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# Regulatory and Ethics Environment, Difficulties and Challenges

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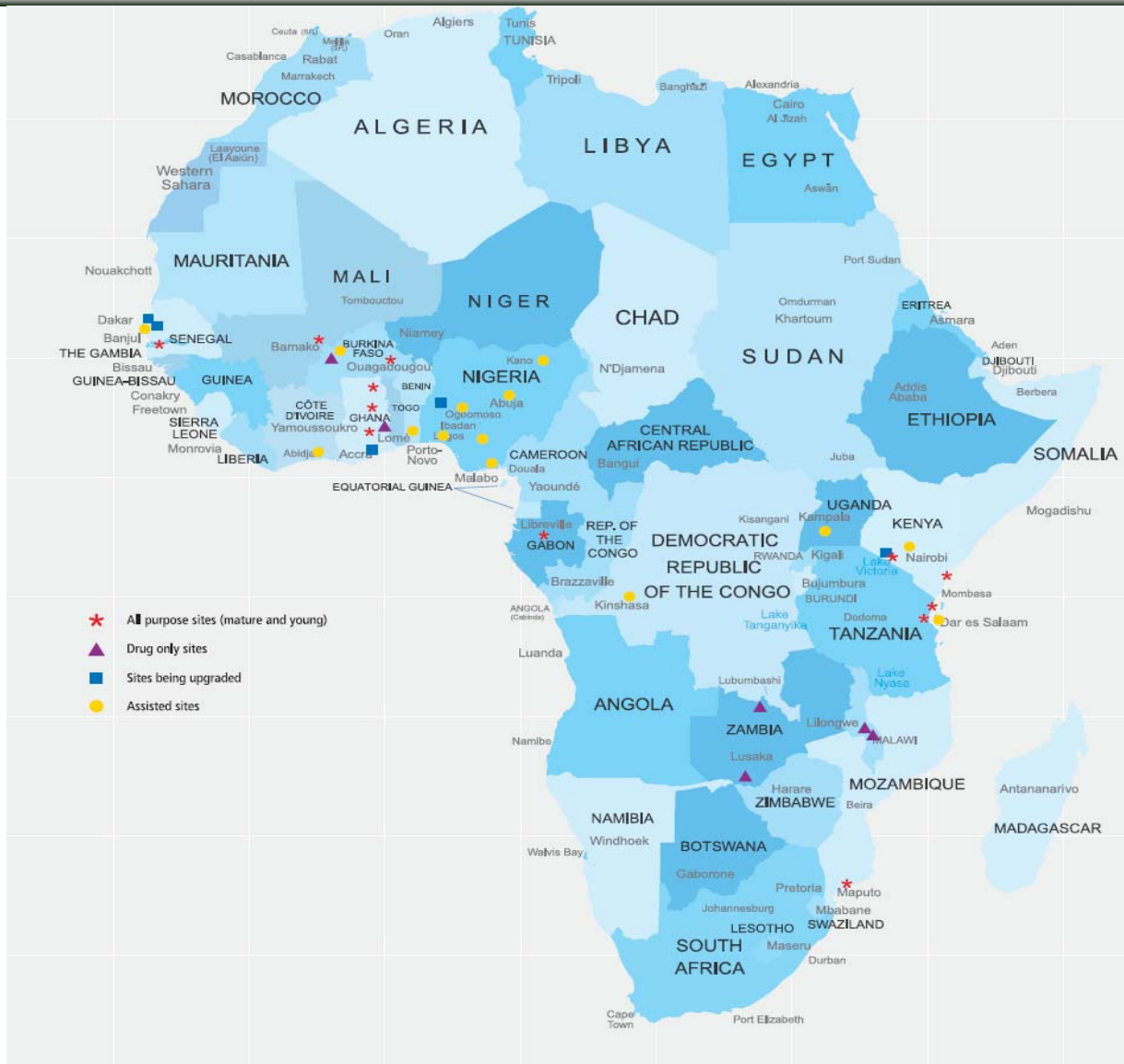


# Preamble

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- Increased funding for R&D on diseases of poverty in Africa
- Subsequent increased need for functional regulatory and ethical reviews
- Substantial improvements in the ethical framework
- Regulatory environment largely remaining weak
- Unprecedented and changing trends pose a challenge for products primarily not intended for the developed world.





## 6 MATURE ALL-PURPOSE SITES

- 1 US Army Medical Research Project-Kenya (USAMRU-K), Kisumu (Kenya)
- 2 Wellcome Trust/KEMRI, Kilifi (Kenya)
- 3 Malaria Research and Training Centre (MRTC), Bancoumana, Bandiagara, Donegoubougou (Mali)
- 4 Centro de Investigaçao em Saude da Manhica (CISM), Manhica (Mozambique)
- 5 Bagamoyo/Ifakara Health Research & Development Centre (IHRDC), (Tanzania)
- 6 Medical Research Council (MRC): Basse, Banjul/Fajara, Farafenni (The Gambia)

## 6 YOUNG ALL-PURPOSE SITES

- 1 Hospital Albert Schweitzer (HAS): Lambarene, Libreville (Gabon)
- 2 Agogo Clinical Trial Centre, Kumasi Centre for Collaborative Research (KCCR) in partnership with the School of Medical Sciences (SMS), Kumasi (Ghana)
- 3 Kintampo Health Research Centre (KHRC), Kintampo (Ghana)
- 4 National Institute for Medical Research (NIMR), Tanga (Tanzania)
- 5 Navrongo Health Research Centre, Navrongo (Ghana)
- 6 Centre National de Recherche et de Formation sur le Paludisme (CNRFP), Oubritenga/Ouagadougou (Burkina Faso)

## 6 DRUG-ONLY SITES

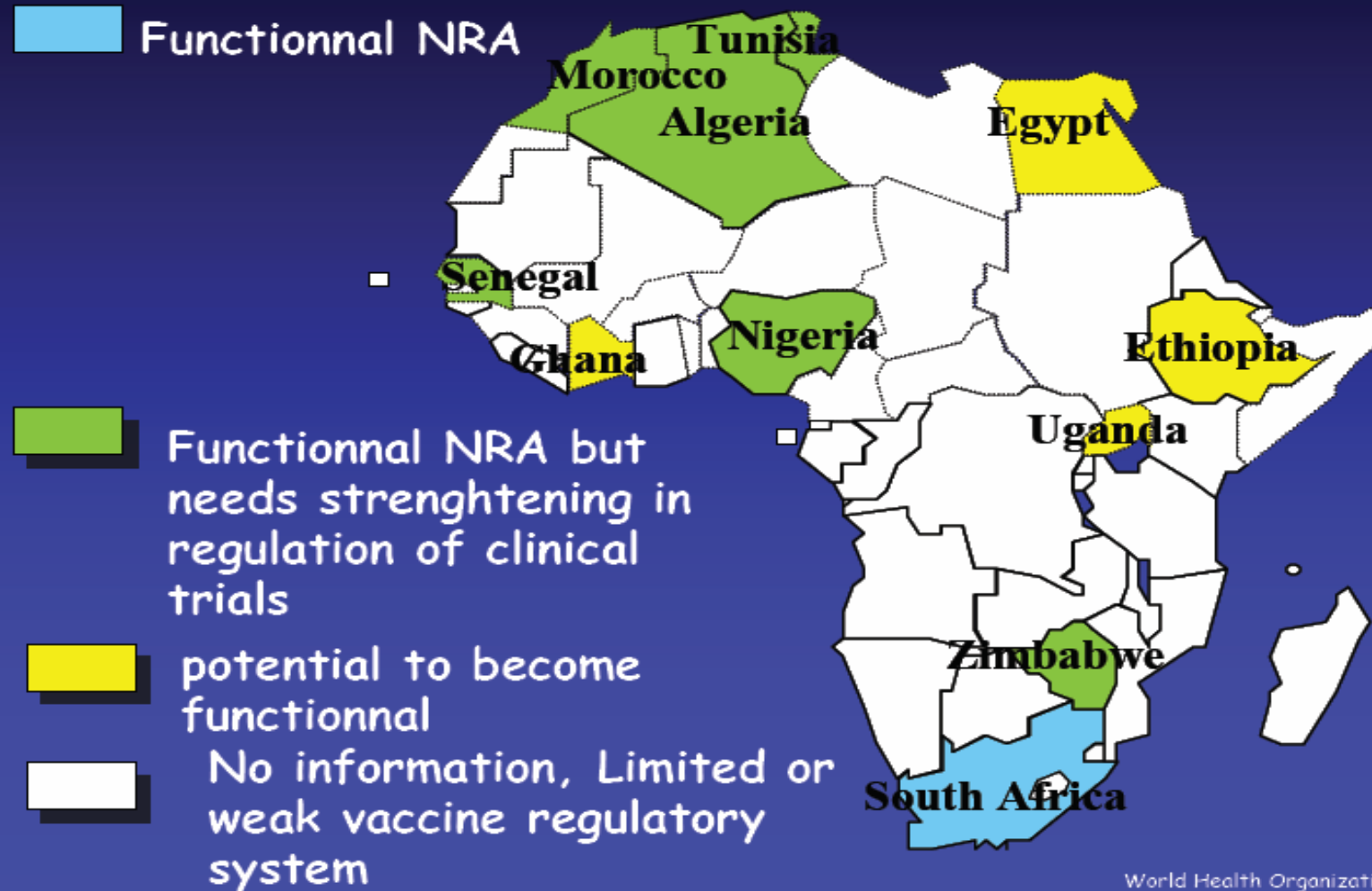
- 1 Centre de Recherche en Santé de Nouna (CRSN), Nouna (Burkina Faso)
- 2 Blantyre Malaria Project Research Clinic, Ndirande, Blantyre (Malawi)
- 3 QE Hospital Malawi-Liverpool- WellcomeTrust Research Programme (MLW), (Malawi)
- 4 Malaria Institute at Macha, Choma (Zambia)
- 5 Tropical Diseases Research Centre (TDRC), Ndola (Zambia)
- 6 Komfo Anokye Teaching Hospital (KATH), Kumasi (Ghana)

THE MALARIA PRODUCT PIPELINE: PLANNING FOR THE FUTURE

HEALTH POLICY DIVISION  
THE GEORGE INSTITUTE FOR INTERNATIONAL HEALTH



# FUNCTIONNAL NRA THAT HAVE CAPACITY TO REGULATE VACCINES , AFRICA, July 2006

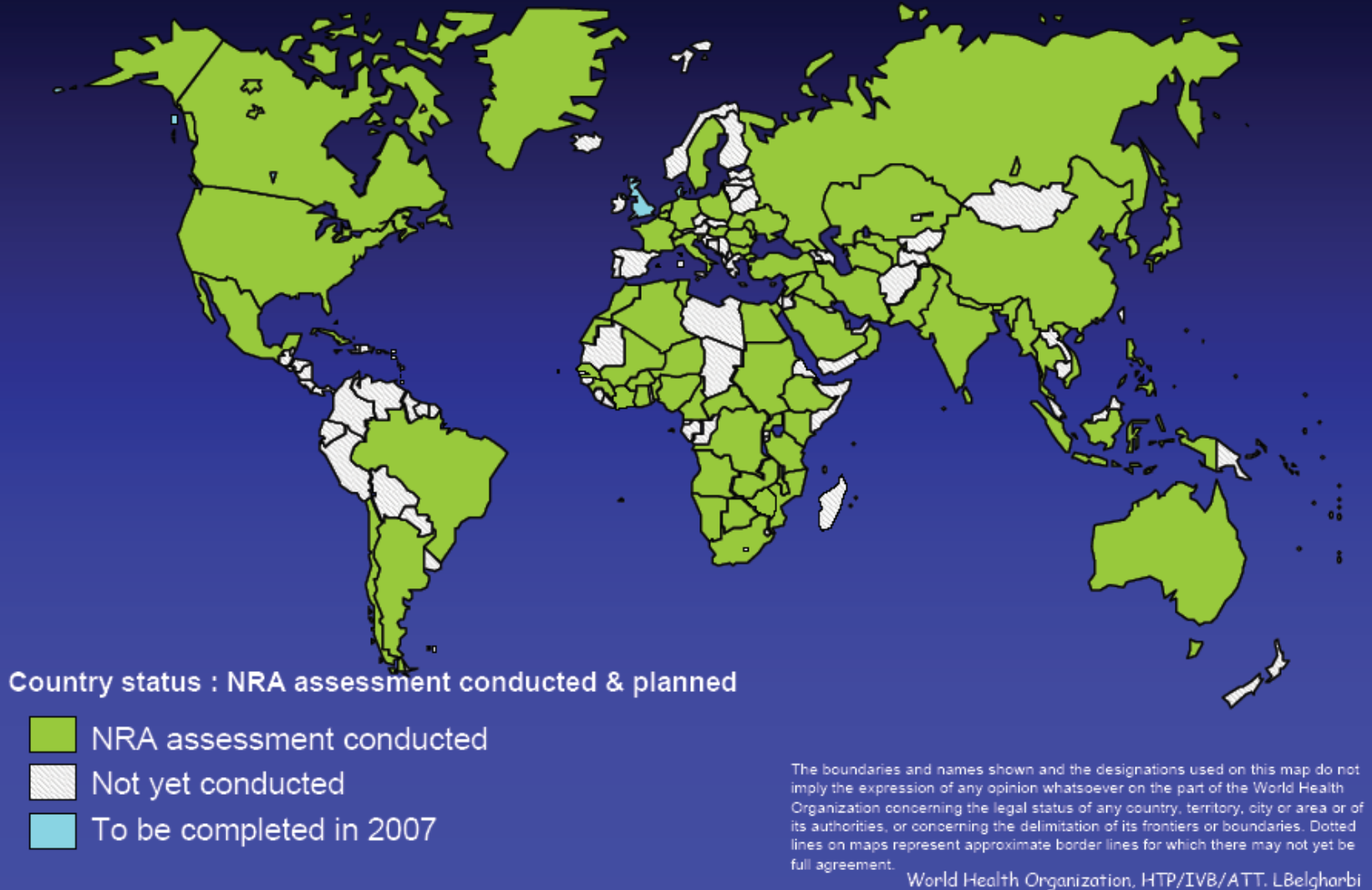


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# INVENTORY OF VACCINE REGULATORY SYSTEMS: 86 NRAs assessed, Oct.1998 - June 2007



# Ethical Review Capacity in Africa

- A study in early 2000 showed that 36% of WHO member countries did not have ERCs/IRBs
- AMANET conducted African ERC/IRB Needs Assessment Survey: probably the biggest survey of Africa to date
- 28 committees surveyed across Africa; analysis in progress
- AMANET Survey covers
  - Availability of resources for the committees
  - Training needs of ERC/IRB members
  - Availability of SOPs
  - Data Management and archiving systems
- To address the needs, US\$50,000 capacity strengthening grants to be given to 21 Ethics Committees





# Issues

## Regulatory

- Product registration and marketing traditionally through colonial lines
- Few NRAs formally exist
- In Africa, 53% of NRA's - limited or no capacity, 37% - basic capacity and only 10% moderate capacity (WHO, 2006)
- Registration processes outdated
- Unapproved and unregulated products circulating on markets (WHO2005; 30% in Kenya)
- Inadequately monitored and unapproved clinical trials
- Inadequate pharmacovigilance
- Emerging regulations - article 58 EU

## Ethics

- Frameworks improving but generally below expected international standards
- Inadequate training of Ethics Committee members
- Limited professional and educational diversity in the committees
- Limited experience and knowledge of reviewing and monitoring complex clinical trials
- Cumbersome paper-based data management and archiving system
- Generally, resource-constrained
- Various positions regarding standard of care issues; during and post-study



# On going efforts

## Regulatory

- Joint reviews
- AVAREF
- Global Training Network
- Regional harmonisation of guidelines – SADC
- DCVRN

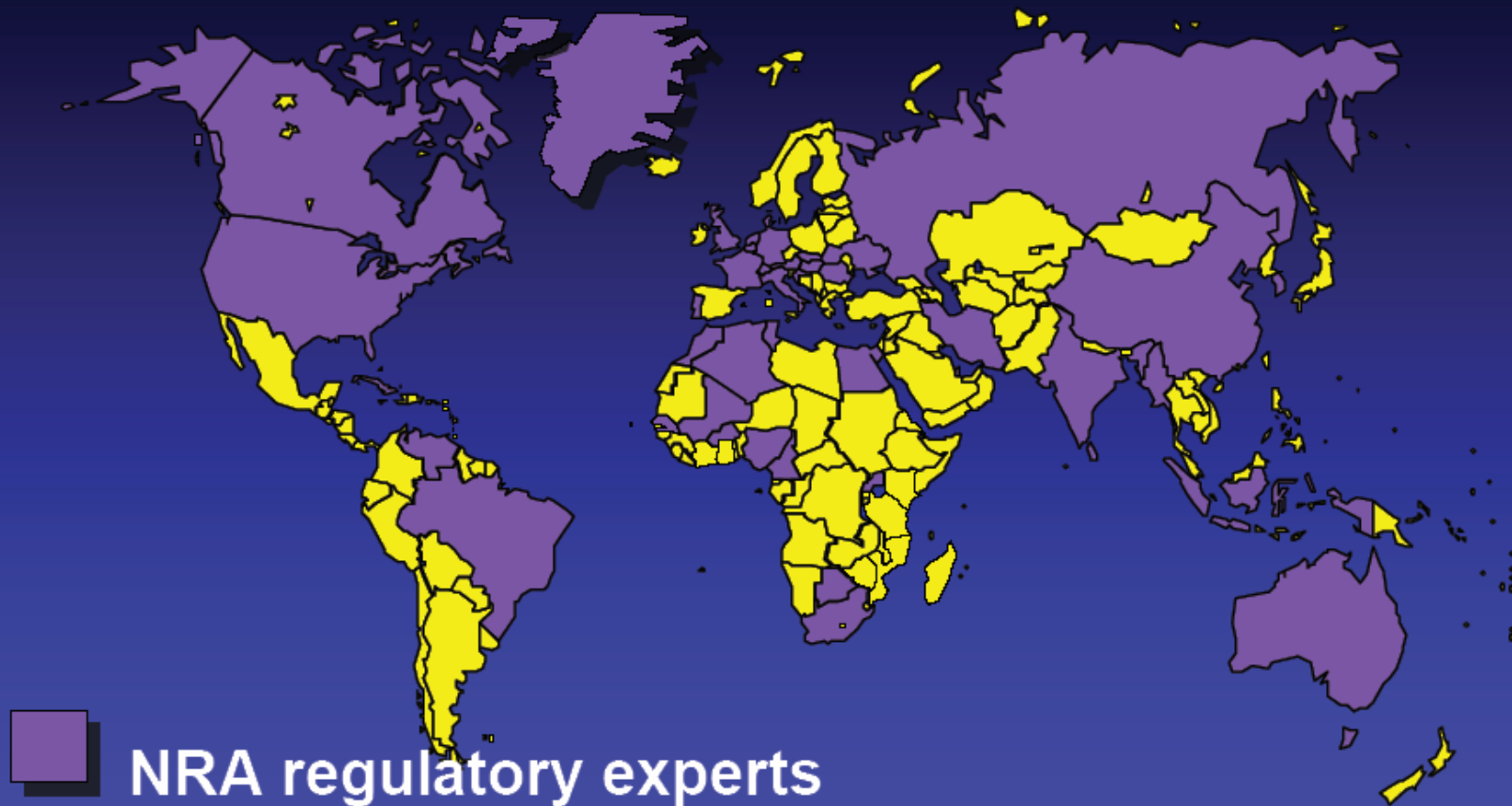
## Ethics

- EDCTP
- On going AMANET survey + capacity building project
- PABIN
- SARETI-South African Research Ethics Training Initiative





# 350 regulatory specialists available in the WHO global roster to assist countries to develop regulatory capacity (Oct.1998 – June 2007)



The boundaries and names shown and the designations used on this map do not imply the expression of any opinion whatsoever on the part of the World Health Organization concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries. Dotted lines on maps represent approximate border lines for which there may not yet be full agreement.



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**By end of 2010 : 37 out of 46 COUNTRIES  
WILL HAVE DEVELOPED APPROPRIATE CRITICAL  
REGULATORY FUNCTIONS**

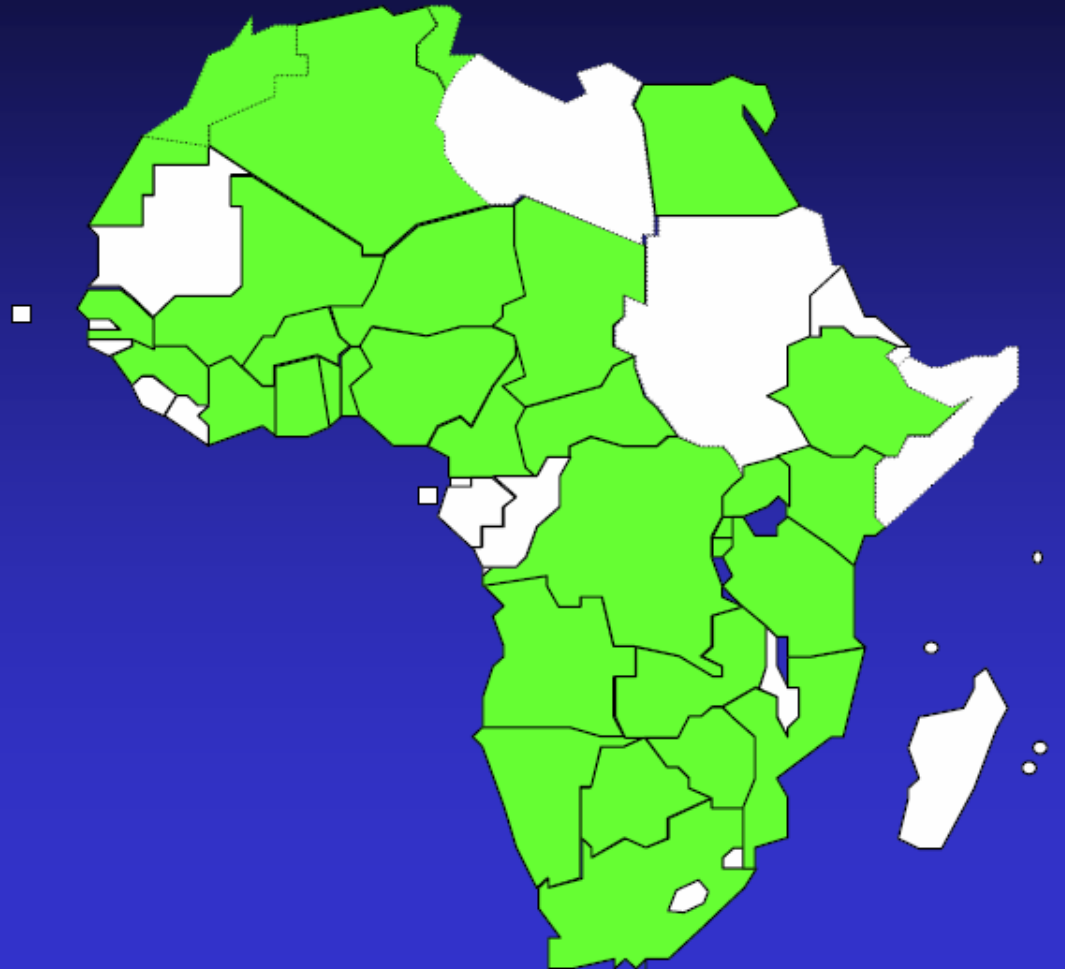
**2006: 6 countries**

**2007: 6 countries**

**2008: 8 countries**

**2009: 8 countries**

**2010: 9 countries**



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# Competing challenges

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## Capacity issues

- Weak/No regulations
- Lack of skilled human resources for review of IDD dossiers
- National Regulations needs to be updated in response to emerging international regulations (Process of articulating applicable laws by governments)
- Development of pharmacovigilance systems by local Authorities
- Regulatory Pathway for IND\*\*\*
- Process of regional harmonization of regulation

## Managerial/Operational

- Inadequate staff
- Minimal solicitation from external expertise (42%, WHO 2006)
- Most financed from state budget with revenues generated paid in public treasury
- Sponsors & manufactures (“unintended”)interference and influences



# Recommendations

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- Continue support Networks...
- Development and Harmonization of SOPs/Guidelines for Ethics Committees and NRAs in Africa is crucial
- Accelerated Regulatory Pathway
  - better synergy, option for parallel and reduction in duplication between article 58 procedures and PQ,
- Its unethical to restrain life saving products only because of bureaucratic procedures



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*Thank You*

