PLASMA PRODUCT LOT RELEASE IN MALAYSIA

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INTRODUCTION

- **Definition of plasma product :**
  - Plasma product is a medicinal product obtained by the process of fractionation of human plasma.
  - It is also called plasma derivatives , fractionated plasma products or plasma-derived medicinal products.
  - (WHO TRS , No.941, Annex 4 : Recommendations for the production, control and regulation of human plasma for fractionation)

- Used for the treatment and prevention of a variety of life threatening injuries and diseases often associated with protein deficiency states

PLASMA PRODUCTS REGISTERED IN MALAYSIA

- Human Albumin
- Factor VIII
- Factor VIII Inhibitor Bypassing Fraction
- Factor IX
- IV Immunoglobulin
- Hepatitis B Immunoglobulin
- Rho(D) Immunoglobulin
- Tetanus Immunoglobulin
- Anti-Rho (D) Immunoglobulin
- Complex : Factor VIII ; Von Willebrand Factor (VWF)
- Complex : Factor II, Factor IX, Factor X
- Complex : Factor II, Factor IX, Factor VII, Factor X

LOT RELEASE FOR PLASMA PRODUCT

Definition of Lot Release:

The process of NRA evaluation of an individual lot of a licensed vaccine / other biological products before giving approval for its release on to the market

(WHO TRS, No.978 , Annex 2 Guidelines for independent lot release of vaccines by regulatory authorities)

The aim of lot release is the confirmation of consistency of production as each lot of plasma product is unique.

In Malaysia, the release involves the review of lot summary protocol and the compliance of the plasma product on the Good Distribution Practice (GDP) requirement.

Guidance Document And Guidelines For Plasma Products Lot Release In Malaysia (DRAFT)

REFERENCES:

1) WHO Assessment Criteria for National Blood Regulatory Systems , 2012

2) WHO Requirements for the collection, processing and quality control of blood, blood components and plasma derivatives. WHO Technical Report Series No. 840 (Annex 2)

3) NPCB Guidance Documents: http://www.bpfk.gov.my

- Drug Registration Guidance Document, **November 2013**
- Malaysia Good Distribution Practice Guideline, 2013
- Supplementary Notes for Management of Cold Chain Products/Material

ASSESSMENT CRITERIA FOR NATIONAL BLOOD REGULATORY SYSTEMS

10. System for lot release of plasma-derived medicinal products

Applicable to plasma-derived medicinal products and donor screening tests

Main criteria related to the function	Rating* Main criteria	Rating* Indicator	Indicators related to the main criteria
10.1. Legal provisions for official lot release certification are in place.	R	R	10.1.1. The NRA has the authority to issue lot release certificates and the enforcement power to suspend or revoke lot release.
		R	10.1.2. The NRA has the legal authority to perform lot release and/or have in place a policy and criteria for acceptance of lot release performed by another NRA (e.g. a lot release certificate from the country of origin).
		S	10.1.3. Written criteria for exemption from lot release exist.
10.2. A lot release system is established and operational.	R	R	10.2.1. Lot release protocols and procedures are established and/or acceptance of lot release performed by another NRA is in place.
		R	10.2.2. Lot release is based at a minimum on review of summary lot-specific data.
		R	10.2.3. Qualified staff members (i.e. staff with relevant qualifications, training and experience) are available to perform lot release.
		R	10.2.4. Testing policy and test protocols including acceptance criteria are defined.
		R	10.2.5. Records on lot release are maintained.
		R	10.2.6. Procedures for communication with the product manufacturer are defined.
		R	10.2.7. Written procedures and guidelines (including templates of certificates), checklists, and/or SOPs are developed and used to review summary lot protocols and are implemented for the lot release process.
		S	10.2.8. Testing procedures are externally accredited.

World Health Organization

OECD PIC/S

SCOPE

- Applicable on registered imported / locally manufactured (if any) plasma products for human use

- NOT applicable for those products manufactured by recombinant techniques

PROJECTION OF PLASMA PRODUCT LOT RELEASE IMPLEMENTATION IN MALAYSIA

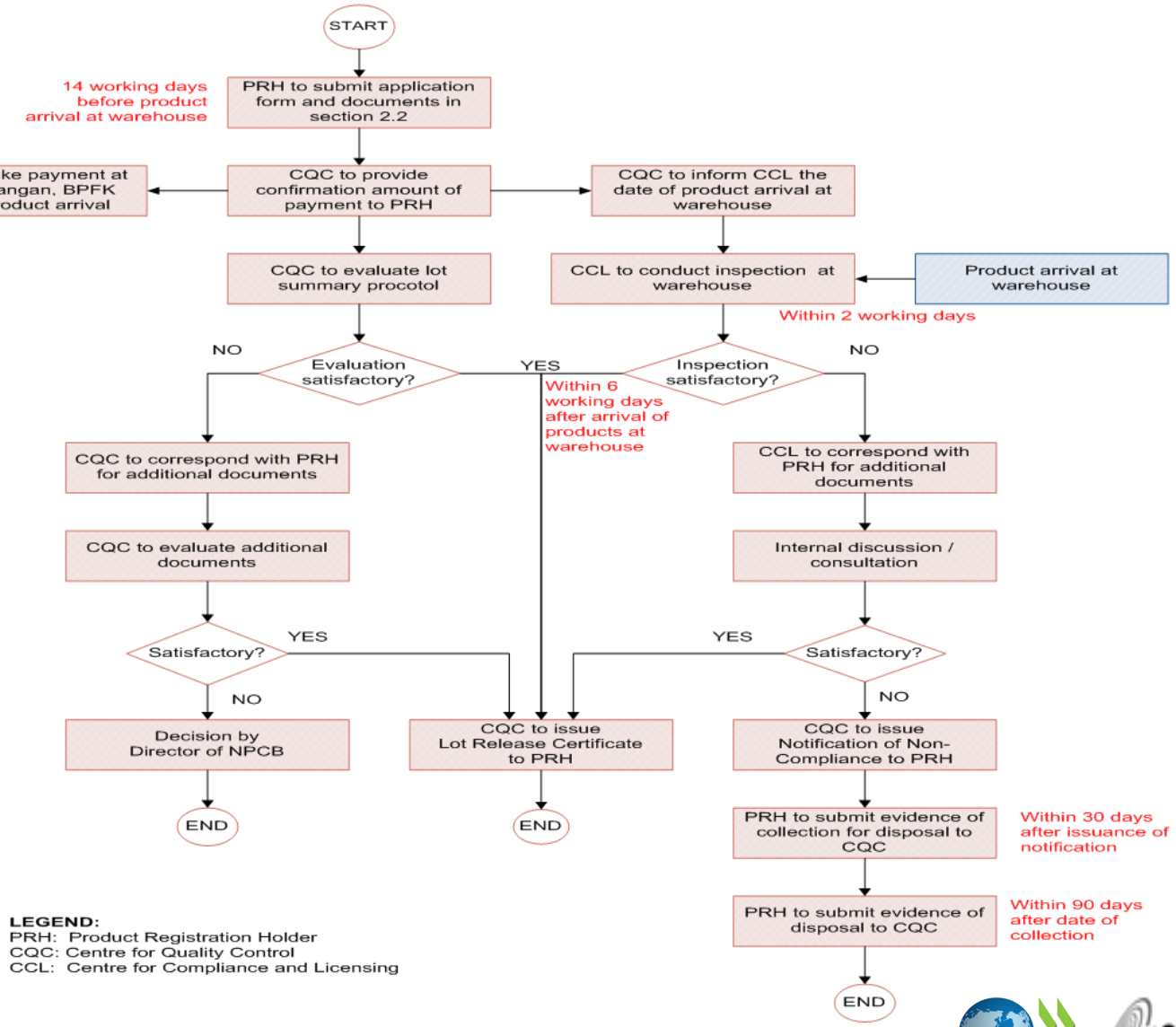
	Objectives	2015						2016											
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	April	May	June	Jul	Aug	Sep	Oct	Nov	Dec
1	1ST DIALOGUE WITH INDUSTRIES																		
2	PREPARATION FOR PILOT STUDY																		
3	PILOT STUDY																		
4	2ND DIALOGUE WITH INDUSTRIES (UPDATES)																		
5	FULL IMPLEMENTATION OF PLASMA PRODUCT LOT RELEASE																		

Projected

IMPLEMENTATION TIMELINE

Phase	Products involved
Pilot study 1 January 2016 – 30 June 2016	• Factor VIII • Factor VIII: VWF Complex • Human Albumin
Full implementation 1 July 2016	All registered plasma product in Malaysia

PROCESS FLOW OF PLASMA PRODUCT LOT RELEASE



LEGEND:
PRH: Product Registration Holder
CQC: Centre for Quality Control
CCL: Centre for Compliance and Licensing

DOCUMENTS TO BE SUBMITTED :

- ✓ Application form filled with product details (available from NPCB website)
- ✓ Lot summary protocol
- ✓ Lot release certificate issued by the authority of country of origin
- ✓ Plasma Pool Certificate
- ✓ Certificate of analysis (COA) of finished products
- ✓ Importing Packing List
- ✓ Airway Bill
- ✓ Payment (Cash/ Credit Card/ Bank Draft/Banker's Cheque/Money Order/Postal Order)

LOT SUMMARY PROTOCOL

A document summarising all manufacturing steps and test results for a lot of vaccine / other biological products, which is certified and signed by the responsible person of the manufacturing company.

(WHO TRS, No.978 , Annex 2 Guidelines for independent lot release of vaccines by regulatory authorities)

Evaluation of lot summary protocol will be based on dossier (Chemistry, Manufacture and Controls) which has been approved by NPCB during product registration.

GUIDANCE ON NON-COMPLIANCE

NON-COMPLIANT PLASMA PRODUCTS

☑In the event of non-compliance, the PRH shall ensure that the supply of the plasma product for the local use will NOT be affected.

☑The PRH shall ensure that the plasma products are NOT released onto the market.

☑Non-compliant plasma products will be disposed in Malaysia

☑The PRH shall provide appropriate proof of collection for disposal WITHIN 30 DAYS after issuance of non-compliance notification

☑The PRH shall provide appropriate proof of disposal WITHIN 90 DAYS after the date of collection.

NON-COMPLIANT PRODUCT IMPORTER/ WHOLESALER

☑Failure of importer or wholesaler to meet the requirements of Good Distribution Practice may result in revocation of import or wholesale licence.

VARIATIONS

1. The PRH are fully responsible to ensure the plasma product complies to the product registration information.
2. The PRHs are to obtain approval for variation prior to submission of documents if there are any changes to the plasma products.
3. Please refer to the Malaysian Variation Guideline for Pharmaceutical Products for further details.

TIMELINE

ACTIVITY	DURATION
SUBMISSION OF APPLICATION FORMS AND DOCUMENTS	14 WORKING DAYS **BEFORE** ARRIVAL OF PLASMA PRODUCTS
PAYMENTS FOR PLASMA PRODUCTS LOT RELEASE	WITHIN 14 WORKING DAYS **BEFORE** ARRIVAL OF PLASMA PRODUCTS
SUBMISSION OF IMPORT PACKING LIST AND AIRWAY BILL	2 WORKING DAYS **BEFORE** ARRIVAL OF PLASMA PRODUCTS
CONDUCT INSPECTION	WITHIN 2 WORKING DAYS **AFTER** ARRIVAL OF PLASMA PRODUCTS AT WAREHOUSE
ISSUE OF LOT RELEASE CERTIFICATE	WITHIN 6 WORKING DAYS **AFTER** ARRIVAL OF PLASMA PRODUCTS AT WAREHOUSE
SUBMISSION OF EVIDENCE OF COLLECTION FOR DISPOSAL IN THE EVENT OF NON-COMPLIANCE	WITHIN 30 DAYS **AFTER** ISSUANCE OF NOTIFICATION OF NON-COMPLIANCE
SUBMISSION OF EVIDENCE OF DISPOSAL IN THE EVENT OF NON-COMPLIANCE	WITHIN 90 DAYS **AFTER** DATE OF COLLECTION FOR DISPOSAL

FEES

FEE FOR WEST MALAYSIA

Type of Plasma Product	Inspection and Evaluation of Lot Summary Protocol	Inspection for Lot Summary Protocol has been evaluated
Single active ingredient	RM 300 / plasma product lot	RM 200 / plasma product lot
Complex	RM 500 / plasma product lot	

FEE FOR EAST MALAYSIA

Type of Plasma Product	Inspection and Evaluation of Lot Summary Protocol	Inspection for Lot Summary Protocol has been evaluated
Single active ingredient	RM 600 / plasma product lot	RM 500/ plasma product lot
Complex	RM 800 / plasma product lot	

ANY QUESTIONS?

- **Review of Lot Summary Protocol:**

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- **Cold chain inspection:**

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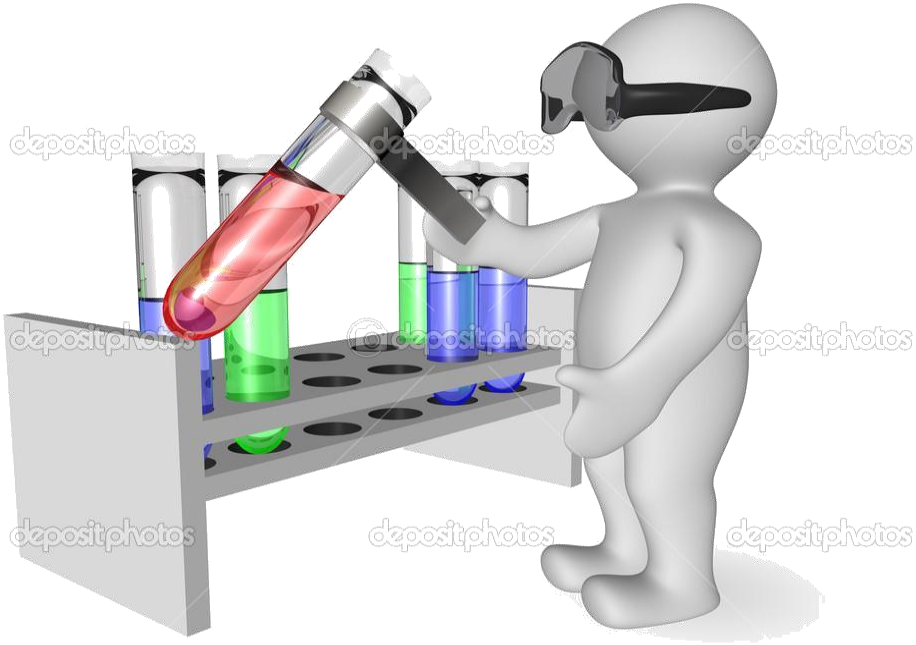

THANK YOU