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Transforming the Regulatory ecosystem in Africa

Satellite session: How can the regulatory landscape on biosimilars be navigated?



















Satellite session: How can the regulatory landscape on biosimilars be navigated?

- Overview of biotherapeutic regulatory landscape including the revision of WHO GLs for Biosimilars and their implementation.
- A Global perspective of the changing landscape of biosimilar regulations including topics such as traceability and interchangeability
- Dr Hye-na Kang (WHO)
 - Norms and Standards for Biological products (NSB Team), WHO HQ

PARTNERS

- Dr Virginia Acha (IFPMA Biotherapeutics Chair)
 - Biosimilars: A Dynamic Regulatory Science



PASA

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QUESTIONS AND ANSWERS

We encourage you to use the Q&A box to raise questions to the speakers.

If a question you would like to ask has already been raised, you can also "like" that question.





Presentation by: Dr Hye-Na KANG Scientist WHO



















Regulatory landscape changes on biosimilars & REVISED WHO Guidelines on evaluation of biosimilars



Dr Hye-Na KANG Norms and Standards for Biological products (NSB Team), WHO HQ

• Africa Regulatory Conference, 23 Oct 2023



HyeNa KANG | Scientist | WHO HQ

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Outline:

1. Regulatory landscape changes: Survey outcomes, 2019 & 2020

2.Key updates incorporated in the revised GLs, 20223.Outcomes of IPRP BWG workshop, Sept 20234.Implementation of GLs, 2023 & 2024

Disclaimer: The speaker is a staff member of the World Health Organization. The speaker alone is responsible for the views expressed in this presentation and they do not necessarily represent the decisions, policy or views of the World Health Organization.

Survey conducted in 2019 & 2020

Aim of survey

- To describe the progress made and the regulatory landscape change for biosimilars in 21 countries during the past 10 years.
 - WHO Guidelines on evaluation of biosimilars issued in 2009
 - A survey to review the regulatory situation in countries conducted in 2010 (Biologicals 39, 2011)
- To identify challenges and areas where further support to Member States needs to be provided.

Countries

 Regulatory experts from 20 countries covered all WHO 6 regions: AF (Ghana, Zambia), AM (Brazil, Canada, Cuba, Peru), EM (Egypt, Iran, Jordan), EU (Russia, Ukraine, UK), SEA (India, Indonesia, Thailand), WP (China, Japan, Malaysia, Korea, Singapore) + USA

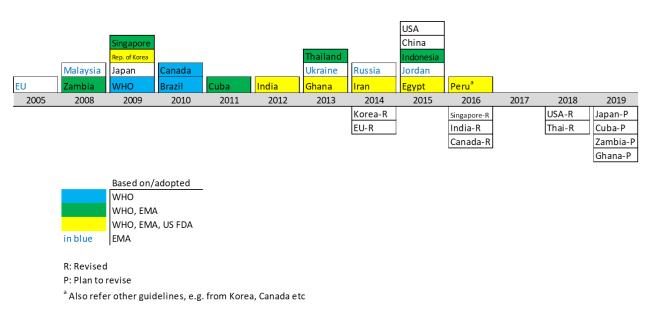
Focuses

Aug 2019: Situations	June 2020: Challenges
Regulation/Guidelines	Reference products
Terminologies	Resources
Approval of biosimilars	Quality of biosimilars
Biosimilars under development	Issues related to the use

NOTE

• Assessment based on the data submitted by survey participants from 20 countries. Thus, biosimilars approved in certain countries might not have been approved following a strict regulatory process as recommended by WHO 2009 GLs.

Survey conducted in 2019: Reg. guidelines & Terminologies



Considerable progress in ADOPTION of guidelines has been made

- All participating countries (and the USA) now have biosimilar guidelines in place.
- Most of countries in the survey adopted WHO GLs.
- It is clear that WHO GLs have contributed to setting the regulatory framework for biosimilars in these countries and increasing regulatory convergence at the global level.

	2010	2019
WHO	similar biotherapeutic products	similar biotherapeutic products
Canada	subsequent entry biologics	biosimilars
Egypt		biosimilars
	similar biological medicinal products	
EU	(biosimilar)	similar biological medicinal products (biosimilar)
Ghana		biosimilar products
India	biogeneric products unofficially* used	similar biologics
Indonesia		biosimilar products
Iran		biosimilars
		follow on biologics (as a synonym for biosimilars:
ر Japan	follow on biologics	indicated on the first page of guidelines)
Jordan		biosimilars
Malaysia	biosimilars	biosimilars
Jordan Malaysia Peru		similar biological product
Republic of Korea	biosimilars	biosimilar products
Singapore Thailand Ukraine	similar biological (biosimilar) products	biosimilars
Thailand		biosimilars
Ukraine		similar biological medicinal products (biosimilar)
USA		biosimilars
Zambia	biosimilar medicines	biosimilars
	biological products developed by	biological products developed by comparability
	comparability pathway (vs. new biological	pathway (vs. new biological products)
Brazil	products)	biosimilars unofficially* used
China	biosimilars unofficially* used	copy biologicals
	known biological products (vs. biological	multi-source known biological products
Cuba	products)**	
		bioanalogue (as a synonym for biosimilars, defined
Russia		in the Federal Law)

Some progress made since 2010 in converging on consensus use of nomenclature:

- The term 'biosimilar', 'similar biotherapeutic products', and 'similar biological medicinal product' are used interchangeably.
- A trend is towards adopting the term 'biosimilar'.
- The term 'biogeneric' has been largely abandoned.

Survey conducted in 2019: Approval and Development of biosimilars

	Brazil	Canada	China	Cuba	Egypt	EU	Ghana	India	Indonesia	Iran	
2010	0	1	0	0	0	14	0	>24	7	7	
2019	21	15	1	6	4	61	13	93	23	21	
	Japan	Jordan	Malaysia	Peru	R. of Korea	Russia	Singapore	Thailand	Ukraine	USA	Zambia
2010	2	0	1	0	0	11	1	0	0	0	1
2019	22	10	15	4	13	31	7	13	7	23	8

Considerable progress made since 2010

- A range of biosimilars is now approved in all participating countries.
- Availability of guidelines and adoption of regulatory approval processes have been rapidly followed by approval of biosimilars.

Difficult to predict but the survey identified the following:

- mAbs: Dominant product class for development.
- Most of blockbusters have biosimilar versions at present or under development.
- In the past, certain global players dominated the market and were the major producers.
- In the future, locally produced biosimilars may become the dominant products in some countries (e.g. Egypt, India, Iran, Russia, Ukraine)

Survey conducted in 2020: Four main obstacles

Challenge 1. Reference products (RP)

- Many of obstacles related to RP issues, e.g. limited access to information of RP, high price of RP, insufficient quantities of RPs in the country.
- Possible solutions to these challenges include:
 - 1) exchanging information on products between NRAs;
 - 2) accepting foreign licensed and sourced RPs; and
 - 3) avoiding conducting <u>un</u>necessary (duplicate) studies.
- Accepting foreign licensed and sourced RPs might contribute to expanding the availability of various product classes, since these products were not available on the market prior to approval of the biosimilar.

Challenge 2. Lack of resources

- Insufficient resources of NRAs: a common problem.
- To be reduced by relying on information available from other NRAs who have assessed particular products and also by joint review of applications.
- Use of a 'reliance' concept and/or joint review for the assessment and approval of biosimilars.
- Short-term measure: Work sharing and information sharing recognized as possible avenues for the development of expertise.
- Long-term measure: efforts to build their own capacity should be undertaken.
- WHO PQ: To assist Member States with insufficient capacity for assessing the quality, safety and efficacy of biosimilars.

Survey conducted in 2020: Four main obstacles

Challenge 3. Quality of biosimilars

Obvious problems existed in 2010, 2019 and 2020 surveys

- Biotherapeutic products which are neither originator products nor biosimilars are approved in several developing nations (non-innovator).
- The inappropriate labelling of products as biosimilars is a barrier to the uptake of biosimilars as it decreases confidence in biosimilar use.
- Difficult to distinguish between biosimilars and non-innovator products which have not been produced to the requirement of the WHO GLs.
- Non-innovators already approved before biosimilar regulations exist may need to be reassessed by NRAs, and the terminology used for such products should not be confused by calling them biosimilars.

Challenge 4. Issues related to the use

Interchangeability

- No consensus on meaning
- Most countries do not have regulatory guidelines for the interchangeability of biosimilars, but many have adopted national approaches for this.
- Good PhV is essential for establishing the safety and efficacy of interchangeability of biosimilars.

Naming and labelling

- Essential for identification of products and for phV & prescribing.
- Approaches being used for the naming of biosimilars:
 - the brand name AND/OR INN (i.e. same INN as RP) without any other distinguisher.
 - Japan, Malaysia, Peru and Thailand have a distinguisher (identifier), e.g. product-specific suffix as part of the name.

Activities to implement the 2014 Resolution

WHA* 67.21 Resolution in 2014, "Access to biotherapeutic products (BTPs) including biosimilars and ensuring their quality, safety and efficacy"

Resolution to update the 2009 GLs	1. taking into account the technological advances for the characterization of BTPs	2. considering national regulatory needs and capacities
Activities & Report to ECBS	 Current scientific evidence and experience gained reviewed in 2020 Informal consultation held in 2021 	Survey conducted in 2019 & 2020
Publications	1 article & meeting report	3 articles

Review of scientific evidence and regulatory experience in 2020

Aim of review

- To review scientific evidence and experience to identify issues/cases for further reducing nonclinical and clinical data
- To reach consensus on regulatory considerations and expectations for evaluation of biosimilars
- To update the GLs with providing more flexibility

Methodology

- Review the relevant GLs, e.g. US FDA, EMA, HC
- Review the literature for long-term experience with biosimilars, e.g. EPAR, journal publications for long-term efficacy and safety of biosimilars for the years 2017 – 2020, systematic reviews published in 2017-2020 to cover older data.
- Evaluate the roles and relevance of clinical efficacy studies for the benefit-risk assessment of biosimilars for the possibilities to reduce clinical data requirements

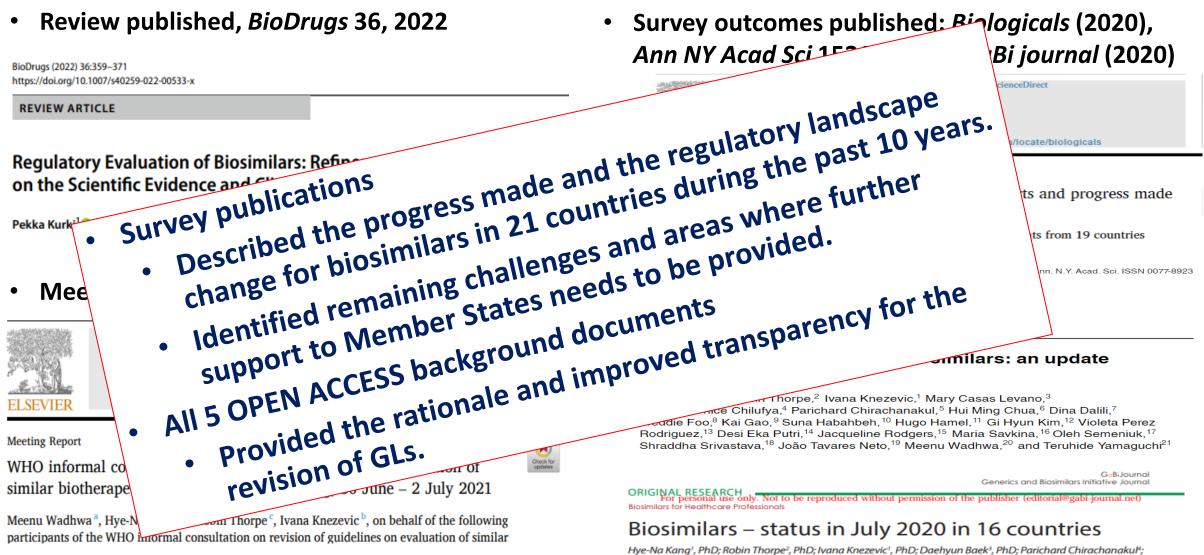
Key finding

- Long-term safety, efficacy and immunogenicity data of licensed biosimilars since 2006 do not raise concerns.
- Current data could suggest that state-of-the-art analytical and functional testing and robust PK and PD studies are sufficient to demonstrate biosimilarity, whereas in vivo animal studies and large confirmatory efficacy and safety studies are generally not needed.
- WHO 2009 GLs to be updated to reflect the current scientific knowledge.

NOTE

• The review and analysis are based on the view of authors, and they do not necessarily represent the views of WHO.

Publications



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Revision of GLs

- Set up Drafting group
 - 1st DrG Zoom meeting (26 Nov 2020)
- Preliminary draft
 - 2nd DrG Zoom meeting (16 April 2021)
- 1st Draft

Annex 3

Guidelines on evaluation of biosimilars Replacement of Annex 2 of WHO Technical Report Series, No. 977

WHO Expert Committee on Biological Standardization

Seventy-fifth report

- 1st public consultation (27 April 24 May 2021, 1 month)
- 3rd DrG Zoom meeting (21 June 2021)
- Informal consultation (virtual, 30 June 2 July 2021)
- WHO editorial review (22 Sept 4 Nov 2021)
- 2nd Draft (BS doc)

2nd public consultation (8 Nov 2021 – 7 Jan 2022, 2 month)

4th & 5th DrG Zoom meetings (10 & 28 March 2022)

Adopted by ECBS, 4-8 April 2022 \implies Published in Annex 3, WHO TRS No. 1043

Key updates incorporated in the revised GLs 1/8

	2009	2022	Reasons for updates
Terminology and	Similar biotherapeutic product	Biosimilar:	In order to align with an
Definition	<u>(SBP):</u>	Biological product that is highly	internationally recognised
	Biotherapeutic product that is	similar in terms of its quality,	harmonised terminology and
	similar in terms of quality,	safety and efficacy to an already	to expand to include the
	safety and efficacy to an already	licensed reference product (<u>RP</u>).	evaluation of biological
	licensed reference		products other than
	<u>biotherapeutic</u> product (RBP).		biotherapeutics alone, e.g.
			palivizumab used
			prophylactically.

Key updates incorporated in the revised GLs 2/8

	2009	2022	Reasons for updates
Scope of	Apply to well-established and	Apply to <u>biological</u> products that	The scope expanded and
guidelines	well-characterized	can be well-characterized, such	clarified.
	biotherapeutic products such as	as recombinant DNA-derived	In addition, the term 'well-
	recombinant DNA-derived	therapeutic peptides and	established' deleted to avoid
	therapeutic proteins. Vaccines	proteins. Some of the principles	confusing with the term
	and plasma-derived products	provided in these Guidelines may	'well-established use' in EU
	and <u>their recombinant</u>	also apply to <u>low-molecular</u>	and its meaning added in the
	analogues are excluded from	weight heparins and	definition of RP, i.e.
	the scope of this document.	recombinant analogues of	'marketed for a suitable
		plasma-derived products.	period of time with proven
		Vaccines and plasma-derived	quality, safety and efficacy'.
		products are excluded from the	
		scope of these Guidelines.	NOTE: Vaccines (e.g. mRNA)
			are excluded but may be
			considered in the future.

Key updates incorporated in the revised GLs 3/8

	2009	2022	Reasons for updates
Key principles for	The development of an SBP	Characterization of the quality	'stepwise' deleted to reflect
licensing	involves <u>stepwise</u> comparability	attributes of the RP should be	the evolution from 'stepwise'
	exercise(s) starting with	the first step in guiding the	to the 'tailored' approach
	comparison of the quality	development of the biosimilar.	based on the current
	characteristics of the SBP and	The subsequent comparability	practices which shows that
	the RBP. Demonstration of	exercise should demonstrate	biosimilar development
	similarity of an SBP to an RBP in	structural, functional and clinical	proceeds in a "concurrent"
	terms of <u>quality is a</u>	similarity.	fashion rather than in a
	<u>prerequisite</u> for reducing the	Demonstration of similarity of a	stepwise mode.
	nonclinical and clinical data set	biosimilar to an RP in terms of	
	required for licensure.	structural and functional aspects,	
		is a prerequisite for establishing	
		comparability, with a tailored	
		clinical data package required as	
		needed.	

Key updates incorporated in the revised GLs 4/8 3 new (sub)sections added in quality evaluation

	2022	Reasons for updates
International reference standards	The role and how and where to use has been clarified.	A new section added as reference standards are now available for a wide range of substances.
Quantity	In general, a biosimilar is expected to have the same concentration or strength of the drug substance as the RP. The quantity of the biosimilar drug substance should be expressed using the same measurement system as that used for the RP.	A new subsection added since many questions on quantity issues were addressed in previous consultations held by WHO.
Comparative analytical assessment	<u>Considerations for RP batches:</u> The number of RP batches needed for the comparative analytical assessment will be influenced by the criticality of the quality attribute(s) under investigation and the approach chosen for demonstrating similarity. In general, sampling a higher number of RP batches over an extended time-period will provide a better estimate of the true batch-to-batch variability of the RP and allow for a more robust statistical comparison with the biosimilar.	A new section added. During consultation process, it had been requested to provide more details on certain topics (e.g. the number of batches required for demonstrating similarity, statistical approaches that can be used for similarity assessment) to emphasize the importance of quality

Key updates incorporated in the revised GLs 5/8 3 new (sub)sections added in quality evaluation

	2022	Reasons for updates
Comparative	Considerations for biosimilar batches:	
analytical	The exact number of biosimilar batches required will be	
assessment	influenced by several factors, such as the criticality of the	
	quality attribute(s) under investigation and the approach	
	applied for similarity evaluation. In general, the risk of a	
	false-positive conclusion on similarity will decrease with	
	increasing number of batches.	
	Considerations for similarity assessments	
	Considerations for similarity assessment:	
	Prior to initiating the comparability exercise, it is recommended to conduct a quality attribute criticality	
	assessment of the RP and risk assignment to guide the data	
	analyses and the similarity assessment. The most frequently	
	used approach for similarity assessment relies on	
	demonstrating that the quality attributes of the biosimilar	
	batches lie within the predetermined similarity ranges	
	established based on characterization data from multiple	
	batches of the RP.	

Key updates incorporated in the revised GLs 6/8

	2009	2022	Reasons for updates
Nonclinical	A head-to-head repeat-dose	A stepwise approach should be	From regulatory review as
evaluation	toxicity study should usually	applied. <u>At first, in vitro studies</u>	well as developers'
	constitute a <u>minimum</u>	should be conducted and then a	experience it is evident that
	<u>requirement.</u>	decision made on whether or not	state-of-the-art analytical and
		additional in vivo animal studies	in-vitro functional tests
		are required.	should be sufficient to
		The <u>3Rs principles</u> for animal	demonstrate biosimilarity in
		experiments (Replace, Reduce,	the majority of cases. Only in
		Refine) should always be	rare cases are additional in
		followed to minimize the use of	vivo animal studies required.
		animals in testing.	In line with the outcomes of
		Repeated dose toxicity studies in	review and implementation
		non-human primates are <u>not</u>	of the 3Rs principles, the
		recommended and nor are	nonclinical part was revised.
		toxicity studies in non-relevant	
		species.	

Key updates incorporated in the revised GLs 7/8

	2009	2022	Reasons for updates
Clinical evaluation	PK, PD, and efficacy studies:	PK, PD, and efficacy studies:	Clarified the goal of clinical
	The clinical comparability	Clinical studies are a valuable	studies and presented the
	exercise is a stepwise procedure	step in confirming similarity. A	considerations related to the
	that should begin with PK and	comparative bioequivalence	amount and type of clinical
	PD studies and continue with	study involving PK and/or PD	data required for biosimilar
	the pivotal clinical trials. Similar	comparability is generally	evaluation.
	efficacy of the SBP and the	required for clinical evaluation.	
	chosen RBP will <u>usually have to</u>	A comparative efficacy and safety	Articulated that the
	be demonstrated. In certain	trial <u>will not be necessary</u> , if	regulatory perspective about
	cases, however, comparative	sufficient evidence of	comparative safety and
	PK/PD studies may be	biosimilarity can be drawn from	efficacy studies is gradually
	appropriate.	other parts of the comparability	shifting from a strict inflexible
		exercise.	requirement to a case-by-
	<u>Safety studies:</u>	Safety studies:	case manner depending on
	Pre-licensing safety data should	Safety data should be captured	the molecule and the data
	be obtained in a sufficient	throughout clinical development	submitted for demonstration
	number of patients to	from PK/PD studies and also in	of biosimilarity based on the
	characterize the safety profile of	clinical efficacy trials when	knowledge and the evidence
	the SBP.	conducted.	accumulated to date.

Key updates incorporated in the revised GLs 8/8

	2009	2022	Reasons for updates
Clinical evaluation	Immunogenicity:	Immunogenicity:	
	Immunogenicity of	Immunogenicity studies may not	
	biotherapeutic products should	be necessary for well-	
	always be investigated	characterized biological	
	preauthorization.	substances (for example, insulin,	
	In the case of chronic	somatropin, filgrastim,	
	administration, one-year data	teriparatide), where an extensive	
	will usually be appropriate pre-	literature and clinical experience	
	licensing to assess antibody	indicate that immunogenicity	
	incidence and possible clinical	does not impact upon product	
	implications.	safety and efficacy.	
	Extrapolation of indications:	Authorization of indications:	Clarified that the decision to
	If similar efficacy and safety of	The decision to authorize the	authorize the requested
	the SBP and RBP have been	requested indications will be	indications depends on the
	demonstrated for a particular	dependent upon the	adequate demonstration of
	clinical indication, extrapolation	demonstration of similarity	similarity between the
	of these data to other	between the biosimilar and RP.	biosimilar and RP.
	indications of the RBP may be		
	possible.		

IPRP Biosimilars Working Group Workshop: "Increasing the efficiency of biosimilar development programs-re-evaluating the need for comparability clinical efficacy studies" (1)*

Public session, 12-13 Sept 2023

- Regulator perspectives
 - Regulators discussed moving on from having a default expectation of CES, but noted that CES may be warranted based on uncertainty.
 - Regulators noted the difficulty of providing different advice regarding the need for a CES when the question is asked when only early analytical data are available.
 - Regulators also noted that ability to streamline in biosimilar development programs also depended on clarity about what type of framework or data could be used instead of default CES to resolve residual uncertainties.

- Stakeholder perspectives
 - Developers believe that CES is less sensitive compared to analytical data in detecting the differences but provide it anyway because it is being expected
 - Global regulatory consistency and predictability is needed
 - Developers are confident in relying on analytical and quality data but believe many Regulators depend on CES for safety and efficacy confirmation
 - Streamlined duration of development is a key for developers in the biosimilar space

IPRP Biosimilars Working Group Workshop: "Increasing the efficiency of biosimilar development programs-re-evaluating the need for comparability clinical efficacy studies" (2)*

Regulator Poll on comparative efficacy studies in biosimilar development programs

- Poll collection period: May Aug 2023
- 38 responses (either collated or individually)
- Summary of observations
 - About 66% of responders believe that the law or guidance required a comparative efficacy study (CES) to support an approval of a biosimilar.
 - Most common reasons (67%) for providing recommendations for a CES were related to timing: residual uncertainties were not known because the comparative analytical assessment was at an early stage.
 - Up to 20 30% of responders may believe that the comparative analytical assessment is insufficient on its own to draw conclusions that there are no clinically meaningful differences between a biosimilar and its reference product.

- 74% of responders expressed being likely comfortable with not having a CES when there is comparative data utilizing a PD marker known to be a validated surrogate for clinical efficacy.
- In contrast, only 20% of responders expressed being likely comfortable with not having a CES when there is comparative data utilizing a PD marker that is not a validated surrogate for efficacy, but the PD marker can support comparisons with respect to functional activity or structural/functional correlations.
- 63% of responders expressed comfort with not having a CES when there is sufficient understanding/experience with structural and functional correlations of analytical differences and there is little to no residual uncertainty.

IPRP Biosimilars Working Group Workshop: "Increasing the efficiency of biosimilar development programs-re-evaluating the need for comparability clinical efficacy studies" (3)*

Regulators only session, 19-21 Sept 2023

- Discussion of Regulators Poll Results
 - Majority responded that CES was expected by law or guidance
 - Discussion: In most countries, guidance is not legally binding and there was no legal requirement for CES
 - Majority responded that advice regarding CES was given because the company proposed it or the question was asked at a time when not much comparative analytical data was available
 - Discussion: Acknowledging timing issues, it is ultimately responsibility of developers to provide strong quality and analytical data in a timely manner
 - Discussion: Limited sensitivity of CES, limited or no examples of CES resolving uncertainties in the analytical assessment

- Overview of analytical assessment and discussion of potential risk framework
 - Comparative Analytical Assessment is comprehensive and based on decades of experience with comparability assessments of biologic product manufacturing changes
 - Uncertainties in analytical data are typically resolved by additional analytical data (orthogonal assays, additional lots, etc.)
 - Potential Risk Framework: When do CES clarify uncertainties or concerns versus how are CES actually being used?
 - Discussion: CES are not currently being used to address specific uncertainties or risks.
 - Discussion: It may be possible to identify the specific risks or scenarios where a CES may be informative, based on risks related to uncertainties, product factors, or clinical factors.
 - Discussion: High risk patient populations or organ- specific concerns may justify use of CES even without other risks.

Implementation of the revised GLs

- Article published, Ann NY Acad Sci 1521, 2023
 - To facilite the implementation of WHO <u>written</u> <u>standards</u>, i.e. Revised GLs

DOI: 10.1111/nyas.14965

ORIGINAL ARTICLE

ANNALS OF THE NEW YORK ACADEMY OF SCIENCE

WHO guidelines on biosimilars: Toward improved access to safe and effective products

Hye-Na Kang¹ | Meenu Wadhwa² | Ivana Knezevic¹ | Clive Ondari¹ | Mariangela Simao¹

- Article submitted for publication, 2023
 - To facilitate the implementation of WHO <u>measurement standards</u>, i.e. Reference standards
 - Title: The role of WHO international reference standards throughout the product life-cycle of biosimilars

- 2 topics identified and case studies under development, 2023
 - Small molecules (Insulins)
 - CMC and non-clinical aspects (also cover device issue)
 - Clamp trial the pivotal clinical trial (also cover immunogenicity issue)
 - Large molecules (mAbs)
 - CQA and streamlined evaluation
- Implementation workshop, 2024
 - In EMR including some countries in AFR
 - Review country situation
 - Hand on training for regulators by using the developed case studies

Thank you for attention!



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General comments for entire doc:

- 1. Dr Patricia Aprea (ANMAT, Argentina)
- 2. Dr Pekka Kurki (WHO Consultant, Finland)
- 3. Dr Maria Savkina (the FSBI «SCEEMP» of MOH, Russia)
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- 9. Dr Junzhi Wang (NIFDC, China)
- 10. Dr Joel Welch (US FDA, USA)
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INTERACTIVE POLL and Importance of Q&A function

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QUESTIONS AND ANSWERS For both experts

We encourage you to use the Q&A box to raise questions to the speakers.

If a question you would like to ask has already been raised, you can also "like" that question.





THANK YOU!

















