2nd Club

Friday 17 January 2025

Club Founder
Dr. Mahmoud Bahgat

Co-Founder & Host:
Dr. Zeyad Anany

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Regulatory Affairs Club

An update for pharmaceutical products regulatory guidelines in Egypt

Online Zoom
7 pm Egypt - 8 pm KSA - 9 pm UAE

Dr. Mohamed Kassem
RA Manager

An Update for Pharmaceutical Products Regulatory Guidelines In Egypt

Dr. Mohamed Kassem

17/1/2025


الدليل التنظيمي الخاص بتنظيم قواعد وإجراءات التسجيل للمستحضرات
الطبية البشرية على وفق قرار رئيس هيئة الدواء المصرية رقم (450)
لسنة 2023
الكود EDREX:GL.CAPP.027
رقم الإصدار (4) السنة 2024

تاريخ الاصدار: 25/12/2024
تاريخ التفعيل: 25/12/2024

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About Me

- My name is Mohamed Kassem
- BSc Pharmacy (1998) – Alexandria University
- MBA (2007) - AAST
- More than 25 years of a diversified experience in the following fields:
  - Regulatory Affairs
  - Launch Management
  - Business development
  - Marketing

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Importance of Registration of new products to the business

1. Revenue Growth and Market Expansion:
    - New Revenue Streams
    - Market Penetration:
    - Increased Sales Volume
2. Competitive Advantage and Differentiation:
    - Market Leadership
    - Attracting customers and investors.
    - Brand Differentiation
    - Customer Loyalty
3. Meeting Evolving physician and patient Needs:
    - Introducing new products helps businesses stay ahead of the curve and remain relevant in a dynamic market.

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First Mover

gains a competitive advantage by being the first to introduce a product to a market. This allows them to establish a strong brand equity and customer base before competitors enter the race.

Advantages:

- Brand Recognition and Loyalty
- Capture a significant market share
- Economies of Scale

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An Update for Pharmaceutical Products Regulatory Guidelines In Egypt

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17/1/2025

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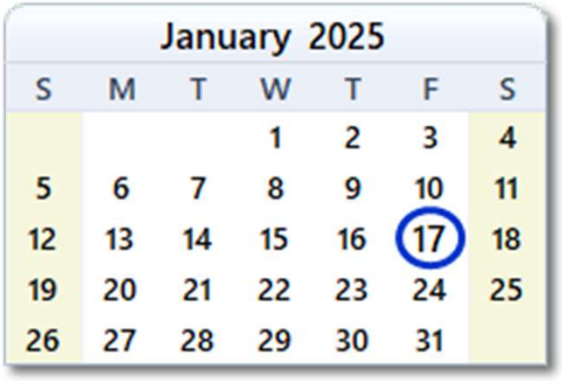
Agenda



Friday, Jan 17th 2025

- Scope of decree 450/2023
- Box system
- Registration of new product
- Preparation and pre-submission
- Submission of registration dossier
- Post registration license commitment
- Highlight major changes
- Registration flow chart & time frame.
- Q&A

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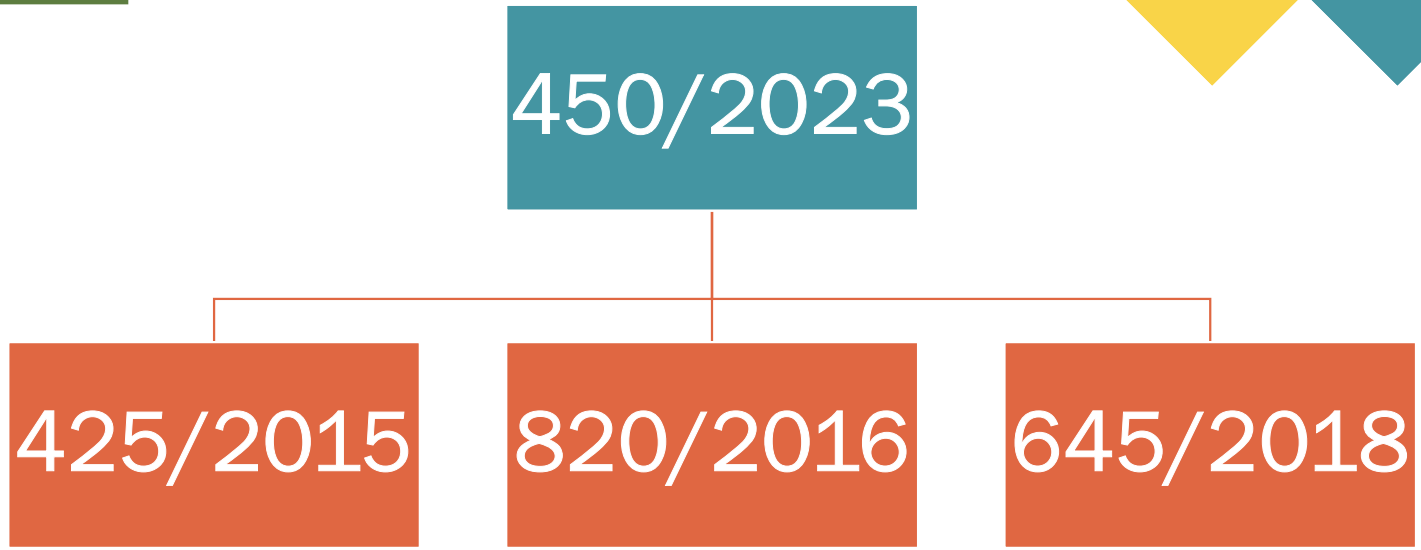
Decree 450/2023 scope:

Organizing the Rules and Procedures of Registration of Human Pharmaceutical Products.



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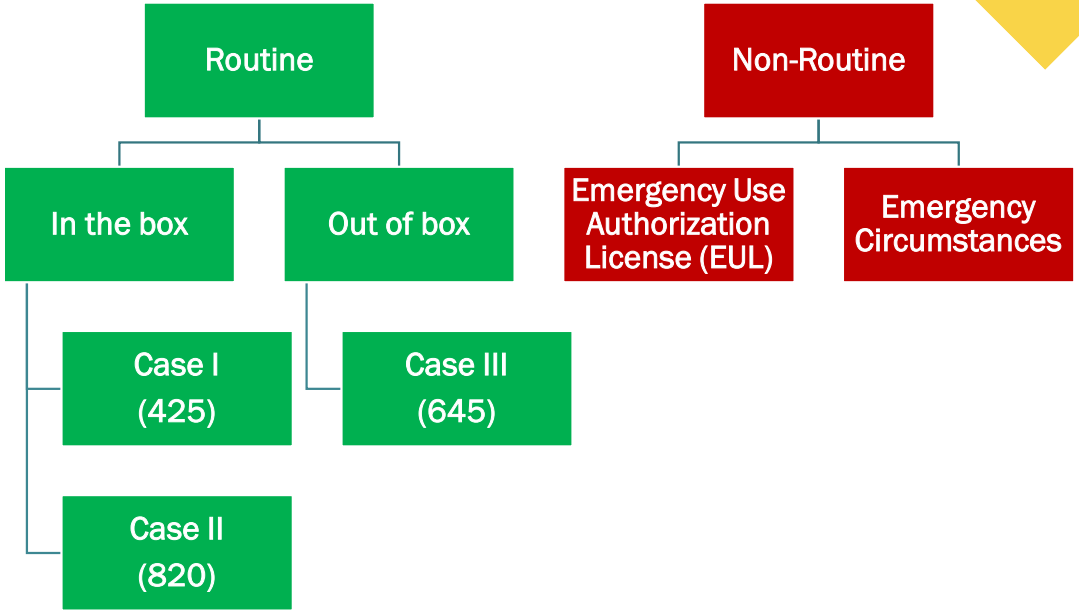
The decree shall apply to organizing registration rules and procedures for human pharmaceutical products, which include:

- This decree shall not apply to the registration of products containing new active chemical entities that have not previously been registered in any of the reference countries, or biological/herbal/veterinary products.

Human Registration of Pharmaceutical Products



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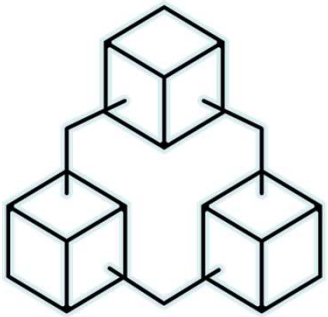

Boxes System

The number of similar in the box consisting of a group of pharmaceutical forms shall be determined starting from the innovator product of the active ingredient.

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Boxes

The number of products for each concentration of the pharmaceutical form with the same active ingredient shall not exceed 12 products, divided as follows:

1 Brand or Innovator	1 Imported generic
10 Generics*	

1 Brand or Innovator	5 Imported generic
6 Generics*	

For the products, whose manufacturing requires high technology which is unavailable in the Egyptian manufacturers. Such products are determined in accordance with the decision of the Central Administration of Operations

*2 Boxes max for toll - in accordance with the priority of submission and the fulfillment of the requirements.

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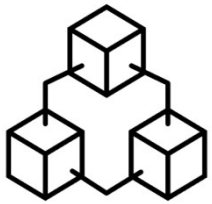

Boxes

The number of products for each concentration of the pharmaceutical form with the same active ingredient shall not exceed 12 products, divided as follows:

- In the event of completing the number of permitted products for any pharmaceutical form within the same box for each registration type with the same concentration:

- Registration requests for the rest of the concentrations shall not be accepted, except for the following:
  - The Line Extension cases (Adding of another concentration for the same company with the same pharmaceutical form or in different pharmaceutical forms within the same box of the same active ingredients for the registered products that have a valid marketing authorization license or for the under-registration products whose registration procedures are in progress).

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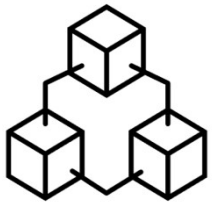

Boxes
Open - Close

If there is availability in the box:

- In the case there are documents required to be fulfilled; the company shall be obligated to complete any required documents within a maximum of 3 months from the date of being notified.
- The company shall be obligated to pay the service consideration of product registration before heading for receiving the registration request approval, provided that the company shall receive the registration request approval within 30 working days from the date of its issuance, otherwise the registration request shall be cancelled.

If there is no availability in the box:

- The fulfilled registration request shall be registered in the waiting list record as per the regulating rules in accordance with the date and time of its submission until the product has availability in the box for whatever reason.
- The company whose turn comes in the waiting list shall be granted the approval of the box. In the case that there are documents required to be fulfilled, a grace period shall be given to the company whose turn comes in the waiting list to fulfill these required documents within 3 months from the date of being notified of the required documents to be fulfilled.

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Appendix No. (2)
Table of the merge and dividing of Pharmaceutical form in the box

Central Administration of Pharmaceutical Products
General Administration of Human pharmaceuticals registration

Guideline

Appendix No. (2) Table of the merge and dividing of pharmaceutical forms in the box									
1	Box I	Solid unit dosage form (traditional (Conventional) immediate release)	Tablets (Sugar - Film Coated)	Hard Gelatin capsules	Dragees (Tablet in French)	Caplets	Lactabs	Pilules (Pills / Capsule)	Spansules (Sugar coated Pills /Capsule)
			Lozenges						
			Gums						
			Soft Gelatin capsules						
2	Box II	Solid Unit Dosage Form (Fast Immediate Release)	Quick Tablets	Flash Tablets (DISSOLVE IN MOUTH only)	Oro-disintegrating	Melt tablets			Oro-Dispersible Tablets
			Chewable Tablets						
			sublingual Tablets						
			Buccal Mucoadhesive Tablets (Buccal Mucoadhesive Tablets (prolonged only in mouth for local effect or systemic effect)						
			effervescent Tablets		Disintegrating Tablets	Dispersible Tablets			
			Effervescent Granules/Powders		Powder in Bottle (each dose will be reconstituted at time of use				Powder / Sachets

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Registration Request

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Case I

Local	Imported
Locally manufactured products for the purpose of local marketing or for tender and export or for export only.	Imported products
Applies for locally manufactured products	Applies for imported products
2 Requests / Month (Factory) 1 Request / Month (Toll)	1 Request / Month

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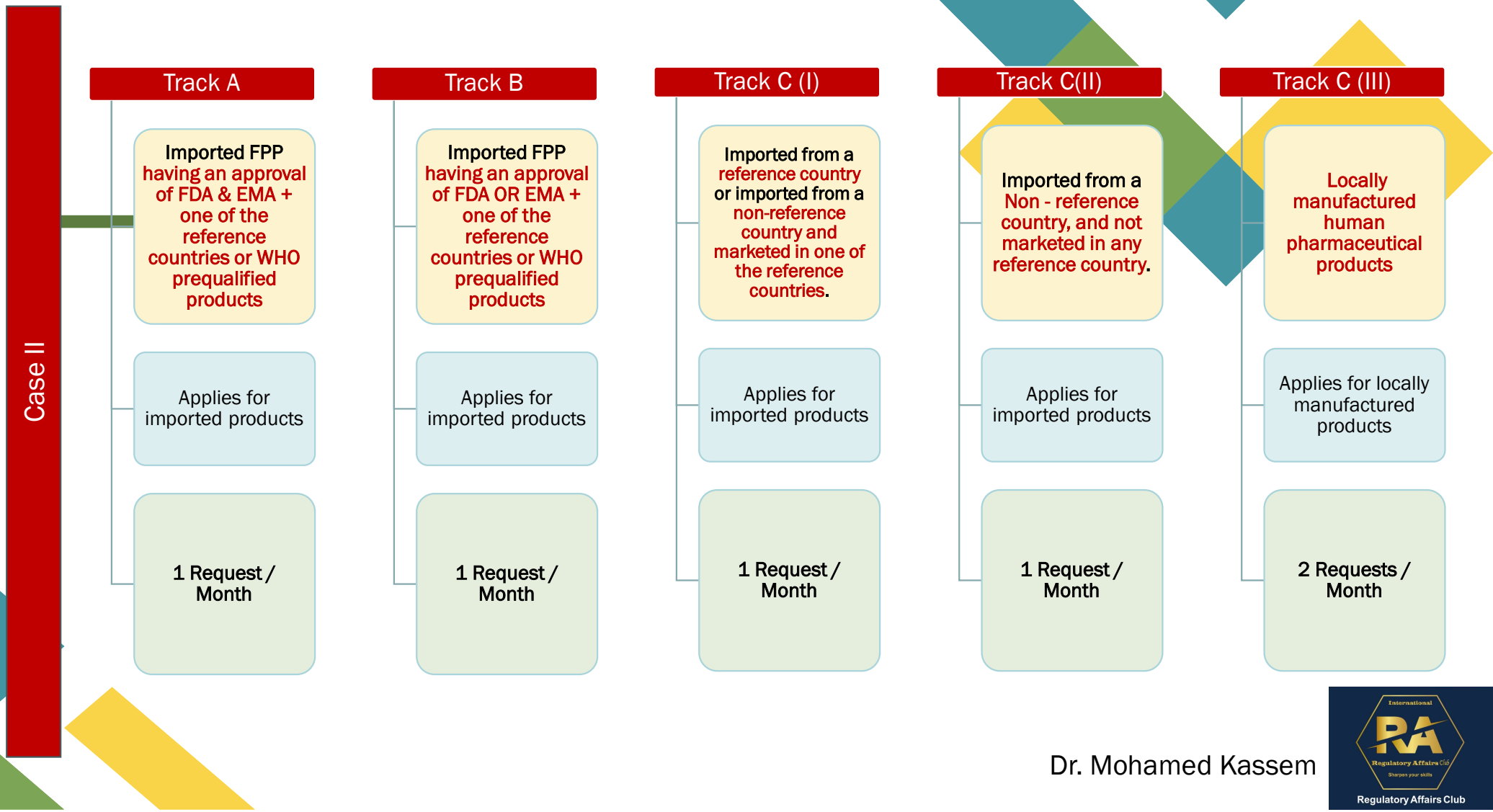

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Case III

Track A	Track B	Track C	Track D	Track E
Drug Shortage according to current updated list by EDA which is updated every 3 Months	**Manufactured locally on rare production lines** and specified by EDA. provided that such lists are announced once a year	Applied for by the owners of the **licensed factories during the last ten years from the decree**	applied for by the owners of **under-construction factories**	produced for the **purpose of local marketing and exporting with no less than (25%)** of the production
Applies for both local manufactured and ***imported products***	Applies for locally manufactured products	Applies for locally manufactured products	Applies for locally manufactured products	Applies for locally manufactured products
4 Requests (Factories) **2 Requests** (Toll) **4 Requests** For imported products)	**2 Requests** licensed factories or under construction) **1 Request** (Toll)	**1 Request** per Month Total of 20 products **(Valid for 2 years from issue date)**	**1 Request** per Month Total of 20 products **(Valid for 2 years from issue date)**	**1 Request** per month Total of 2 requests per year.

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Non-reference products

- For locally manufactured human pharmaceutical products that do not have a scientific reference.
- If the product does not have a scientific reference with the same pharmaceutical form, concentration or method of administration, the company shall submit the scientific files of the product to the specialized scientific committees within 30 working days from the date of issuing the registration request approval, otherwise, the registration request shall be canceled.
- The product shall be presented to the specialized scientific committees within 60 working days from the date of receiving the completed scientific file.

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Pre-submission Preparation
(Rolling submission)

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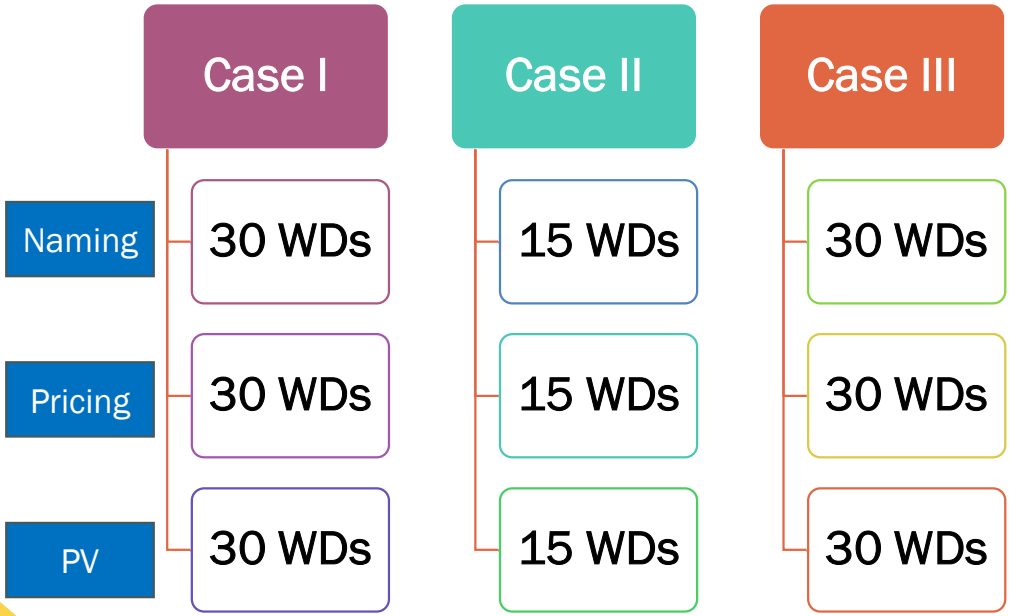
Pre-submission Preparation ensure the submission of the following within the due dates:



- A list of 15 names.
- 20 WD allowed to submitted new list.
- 4 lists allowed.
- In case of rejection of 4th list, scientific name alongside with company name will be approved.

- The documents required for pricing the local products and the imported products shall be Submitted.
- Export only or Export and tender products are exempted from submission of pricing file.

- The documents necessary to fulfill the Pharmacovigilance requirements as per the regulatory rules of the GAPV.

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Pre-submission Preparation
Prepare for pilot / production batches for locally manufactured products

- Company shall start looking for API(s) supplier/manufacture.
- Seek Pre-evaluation of S-Part (optional)
- Product development along with the development of analytical methods.
- Preparation of packaging materials, seeking approvals (if needed)

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Pre-submission Preparation
1- Starting production

- Importation and custom release General Administration shall be addressed to apply for importing the active ingredient / packaging material as per the registration request approval.

- Before production, the company shall apply to the CAO as per the regulatory guideline of the relevant central administration to manufacture three pilot/ production batches in the presence of an inspector from the Central Administration of Operations, provided that pilot batches shall never be marketed in the local market.

- Pilot batches/production batches composition is attached to inspector report, signed/stamped (ensure an original copy to be kept at the company)

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Pre-submission Preparation
2- Stability study

- Accelerated stability study for 6 Months and Long-term stability study for 12 Months “At least” for the 3 Pilot/Production batches.
- Product will be granted an initial shelf life for 2 years, till obtaining the final shelf life according to the quality module.
- The company shall inform CAO for the Place and Start date of the stability studies, before the start the study, mentioning the API manufacturer, batch numbers, batch type, manufacturing site name, product name and details, storage condition according to dosage form and the scientific reference.
- e.g.: Diluent, Solvent, & it's volume (for injectable products), In-use shelf life & shelf life after opening / dilution or reconstitution & storage conditions, etc...)
- Company can request to submit the long-term stability study for 6 months only, along with a commitment to continue the long-term study for 12 months, for the same batches. (Fees applies)

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Pre-submission Preparation
3- Bioequivalence study

- Company shall submit a request with the attached composition on which the production is made and signed and stamped by the inspector of the Central Administration of Operations to determine the status of the product in terms of the type of the study required. (Studies required)
- The company shall be obligated to send a commitment stating the presence or absence of any other concentrations of the same active ingredient in the same pharmaceutical form (be under registration or registered).
- If there are other concentrations, the company shall submit the compositions approved by EDA for these concentrations so that the company's request can be adjudicated.
- The Evaluation Unit of Bioavailability and Bioequivalence Studies of Human Pharmaceuticals shall notify the company of the type of the required study.

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Pre-submission Preparation
3- Bioequivalence study

- In case of registering the locally manufactured products intended for export only, the company may submit a request to be exempted from conducting the studies of bioavailability, bioequivalence and comparative dissolution for human pharmaceuticals within the Arab Republic of Egypt, provided that the company shall submit the study upon conducting it abroad.

- This procedure is stated as a condition in the marketing authorization license.

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Pre-submission Preparation 4- Studies & requirements submission

❑Bioavailability and Bioequivalence

- Company shall submit Module 5 for Generics, to Bioavailability and Bioequivalence unit, for evaluation. (evaluation within 60 WDs)
- Company must fulfil all comments (if any) within 60 WDs.

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Pre-submission Preparation 4- Studies & requirements submission

❑Company shall submit Module (3) to the Administration of technical affairs.

- The S-Part, shall not be evaluated in case of the submission of a proof for previously submitted and approval with same version number for the same API manufacturer, in the following cases:
  - Optional pre-evaluation of the quality file of the active ingredient.
  - Optional listing of the active ingredient for pharmaceutical products.
  - Using of active ingredients listed in the Egyptian Drug Authority's list of active Ingredients for pharmaceutical products.
- In all cases, letter of access , shall be submitted within the S-Part (API part)

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Pre-submission Preparation 4- Studies & requirements submission

❑Inner leaflet & Mockup approvals:

- The company shall submit application to approve the inner leaflet of the product, in accordance with the regulatory guide of the General Administration of Pharmaceutical References and Inserts , after approving Module (3)
- The company shall submit application to approve outer and inner label, after approving module (3)
- The company be allowed to get approval for inner leaflet and mockup for the product, for concerned departments, before approving module (3) in case of producing a production batch instead of pilot batch.

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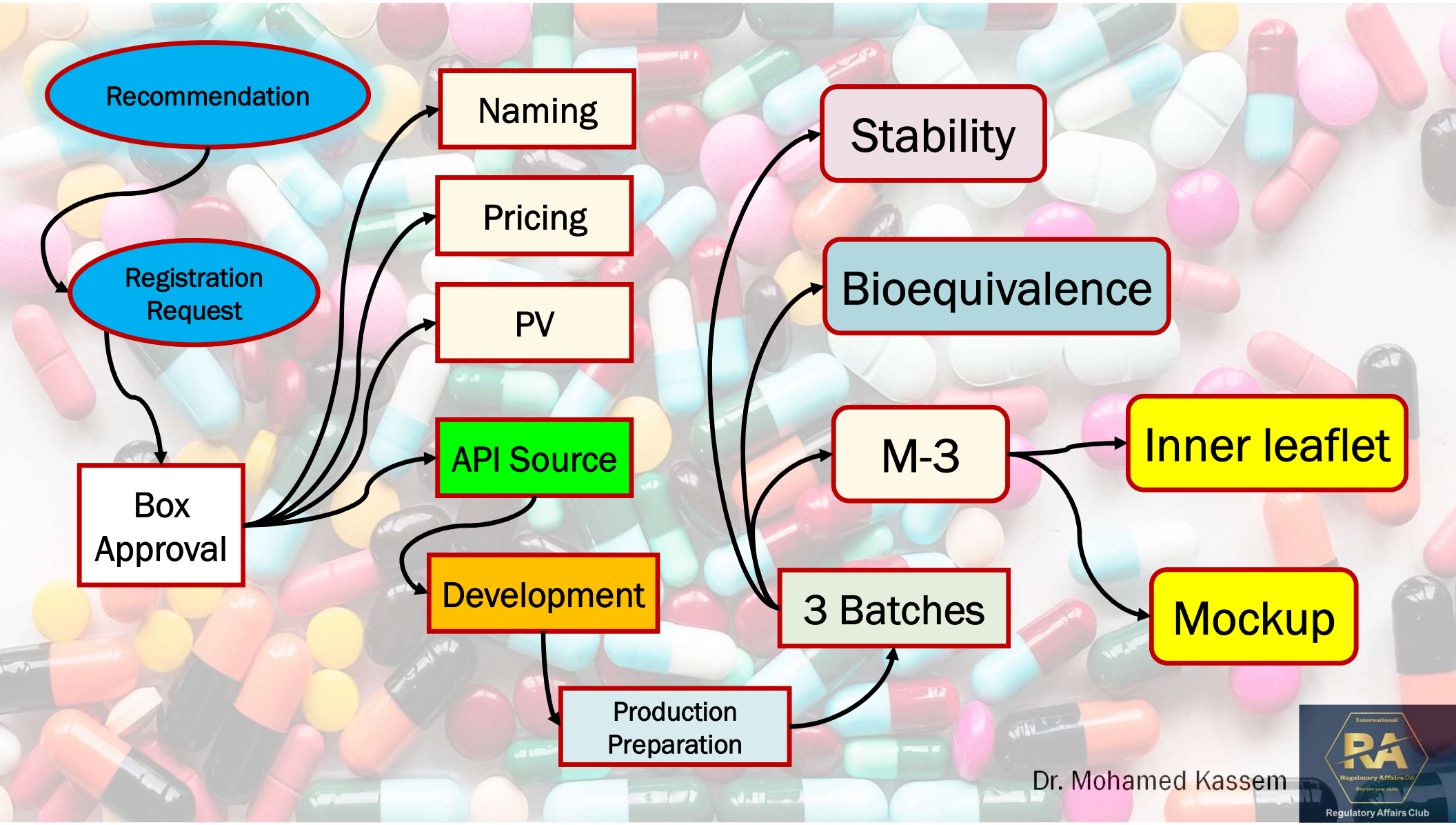
Recommendation
Registration Request
Box Approval
Naming
Pricing
PV
API Source
Development
Production Preparation
Stability
Bioequivalence
M-3
3 Batches
Inner leaflet
Mockup
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Registration Dossier Submission

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Timeline to submit Registration Dossier

Imported Products	Local Products		
Case 1 & Case 3 (A)	Case 3 (A) Drug Shortage	Other cases Export	Other Cases Tender & Export
6 Months From Pricing or PV	21 Months from Pricing or PV	33 Months from Box Approval or Scientific Committee	33 Months from Pricing or PV
Extra: 6 Months 2 times (each 3 Months)	Extra: N/A	Extra: 12 Months 4 times (each 3 Months)	

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Registration Dossier Submission

- The applicant shall submit the registration dossier according to guidelines, within the time frame according to different cases.
- All checklists / requirements shall be fulfilled within the defined due date.
- After fulfilment of the registration dossier and all requirements, it will be presented to the technical committee for drug control to adjudicate whether to issue or not the marketing authorization license and in case of approval a marketing authorization license shall be issued.

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Production / Importation grace periods

Case I	• 18 Months from license issuance
Case III A Local	• 6 Months from license issuance
Case III A Imported	• 3 Months from license issuance
Case III B	• 12 Months from license issuance
Case III C	• 12 Months from license issuance
Case III D	• 24 Months from license issuance
Case III E	• 9 Months from license issuance • Export (25%) within 30 Months from license issuance

The products registered for export only or for tender and export are not subjected to the grace periods of production and importation.

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Post registration commitments
(Locally manufactured Products)

	In case of Pilot Batches	In case of Production Batches
CADC Analysis	• First batch analysis at CADC (Administration of Evaluation and Approval) • Second & third batches analysis at CADC (Administration of post approval control)	The company is committed to perform the analysis of 3 batches produced before issuance of registration license, as follows: • First batch analysis at CADC (Administration of Evaluation and Approval) • Second & third batches analysis at CADC (Administration of post approval control)

Commercial production within time frame, to avoid cancellation of the product license.

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Post registration commitments
(Locally manufactured Products)

	In case of Pilot Batches	In case of Production Batches
Stability Study	• Accelerated and long-term Stability study on the first 3 production batches, after issuance of registration license. • Studies to be submitted together within 5 years from registration license issue date.	• The company is committed to complete the long-term stability study on the first 3 production batches, produced before registration license.

Commercial production within time frame, to avoid cancellation of the product license.

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Post registration
(Locally manufactured Products)

- The company is committed to submitting a Process Validation study to the CAO as soon as it is conducted on the three production batches, and this is stated as a condition in the marketing authorization license.

- Proof of submission and approval of Process Validation by the Central Administration of Operations shall be provided.

- Adherence of the company to submitting a report on the safety, quality and efficacy of the registered product during the last three months of the fifth year from the date of marketing authorization license. In the event of non-compliance with that procedure, the marketing of the product shall be suspended based on a report issued by the relevant central administrations.

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Central Administration of Pharmaceutical Products
General Administration For Human Pharmaceuticals Registeration

Notice to applicant

Flowcharts for
EDA Chairman Decree 450 for the year 2023

Year 2024

Code: EDREX:NP.CAPP.064
Version No: 5
Issue Date: 9/1/2025
Effective date: 9/1/2025

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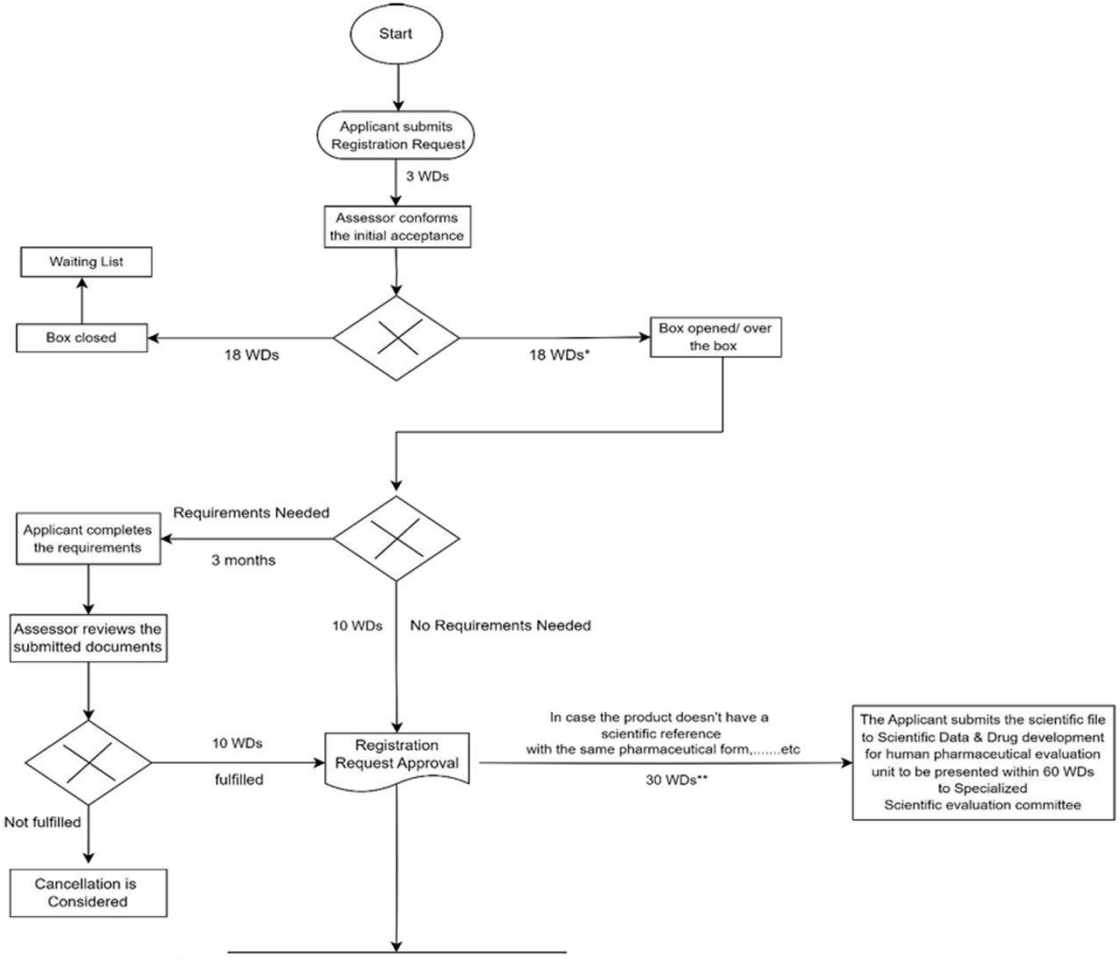
EDA Chairman Decree (450/2023) Flowchart for Locally Manufactured Generic Products with assessment timelines



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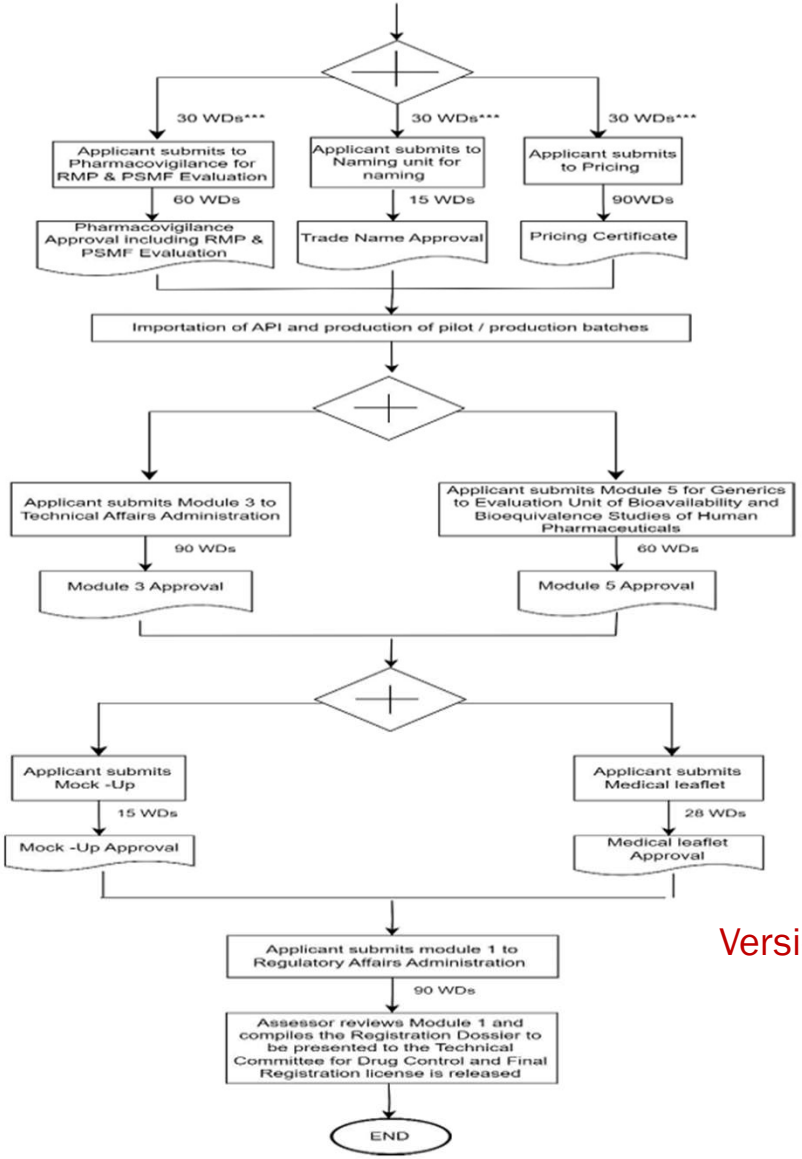

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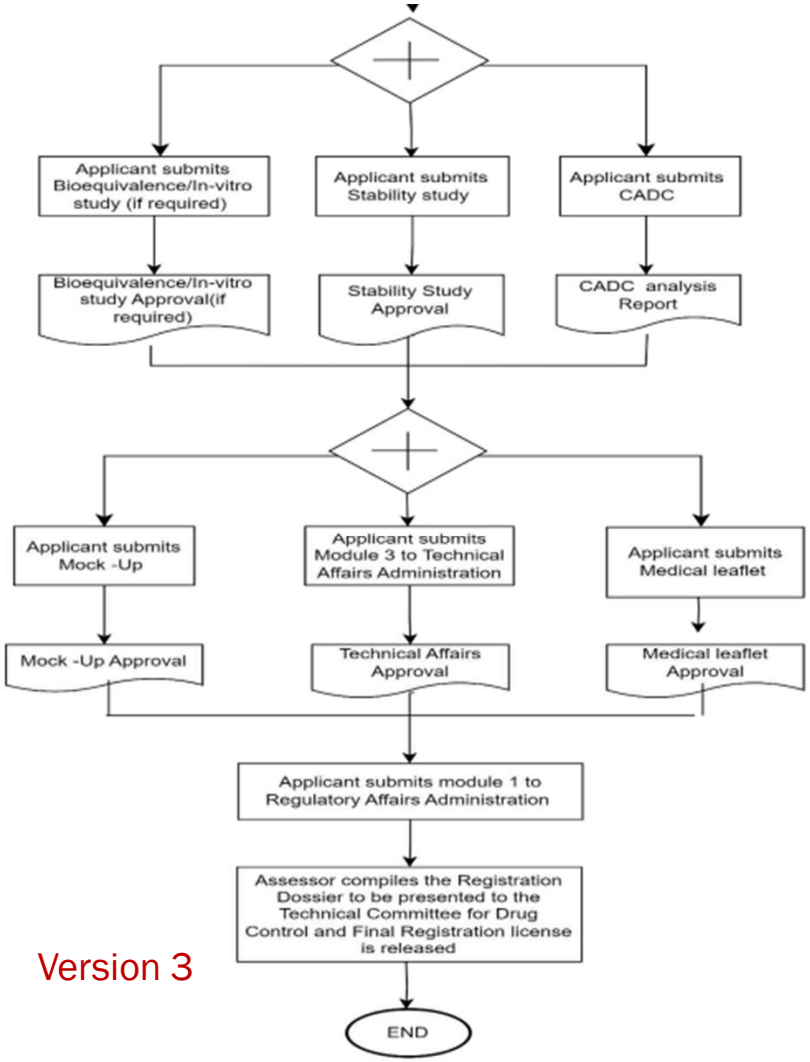

Version 3

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Q&A

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Thank you

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