

The logo for the Association for Accessible Medicines (AAM) features the lowercase letters 'aam' in a bold, white, sans-serif font on a blue rectangular background.

Association for Accessible Medicines

**Your Generics & Biosimilars Industry**

# Quality & Overseas Manufacturing

## An Ongoing U.S. Policy Debate

Jeff Francer, Interim CEO

The 5<sup>th</sup> Indian Pharmaceutical Forum 2020

February 27, 2020

# 90%

PRESCRIPTIONS  
FILLED IN THE  
U.S. ARE  
DISPENSED AS  
GENERICS

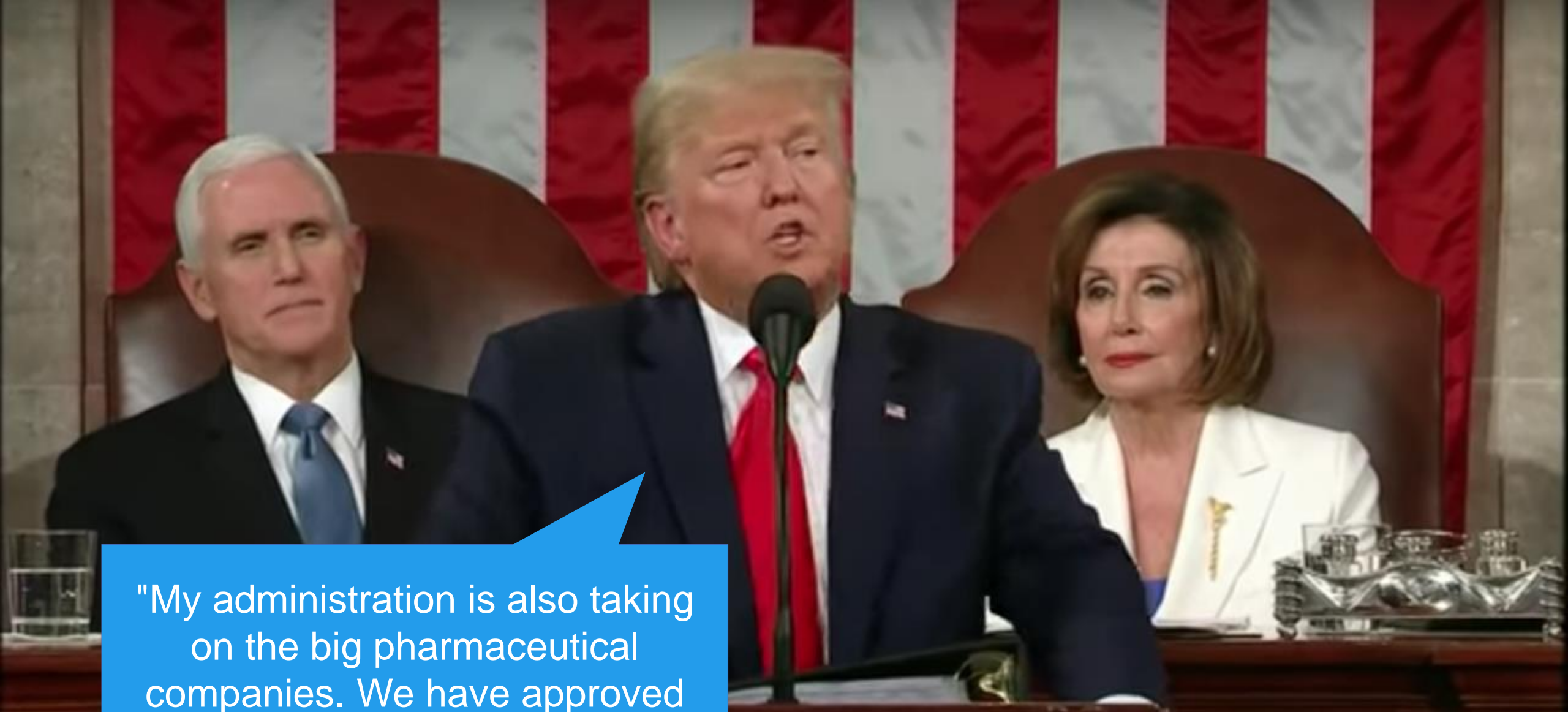


YET GENERICS  
ACCOUNT FOR ONLY

# 22%

OF ALL DRUG  
SPENDING

Source: IQVIA 2019



"My administration is also taking on the big pharmaceutical companies. We have approved a record number of affordable generic drugs."

**President Donald Trump**

State of the Union  
February 4, 2020



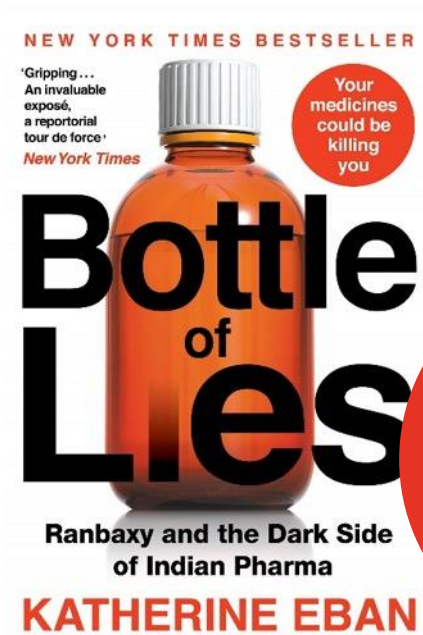
# Quality & Overseas Manufacturing: A Growing Policy Storm in the U.S.

- 💧 Quality criticisms
  - 💧 Alarmist headlines
    - 💧 Federal & state
- 💧 Safety questions
  - 💧 Right- & left-wing talk radio
    - 💧 National security challenges
      - 💧 Republican & Democratic concerns
- 💧 Presidential & local candidates

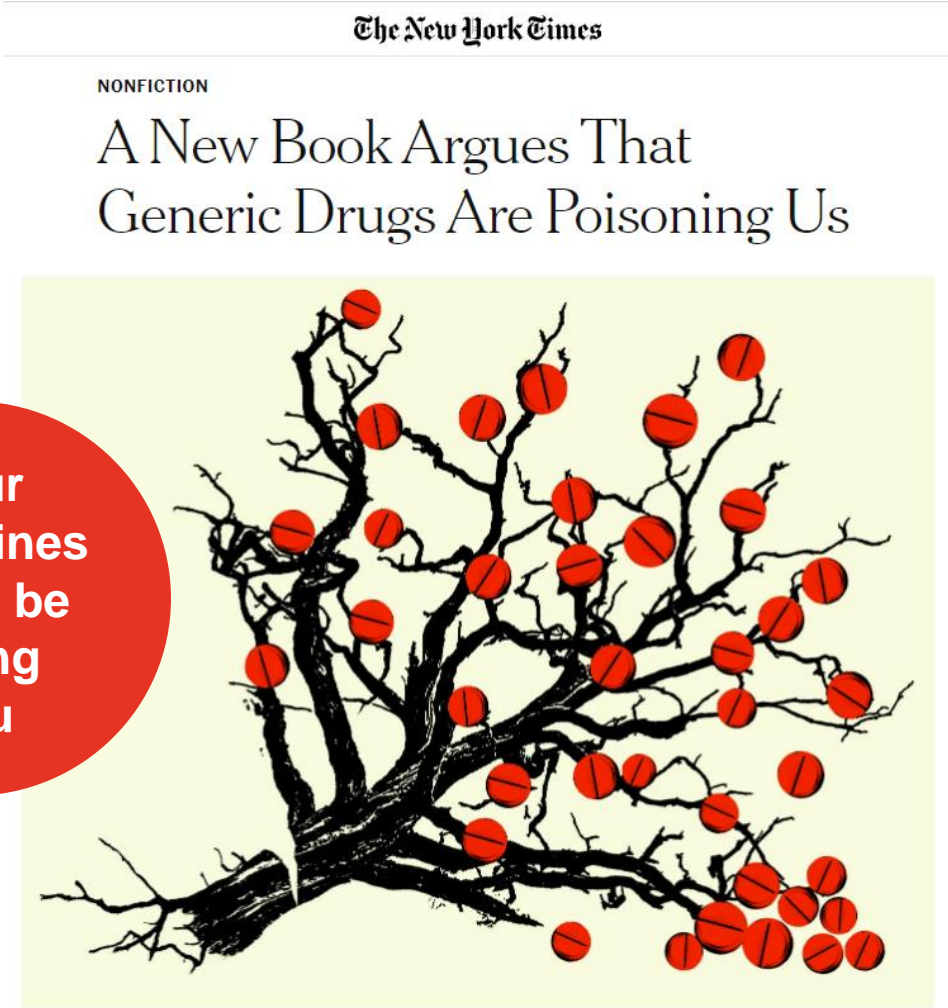


# Quality & Manufacturing

## Generics Are Under Attack

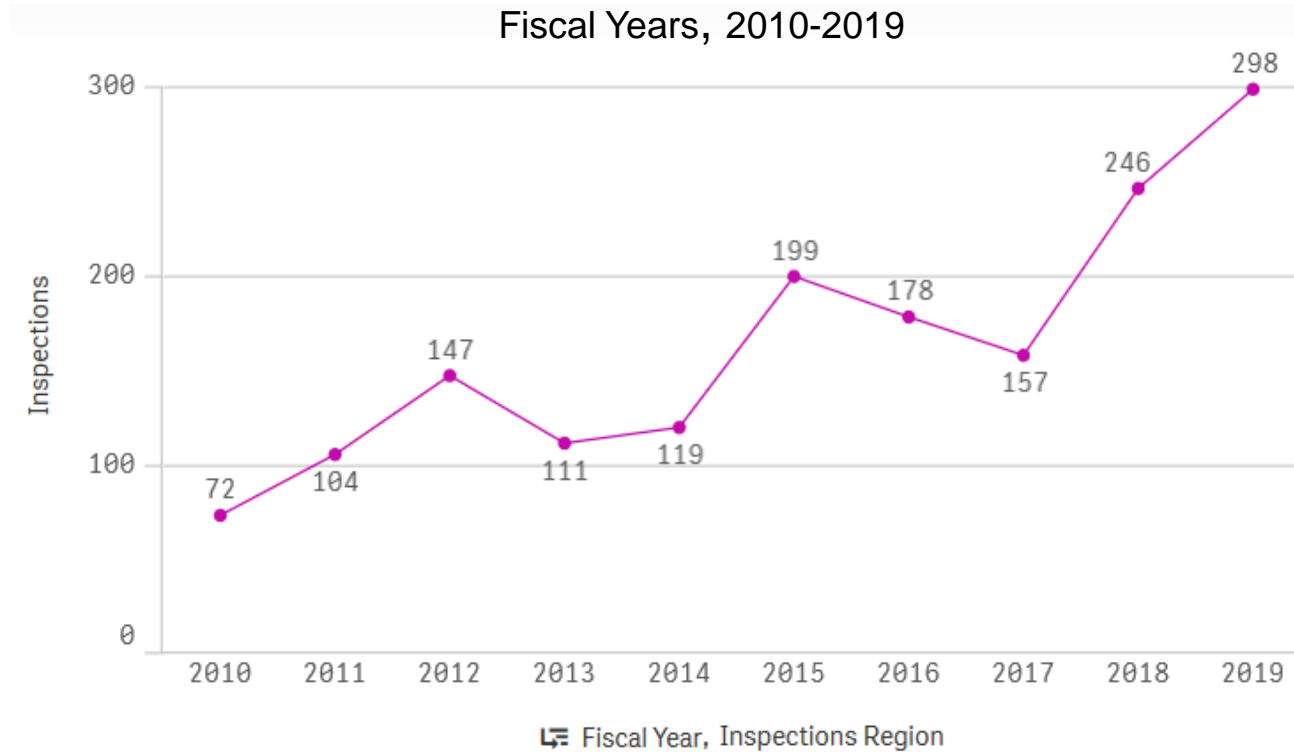


Your medicines could be killing you



**THE HILL** Public health activist calls for country-of-origin labels on prescription drugs

# FDA Inspections in India



Source: U.S. FDA: <https://datadashboard.fda.gov/ora/cd/inspections.htm>

- The FDA has increased its inspections of overseas manufacturing facilities, particularly in India
- Warning letters have been issued to India's top firms
- India accounted for nearly one-third of total foreign inspections by the agency between October 2018 and June 2019

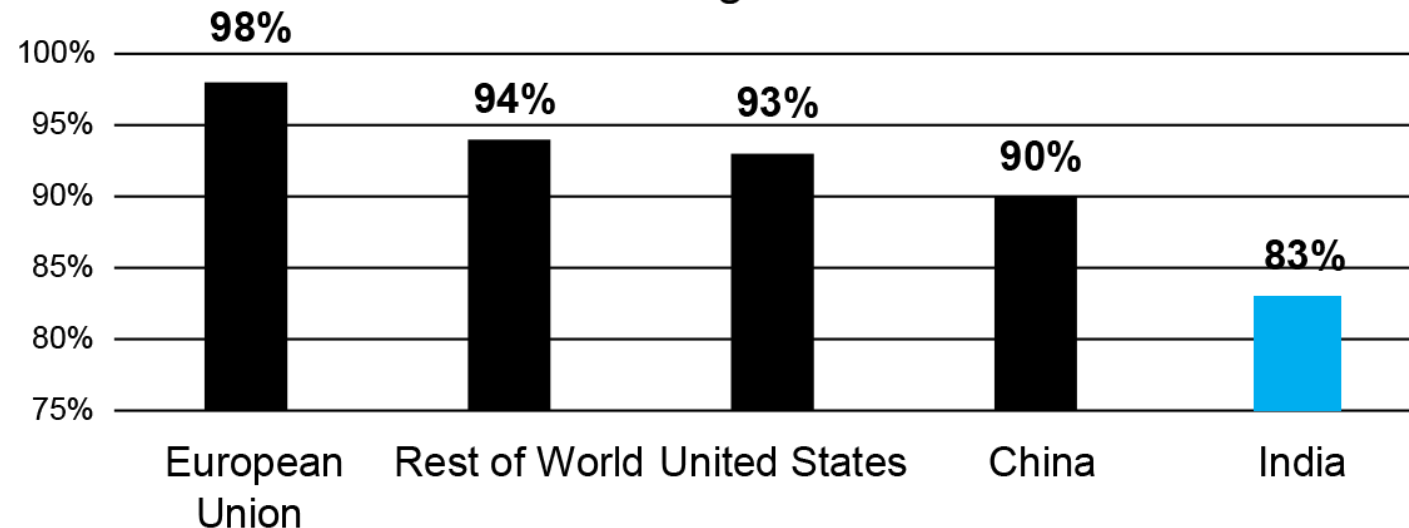
# Congressional Hearing on Foreign Inspections

December 10, 2019



**WOODCOCK:** “However, India had a lower percentage of acceptable outcomes than other countries and regions.”

Percentage of Drug Manufacturing Facilities with Acceptable Final Outcomes (i.e. No Action Indicated or Voluntary Action Indicated) by Country or Region, as of August 2019



# Overseas Manufacturing: A Target for Policymakers



“We need to think of pharmaceuticals as what they are for millions of Americans: a critical good that we literally can’t live without. **It’s unacceptable to become fully dependent on any single foreign country for those goods — all the more so when it’s China.**”

*Representatives Anna Eshoo & Adam Schiff  
Washington Post (Sept. 10, 2019)*





# Overseas Manufacturing: A Target for U.S. Policymakers

## US-China Economic and Security Review Commission Hearing July 31, 2019

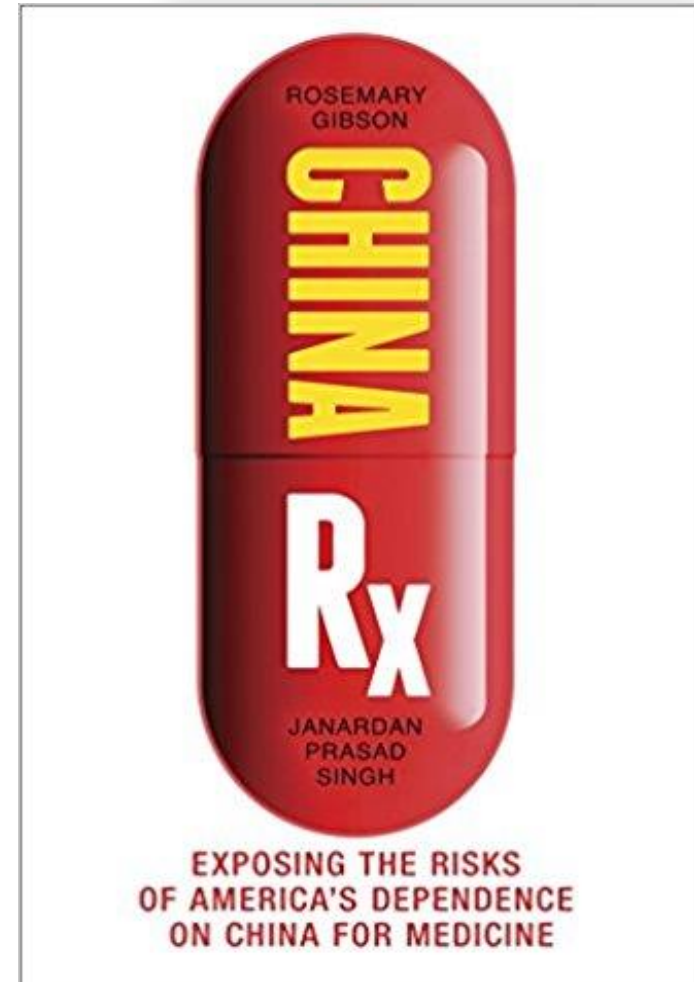
“The national security risks of increased Chinese dominance of the global active pharmaceutical ingredient (API) market cannot be overstated.”

Christopher Priest, acting deputy assistant director for health care operations and Tricare, DHA.



National Security Risks of  
Dependence on China

Christopher Priest, DHA



# Policy Risks and Potential Impact

## Possible Policy Proposal

DoD and VA to “Buy American”

FDA demands additional funding

Improperly-designed finished dose rating system

Greater reliance on private testing by pharmacies or purchasers

Greater company disclosure to FDA of API source, likely product discontinuation

Country of origin labeling transparency (API / finished dose)

# AAM-FDA Cooperation on Quality

- Through GDUFA II, the generic industry will have contributed approximately \$4 billion to the FDA
  1. With GDUFA funding, FDA has been able to hire approximately 1500 employees to improve the ANDA review and approval process, which includes inspections of all facilities, U.S. and foreign
  2. Allowed FDA to stand-up the Office of Pharmaceutical Quality which has expanded the scope of quality oversight
  3. Allowed for a structured interaction between CDER and ORA
- Regular dialogue between AAM member companies and CDER leadership



**aam**  
Association for Accessible Medicines

# Access!

2020 Annual Meeting

May 11-13, 2020 | Washington,  
DC

[Register Now](#)

Find out more at [access.accessiblemeds.org](https://access.accessiblemeds.org) or contact  
Jennifer Soup at [jennifer.soup@accessiblemeds.org](mailto:jennifer.soup@accessiblemeds.org).

HEALTH POLICY EXPERT  
SEEMA VERMA NAMED  
KEYNOTE SPEAKER FOR  
ACCESS! 2020

**SEEMA VERMA**  
Administrator, U.S. Centers for  
Medicare and Medicaid Services

IF YOU'RE IN THE GENERICS AND  
BIOSIMILARS INDUSTRY, YOU CAN'T  
AFFORD TO MISS THIS CONFERENCE

