VICH/09/034
15 May 2009
Final

VICH STEERING COMMITTEE
22nd meeting
February 25 & 26, 2009
Ottawa, Canada

Minutes of the meeting

1. Opening of the meeting and chairperson's introduction

The meeting was chaired by Dr Bernadette Dunham, Director of the Centre for Veterinary Medicine – FDA. She opened the meeting by welcoming the participants to the 22nd VICH SC meeting.
She then passed the floor to Dr Ian Alexander, who wished the participants a pleasant stay in Ottawa and in wintery Canada.
Dr Alexander introduced Dr Siddika Mithani, Associate Assistant Deputy Minister, Health Canada, who welcomed VICH Steering Committee members to Canada. In her remarks she stressed the importance of VICH for Health Canada and noted that Canada had adopted many VICH guidelines. Dr. Mithani also thanked the CAHI for its efforts in coordinating the meeting and wished the SC fruitful discussions and positive outcomes.

2. Adoption of the agenda

The Secretariat recommended discussing items 3.3 before item 3.2.
The EU proposed to add item 12.1: Communication within VICH and between Steering Committee meetings.
Draft 3 of the agenda was adopted without further change.

3. VICH Strategy Phase II

3.1 Future VICH topics

VICH GL on statistical evaluation of stability data

The EU introduced a proposal, circulated before the meeting, for the SC to consider the development of a VICH GL on statistical evaluation of stability data. The EU explained that during the European public consultation period for VICH draft Quality GL45, Bracketing & Matrixing, the EU had received comments suggesting that VICH should consider the evaluation of stability data.
If the SC supported this proposal, the EU would prepare a detailed Concept Paper for discussion.

IFAH Europe pointed out that its experts believed that this particular ICH topic may not be appropriate for a transfer to the veterinary sector.

AHI voiced also its reservations regarding this proposal, and believed that VICH's main purpose was to establish guidance on study protocols to demonstrate product safety and efficacy rather than guidance on how to interpret and evaluate data.

FDA pointed out that CVM's experts to the VICH Quality EWG supported the proposal.

The EU clarified that the intention of the GL was not to make a statistical analysis method mandatory, but only to provide for the possibility for performing a statistical analysis..

Other SC members considered that there had not been sufficient time since the distribution of the proposal to review the proposal in depth.

The SC therefore agreed that the EU will develop a more detailed Discussion Document for review at the next SC meeting.

Act: EU

3.2 Strengthening the partnership between OIE and VICH

- Introduction by OIE

(OIE's presentation is available on the VICH website's members' area.)
OIE explained that in the preparation phase of its 5th Strategic Programme (2011-2015) it considered focussing OIE's future strategy more on Veterinary Medicinal Products than in the past in order to ensure the improvement and maintenance of Animal Health and Welfare, and to better guarantee the safety of food of animal origin.

OIE believed that the inclusion of the VMPs governance as part of the new OIE strategy represented an excellent opportunity to strengthen the cooperation between VICH and OIE, as OIE has identified VICH as a key partner for the next Strategic Programme.
OIE suggested also evaluating ways to link the VICH GLs with the OIE International Standards.

OIE indicated that the new global strategy will be adopted at the OIE General Session in May 2010, but an intermediate motion will be presented at the next General Session in May 2009.

- Exchange of views

ANZ recommended that the SC and OIE reach agreement on an appropriate joint strategy before the VICH IV Conference because the VICH IV Conference offers an excellent opportunity to showcase this initiative.
The Secretariat mentioned that, during the 3 days preceding the VICH IV Conference, OIE has organised a meeting of the OIE collaborating centres and reference laboratories. The Secretariat also mentioned that the individuals associated with the OIE collaborating centres and reference laboratories are generally much more focussed on VMPs and regulatory affairs than are the CVOs who usually attend the OIE General Session.FDA pointed out that many delegates from developing countries' regulatory authorities will likely attend the OIE meeting that precedes the VICH IV Conference and these OIE participants should be encouraged to attend VICH IV.

JMAFF supported OIE's proposal and explained that the OIE regional representation for Asia and the Pacific organises each year a workshop on harmonisation of veterinary medicinal products. JMAFF also noted that a VICH representative from Japan (Dr. Shimazaki) participated in the last OIE ASEAN regional meeting.

After further discussion, the SC supported JMAFFs proposal to collect more information on the OIE regional activities and requested the VICH subgroup on the Global Coordination Group (GCG) to reflect further on the strengthening of the VICH/OIE partnership.

Action: OIE/Subgroup

3.3 Review of the draft Proposal for a VICH Global Coordination Group & Background document

OIE thanked all participants of the subgroup for their input by electronic procedure and reminded the participants that the mandate of the subgroup was:

- to prepare a new discussion paper clarifying the general objective to enhance the global outreach of VICH GLs
- to assess the best ways to fulfil this objective taking into account:
    - the links between VICH and OIE and the potential to maximise synergies
    - the resources available
    - the regional harmonisation cooperations existing in some non VICH regions
    - the needs of the countries regarding training and capacity building

OIE explained that the subgroup had added points of clarification to the proposal document, and raised several questions for review by the SC, such as:

Definition of the objectives,
Refinement of the mandate of the subgroup,
Review of the mandate of the GCG,
Review of the format and working procedures,
Clarification of the finances,
Setting of milestones

The initial discussions have shown that the model developed by ICH will not be transposable to the veterinary sector and that VICH outreach initiatives will have to rely on existing structures and programmes such as OIE focal points, OIE regional commissions, and specific conferences.
(OIE's presentation is available on the VICH website's members' area.)

During the general discussion of this item, the SC decided that this initiative should be renamed from "Global Coordination Group - GCG" to "VICH global outreach".

FDA mentioned that at the "regulators' preparatory meeting" it was believed that the VICH global outreach should be focussed on the needs of the countries that have not participated in VICH and that the VICH global outreach planners need to always keep in mind the expectations of the government and industry representatives of these countries and to aim the VICH message to them.

AHI reported that at the "industry preparatory meeting" it was suggested that the area of biologicals could be used for a pilot project and it was stressed that the problem of resources and funding will be a key issue.
The VICH IV Conference could represent an opportunity for a breakout session to share the targeted issues identified by the subgroup.

OIE recommended that the subgroup should hold a face-to-face meeting before the 23rd SC meeting in order to clarify the objectives and requirements of a VICH global outreach exercise and to provide solutions to the outstanding issues.

In preparation of this meeting, OIE also suggested to ask the non-VICH countries, through the OIE focal points and regional representatives, what they would expect from a VICH global outreach exercise.
A pilot phase could then be launched at the VICH IV Conference for a start in fall 2010.

IFAH Europe recommended focussing on the objectives of VICH which aim to reduce the time to market by avoiding duplication of efforts and simplifying the global regulatory system.

JMAFF encouraged the subgroup to review the activities of OIE regional offices and identify the requests from the non-VICH countries before clarifying the objectives of the outreach.

AHI, IFAH-Europe and the EU suggested highlighting the VICH outreach initiative at the next CCRVDF meeting. OIE agreed to include this topic in its report to Codex.

After an in-depth discussion the SC agreed that the subgroup should meet at a face-to-face meeting. Prior to this a questionnaire would be prepared and circulated to non-VICH OIE countries in order to get a better understanding of their needs and expectations before discussing the matter further. OIE would draft the questionnaire with the help of the sub-group, by next April 15. The questionnaire will be circulated through OIE, using its existing channels such as the CVOs, regional offices, focal points, collaborating centres etc... as well as regulatory authorities. Replies will be required before the end of June.
As OIE has mainly CVO addresses the other SC members agreed to help compiling contact lists for regulatory authorities and will also provide, if possible, these lists of further target addresses to OIE.

Action: All

OIE will meanwhile provide the subgroup with a report on existing OIE activities.

Action: OIE

In addition, the mandate of the subgroup detailed above, was amended to read:

- Assess the needs and expectations of the countries regarding training and capacity building
- Refine the objectives of the enhancement of the VICH global outreach

The SC authorised the subgroup to meet during the first week of September in the USA.

Action: Subgroup

4. VICH IV Conference

4.1 Logistical matters

The Secretariat confirmed that the VICH IV conference is scheduled on Thursday, June 24 and Friday, June 25, 2010 in the OIE headquarters in Paris and will follow a meeting of the OIE collaborating centres and reference laboratories. The VICH Secretariat is working in close collaboration with OIE to address all logistical matters. In particular, a sufficient number of hotel rooms have already been secured in Paris for these dates. OIE will provide all the meeting rooms.
The financial aspects are covered by the hosting region (IFAH Europe).

4.2 Adoption of the scientific programme

IFAH Europe clarified the changes to the draft programme that were made to the version circulated before the SC meeting.

After a first round of discussion, IFAH Europe presented a further amended draft programme which the SC reviewed again.

During further discussion the SC congratulated IFAH Europe for revising rapidly the draft program and agreed to add a session on the enhancement of the VICH outreach and the new OIE strategy, as well as a session on the impact of VICH and the vision for the future.

The SC agreed not to organise breakout sessions for "non active" EWGs, but decided to organise poster sessions related to the existing GLs that will not be covered by the breakout's agenda.
ANZ pointed, however, to the urgent request for guidance at international level regarding anthelmintics in the areas of resistance, bioequivalence, and others.

The SC acknowledged that the breakout sessions had not been able to stimulate a large amount of interest and participation at the previous VICH conferences and discussed ways of improving the content of these sessions.

OIE suggested inviting representatives from the World Bank (e.g., financing the purchase of vaccines), as well as other global organisations that have interest and relevance to the goals of VICH and OIE in the area of VMPs.

The Secretariat mentioned that in previous VICH Conferences there had not only been participants from the industry and the regulators, but also students, academics, journalists, etc.

IFAH Europe and the EU will continue working together to fine-tune the draft programme and they requested all SC members to provide their comments to IFAH Europe by next March 31st.
The organising team composed of IFAH Europe, the EU, FDA, OIE and the Secretariat will address necessary matters between SC meetings.
The SC agreed to finalise the list of speakers at the next SC meeting. All members were asked to reflect on potential speakers before the meeting.

Action: All

5. Review of

5.1 Written updates from the coordinators

The SC took note of the report and thanked the coordinators for their work.

5.2 Status of consultation for draft GLs at Step 4

The SC took note of the report.

6. Review of final VICH Guidelines

6.1. Proposal for a revision of GL 18 – Quality: Impurities: residual solvents in new veterinary medicinal products, active substances and excipients

JMAFF reminded the SC that the overall aim of this concept paper was to initiate a revision of the VICH GL 18 following the revision of the ICH Q3C (R3).
The SC reviewed the Concept Paper prepared by JMAFF and approved the recommendation that the topic leader would provide a proposal for the revision of VICH GL 18 to the Quality EWG by July 2009. The EWG would provide a step 2 document to the SC by February 2010.

The SC requested the Quality EWG to work by written procedure only.

Action: Quality EWG

6.2. Proposal for a revision of VICH GL 23 – Safety - Studies to evaluate the safety of residues of veterinary drugs in human food: Genotoxicity testing

At the last SC meeting FDA had agreed to develop a Concept Paper to include the *in vitro* mammalian cell micronucleus assay in the revision of VICH GL 23, as in the corresponding ICH GL.
However, after further review and discussion by experts at CVM, FDA is of the opinion that this proposed revision would be premature. The in vitro micronucleus assay is still in draft form (Draft Technical Guidance 487) and under discussion within OECD concerning the acceptability of the cytotoxicity measurements that have been proposed as part of the in vitro micronucleus assay.
FDA therefore recommended waiting for the consensus in OECD despite the fact that ICH is moving ahead in incorporating this assay in its guidance document.

IFAH Europe stated that its toxicologists had also reviewed the proposal and considered that the micronucleus assay had very limited use for veterinary medicines.
The EU supported progressing with the revision, without waiting for the finalisation in OECD.
JMAFF, however, requested to wait until the OECD process is finalised.

After further discussion, the SC therefore agreed to wait and to review the progress again at the next SC meeting.

Action: Next SC meeting

6.3. Review of the Concept Paper that Proposes to revise VICH GL 33 - General Approach to Animal Testing, to Include References to the 3 R's Principle

The SC reviewed the Concept Paper prepared by FDA and recalled that at the last SC meeting it was agreed to include the 3Rs reference in the General Approach to testing. FDA proposed that this revision should be considered as a minor change to the GL.

The Secretariat suggested that the SC could review and amend the GL immediately in order to sign off the document at the current SC meeting.

The SC therefore discussed thoroughly the proposed draft text and unanimously agreed several amendments to the initial proposal.

The revised GL was adopted under item 9.1 of the agenda.

6.4. Review of the Concept Paper that Proposes to revise GL 36 - Studies to Evaluate the Safety of Residues of Veterinary Drugs in Human Food: General Approach to Establish a Microbiological ADI

The SC reviewed the Concept Paper prepared by FDA, which was amended since the last SC meeting with the assistance of the EU, AHI and IFAH Europe.

FDA proposed to establish an EWG or a TF with the aim to revise GL 36.

The Secretariat suggested that it would be most appropriate establishing an EWG and other SC members agreed that the work of this group was so unique that it should stand on its own with the status of an EWG.

After discussion the SC approved the creation of the "Microbiological ADI EWG" and recommended that the initial activity of the EWG should be by electronic procedure in order to prepare a preliminary report for the next SC meeting.
FDA agreed to lead the EWG and nominated Dr Haydee Fernandez as its chairman. After discussion, the SC ratified this nomination.

The SC agreed to nominate the experts by next 15 April, the deadline for which all SC members were requested to send their nominations to the Secretariat.

Action: ALL

JMAFF indicated that the microbiological ADIs topic is under the joint responsibility of the Japanese Food Safety Commission (FSC) and of JMAFF; both would nominate an expert to the EWG. JMAFF explained that the expert from JMAFF will be nominated in time but the expert from FSC would be nominated later.
The SC agreed.

The SC acknowledged that most (but not all) experts had already been involved in the preparatory discussions and should therefore be able to provide a revised proposal prior to the next SC meeting.

After a thorough discussion it was further agreed that the EWG chairman should evaluate rapidly if the GL could be revised by written procedure only or if the EWG would need a face-to-face meeting. Should the latter be necessary, the SC authorised in principle the EWG to hold one meeting only, in September 2009, prior to the 23rd SC meeting.

Action: Chairman Microbiological ADI EWG

7. Progress Reports of Expert Working Groups

7.1. Quality

The SC reviewed the written report prepared by the chairman of the Expert Working Group, Dr Hamamoto, and presented by JMAFF.
The SC acknowledged that GL 45 (Bracketing and Matrixing Designs for Stability Testing) was still under consultation in the USA.
FDA confirmed that consultation period will be finished by end of April 2009.

7.2. Pharmacovigilance

7.2.1. Pharmacovigilance EWG

The SC reviewed the written report prepared by the chairman of the Expert Working Group, Dr Lynn Post, and presented by FDA.
The SC acknowledged that this report refers essentially to the activity of the Task Force on Controlled List of Terms (CLT TF).

7.2.2. Pharmacovigilance Task Force

The SC reviewed the written report prepared by the chairman of the CLT TF, Dr Cornelia Ibrahim, and presented by the EU.

(The presentation from the EU is available on the VICH website's members' area.)

The EU reported that the TF had finalised the lists of controlled terms required to complete the controlled data fields as identified in VICH GL42 on the data elements for submission of adverse event reports (AERs). The lists are (with their leadership):

Species and breeds	EU
Dosage form	Canada
Route of exposure	EU
Explanation for Off-label use	Japan
Regulatory Authority identifier code	US
Units of value for Dose and Strength Unit	US
VeDDRA	EU (agreed previously by the SC)

Regarding the breeds, the TF identified the need to amend GL 42 in order to include reports related to crossbreeds/multiple breeds.
The TF confirmed again the commitment to the yearly VeDDRA update.
Regarding the Maintenance of the lists (see separate TF proposal on Controlled List of Terms Maintenance and Technical Changes Committee (Maintenance Committee - MC)), the TF proposed to establish a Maintenance and Technical Changes Committee (comprising 2 experts per region, one regulatory and one industry each), which would work through an annual update procedure by teleconference, web conference or e-mail exchange; only in case of major changes a face-to-face meeting might be convened.

The TF recommended the publication of all the lists (except VeDDRA) on the VICH website in order to ensure their availability. The region currently responsible for the development of a list would be responsible for the maintenance of the list.
The EU confirmed that the recommendations of the TF had been made unanimously by the TF experts of all VICH regions. With the completion of the lists the TF had completed their task. The lists are to be understood as the VICH lists to use in application of VICH GL 42.

The SC congratulated the experts and the chairman of the TF for the amount of work that was achieved at the TF meeting. The SC agreed the lists and adopted the proposal for the Maintenance and Technical Changes Committee.

The EU presented a proposal prepared in consultation with the secretariat for the sign-off and implementation procedure for the controlled lists of terms under GL 30. This proposal foresees the revision of draft GL 30 to take into account the recommendations of the TF/SC and to include references to the lists and describe the maintenance process.
The EU believed that the revision of GL 30, which is merely a cover page rather than a GL, would largely be a drafting exercise and could be achieved by written procedure. the EU topic leader could draft the necessary amendments for sign-off by the EWG at step 5, for subsequent sign-off (writing or at SC meeting) by the SC.

The EU suggested that the revised GL 30, having already been published for consultation, would not need any further consultation.

The SC supported this proposal and agreed that the EWG would be asked to finalise the GL and sign-off at step 5. At this stage the EWG should review the lists and carry out any tidying up that would be necessary. The SC agreed 15 May 2009 as deadline for sign-off by the EWG.

The SC reviewed thoroughly the TF proposal for an amendment of GL 42 with regard to the data field B 1.4. "Breed" by splitting the breeds' field in order to enable the reporting of

different breeds and crossbreeds within one report and recognised that the input of information should be facilitated as much as possible for users. Following explicit support by IFAH-Europe, the EU, IFAH and AHI for accepting the change and consider it as minor, and some concerns from the side of the FDA that this change could be understood as reopening of GL 42 and lead to requests for further changes, the SC gave its support to the TF proposal regarding the amendment of GL 42 and considered this change as minor. The SC also recognised that the approval of the change by the experts is required, but that it would be useful that a clear message be given to the EWG of the SC's expectations and positive encouragement.

Regarding GL 35 the EU proposed that GL 35 on the electronic standards be finalised so that the whole package of VICH PhV GLs can be completed and implemented. The existing draft is at an advanced stage but work at VICH level was discontinued following the FDA request to make reference to HL7 as standards. The EU reminded the SC, as explained at previous meetings, that the EU legislation does not permit accepting any standard that is not recognised by the International Standardisation Organisation - ISO or by CEN, both in the veterinary and the human fields. However, progress on GL 35 would be possible without referring to HL7 as a VICH standard. This could be achieved by mapping to the standards in the regions. It was therefore suggested to find a way to implement GL 35 without the EU having to commit to HL7.

AHI (topic leader) and FDA agreed to liaise with the EU in finding an acceptable wording for GL 35 and to prepare a draft for consideration by EWG. The work should be carried out swiftly, as a public consultation of the GL is needed.

The SC discussed the procedure for the finalisation of the Pharmacovigilance GLs and decided that the issues that had been solved by the TF should not be re-addressed by the EWG. The aim is to have the package on Pharmacovigilance GLs signed off for implementation prior to the VICH IV conference.

After discussion, the SC confirmed the mandate of the EWG to review and sign-off GL 30 including the controlled lists of terms, GL 35 and the amendment regarding the reporting field for breeds in GL 42 and decided that the EWG should address all issues by written procedure.

<u>Action:</u> Pharmacovigilance EWG

In order to prevent misunderstandings the SC drafted and adopted an explanatory e-mail to the experts, explaining that:

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The SC recognised that the EWG will review the TF's recommendations, and may carry out a final consistency check and make any necessary minor adjustments.

Therefore, the SC encouraged the EWG to consider the constructive recommendations of the TF for the amendments of GL 42. The SC confirmed that these amendments are all minor changes, as suggested by the chairman of the EWG, and noted that this could be adopted by a rapid written procedure.

The same applies for GL30, where the EU topic leader agreed to amend the GL text in light of the TF's recommendations to reference the 8 lists and to include the maintenance procedure. The SC encouraged the EWG to provide the step 5 documents to the SC by mid May 2009.

In addition, the SC agreed that GL35 should be finalised as speedily as possible, so that the complete package of Pharmacovigilance guidance is available in 2010. AHI and FDA in liaison with the EU will prepare a draft document for review by the EWG.

The SC considered that completing the remaining work on Pharmacovigilance guidance could be achieved without a further face to face meeting of the EWG.

This message was immediately circulated to the experts by the Secretariat.

7.3. Biologicals Quality Monitoring

The SC reviewed the written report prepared by the chairman of the Expert Working Group, Dr. Shimazaki, and presented by JMAFF.

- *Mycoplasma contamination testing (GL 34)*

JMAFF expressed its concern that the Mycoplasma GL was still not finalised, although it had been signed off by the EWG at step 2 in December 2001.
JMAFF reconfirmed that the topic leader is Dr Rebecca Hyde from USDA.

JMAFF expressed its gratitude to Dr Catherine Milne from EDQM for having actively established a detailed guidance document for the regions for obtaining the reference strains and relevant templates supporting the progress of the test to determine if these strains are suitable for evaluation of GL34.
A new reporting form will be placed on the VICH website to monitor the progress of the tests in each region and updated regularly by JMAFF.
The aim of the chairman of the EWG is that the tests of the strains should be finished by next September so that the results of the tests in the regions can be compiled in preparation of a face-to-face meeting of the EWG that could take place in Strasbourg at the earliest opportunity.

The EU reminded the SC members of the detailed documentation explaining the process for finalising the testing protocol, advice for conducting the testing, and information on the strain origin and shipment information that had been provided by the EDQM to the EWG and had also been circulated to the SC. The timelines proposed by the EDQM for the testing were outlined in the letter of 11 February. For further questions regions were advised to contact the EDQM at the address given.

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USDA confirmed that the testing of the strains will start shortly and that it should be finalised within 6 months, in time for a meeting in September.
USDA considered it to be very important that the experts review the outcome of the tests in a face-to-face meeting in order to be able to finalise the draft GL based on these tests.

The EU considered that it seems overambitious to determine September as date for the face-to-face meeting, considering that EDQM would need some time to analyse the results of all the testing that will be made and would request a confirmation from all regions that their results will be provided before next 1st September. It seemed more likely that the meeting of the EWG would be postponed to Q4 2009. The SC agreed that the date of the face-to-face meeting should be driven by the testing schedule, and should be determined between the chair, the topic leader and the EDQM once the testing has made progress.

Action: ALL

The EU reminded that the regions should report only the testing made on the current frozen strains and not testing achieved previously on the lyophilised strains in order to provide accurate data as the basis for the GL.

- *Extraneous agents testing for Biologicals*

JMAFF mentioned that the seed lot system was implemented in Japan in March 2008 and will be presented at the next EWG meeting to re-open this topic.

JMAFF voiced the Chairman's intention that the EWG should focus primarily on the Mycoplasma detection GL 34 and secondly on the extraneous agents testing GL in order to concentrate the limited resources of the EWG on these two mandates.
JMAFF believed that the EWG could only address a new topic once these 2 topics have been progressed.

The SC approved in principle a face-to-face meeting of the EWG to take place between September and December 2009.

7.4. Metabolism and Residue Kinetics EWG

The SC reviewed the written report prepared by the chairman of the Expert Working Group, Dr Scheid, and presented by the EU.
Since the EWG meeting held in Japan that was reported at the last SC meeting, the experts have continued electronic discussions to further develop the four topics:

1. Studies to identify the nature and quantity of residues
2. Comparative metabolism studies in laboratory species
3. Studies to determine the depletion of residues
4. Analytical method validation

The EU indicated that the experts had overcome most hurdles without any major difficulties foreseen for the future, although for some issues, consensus remains to be found for the 3 first topics. Topic 4 is ready for sign-off at step 2 by the EWG.
The EU was optimistic that most remaining issues can be solved within a short time by written exchange. One unresolved issue under topic 3 is the EU proposal with respect to inclusion of a "surrounding injection site sample" in the VICH guidelines. Also a proposal from IFAH Europe on multi injection sites was circulated recently that had not yet been discussed.

The EU indicated that the chairman did not expect a consensus on this issue to be reached in the short term. He therefore proposed to the SC either (option 1) to sign-off the 4 draft GLs at step 2 with the inclusion of the majority's approach and the alternative suggestion where relevant (topic 3), or (option 2) to postpone the signature of the draft GLs until a complete consensus has been reached on the outstanding issues. The chairman feared however that this would require a further delay that might be considered unreasonable.

The EU recommended supporting option 1 above.
Other SC members agreed also that, in case the EWG could not reach a consensus, VICH should publish the topic 3 draft GL for public consultation with the 2 options enabling the EWG to review the issue together with the comments that will be received.

JMAFF considered however that in Japan it is impractical to open a public consultation of draft GLs including two conflicting approaches. In order to enable an informal discussion, a further consultation period was required on topic 3 with both the FSC and the Ministry of Health, Labour and Welfare (MHLW). This will require 3 to 4 more months of discussion, as both the FSC and the MHLW will need to consult with their external experts.

FDA mentioned that in the US it may not be legally acceptable to publish a draft VICH GL with 2 options and indicated that it would need to consult with its lawyers for a decision.

After a further in-depth discussion the SC encouraged the EWG to try to solve the outstanding issues by written procedure.

However, if no progress would be achieved by the end of May 2009, the SC recommended that the EWG should sign-off the draft GLs for topics 1, 2 and 4 at step 2, and postpone the signature for topic 3.

Action: Metabolism and Residue Kinetics EWG

8. Adoption at Step 3 and release of Guidelines at Step 4

No document was submitted.

9. Adoption at Step 6 and release of Guidelines at Step 7

9.1. GL 33 – Revision 2: Safety – Studies to evaluate the Safety of residues of veterinary drugs in human food: General Approach to Animal Testing

The Steering Committee adopted GL 33 – Revision 2 as final VICH guideline at Step 6. This guideline was transmitted to the VICH members for implementation in the three regions at Step 7.
The Steering Committee agreed that the revised guideline will enter into force by February 2010.

10. Concept papers/Discussion papers

10.1 Review of the draft Concept Paper for the Establishment of an Expert Working Group to Elaborate the Requirements to Demonstrate Bioequivalence

For this agenda item, the SC had agreed prior to the meeting that a representative of GADA (the US Generic Animal Drug Alliance) could exceptionally attend the SC meeting for this particular discussion.

FDA introduced its revised Concept Paper for developing guidance covering bioequivalence studies and mentioned that the EU had recently provided additional comments.
The EU explained the rationale of its comments, in particular the uncertainty of the objectives of the proposed VICH bioequivalence guideline, in particular if the BE GL was aimed to be a "classical "GL or more a teaching tool, and the need to identify differences between regional requirements before embarking on a harmonisation activity. The EU confirmed that the CVMP Bioequivalence GL is currently under revision and will in future be more consistent with the FDA GL. The EU therefore suggested waiting to proceed with this topic in VICH until the EU GL has been finalised. The EU draft GL will be published in 3 months for a 6 months consultation period.

AHI supported strongly the development of a VICH GL and pointed out that it should be drafted (as is the case with other VICH GLs) in order to ensure that required data packages would be accepted equivalently in all the VICH regions. The GL will be as much applicable to generic substances as to pioneer substances which also require bioequivalence tests for different extensions of the registration.
IFAH Europe also supported the development of a single standard for the Industry in the VICH regions.

FDA acknowledged the request of all parties, including GADA, to participate in the drafting of this VICH GL.

GADA thanked the SC for the opportunity to participate in the discussion in the SC, and confirmed its wish to be involved in the development of a VICH bioequivalence GL.

GADA noted that not only is bioequivalence the key component for approval of generic drugs - but bioequivalence is also critical in certain pioneer drug supplements and indication line extension applications. Examples would include changes to an approved formulation and adding a new route of administration. Also, bioequivalence can play a role in pioneer combination drug or hybrid applications.
Therefore, GADA said it makes sense that harmonisation of a bioequivalence guidance is necessary and critical. GADA would support a decision by the VICH Steering Committee to proceed. GADA concurs with the concept paper prepared by AHI & FDA. This concept paper appropriately justifies the need for a VICH bioequivalence guidance to be sure that sound science guides the basis of approval for generic and certain pioneer drugs.
GADA concurred that an established bioequivalence guidance will be beneficial to VICH and non-VICH countries and ultimately improve the human safety of the global food supply.

ANZ mentioned that the WAAVP (World Association for the Advancement of Veterinary Parasitology) was very supportive to a VICH bioequivalence GL and urged VICH to progress this initiative without delay.

The EU requested to define clearly the scope of a VICH GL by identifying first the existing regional requirements and the areas that are in need for harmonisation in the Concept paper. The EU also pointed to the need to clarify the necessary resources and timelines for the development of a GL before starting the work of an EWG.

JMAFF explained that a first draft Japanese bioequivalence GL for veterinary medicinal products is now developed and in consultation with industry. However it seems very difficult to reach a consensus within industry in a few months, because of a conflict of interests. JMAFF expressed that it will submit the draft Japanese GL to FDA and other regions after a consensus is reached. Furthermore, JMAFF pointed out that in Japan more discussion was also necessary between the industry and the regulatory authorities on this Concept Paper and suggested, therefore, to postpone a final decision on the Concept Paper until the 23rd SC meeting.
JMAFF asked FDA to include the following two statements in the Concept Paper:
1) It would not be a contradiction to the organisational charter if JMAFF applied less restrictive requirements than those recommended by a VICH GL equally both to imported products and domestic products;
2) This is not a double standard as JMAFF accepts the data which was generated according to the VICH GL, i.e. JMAFF will consider the VICH GL to be a maximum requirement.
JMAFF mentioned that the existing Japanese guidance does not necessarily coincide with the proposals in the Concept Paper. JMAFF nevertheless confirmed its willingness to participate in the continuing discussion but requested that the VICH proposed GL should be less restrictive than currently suggested in the Concept Paper.

Canada confirmed also its support and suggested that FDA should work further with the regions in order to fine tune the Concept Paper for adoption at the next SC meeting.

After further discussion, the SC agreed that a thorough electronic discussion should be pursued within the SC in order to identify all the current requirements in the regions and to enable FDA to further refine the Concept Paper by addressing issues such as timelines, resources, and other matters.
FDA will work closely with AHI and GADA and then with other SC members.

Action: FDA/All

10.2 Review of the draft Concept Paper for the Harmonisation of the Target Animal Batch Safety Test for Immunological Veterinary Medicinal Products

The EU introduced the Concept Paper developed following the comments expressed at the last SC meeting on the discussion document.
The SC had unanimously supported the overall aim of the VICH GL to reduce animal testing and had already agreed that this topic should be addressed by the BQM EWG.

Subsequently, the EU had asked the regions to clarify their view on the scope of the GL, i.e. whether it should concern only Target Animal Batch Safety Testing (TABST) or also include Batch Safety Tests in laboratory animals (BST), and whether it should include live and inactivated vaccines or only inactivated vaccines. Considering the responses and the legislation in place in the regions a phased approach was proposed as a way forward to achieve consensus.In a first step harmonisation for the waiving of TABSTs for inactivated vaccines would be sought, and the EWG would establish criteria for this in a VICH GL. The EWG would explore possibilities for harmonizing BSTs and waiving of BSTs including laboratory animal tests and live vaccines and report back to the SC for consideration of future extension of the topic and VICH GL.

IFAH Europe and AHI supported the development of this topic and recommended that the initial scope should be as broad as possible, and the first priority should be to agree the criteria for waiving the TABST. The second priority should be to harmonise the TABST.

JMAFF noted that the discussion on this new topic at the 21st SC meeting was based on a paper "The *Target Animal* Safety Test - Is it Still Relevant?, Biologicals 30 (2002)" in which laboratory animal testing was excluded. The lab animal studies should however be included in the proposal after the experts have identified the documents containing the scientific basis for addressing this issue. JMAFF further recommended addressing inactivated vaccines in the first step, live vaccines being included at a later stage.

JVPA supported addressing target animals and inactivated vaccines.
USDA and AVBC supported addressing the target animals as well as laboratory animals.
USDA also supported the JMAFF's recommendation i.e. the step-wise approach for this topic: firstly the target animals and, only at a later stage, the inclusion of laboratory animals.

JMAFF pointed out that the BQM EWG has already 2 priority topics to address (Mycoplasma testing and extraneous agents testing in live/inactivated vaccines). The TABST would be an additional topic which the EWG may have difficulties to handle jointly.
The SC noted that the experts can be supported by advisors.

After further discussion, the SC agreed that the EWG should start reviewing the TABST for inactivated vaccines as the EWG's 3rd topic.
The EU agreed to be the topic leader.
All SC members were asked to identify their additional advisors to strengthen the BQM EWG and inform the VICH Secretariat.

Action: All

JMAFF stressed that it had not discussed this proposal internally before the SC meeting and requested that the initiation of this 3rd topic should be delayed until the next SC meeting because of the limitation of resources.
JMAFF confirmed however that it will participate in an electronic discussion lead by the EU.

It was acknowledged that much progress can be achieved by written procedure. The EU will draft a first proposal with the criteria for the initial phase of the work, as well as suggestions for further broadening at a later stage.

Action: EU

The SC will confirm the launch of the topic at the next meeting.

10.3 Review of the draft Concept Paper for the Harmonisation of the Studies to Establish an Acute Reference Dose

FDA introduced the Concept Paper developed following the comments expressed at the last SC meeting on the discussion document.
The Concept Paper explains that guidance for establishing acute reference doses has been developed by the WHO/FAO Joint Meeting on Pesticide Residues for application to pesticides, but the existing guidance would not be applicable for veterinary products. FDA tabled a revised version of the concept paper that had taken into account comments circulated by the EU prior to the meeting, and the objected text passages had been amended or deleted.
FDA therefore proposed to establish an EWG to review this topic.

IFAH Europe, AHI and JMAFF supported the Concept Paper.

The EU acknowledged that, as there were no longer any statements concerning the use of the acute reference dose for the assessment of injection site residues or residue control, the EU could agree to start the scientific work within the scope given in the paper. The EU however stressed that the EU position in respect to assessment of injection site residues and risk management, i.e. residue control that was stated at previous SC meetings, remains unchanged (non-implementation of this guideline insofar as it would imply any change in food hygiene rules).
After further discussion, the SC recognised that the Safety EWG, which has been dormant for many years, needed to be re-established in order to address the requirements for Harmonisation of the Studies to Establish an Acute Reference Dose.
The SC members agreed that FDA should continue to chair the EWG.

SC members were requested to nominate their experts and to inform the Secretariat by next 1st June. The SC noted that the expert from JMAFF will be nominated in time but the expert from FSC would be nominated later.

Action: All

The SC approved in principle that the EWG may hold a face-to-face meeting if the EWG considered it to be necessary, but the chairman should inform the Secretariat beforehand.

11. Other issues

11.1 Update on the Electronic Presentation of Regulatory Documents (VICH/IN/08/001) – Monitoring of the situation

IFAH Europe confirmed that it had been in contact with the 3 regions and had recently met with Canada which supported the EU approach. Information has also been shared with Australia and with JMAFF.
IFAH Europe asked to be informed of any change in the regions.

Act: All

12. Any other business

12.1 Communication within VICH and between Steering Committee meetings.

The EU suggested clarifying the means of communication that are available within VICH between the SC meetings in order to accelerate the flow of information between the SC members as well as within the EWGs.

The Secretariat believed that only the official documents such as draft/final GLs, final meeting documents and reports, formal requests from EWG chairmen, etc. should be channelled through the Secretariat with a formal numbering.
SC members and coordinators should circulate all other documents and messages (draft documents between meetings, questionnaires, information, etc.) directly to the SC members or EWGs by using the specific "group e-mail addresses".

As a reminder, the Secretariat said that one single address is used to write to the entire SC or to each EWG/TF. This address is linked to a list including all members of the SC (or experts of the EWG + the SC Coordinators and any member who wishes to receive the mails for a specific EWG).
These lists are managed by the Secretariat and any change of address of an Expert or a Member has to be communicated directly to the Secretariat.
Members can use the "group e-mail addresses" without having to type the personal address of each individual in the e-mail.

The "group e-mail addresses" of the EWGs are available on the members' area of the VICH website under "Miscellaneous". On this page they are further linked to a word document listing the individual contact details of each expert,
The Secretariat will improve the lay-out of this web page and ensure that the word documents are kept up to date.

Action: Secretariat *(Done)*

The Secretariat asked SC members and coordinators to ensure that all changes of personal contact details and experts' details are communicated promptly to the Secretariat.

Action: All

13. Dates and venue of next meetings

- The 23rd SC meeting will take place from Thursday, November 5 to Friday, November 6, 2009 in Kobe, Japan.
- The 24th SC meeting will take place on Wednesday, June 23 and Saturday, June 26, 2010 at the OIE headquarters in Paris, in the frame of the VICH IV Conference.

14. Adoption of the Press Release on the 22nd SC meeting

The SC members reviewed and adopted the press release as proposed by the Secretariat.

VICH STEERING COMMITTEE

22nd meeting

February 25 & 26, 2009
Ottawa, Canada

Chair: B. Dunham (US FDA)

LIST OF PARTICIPANTS

STEERING COMMITTEE (C) coordinators

AHI	R. LIVINGSTON
AHI (PFIZER)	M. J. MCGOWAN
EUROPEAN COMMISSION (DG ENTERPRISE AND INDUSTRY)	K. KRAUSS (for M. Terberger)
EMEA	K. GREIN (C)
EMEA-CVMP (AFSSA)	G. MOULIN
IFAH-Europe (BAYER)	L. KLOSTERMANN
IFAH-Europe (MERIAL)	B. BOENISCH
IFAH-Europe	R. CLAYTON (C)
JAPAN MAFF	Y. ENDO
JAPAN MAFF	K. NODA (C)
JAPAN MAFF	M. SAKAI
JVPA (KYORITSU SEIYAKU CO.)	M. KAJIWARA
JVPA (DAINIPPON SUMITOMO PHARMA CO.)	T. KOMATSU
USDA APHIS CVB	B.E. RIPPKE
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US FDA	M. LIMOLI (C)

OBSERVERS

HEALTH Canada	I. ALEXANDER
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NZSFA/APVMA	D. MORRIS
CAHI	J. SZKOTNICKI

INTERESTED PARTY

AVBC	J. THOMAS

OIE

OIE	P. DEHAUMONT

VICH SECRETARIAT

IFAH	H. MARION
IFAH	B. FREISCHEM

APOLOGY

JVPA	S. OHSHIMA (C)

GUEST (Part)

GADA	B. ZOLLERS