Drugs Registration in Brazil

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GLOBAL
REGULATORY PARTNERS

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Definitions

DRUG CATEGORY	DEFINITIONS
New Drugs	Innovative products for which safety, efficacy and quality have been proven via multiple non-clinical and clinical studies before registration with Anvisa.
Branded Generics	Products that contain the same active ingredient(s), has the same concentration, dosage form, administration route, dosage administration and therapeutic recommendation, as the reference drug registered with Anvisa. It may differ only in the product's size and form, expiration date, packaging, labelling, excipients, and it must always be identified by trade name or brand name.
Non-Branded Generics (Similar Drugs)	Products that contain the same active ingredient, formulation, pharmaceutical form, mode of administration, dosage and indication than the reference drug that drugs already registered with Anvisa. They are intended to be interchangeable with the reference product.

Different Steps of Drugs Registration in Brazil

Step 1
- Preparation and submission of registration dossier to Anvisa

Step 2
- Anvisa GMP inspection of manufacturing sites

Step 3
- Local testing in Brazil

Structure of Registration Dossier

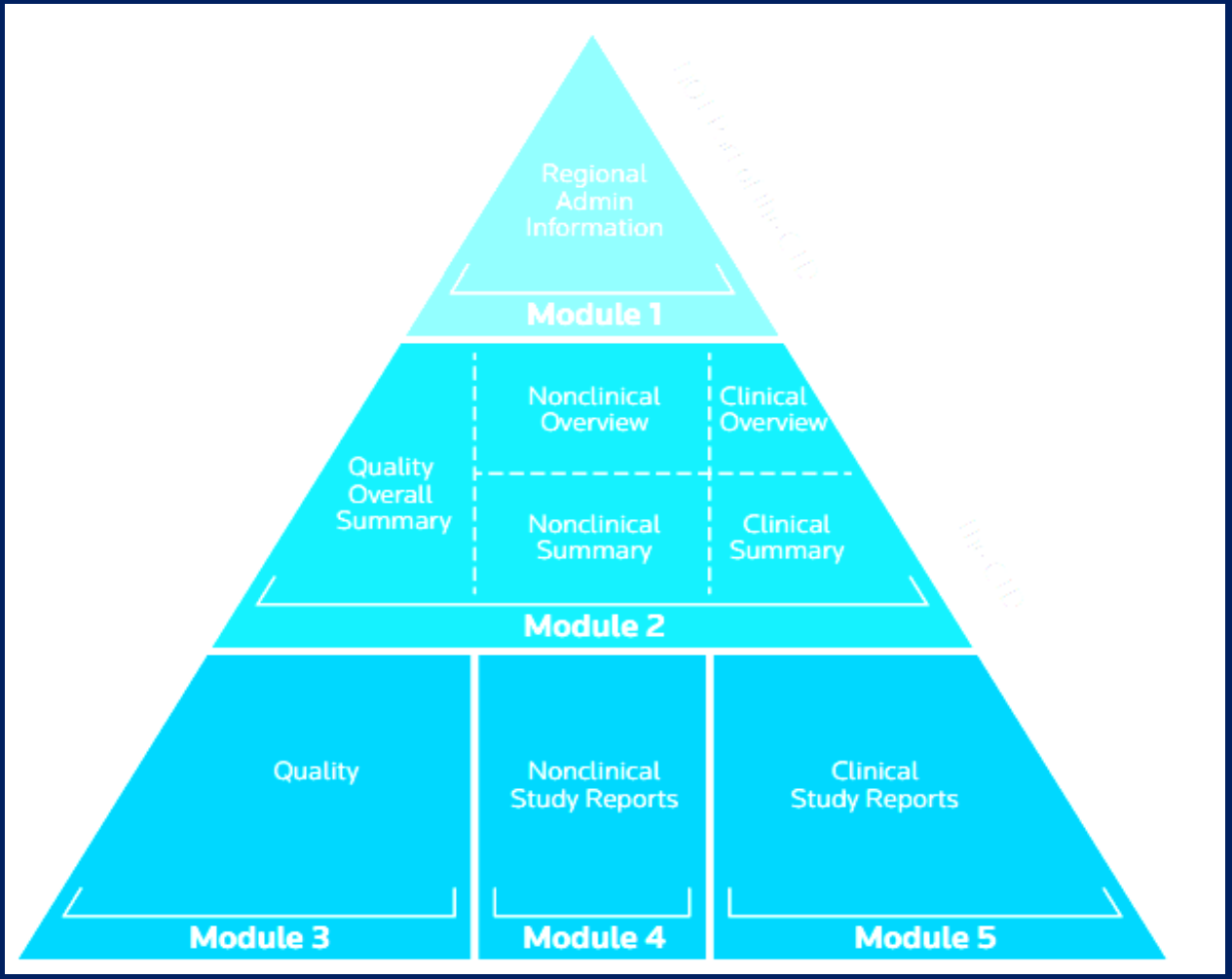
In Brazil the registration dossier is structured in eCTD format and it has two main parts:

Part 1- Administrative Part:

It corresponds to Module 1 and includes compilation of all administrative data and local information

Part 2 - Technical Part:

It corresponds to Module 2, Module 3, Module 4 and Module 5 that include summaries od pre-clinical studies; CMC information; nonclinical data and reports; and clinical information and reports.



Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 1			
Sanitary license of local representative	√	√	√
Local representative operating authorization	√	√	√
Registration of local Pharmacist at professional counsil	√	√	√
Petition form	√	√	√
Justification for product registration	√	√	√
Labeling of different presentations	√	√	√
Previous Communications with ANVISA	√	√	√

Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 1			
CPP issued from the HA in country of origin	√	√	√
GMP certificates issued from the HA in country of origin	√	√	√
GMP certificates granted by Anvisa	√	√	√
Registration status worldwide	√	√	√
Pharmacovigilance data	√	√	√
Product labeling in portuguese	√	√	√
TSE information	√	√	√

Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 2			
2.1 Table of contents of Module 2	√		
2.2 Introduction	√		
2.3 Quality Overall Summary	√		
2.4 Non-clinical Overview	√		
2.5 Clinical Overview	√		
2.6 Non-clinical	√		
2.7 Clinical Summary	√		

Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 3			
3.1 Table of contents of Module 3	√	√	√
3.2 Body of data	√	√	√
3.2.1 Drug Substance	√	√	√
3.2.2 Drug Product	√	√	√
3.3 Literature references used in Module 3	√	√	√

Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 4			
4.1 Table of contents of Module 4	√		
4.2 Study reports	√		
4.2.1 Pharmacology	√		
4.2.2 Pharmacokinetics	√		
4.2.3 Toxicology	√		
4.3 Literature references used in Module 4	√		

Content of Registration Dossier

Dossier Content	New Drug	Branded Generic Drug	Similar Drug
Module 5			
5.1 Table of contents of Module 5	√		
5.2 Tabular listing of all clinical studies	√		
5.3 Clinical study reports	√		
5.3.1 Reports of biopharmaceutic studies	√		
5.3.2 Reports of human pharmacokinetic (PK) studies	√		
5.3.3 Reports of human pharmacodynamic (PD) studies	√		
5.3.4 Reports of efficacy and safety studies	√		
5.3.5 Reports of post-marketing experience	√		
5.3.6 Case report forms and individual patient listings	√		
5.4 Literature references used in Modulo 5	√		
BE Studies		√	√

Anvisa Review Process of Registration Dossier

Applicant submits registration dossier to ANVISA

GEPEC reviews the Safety, efficacy and pharmacological data provided in the submission dossier

(CMED)Chamber of Drug Market Regulation discusses drug price with applicant

ANVISA carry out facility GMP inspection

ANVISA approves the drug and grants marketing authorization

EXTERNAL CONSULTANT ACTIVITY
Advice from external consultants used on ad hoc basis

CATEME ACTIVITY
Technical chamber of medicines provides expert advice

ANVISA GMP Inspection

Content of the application for GPM inspection:

- Petition form completed, stamped and signed
- Valid GMP certificate issued by the health authority of the country of origin. Certificates issued in English or Spanish will be accepted without the need of a sworn translation.
- Plant Master File - AMP or Site Master File – SMF.
- Periodical Product Review (RPP)
- Inspection Report from other health authorities in country of origin if availabale

ANVISA GMP Inspection

Timelines for ANVISA inspection:

- ANVISA inspection of manufacturing site occurs approximately 6 months after submitting the request for inspection to ANVISA
- ANVISA issues the Good Manufacturing Practice certificate to company 45 to 60 days after inspection

Requirements for Local Testing

- The importer located in Brazil is responsible for performing complete quality control tests of finished products in accordance with the specifications and test methods registered in Brazil with ANVISA.
- The testing frequency depends on the number of shipments made to Brazil each year:
  - ✓ Importation of **> 8 shipments/year** of each drug ➡ samples of 2 batches/ year to be tested
  - ✓ Importation of **≤ 8 shipments /year** of each drug ➡ samples of 2 batches/ every 2 years to be tested
- The time required for each local testing depends on the product's specifications that need to be tested.

Anvisa Review Timelines

The timelines for drugs' registration and post-approval changes are here below:

PRIORITY REVIEW		STANDARD REVIEW	
Registration	**Post-approval Changes**	**Registration**	**Post-approval Changes**
120 days	60 days	365 days	180 days

References

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