly or updated without NPRA's approval (approval for product variation by NPRA shall be received before the submission of application for lot release)

9. TIMELINE

Activity	Duration
Submission of application form and documents in section 2.2.1 - 2.2.5	14 working days before product arrival at warehouse
Payment for lot release	Within 14 working days before product arrival at warehouse
Submission of import packing list and airway bill (Section 2.2.6 and 2.2.7)	2 working days before product arrival
Conduct inspection	Within 2 working days after product re-palletization at warehouse
Submission of samples of lots inspected to NPRA for testing	Within 1 working day from cold chain inspection for warehouses within Klang Valley, or 2 working days for outside of Klang Valley
Issuance of lot release certificate	Within 6 working days after product arrival at warehouse
Submission of evidence of collection for disposal in the event of non-compliance	Within 30 days from issuance of notification of non-compliance
Submission of evidence of disposal in the event of non-compliance	Within 90 days from date of collection for disposal

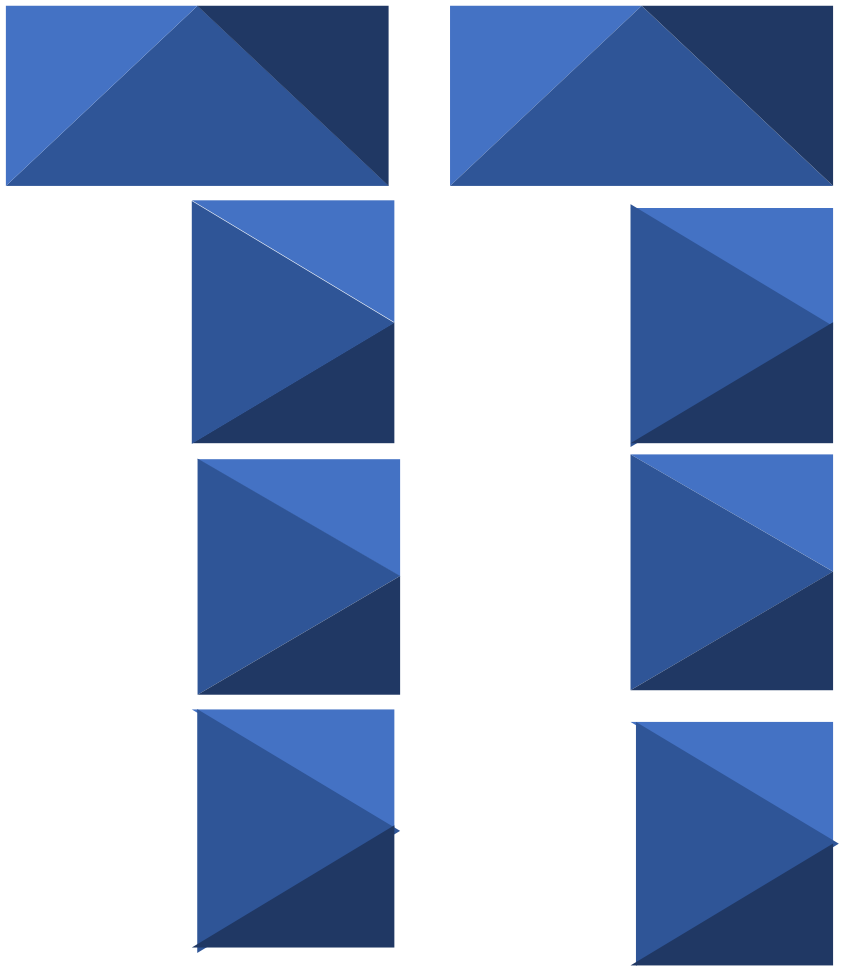
10. PROCESSING FEE

Fee for vaccine:

Type of Vaccine	WEST MALAYSIA		EAST MALAYSIA	
	Cold Chain Inspection & LSP evaluation	Cold Chain Inspection only	Cold Chain Inspection & LSP evaluation	Cold Chain Inspection only
Monovalent vaccine	RM 300/vaccine lot	RM 200/vaccine lot	RM 600/vaccine lot	RM 500/vaccine lot
Polyvalent vaccine	RM 500/vaccine lot		RM 800/vaccine lot	
Combination vaccine	RM 1000/vaccine lot		RM 1300/vaccine lot	

Fee for plasma derived medicinal product (plasma product):

Type of Plasma Product	Cold Chain Inspection & LSP evaluation	Cold Chain Inspection only
Single	RM 500/plasma product lot	RM 200/plasma product lot
Complex	RM 800/plasma product lot	



11. LIST OF REFERENCES ✅

12. APPENDIX

Appendix 1:
Application Form for Lot Release

Appendix 2:
Application Form for Sample Submission

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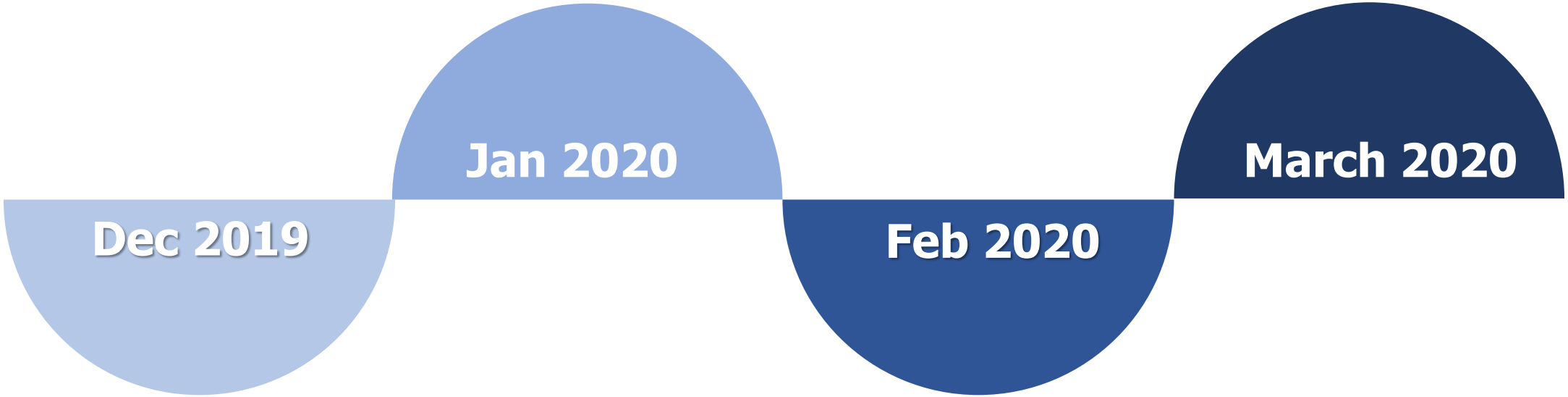
PILOT STUDY

Target:
Vaccine & plasma derived medicinal product lot arriving at warehouse after 1 Dec 2019



Objectives:

1. **To observe the process flow for sample submission and testing**
2. **To observe the ability to comply with existing timeline for issuance of Lot Release Certificate**


Thank you!
Thank you!
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Thank you!

CONTACT US

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