

# Regulatory Perspectives for Driving Sustainability

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# **EDQM**

- ★ Founded in 1964
- ★ Partial agreement(39 members states & the EU + 33 observers)
- ★ Contributes to public health and access to good quality medicines and healthcare in Europe
- ★ Wide scope of activities

# Our vision

Together for better health, for all

### Our mission

To contribute to public health protection by engaging with an international community of experts and stakeholders







# Key figures

Administrative entities





More than 400 staff members about 30 nationalities and dozens of different professions



Strasbourg (2)



Metz

Areas of work

- Medicinal products
- Substances of Human Origin
- ★ Pharmaceutical care
- ★ Consumer health

Working with a global network of almost **2 000 experts** from a wide variety of scientific disciplines

- ★ 5 intergovernmental committees
- ★ 1 treaty-based body, the European Pharmacopoeia Commission
- ★ 2 steering committees (BSP, CEP)
- ★ 2 networks (OMCL, OCCL)
- More than 100 expert groups edom





# **EDQM** and its partners



More than 60 years of collaboration in the field of medicinal products More than 15 years of collaboration in the field of SoHO







- ★ European Commission
- ★ European Medicines Agency
- ★ European Centre for Disease Prevention and Control





# Agenda



- ★ Council of Europe's roadmap for sustainable development
- **★**Sustainability and its incorporation into the EDQM strategic framework
- **★**Sustainability of API manufacturing











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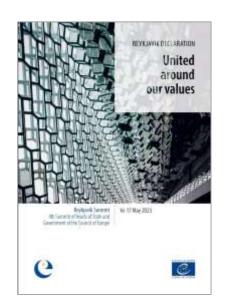




# Council of Europe's roadmap for sustainable development



#### 4th Summit of Head of States held in Reykjavík on 16 and 17 May 2023



#### **Reykjavík Declaration:**

Commitment to strengthen the Organisation's work on aspects of the environment



More information

Dedicated webpage



# Roadmap for sustainable development and carbon footprint reduction

- ★ Council of Europe to become Carbon neutral by 2050
- ★ Audit conducted in 2024 to determine the Organisation's Carbon footprint
- ★ Action plan at Organisational level



EDQM as part of its Medium-Term strategy 2024-2027, already on the move:

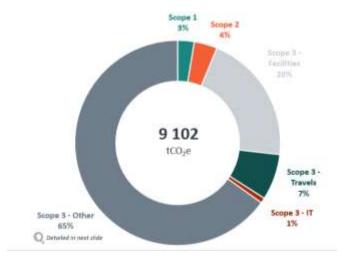
★ Strategic projects to embrace environment sustainability internally and externally





# Council of Europe's roadmap for sustainable development Cont.

#### Main Drivers of EDQM carbon emissions



#### **KEY TAKEAWAYS**

- EDQM's emissions are strongly influenced by its production activity.
- Downstream freight and emissions directly related to its products (use, end-of-life) account for 49% of total emissions.
- Scope 3 is also driven up by product use and purchases of raw materials (especially plastic packaging).
- Scope 3 Facilities includes renovations (heavy or light) carried out in buildings occupied by EDQM and furniture purchases.
- . Scope 3 IT account for only 1% of the total impact.

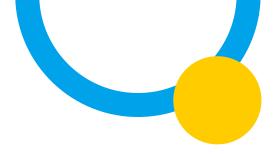


#### **Next steps**

- Action plan to be adopted by Committee of Ministers
- Specific actions are being developed (e.g. replacement of specific high emission fluids, replacement of plastic and other petrol sourced material notably in shipping material, grouping regular shipments, launch initiatives in circular economy like reusing some material and equipment, using second-hand equipment, etc.).









- ★Sustainability and its incorporation into the EDQM strategic framework
- **★** Sustainability API manufacturing







# EDQM Medium-Term Strategy for 2024-2027



1. Responsiveness

We will respond to and/or address current and emerging public health challenges and priorities for the benefit of patients and consumers.



2. Global Outreach

We will enhance the global outreach and impact of the EDQM.



3. Stakeholder Engagement

We will actively engage with our stakeholders to increase trust and credibility, improve decision-making, and ensure the sustainability of the organisation.



4. Sustainability

We will ensure a sustainable EDQM by future-proofing our operations and activities.



5. Modernisation

We will modernise our working methods to increase the quality and efficiency of our contribution to public health.



6. People
Development

We will develop our people, our teams, and our organisational culture to achieve our goals.



7. Culture of Service

We will establish and enhance a culture of service.



# Sustainability at the EDQM



We will ensure a sustainable EDQM by future proofing its operations and activities – 6 projects

#### **Assets/Equipment & Infrastructure**

★ Future proofing our infrastructure (construction of a 3<sup>rd</sup> building and refurbishing/renovating existing building)



★ Moving towards workforce planning to ensure sustainability in our workforce



#### **Stakeholders**

★ Consolidating & future proofing our IT architecture and tools

#### **Environment & health**

- ★ Environmental sustainability within our organisation (internal)
- ★ Environmental sustainability within our activities for our stakeholders (external)

#### **Business model**

★ Securing the EDQM's long term financial sustainability







Examples of concrete actions/approaches towards our users

- ★ Avoid and reduce use of hazardous reagents e.g. replacing hexane by heptane, reduce use of chloroform and dioxane
- **★ Reduce the amounts of solvents** used in Ph. Eur. methods
- ★ Avoid use of Mercury (Hg) and mercury compounds (e.g. mercury salts in non-aqueous titration) and the use of equipment using mercury (e.g. thermometer); supported by Minamata convention (UN) signed by most Ph. Eur. Members







# Examples of concrete actions/approaches towards our users Cont.

★ Develop and promote alternatives to Animal Testing i.e. follow 3Rs approach

Recent European Pharmacopoeia Commission (EPC) milestones



June 2024: Removal of the Rabbit pyrogen test from 57 texts of the European Pharmacopoeia More info: **EDQM** dedicated news





November 2024: suppression of the Rabbit pyrogen test itself (chapter 2.6.8). Together with 2 other general animal safety tests: Histamine (chapter 2.6.10), Depressor substances (chapter 2.6.11)

More info: EDQM dedicated news



### From January 2026

No more general safety tests using animals in the Ph. Eur.!



More information: Dedicated webpage







# Sustainability as a topic at International Meeting of World Pharmacopoeias



- ★ Discussions on sustainability have started also at the IMWP
- ★ 14th meeting, pharmacopoeias provided an update on their efforts

#### **Agreed action points:**

Develop a set of principles on sustainability for IMWP members to commit to.

This activity would be conducted by the existing sustainability subgroup, which is co-chaired by the Indian Pharmacopoeia Commission and the US Pharmacopeia. Other participants of the subgroup are the Brazilian Pharmacopoeia, British Pharmacopoeia, European Pharmacopoeia, Japanese Pharmacopoeia, Korean Pharmacopoeia and Mexican Pharmacopoeia. Other pharmacopoeias were welcomed to join the subgroup and told they could do so by contacting the Indian Pharmacopoeia Commission or US Pharmacopeia.

Use the agreed principles to develop an advocacy document, for example a white paper, to showcase the sustainability initiatives of world pharmacopoeias.

 This activity would be a continuation of the activity above and would be conducted by the sustainability subgroup.



#### **Next steps**

★ Discussions continued at 15th meeting taking place (5-7 February 2025) in New-Delhi, India.

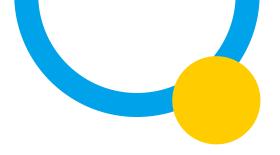


#### More information:

Link to 14th meeting report









- ★ Sustainability and its incorporation into the EDQM strategic framework
- **★** Sustainability of API manufacturing







# Trends API manufacturing

Green
manufacturing
and
Sustainability

Continuous manufacturing

Advanced manufacturing technologies

Automation and AI integration

# Challenges

- Regulatory and Compliance changes/hurdles
- > High Investment
- Supply chain complexity





# Need for International Collaboration and Reliance







# CEP is an attractive option

CEP = Certificate of Suitability to the monographs of the European Pharmacopoeia

The CEP procedure was established in 1994 and was initially only applicable to active substances

In 1999, the procedure was extended to include products with a risk of transmissible spongiform encephalopathy (TSE)

The procedure was further revised to allow for the control of herbal drugs and herbal drug preparations





# CEP procedure

#### In scope

- Substances described in monographs in the Ph. Eur. (active substances, excipients, herbal drugs)
  - → "Chemical" or "Herbal" CEP
- Products with risk of TSE (including intermediates, reagents, culture media..)
  - → "TSE" CEP

#### Out of scope

- Substances not included in Ph. Eur. (except TSE CEP)
- Substances which do not comply with the Definition section of the monograph, if applicable
- Biologicals and products extracted from animal tissues
- Human tissues derivatives, blood derivatives, vaccines
- Finished products

Open to any manufacturer of pharmaceutical substances regardless of geographical origin





# The CEP Procedure provides...

1. Centralised and harmonised assessment

**Save time and resources!** 

- 2. Application submitted directly to EDQM by the manufacturer of the pharmaceutical substance
- 3. Facilitates management of Marketing Authorisation Applications and their and variations

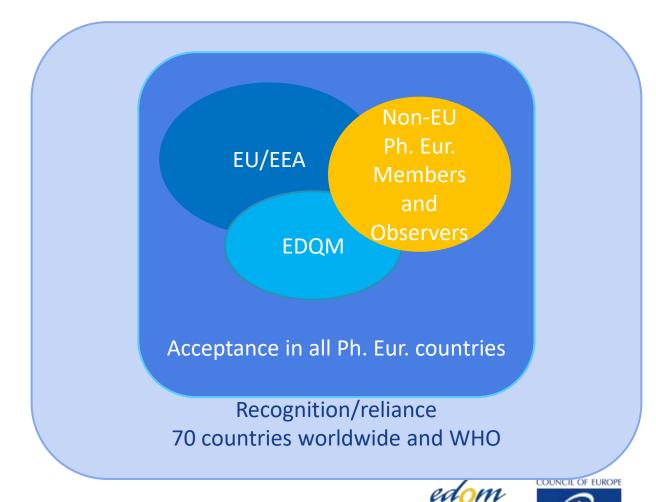


4. Information on the need to update Ph. Eur. Monographs



# Acceptance of CEPs globally

- CEP are accepted by Ph.Eur. Convention Member States (39) + the EU and by other countries (e.g. Canada, Australia, Singapore, South Africa, Saudi Arabia, TFDA, Ghana, WHO, Brazil etc.)
- Exchange of information on acceptance of CEPs by EDA (Egypt), NAFDAC (Nigeria), TITCK (Turkyie)
- African Medicines Agency (AMA) setting up process for API assessment, acceptance of CEPs is part of the process



# International Collaboration for CEPs



#### List of authorities and organisations which may have access to assessment and/or inspection reports

Organisation	Assessment reports	Inspection reports
Brazilian Health Regulatory Agency (ANVISA) Brazil	.80	Ж.
Health Products and Food Branch of the department of Health of Canada (HPFB) Canada	8	
Health Sciences Authority (HSA) Singapore	*	*
Institute for Standardization and Control of Pharmaceuticals, Israel Ministry of Heath (ISCP) Israel	х	
Ministry of Food and Drug Safety of the Republic of Korea (MFDS) South Korea	×	, X.
Ministry of Health, Labour and Welfare (MHLW) Japan		(8)
Pharmaceutical Inspection Co-operation Scheme (PIC'S) Switzerland		. 1.
Saudi Food and Drug Administration (SFDA) Saudi Arabia	×	3.
South Africa Health Products Regulatory Authority (SAHPRA) South Africa	ж	36.5
Taiwan Food and Drug Administration of Ministry of Health and Wetfare (TFDA) Chinese Taipei	×	. *
Therapeutic Goods Administration (TGA) Australia		. A.
United States Food and drug Administration (USFDA) USA		. 8.
World Health Organization (WHO) Switzerland	×	- X

#### **Bilateral confidentiality agreements/MoU** with health authorities:

• to exchange confidential information concerning the quality of APIs and/or GMP status of manufacturing sites

With CEP 2.0: Extension of access to the secure "Authorities database" for regulatory authorities beyond Ph. Eur. accepting CEPs, under confidentiality agreements/MoU:

- Revised Holder's declarations in the CEP application form to allow confidential information sharing (June 2023)
- List of authorities which have access to the database displayed on the EDQM website (column "assessment reports" Here)

Continued collaboration with other authorities

# Reliance on others' API GMP inspections by EDQM

50% of GMP supervision for API manufacturing sites covered by CEPs is achieved by Reliance procedure

### Source EEA inspections

No API inspections on EEA territory

Recognition of GMP Certificates for API manufacturing sites

Actions taken based on Statement of GMP Non-Compliance for API sites involved in CEP scheme

## Source other inspectorates

Documentation based assessment

Review of inspection reports from Trusted Authorities\* (e.g. PIC/S)

Result: accept outcome and include in re-inspection framework

<sup>\*</sup> high degree of similarity between EU and the authority's inspection procedures and GMP standards (currently equivalent inspections can be considered in connection with an MRA, ACAA and PIC/S).

# International Collaboration for the Ph. Eur.

- Ph. Eur.: successful model of work-sharing and harmonisation between currently 39 countries, based on strong political will and legal commitment
- Ph. Eur., United States Pharmacopoeia, Japanese Pharmacopoeia and Indian Pharmacopoeia, with WHO as an observer, are partners in the **Pharmacopoeial Discussion Group** (PDG)
- **Prospective harmonisation:** joining forces on new monograph elaboration with other pharmacopoeias (individually with USP, JP and WHO)
- Bilateral Agreements / MoUs with pharmacopoeia authorities on collaboration and exchanges; involvement of observers in the elaboration of texts.
- Global harmonisation (Good Pharmacopoeial Practices): EDQM key player in International Meeting of World Pharmacopoeias (IMWP)





# Pharmacopoeial Discussion Group (PDG)

- Harmonisation of pharmacopoeial texts focus is on general chapters and excipients monographs
  - 31 general texts and 48 excipients monographs harmonised
  - Work programme almost complete
  - Maintenance (revision) of harmonised texts
- PDG in charge of the maintenance of ICH Q4B guideline and its 16 annexes
- → via Q4B, goal is to achieve regulatory interchangeability among ICH authorities
- → Initiation of revision of ICH Q4B
- Indian Pharmacopoeia Commission (IPC) full PDG member since October 2023
- Global expansion initiative, for Pharmacopoeias willing to join:
  - To fulfill entry criteria to maintain optimal level of science and ensure PDG's progress
  - To implement the complete PDG work programme





# Join us in paving the way for the future...

Contribute to the protection of public health by:

Making your comments count!

PHARMEUROPA ONLINE



Becoming part of a dynamic scientific community!







## More information



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