VICH/98/020
April, 1998
Final

VICH STEERING COMMITTEE
3rd meeting
26 - 27 February 1998
Paris, OIE Headquarters

Minutes of the meeting

1. Opening of the meeting and chairman's introduction

After welcoming the participants, the Chairman yielded to Dr. Blancou, director-general of OIE. Dr. Blancou recognised the progress made by VICH and expressed the pride of OIE to be the umbrella of such an important initiative. He stressed the role that OIE will continue to play in disseminating the VICH recommendations to its member countries and to its Standards Commission.

2. Adoption of the agenda (VICH/98/004)

With two modifications (advancing item 4. 7. before item 4.6, and deleting the word "tentative" under agenda item 5, point 4 (VICH Web site), the agenda was adopted.

3. Progress reports of Expert Working Groups on selected topics

3.1. ICH Quality guidelines [see written report by Y. Takahashi/JMAFF (VICH/IN/98/005) and by J. L. Robert/EU (VICH/IN/98/007)]

The secretariat summarised the written report of Dr. Takahashi, the Working Group chairman. The WG proposed three draft step 2 VICH guidelines for adoption at step 3 before release for consultation. These are:

- VICH GL 3: stability testing of new drug substances and products
- VICH GL4: stability testing for new dosage form
- VICH GL5: stability testing : photostability testing of new drug substances and products

The texts of these guidelines were based on existing ICH guidelines and only a few changes had been made by the WG. The SC discussed the scope of these stability guidelines. It was proposed to clarify that these stability guidelines should not apply to biologicals or to pre-mixes for medicated feeds. These would be the subject of separate guidelines. After a thorough discussion the SC agreed to clarify this in the text of the guidelines. With this additional sentence, the draft guidelines were approved at step 3 for consultation (step 4).

The SC identified the difficulty of defining "biologicals" or "biological products" as these may include micro-organisms used for the development of vaccines but also defined proteins produced by means of biotechnology, most of which (but not all) will have an immuno-modulating effect. These products may be regulated differently in each of the three regions. The SC did not reach any solution on this issue.

Secretariat : c/o COMISA, rue Defacqz, 1 - B - 1000 Bruxelles (Belgium) - Tel. +32-2-541.01.11, Fax +32-2-541.01.19

The SC agreed that, in order to have the appropriate expertise available to develop the separate guidelines for stability testing for biological/biotechnological products, each VICH member would have the opportunity to nominate an additional advisor to the WG. Members wishing to do so will have to notify the secretariat and the WG chairman of the name and address details of the advisor by March 31, 1998.

The SC noted that the WG was still discussing three draft guidelines on impurities, including those on residual solvents. The European Union mentioned that it had agreed to compromise on its earlier position concerning threshold levels and that it hence hoped that the WG could reach a consensus on these three guidelines. The SC urged the WG to do so as soon as possible, and at their next meeting at the latest.

The SC approved the next meeting of the WG, which was tentatively scheduled by the WG chairman for the end of May 1998 in Washington.

3.2. ICH Safety guidelines [see written report by D. Renshaw/EU (VICH/IN/98/004)]

It was reported that since the changes in the composition of the WG had only been received shortly before this SC meeting, the chairperson had not been able to make progress on this WG. The SC noted that Fedesa and ANZ had provided new experts/advisors to the WG and that all the other members had maintained the same experts. The Japanese delegation committed to discuss with their Ministry of Health and Welfare on the activities of this WG.

The US delegation said that, with the revised composition of the WG, the chairperson will prepare a discussion document, along the lines of the new mandate of the WG as agreed by the SC at its second meeting in August 1997, for the next meeting of the WG, as well as a schedule for this next meeting. The SC agreed that a proposed meeting date would be provided by March 31, 1998.

The SC noted that the WG should consider on both ICH gene toxicity guidelines (i.e. ICH S2A and ICH S2B) since both had reached step 4 in the ICH process.

The SC noted that, in line with the rotation of WG meetings, the next meeting of the WG will be held in Europe. However, the SC will still have to authorise the meeting on the basis of the information to be received from the WG chairperson.

3.3. Ecotoxicity/environment impact assessment **[see written report by J. Robinson/AHI]**

The SC noted that the WG had not reached consensus on phase I guidelines, because of a few contentious issues. The European Union mentioned that it had agreed to compromise on its earlier position and that it hence hoped that the WG could reach a consensus on the Phase I guidelines. The SC urged the WG to do so as soon as possible, and at the latest at their next meeting.

As to the question raised by the WG chairman on how to handle aquaculture pharmaceuticals, the SC agreed that these are to be part of the VICH guidelines. It was decided that it was up to the WG to find the most appropriate way to integrate these within the guidelines (alternative 3 of WG chairman’s progress report).

The SC approved the next meeting of the WG, which was scheduled for the week of May 11 in Tokyo. At that meeting the WG should finalise the draft Phase I guidelines, find the most appropriate solution for integrating aquaculture pharmaceuticals in the guidelines, and start working on Phase II guidelines.

3.4. Good Clinical Practice [see written report by V. Cracknell/FEDESA (VICH/IN/98/014)]

Two SC members expressed disappointment at slow progress made when the contents of such an optimistic report given by the topic leader at SC 2 last year clearly had not materialised. The SC noted that draft guidelines had been circulated to WG experts for comments and that several members had forwarded comments to the WG chairman. One expert had proposed a re-write of the guidelines, with a completely different format and philosophy. The SC agreed that no specific guidance could be given on the format of the guidelines and that it was for the WG to sort this out. The SC concluded that the optimal format would follow from a consensus on the basic principles of GCP and did not have to match the format of the ICH guidelines. The SC urged the WG to agree on a step 2 document at their next meeting planned for the week of March 9, 1998 in Washington. The SC authorised this meeting.

Members required clarifications as to the scope of the guidelines. Whilst some would have no problem with the GCP guidelines covering both pharmaceuticals and biologicals, the SC agreed to restrict the scope of the guidelines initially to pharmaceutical products in order not to slow down progress on these guidelines. Once consensus is reached on the guidelines for pharmaceuticals VICH members will have the opportunity to send competent experts and therefore modify the composition of the WG. These additional nominations will have to be sent to the secretariat and to the WG chairman.

3.5. Efficacy requirements for anthelmintics [see written report by Prof. Vercruysse/EU (VICH/IN/98/002)]

The SC noted the written report provided by the WG chairman. The SC noted that disagreement among the experts on two or three issues had prevented the WG from finalising the general guidelines as a step 2 document. On the basis of this experience, the SC identified the need to have a step 2 document signed off by all experts of the WG. It was recognised that the difficulty encountered had demonstrated the importance of feedback on such issues from experts/topic leaders to Steering Committee members and co-ordinators so that attempts can be put in place to resolve matters as quickly as possible.

The SC evaluated the WG chairman's proposal to hold the next meeting of the WG in Australia in July 1998 in conjunction with the congress of the WAAVP (World Association for the Advancement of Veterinary Parasitology). The SC agreed in principle with this proposal pending final approval by the Japanese delegation by March 31,1998. It was also agreed that even if the next meeting was going to be held in Australia, the next meeting after that one should be held in Japan, in line with the rotation among VICH member regions. The SC also agreed that the organisational charter should be modified to reflect the fact that, for cost efficiency reasons, WG meetings could be held outside the three regions, or deviated from the regular rotation among the three regions. This would be the case only if most of the WG experts are going to be present together in a particular location on the occasion of a particular conference or meeting.

The SC urged the WG to finalise at their next meeting the general guidelines and some of the species-specific guidelines (bovine, ovine/caprine, equine, and canine).

The chairman took the opportunity of the discussions raised by this topic to reiterate a general recommendation: in order for the harmonisation process to be efficient, each VICH member needs to appoint experts who are technically competent, have an open and flexible mind, and are given a sufficiently broad brief so that they have a certain room for manoeuvre in the WG negotiations.

3.6. Biologicals Quality Monitoring (oral report by secretariat)

3.7. Pharmacovigilance (oral report by secretariat)

The two new working groups were discussed together. The secretariat informed the Committee that the composition of both WGs had been finalised only shortly before the SC meeting since several members had only sent the names of their experts very recently. The secretariat had sent letters to all experts, topic leaders and chairpersons.

The Japanese delegation expressed reservations against the creation of additional working groups and insisted that further progress was needed on the existing groups and that one of the groups would have to finish its work before one of the new groups could meet.

The European and US delegations expressed concern that further delaying the start of the two new groups would work against the increase in efficiency in the VICH process that was desired by all members.

After further discussion, the SC agreed to the following compromise: the new WGs should continue to work on the preparation of their meetings; however, a new WG will only be authorised to meet if and when an existing WG will have produced a step 2 document on its original mandate as defined by the work programme VICH/96/005. It was expected that the Quality WG, the GCP WG, and the Ecotoxicity would reach such a stage soon. In the case only one group could meet, the SC agreed that priority should be given to the WG on Quality monitoring of biologicals, thereby overturning the footnote of the work programme VICH/96/005 which gave priority to pharmacovigilance.

4. Review of VICH procedures and functioning of the VICH process (based on VICH/96/002)

4.1. Steering Committee: observers

The SC noted the expression of interest from the WVA (World Veterinary Association) and from the Canadian government, and expressed concern about the continuous lack of participation from Mercosur and the Latin American industry. The SC suggested that some criteria for admitting or rejecting observers should be elaborated. The Secretariat commented that no discussion paper on this issue could have been prepared since no input had been received from the SC members. They requested a small drafting group to work on a specific proposal. The SC agreed with the conclusion of the drafting group which were :

For reasons of efficiency, the SC does not want to expand its composition beyond the current membership. However, this issue should be re-assessed regularly, and individual requests will be reviewed on a case-by-case basis. The ability to actively contribute to the discussions will be considered as an important criterion.

Channels of communication to regions and countries which are not directly involved in VICH include the dissemination of VICH recommendations through OIE, the VICH web site, and the public VICH conferences.

Also, the SC confirmed that it will examine specific offers of technical expertise and consider nominations for participation in expert working groups. In accordance with paragraph 5.1.1. of the Organisation Charter of VICH (VICH/96/002) only one expert or advisor per member should speak on a given topic.

The SC also took the following position on the two specific cases of Canada and Mercosur :

Canada

In view of the above, the SC decided, after the examination of the Canadian offer of technical expertise, to grant to Canada the opportunity to nominate (an) expert(s) on the WG on Quality monitoring of Biologicals. The Secretariat would request the Canadian government to confirm their offer and to appoint this expert.

Mercosur

Since the region has not actively participated in the activities of VICH, it was agreed to contact Mercosur and Latin American industry representatives in order to let them know that, if no active interest takes place before and at the next meeting of the SC, the SC will decide that the region will be removed from the membership of VICH.

The SC also discussed briefly the involvement of the Pharmacopoeias. The SC concluded that this was a matter for each member to evaluate how to involve representatives of their pharmacopoeias, and reiterated that additional expertise could be added into the WG, if justified.

4.2. Location of SC

After some discussion the SC agreed that, for a better balance of resources spent among the VICH members, the location of SC meetings would rotate among the three member regions. The SC also agreed that in a second phase SC meetings could also be held in observer regions. Some members expressed concern that the role of OIE might become secondary if meetings were no longer held in the OIE headquarters. The Chairman mentioned that the role of OIE would be maintained irrespective of the location of the meeting. In order to stress the role of the OIE, it was also decided that, when the SC is to meet in Europe, SC meetings should be held, in general, at the OIE headquarters in Paris.

Both the US and the Japanese delegations offered to host the next meeting. After the discussion on the role of the chair (see below), the US delegation withdrew its offer and agreed that the next meeting will be held in Japan.

4.3. Role of chair

The SC discussed at length who should chair SC meetings in the future and the role of this chairperson . On the first question, the SC did not reach consensus, with one half of the members favouring a rotating chair among the VICH member regions, and the other half preferring to keep the OIE as chair. In the absence of consensus, the SC decided that this issue should be discussed again at its next meeting and that the secretariat should

prepare a paper for this purpose, outlining a proposal for the role of the chairperson . On this issue, the SC agreed that the role of the chairperson should be restricted to a facilitator and consensus-builder at SC meetings, and that in-between meetings it was the prime responsibility of VICH members, with the help of the secretariat, through their co-ordinators to ensure that actions are being carried out.

4.4. Role of coordinators

After a thorough discussion, the SC agreed that the co-ordinator plays a valuable role in the VICH process. He/she is a liaison person between the VICH member and the secretariat, particularly in between meetings. In addition, he/she has an important responsibility within the region for ensuring that appropriate and timely response and follow-up is provided on all issues. He/she is also an important contact person for the expert and topic leaders from the region. The SC agreed that the co-ordinator can be one of the two members of the SC or can be a separate person. In the case the co-ordinator is a separate person, he/she will be sent the same documents as any VICH member and will be invited to participate in the SC meetings. However, this is not mandatory and is left to each member to decide upon. The SC decided, however, that if a separate person is appointed as a co-ordinator, and when there is a decision to be taken on a contentious issue being debated and discussed, only the two official representatives should be the spokespersons of each VICH member. The organisational charter VICH/96/002 will be amended in accordance with this decision and on the basis of the paper prepared by the Secretariat.

4.5. Procedure in case of persistent disagreement within WG

After an introduction of this issue by the representative of Fedesa, the SC concluded that technical issues should be resolved by the WG, and that all efforts should be undertaken for this to be the case in a flexible way. However, it is the responsibility of the WG chairperson or topic leader to make the SC aware of contentious issues, so that the SC members can facilitate the consensus at WG level. It was mentioned that the SC could always decide to stop the discussions on a specific topic if persistent disagreement leads to an inefficient utilisation of the resources dedicated to harmonisation.

4.6. Draft guidance documents for VICH topics

**** Note on the format & style of VICH guidelines (VICH/97/061)***
**** Draft guidance for elaboration of topic concept paper (VICH/97/037)***
**** Draft guidance for elaboration of VICH discussion document (VICH/97/036)***
**** Draft guidance for elaboration of topic progress report (VICH/97/038)***

The Secretariat mentioned that no comments had been received on any of these documents circulated at the 2nd meeting of the SC or shortly thereafter. He proposed to have a short final round of consultation on these texts before finally approving them.

On VICH/97/061, the US delegation commented that the document needs to be modified to take into account the new US requirements for Good Guidance Documents and that the ICH guidelines on which VICH/97/061 is copied does not take this into account. It therefore requested a written procedure under which the SC could review the final document before approval. The US delegation added that it also had some editorial comments on the other documents.

The following schedule for finalising these documents was therefore approved:

1) Comments by SC members to be sent to the Secretariat by April 15, 1998.

2) Secretariat to send revised version before May 15 for final approval within one month after the document will be sent.

4.7. Review of overall efficiency of VICH process [letter FDA January 30 (VICH/IN/98/013)]

Several members expressed concern about the efficiency and transparency of the VICH process. Several WGs had failed to deliver step 2 documents by the end of 1997 despite the mandate given to them after the 2nd meeting of the SC. Members and observers mentioned as well that the development of a VICH strategy (including goals, measurable objectives, broadening geographical scope of VICH) might facilitate tracking, assessing performance and continuous investment in VICH. ANZ and the FDA submitted a written proposal.

As to transparency, the Secretariat reported on some improvements that had already been introduced in order to boost the transparency of VICH such as the circulation of WG minutes to SC members as requested at the 2nd meeting and the development of the VICH web site. After several examples of lack of efficiency were reviewed, it was highlighted that it is a continuous struggle to maintain a high level of involvement in VICH as both industry and regulators have very often other urgent priorities that they have to deal with. It was concluded that it is the primary responsibility of VICH members themselves to make the process more efficient.

It was mentioned that the concern about efficiency was also due to the long time between the first and the second, and to a lesser extent, the second and the third meeting of the SC, and that this should improve with regular six-month cycles between SC meetings.

The SC agreed on both short-term measures to improve the efficiency of the VICH process and on the need to develop a long-term strategy. The short-term measures involve an expanded role of the secretariat working with VICH co-ordinators in emphasising the importance of deadlines. The Secretariat should also envisage circulating step 2 documents for approval at step 3 through a written sign-off procedure in order not to wait until the next SC meeting for starting the consultation at step 4. The Secretariat mentioned that it would do so in the hope that it could count on co-operation by all members for respecting the deadlines for the sign-off.

The SC agreed on the need to develop a long-term strategy for VICH. A drafting group consisting of Drs Knox, Thompson, Jones and Verschueren would develop a paper for discussion at the next SC meeting, with Dr. Knox taking the lead on developing an initial draft for discussion by the drafting group.

4.8. Implementation of adopted guidelines

The issue was brought up as a result of the concern that the implementation of VICH guidelines might not occur simultaneously in the three regions. The Secretariat pointed out that at step 8, members would be asked to report on the implementation of VICH guidelines. This being said, and in line with step 7 of the VICH process, the SC confirmed that it will have to specify an implementation date each time a VICH guideline/ recommendation is adopted. The duration of the period between adoption and

implementation may vary from one guideline to another depending on the time needed by all parties to adapt to the new requirements, and will be decided on a case-by-case basis.

4.9. Procedure for amending adopted guidelines

The SC agreed that the procedure enshrined in the VICH charter for proposing amendments to the VICH guidelines (step 9) might need to be more visible. The Secretariat volunteered to draft a document that will lay down more explicitly that a member of the VICH SC may request a particular guideline to be revised through a procedure similar to that for the proposal of a new topic.

5. Communication

- ***ITCVDR***

The Chairman informed the Committee that the ITCVDR (International Technical Consultation on Veterinary Drug Registration) would be held in Yogjakarta, Indonesia on June 23-26, 1998 and that a special session will be dedicated to international harmonisation. This meeting will be another opportunity to provide countries in South East Asia with information on VICH.

- ***Official VICH public conferences***

The EU delegation presented their proposal for the first VICH public conference to be held in Europe in 1999. The SC thanked the EU for its proposal and unanimously agreed with the proposal to hold a public meeting in Europe in the second half of 1999, in conjunction with the 6th meeting of the SC. The location of the conference is to be decided by the EU delegation but is likely to be Brussels or London.

The SC agreed that the agenda and the scientific programme of the conference is to be decided by the SC. Therefore the Secretariat was given the mandate to develop a proposal with the co-ordinators for discussion and decision at the next meeting. This proposal should clearly identify the target audience for the conference. The Secretariat was also asked to liaise with the two EU co-ordinators for the logistic organisation of the conference. It was also decided to no longer pursue the idea to link this conference with another public conference.

- ***Publication of a VICH brochure***

The Secretariat briefly presented information on the cost to develop and print an official brochure on VICH. The cost of this (not counting the time of the Secretariat) would be in the range of 4,000-5,000 US$ for 5,000 copies. The SC agreed to the principle of such a brochure and that the cost should be shared among the members. Some members agreed to share the cost of such brochure whilst other reserved their position until the next meeting.

The EU co-ordinator reminded members of the commitment given at the last Steering Committee to support articles on progress of VICH being published in Europeann Pharmaceutical Law Notebooks. He would be co-ordinating input to this journal from members and topic leaders for topics where guidelines had reached Step 4.

- ***VICH web site (presentation of web site by EU and secretariat)***

The EU and the Secretariat introduced and demonstrated the proposed VICH web site that they had developed together. The SC praised both parties for their work and the

impressive results. The SC decided to go ahead with opening the web site in the second quarter 1998 and after having incorporated the following modifications:

- Deletion of addresses of experts. The composition of the WG should be mentioned with the names of the experts and their affiliation only.
- Deletion of the flags in the general scheme.
- Addition of an additional button for “who to contact for more information”
- Deletion of internal guidance documents for experts
- Editorial and wording changes to be provided to the Secretariat by March 31,1998.
- Deletion of agendas and minutes of SC meetings WG minutes would not be included either)

The SC concurred with the site designers that a restricted access to sections of the site containing more detailed information (e.g. minutes of meetings) by individuals with coded passwords is technically feasible but extremely difficult to manage efficiently. Therefore the idea was abandoned at this stage. After some discussion, the SC agreed to publish draft VICH recommendations that are circulated for consultation at step 4, with a clear designation of who to contact for comments. It also agreed that each topic should have a short status report.

For the maintenance and update of the site, the Secretariat said that it is very much willing to take care of this provided it can continue to benefit from the same level of technical co-operation from the European Commission as for the elaboration of the site. The European Commission confirmed its commitment to the Secretariat.

6. Any other business

The Secretariat communicated the new phone, fax numbers and e-mail address of the VICH secretariat:

Telephone: 32-2-541-01-11
Telefax : 32-2-541-01-19
e-mail : comisa@fedesa.be

7. Date(s) of next meeting(s)

To be held in Tokyo, Japan on October 20-22, 1998, starting on Tuesday October 20 afternoon if necessary.

8. Adoption of press release

With several modifications on the draft prepared by the Secretariat, the press release was adopted.