Appendix 6

Requirements for provision of a bridging report for reference SRA-approved pharmaceutical product and vaccines for consideration of registration in participating countries

It is expected and is general practice that medicines authorized for use by reference SRAs are approved for the conditions of use relevant for the respective reference SRA territory. When a reference SRA-approved product is submitted for the regulatory approval in a country where conditions of use or the benefit–risk profile of the medicine may differ, it is assumed that the applicant for registration (marketing authorization) is able to support the application by providing evidence of a positive benefit–risk profile for the proposed conditions of use for the country concerned. Since reference SRA assessments may not always account for specific circumstances that can significantly affected the benefit–risk of a medicine in countries/regions outside the SRA’s region, the reference SRA assessment reports can be considered incomplete to enable appropriate benefit–risk evaluation in those settings. Currently only the European Medicines Agency (EMA)’s scientific opinion according to Article 58 of Regulation (EC) No. 726/2004, in the EU, may be considered to extensively address these questions.

Differences in target population, epidemiology and other features of the disease, concomitantly used medicines and hence the interaction potential, local treatment and diagnostic modalities and other factors can substantially affect the benefit–risk profile of a medicine. There can also be issues related to certain quality parameters, especially in relation to the stability under different climatic conditions. Therefore, to provide regulators in target countries with information relevant to the use of the product in their countries it is proposed to develop a bridging report supplementing the reference SRA assessment report (quality, safety) and the quality and clinical overviews provided in Module 2 of the common technical document (CTD).

Such a bridging report should, in particular, provide the applicants with the justification of the:

- comparability of the studied population to the target population (e.g. ethnicity, gender representation, age groups) as regards demonstration of safety and efficacy;
- relevance of reference SRA-approved conditions of use as regards epidemiology and disease pattern in the target countries as well
as other implications for efficacy and safety, e.g. feasibility of monitoring and precautionary measures (e.g. resistance testing or therapeutic drug monitoring);

- interactions with food and with other medications relevant in the target countries that are not discussed in the reference SRA’s assessment report;
- therapeutic role of a product and its recommended use according to relevant national and international treatment guidelines;
- other related quality issues, including but not limited to, storage conditions and conditions of administration and use.

Such a report is justified where the reference SRA assessment report does not sufficiently cover these elements of assessment. Provision of a bridging report should not be mandatory, but can substantially facilitate conduct of the regulatory assessment, reduce the number of potential regulatory questions and shorten the duration of the regulatory approval process. Such a report can be valid for more than one country, where conditions of use of the medicine are considered, in principle, to be similar. Similarly to the the case of overviews submitted in Module 2, the bridging report may be prepared by the applicant, or by expert(s) contracted by an applicant, who will attach their professional CV(s).