COMMUNICATION TO STAKEHOLDERS

Issue No.: HPA01-2022/23

30 July 2024

Medicines Registration Renewals Implementation Framework

Document History

First publication – Version 1	22 June 2022
Update – Version 2 Updated section 7 PILOT PHASE Included section 8 PILOT UPDATE	03 February 2023
Update – Version 3 Extensive update in line with outcomes of Industry Workshop	07 June 2023
Update – Version 4 Section 6 updated by deleted point j); regarding Envelope Element Description	22 June 2023
Update – Version 5 Section added on Renewals certification	25 July 2023
Update – Version 6 Older version of renewals guideline removed throughout document Further clarity provided under section 2 regarding duplicates or clones/replicas	18 August 2023
Update – Version 7 Annexure B updated to reflect Y13 Amended section 6(j) dormant product grace period	23 July 2024

This document sets out the proposed approach that SAHPRA undertakes to implement the process of health product registration renewals, ensuring a consistent approach to benefit all stakeholders, thereby guaranteeing quality, efficacious and safe products are available to the public. This will be a "living document" and will be updated as required. This communication is an interim document.

1. INTRODUCTION

To comply with the legal provisions, as set out in the Medicines and Related Substances Act (Act 101 of 1965), as amended, SAHPRA will be implementing a process to renew the validity of human and veterinary medicine registrations. The framework will cover health product registration renewals for

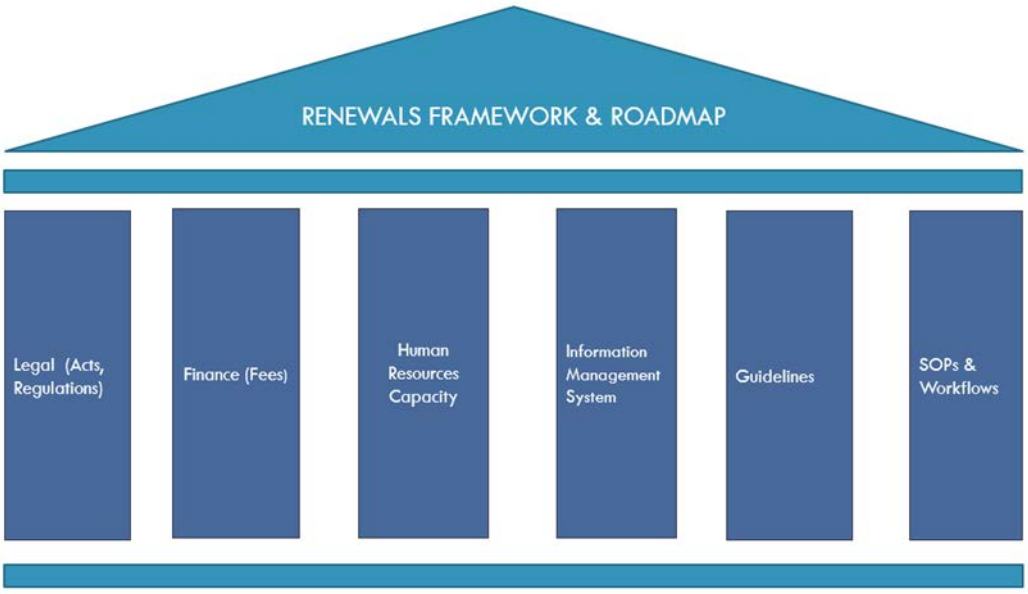
all medicines, except for complementary medicines, medical devices and in-vitro diagnostics (as these products are not currently being registered by SAHPRA).
Implementing this process will ensure that SAHPRA complies with the legal provisions, but it will also enable the regulator to comply with the requirements as set out by the WHO in the Global Benchmarking Tool. It is SAHPRA's intention to comply with WHO Review Practice and the requirements contained in the WHO guidelines. This step is of particular importance to the regulator and industry alike, as it may allow for Regulators from other regions to rely on SAHPRA's regulatory decision for products registered, to facilitate shorter timelines for registrations in other markets.

The process that has been proposed in the registration renewals guideline is the product of research and consultations with the WHO, other regulatory authorities in the SADC Region, other WHO Maturity Level 3 African Regulators, and considering as well best practice from regulators in the Middle East & North Africa (MENA) region.

The relevant legal provisions that may be referenced can be found in the Medicines and Related Substance Act No. 101 of 1965, as amended.

- Section 2B(1)(c) provides for the periodic re-evaluation or re-assessment and monitoring of medicines, medical devices and IVDs.

- Section 15(6)(a)(b) provides for the registration of medicines, medical devices or IVDs. It further states that any registration under this section may be made subject to such conditions as may be determined by the Authority; and shall in the case of medicines, be valid for a period of five years.



2. RENEWALS PROCESS IMPLEMENTATION

The registration renewal implementation process is currently following the 2022-2023 roadmap in Annexure A. Renewal applications must be submitted to SAHPRA six (6) months prior to the expiry of the health product registration and the required fees paid. The renewal fees will be published for public comment and submitted for gazetting, upon which renewal fees will be introduced. Until such time, renewal fees will not be payable in advance and invoices will only be sent to applicants at the end of the review process upon renewal outcome decision.

Failure to submit a complete and compliant renewal application may result in registration expiry and the product registration no longer being valid. If the product registration has expired, the applicant must submit a new product registration application, in line with the General Information guideline.

Product submission roadmaps per applicant have been shared with applicants in July 2022, listing the products to be submitted for registration renewal during a specific quarter for the specified year. For example, during Phase 1 there are only 46 applicants with 185 product lines requiring renewal of registration, all these registered in 2018. The first renewal submissions are expected during June 2023, in line with the high-level 2023-2034 roadmap (Annexure B). Thereafter applicants will be required to complete submissions monthly, as detailed in their schedule. Please note that renewal applications may only be submitted during the timeframe indicated for that product in the applicant-specific roadmap, not earlier or later, unless it is a duplicate or clone/replica to be submitted together with a

master application that was registered in 2018 and before. This will be done on case-by-case basis. For duplicates or clones/replicas registered in 2019 and onwards they will be renewed as per the road map schedule and not with the master.

3. GUIDELINES AND FORMS

After deliberation with Industry stakeholders, an updated registration renewals guideline has been published on the SAHPRA website, namely SAHPGL-HPA-04 Renewal of Registration of Human and Veterinary Medicines (version 2) dated 02 May 2023. An amended Module 1.2.1 Application Form, inclusive of a section pertaining to renewal information, has been published in May 2023 for implementation on 01 July 2023.

4. ASSESSMENT PROCESS

Please refer to latest SAHPGL-HPA-04 Renewal of Registration of Human and Veterinary Medicines, for details pertaining to the renewal of product registrations process.

5. FEES FOR RENEWALS PROCESS

SAHPRA will be charging a fee for applications to be renewed. The fees will be derived from a cost to serve analysis. The new fee structure will be published for public comment, upon which it will be published for implementation. As indicated above in section 2. RENEWALS PROCESS IMPLEMENTATION, no renewal fees will be payable until the fees have been published for implementation and applications received before Gazetting will be invoiced at the end of the renewal process.

6. RENEWAL SUBMISSION SCHEDULES AND OTHER INFORMATION

By means of providing further clarity and guidance, SAHPRA would like to confirm the following with regards to the communicated schedules – refer to Annexure B for the high-level 2023-2034 roadmap:

a) The current list of active products, according to the SAHPRA medicines register, have been plotted over an 11-year period to spread the planning period and administrative burden across a reasonable timeframe.

b) For the submissions of products currently registered – and on this schedule – HPA has divided these into different years and quarters per year, so SAHPRA can receive the renewal submissions for the relevant products in the **first month** of each of those identified quarters, i.e., if a product appears in PHASE 2 Q3, SAHPRA requires receipt of the submission(s) in July 2024; if it was PHASE 1 Q2, it would equate to August 2023. Kindly note that due to the delays experienced in concluding the pilot study and completing the refinement on the guideline and respective templates, the timelines for year 1 have been shifted accordingly:

   Phase 1 Q1 - submit between 1 and 30 June 2023

   Phase 1 Q2 – submit between 1 and 31 August 2023

   Phase 1 Q3 – submit between 1 and 31 October 2023

   Phase 1 Q4 – submit between 1 and 31 December 2023

   The normal schedule as set out in Annexure B will be in play from 2024 onward.

c) For products registered from October 2022, an expiry date is indicated on the registration certificate and for these products the expiry date, minus 6 months, will be the product's renewal submission window in 5 years' time.

d) Please note that the SIAMED column is an internal vlookup reference marker and may be ignored by industry colleagues.

e) Old Medicines not registered do not form part of the renewals process.

f) No variations will be allowed during a renewal application review; variations must follow their normal submission processes.

g) Completed SAHPRA-specific QOS and QIS to be submitted in Module 3.2.R.8 – Other. Refer to the SAHPRA QOS (GLF-PEM-02D) and QIS (GLF-PEM-02C) templates. Both the QOS and QIS are required for the first registration renewal, whereupon only the updated QIS will be required for subsequent renewal applications. If the product was registered with a SCoRE document and a complete, updated SCoRE document is available in Module 3.2.R.8, then a QOS will not be required.

h) Renewals for veterinary products may be submitted as per the current CTD format.

i) For older, registered products in the year 2017 and dating further back, a full eCTD baseline (0000) submission in line with the General Information guideline will be required (if not already converted to eCTD), which should be accompanied with sequence 0001, which contains the documents for the renewals process.

j) Dormant products cannot be exempted from the legislated requirement for renewal of a registration. The dossiers for these products are to be maintained and variations should be submitted in line with the lifecycle management requirement. The expectation is that the information on the safety, quality and efficacy for any product submitted for a registration renewal review will be up-to-date and will meet the requirements, as set out in the relevant SAHPRA guidelines.

Applicants will be given a "grace" period to Dec 2025 following the implementation of renewals after which they must submit renewal applications of dormant products.

7. PILOT UPDATE

The review of the pilot applications has been completed. The learnings from the pilot have been incorporated into the guideline and templates to streamline the process.

8. RENEWALS CERTIFICATION

Standard documentation required for an updated certificate:

1. Application form (M1.2.1)

   The application form must include the variation history
2. Medicine register details (M1.5.2.2.1)

   The information that has been applied for through the DVP and approved through the variation's summary must be added onto module 1.5.2.2.1 medicine register details under the "proposed column" and NOT the "current column". Only information appearing on the current registration certificate must be included under the "current column".
3. Copy of current approved registration certificate (M1.5.2.2.2)
4. If applicable, variations summary (appended to the registration certificate in M1.5.2.2.2) as well as any other approvals received from PEM for the FPP manufacturer/Primary Packer

9. ANNEXURES

Annexure A: 2022-2023 Renewals Roadmap

Annexure B: High-Level 2023-2035 Renewals Roadmap