

# Managing Risks and Benefits in Medicines Systems: The Example of Dolutegravir

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**COMMITTEE ON STRONGER FOOD AND DRUG  
REGULATORY SYSTEMS ABROAD,**  
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# Quality Assurance Team

## Mission

**Enable procurement of the health products complying to internationally-recognized norms and standards, assure continuity of supply, and facilitate access to innovative products through policies, communications with countries, data sharing and compliance verification exercise**

Value driver	Description of value
<b>Safety</b>	<ul style="list-style-type: none"><li>• Ensure products procured with GF funds are safe, efficacious and of assured quality</li></ul>
<b>Access</b>	<ul style="list-style-type: none"><li>• Support introduction to innovative products through Expert Review Panel (ERP) process</li></ul>
<b>Availability</b>	<ul style="list-style-type: none"><li>• Work to ensure continuity of supply</li></ul>
<b>Compliance</b>	<ul style="list-style-type: none"><li>• Guarantee that products procured with GF funds adhere to GF internal policies and guidelines</li></ul>



**In full alignment with TGF 2022-2017 Strategy :  
Maximize impact against HIV, TB and Malaria**

# Recalling the event

- A preliminary analysis of an on-going observational study in Botswana has identified a potential safety issue with the HIV antiretroviral medicine Dolutegravir (DTG)
- The preliminary findings identified 4 cases of neural tube birth defects out of 426 women who became pregnant while taking DTG. This rate of approximately 0.9% compares to a rate of 0.05% seen among women treated with EFV-based ARV and 0.09% among HIV-negative women.
- Neural tube defects are birth defects that can occur early in pregnancy when the spinal cord, brain and related structure do not form properly
- Preliminary data from the aforementioned study seem to suggest that the potential safety issue arises from a women's exposure to DTG at the time of conception rather than during pregnancy.

# Current environment in 2018

- DTG is a very promising medicine
  - Faster action
  - Less toxic
  - More robust – High barrier to resistance
  - Potential to be cheaper - 270m USD per year in savings
  - Potential increase in treatment for same funding for 5 million people
- Dolutegravir is an US FDA, EMA and WHO approved antiretroviral medicine used in combination with other ARVs medicine to treat HIV.
- As per Global Fund's Quality Assurance policy DTG is eligible for procurement with GF funds because stringently assessed
- As consequence Drug safety communication from Major regulators providing safety recommendations on the use
- The same has been forwarded to all GF recipients via QA Information Notice

# Experience gained from Dolutegravir / 1

- ✓ Innovative medicines usually bring added benefits (cost, efficacy) but also uncertainty
- ✓ This uncertainty is inherent to the limited knowledge gained through the development of the medicine including Clinical Trials, on a limited population, and recruitment criteria not considering all types of patients (pregnant women, MultiTh).
- ✓ Robust regulators such as FDA & EMA supplement their marketing authorization with specific plan to manage risks (RMP) based on the remaining uncertainty, e.g. registry exposure, post-authorization safety studies (PASS), ...
- ✓ Robust regulators can rely on operational Pharmacovigilance systems intensified for innovative molecules, allowing for early identification of safety signals
- ✓ Where innovative products are marketed in mature health systems, health practitioners and personal are trained, patients informed on risks

# Experience gained from Dolutegravir / 2

- ✓ GF through grant funds improves to a great extent the access to innovative products for an increased number of patients
- ✓ Some of these innovative medicines may potentially lead to an increased risk of emerging adverse drug reactions only by volume effect which increases the probability for ADRs
- ✓ In most of LMIC where the innovative medicines are provided, regulators are not sufficiently mature and have poor pharmacovigilance systems in place.
- ✓ Moreover Risk management plans similar to those implemented in mature regulatory systems are not always in place and / or may not be adequate to the LMIC country environment e.g. change in the IFU/notice
- ✓ Health care providers are not always trained and patients sensitized to Pharmacovigilance
- ✓ Limiting the capacity to detect safety signals in a timely manner

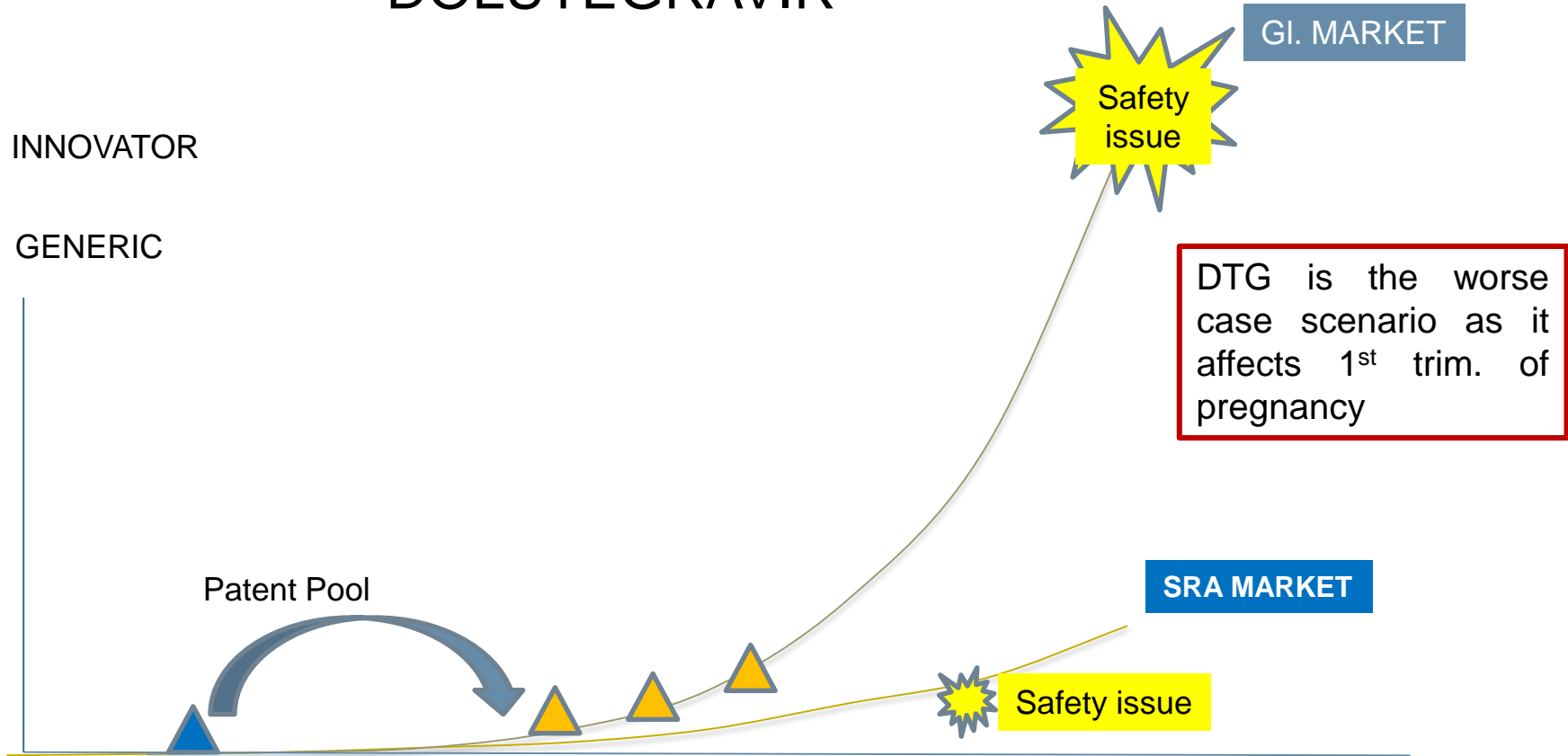
# Experience gained from Dolutegravir / 3

- ✓ In the past, innovative medicines were put first on the market in countries with mature regulatory system and reached LMIC markets at later stage
- ✓ To some extent, developing countries were relying / benefiting on drug safety data collected from Robust regulatory system and assessed by Stringent Regulators
- ✓ At present, numerous novel products are being developed in order to treat diseases which are disproportionately affecting developing countries and are introduced in early in those countries
- ✓ Without intervention, this might increase the number of patients exposed to emerging risks which could seriously undermine the global effort to provide new treatment options to patients

# DOLUTEGRAVIR

▲ INNOVATOR

▲ GENERIC





# Concluding Remarks

- No intension to reconsider the GF position to support introduction of innovative health products which is a corner stone of the GF Strategy
- Quality Assurance should not be seen as a barrier to access but rather as a tool for continuous improvement / risk assessment
- We have to learn lessons based on this example
  - To review our initial assessment of risk triggered by introducing innovative products
  - To reconsider our current practices and further improve our internal processes e.g. communication & sharing information on risks
  - To provide financial support to countries and to external partners such as WHO
  - To sensitize the global community

Thanks for your attention

# Concluding Remarks

## Communication Challenges in the QA Ecosystem

