Regulatorischer Druck und Kostendruck in der Pharma-industrie: Trends zur Veränderung der Produktionsprozesse

Hamburg, 18.4.2013
Warum dieser Titel,..

• Die Pharmaindustrie und damit die Anforderungen an die Pharmatechnik haben sich in den letzten 20 Jahren substantiell geändert
• wir wollen zeigen, welche Wege die verschiedenen Firmen gehen, um mit diesem gestiegenen Druck umzugehen
• Druck, wie
  • Patent Verluste, Trends zu Generika, mit massiv tieferen Verkaufspreisen
  • Gestiegene Erwartungen an die Anlagen & Prozesse seitens der Behörden
  • Neue Marktteilnehmer, z.B. aus Indien und China, welche nebst einer anderen Kostenstruktur auch andere Geschäftskulturen haben

• Nebst diesen Bedrohungen zeigen aber die folgenden Referate auch, wie man mit diesen geänderten Rahmenbedingungen kompetent umgehen kann und dies sogar zu einem Vorteil ausbauen.
Threat 1: Patent Cliff

- Zwischen 2010 und 2015 entfallen substantielle Patente, die momentan ca. 250 Mrd USD
- Typischerweise brechen die Gesamtumsätze um 75% ein, diejenigen der original Preparate um 90%
Threat 2: Zunahme an FDA Warning Letters

- Seit 2009 ist ein sehr markanter Anstieg an WARNING letters (483) durch die FDA zu verzeichnen. D.h. es wird viel kritischer beurteilt und es besteht keine Scheu vor Massnahmen. (Werke wurden geschlossen, auch bei schwieriger Versorgungslage.

- Die Unternehmen müssen erheblich in die Erneuerung investieren um cGMP compliant zu bleiben.

- Diskussionen, Austausch, Entwicklung von Standards wie durch die ISPE helfen hierbei stark auch als Gegen gewicht
Threat 2:
Zunahme an FDA Warning Letters um 166% (2010 -> 2011)

- FDA Warning Letters Increase 155% from 2010 Levels
  - If you have any role within an FDA-regulated company, it is likely you are aware that the FDA has been much more focused on enforcement activities since 2008. Alternatively, if you are involved at all with supply chain, manufacturing, quality assurance, quality control, regulatory affairs or other FDA compliance activities, you are likely intimately familiar with the FDA’s aggressive posture with respect to regulatory compliance enforcement. For people that spend their days working inside companies trying to build compliance systems and remediate compliance deficiencies, it is common knowledge that FDA is looking harder, looking deeper, and issuing more FDA 483s more than ever before.

However, even though I spend my days doing this sort of work I was shocked at a number that was just communicated to me in a public setting relative to FDA enforcement. On Thursday, January 26, 2012, I attended the New York State Bar Association’s Annual Meeting in New York City, and as part of that, attended the Food, Drug and Cosmetic Law Section meeting. As part of the regular Food and Drug Administration Update portion of the meeting, the Section was privileged to secure Elizabeth H. Dickinson, Esq., Acting Chief Counsel of the Food and Drug Administration, as the keynote speaker. As part of Ms. Dickinson’s talk, she briefly reviewed the FDA’s recent enforcement history. This was where the shock came. Ms. Dickinson outlined the number of Warning Letters issued in 2009, 2010, and 2011. The numbers related by Ms. Dickinson during her talk are provided in the table below (I have added the % increase column).

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Warning Letters Issued</th>
<th>% Increase over Prior Year</th>
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<tbody>
<tr>
<td>2009</td>
<td>474</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>673</td>
<td>42%</td>
</tr>
<tr>
<td>2011</td>
<td>1,720</td>
<td>155%</td>
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As can be seen from the numbers, FDA issued 1,720 Warning Letters in 2011 – a full 155% increase over 2010 levels. This is also a full 262% increase over 2009 levels – an extraordinary increase by any measure. Now, I must caveat that I have no idea whether these numbers are the final numbers that will be issued formally by the FDA for 2011 Warning Letter levels. I further have not had the ability to directly verify these numbers with anyone else within the FDA. However, I think a statement by the Chief Counsel in a Bar Association meeting is a public-enough forum to feel comfortable sharing this information with a broader audience.

The continuing lesson for FDA-regulated companies is that the FDA is fully-engaged, and highly-focused, on enforcement activities. For those companies that don’t want to spend any more money on improving their quality and compliance systems because of “business” considerations, keep the following in mind: an FDA inspection is in your future – it is a matter of when, not if, FDA will walk through your doors. The costs of remediating compliance after the fact (and salvaging your company’s reputation, product brand equity, and loss in shareholder value) far exceeds the incremental spend on additional personnel, systems remediation and consultants in an ongoing manner.

So be careful out there – and for expert assistance with achieving best-in-class quality and compliance systems, contact Compliance Architects® at 888-REG-XPRT (888-734-9778) or Jack Garvey, Principal, at john.garvey@compliancearchitects.com.
Threat 2: Warning Letter Beispiel

In the image, there is a screenshot of a Warning Letter from the U.S. Food and Drug Administration (FDA) to Wyeth Lederle S.p.A. The letter details violations of good manufacturing practice (GMP) regulations and is dated 27-March-2013. The letter is addressed to Mr. Giuseppe Galizia and discusses the non-compliance with Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (the Act), 21 U.S.C. 351(a)(2)(B), which states that the methods used in, or the facilities or controls used for, their manufacture, processing, packing, or holding do not conform to, or are not operated or administered in conformity with, GMP.

The letter also mentions the additional violations identified under Section 505(a) and Title 21, Code of Federal Regulations, Section 211.61, which requires an applicant to establish and maintain records, and to report data relating to clinical experience, along with other data or information, for drugs in which an approved application is in process.
Threat 3: Patente und Emerging Markets

- Ueberdurchschnittliches Pharma Wachstum in den Emerging Markets
- Gleichzeitig schwierige Patent Situation
  - Fälschungen
  - Frühe Generika
  - Teilweise nicht Anerkennung der Patente durch Behörden
Wie können wir damit umgehen

- Mögliche Antworten auf dieses geänderte Umfeld sind
  - Prozess Verbesserungen
  - Optimieren der internen Abläufe
  - bessere Auslastung der Anlagen
  - Sicherstellung, dass die Anlagen dem Stand der Technik entsprechen
  - Schnellere und flexiblere Investitionen
UND NUN....

WILLKOMMEN ZU DEN PRESENTATIONEN