Principle of Thailand Medicine Reclassification Guidelines

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Food and Drug Administration

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FOOD AND DRUG ADMINISTRATION
THAILAND

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- Drug classifications of Thailand
- Decision in Drug reclassification
- Worldwide Drug reclassification guideline
  - WHO guideline
  - European Directive
  - UK MHRA guideline
- Common Practice in Reclassification
- (Draft) Thailand Reclassification guideline

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Drug classifications of Thailand

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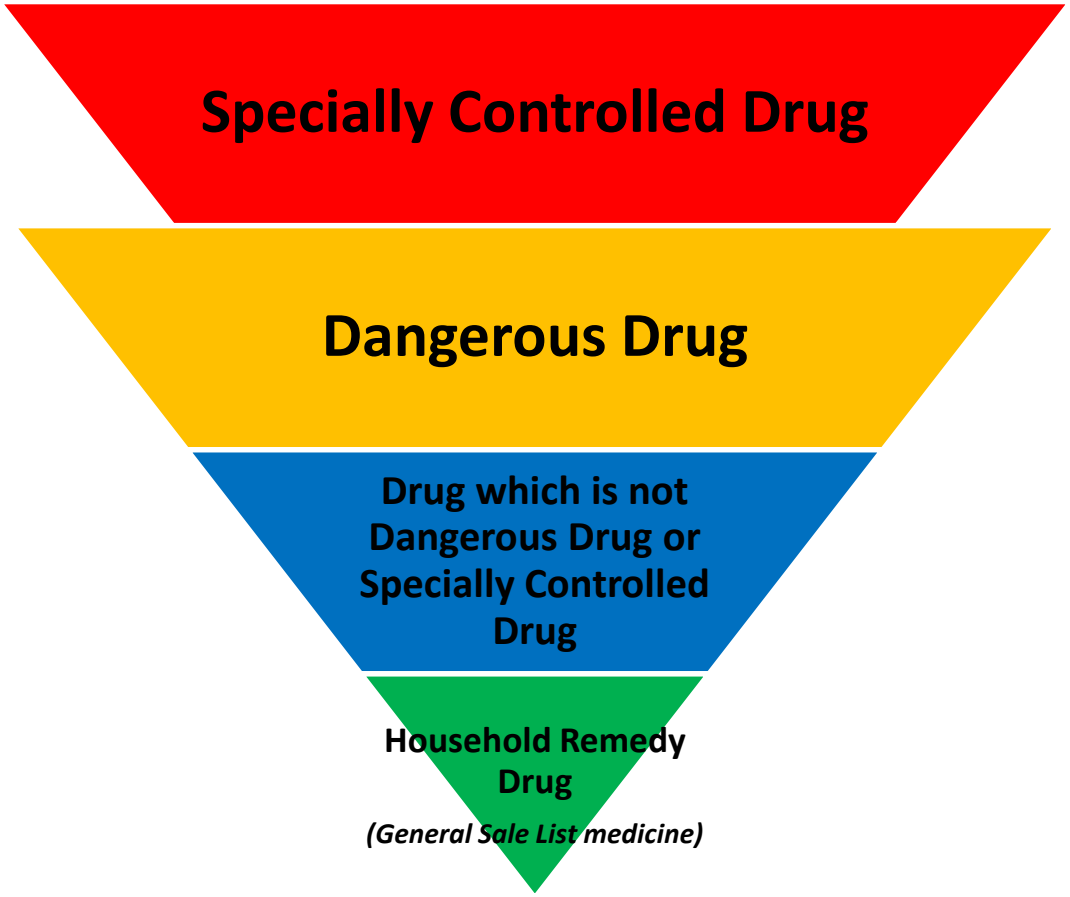
Characteristics of drug classifications in Thailand



Prescription-only medicine
(Healthcare professional advertising)

Pharmacy medicine
(Healthcare professional advertising)

Pharmacy medicine
(direct-to-consumer advertising ***)***

All distribution channel
(direct-to-consumer advertising ***)***

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Decision in Drug reclassification

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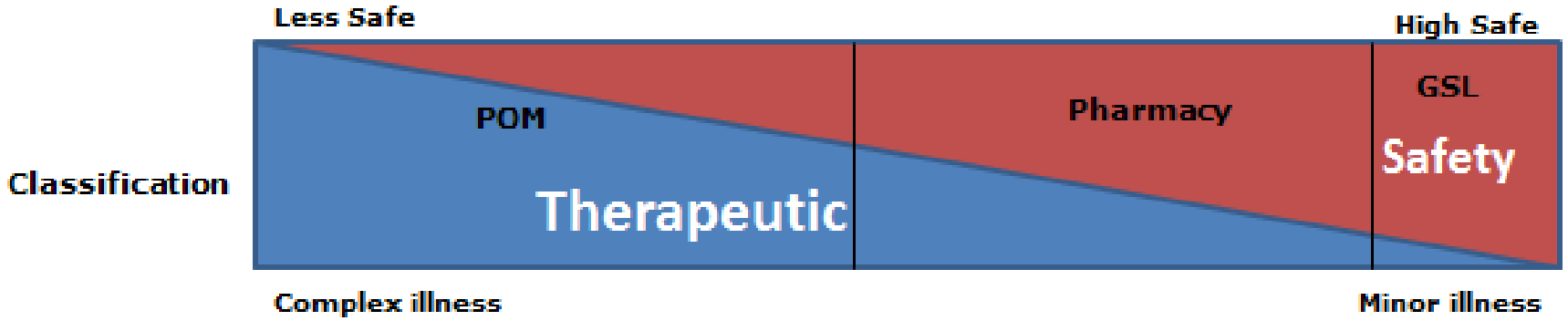
Decision factors in drug reclassification



GSL *General Sale List medicine*
P *Pharmacy medicine*
POM *Prescription-only medicine (Rx)*

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Worldwide Drug reclassification guideline

- WHO guideline
- European Directive
- UK MHRA guideline

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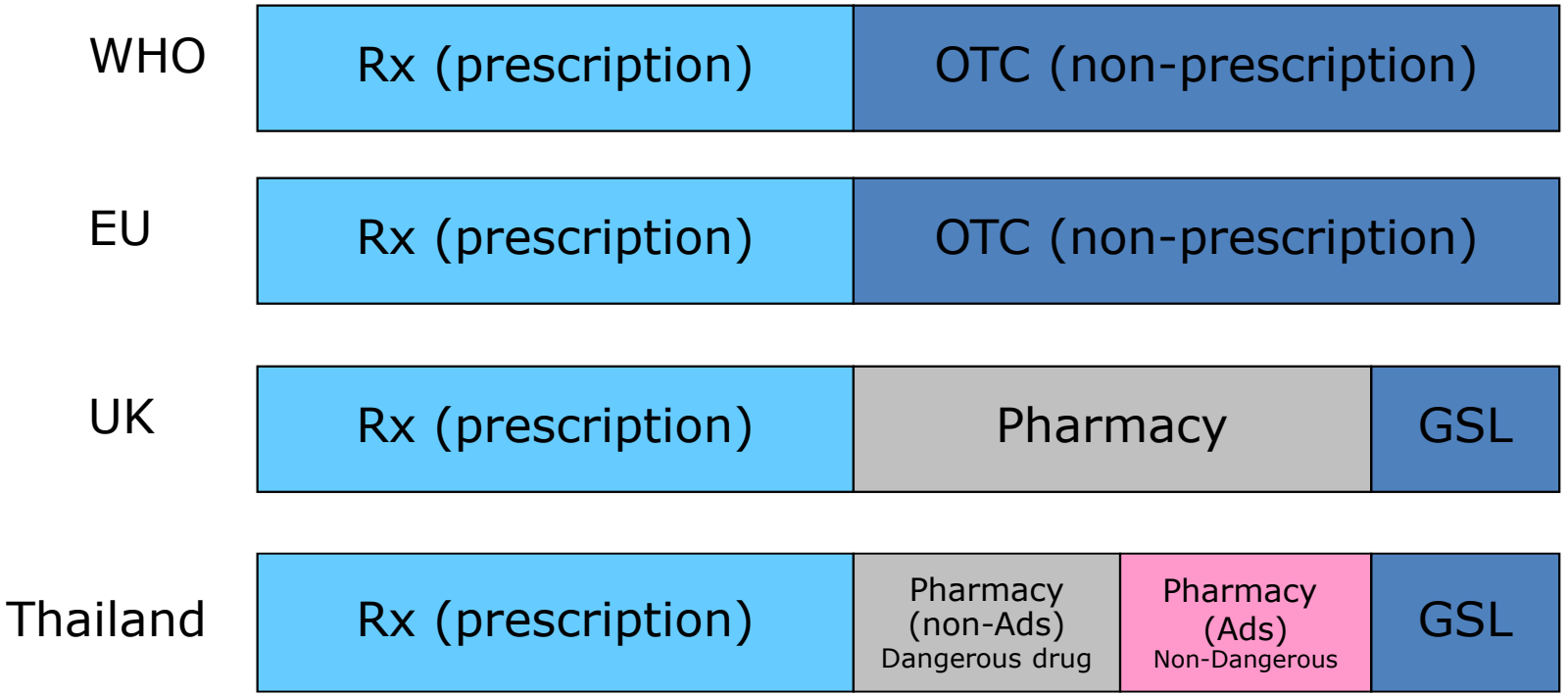
Comparative Drug Classification (vs Thailand)



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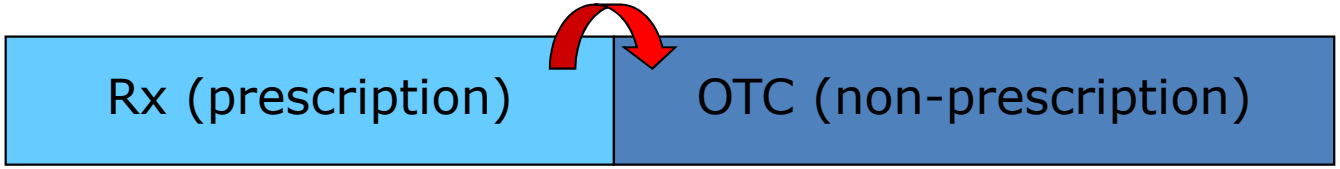
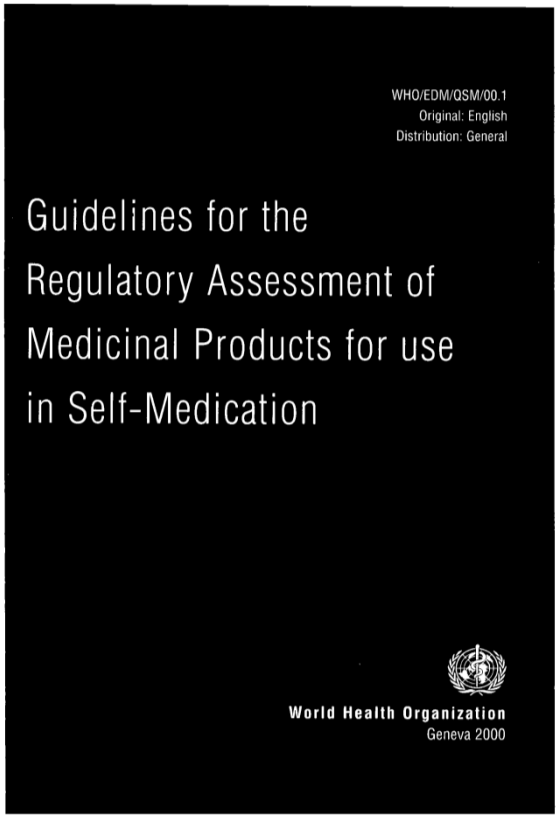
WHO's OTC reclassification guideline

WHO





Basic Criteria for a self-medication product.

(1) The active ingredient at the intended dose should have low inherent toxicity.

(2) The intended use should be appropriate for self-medication.

(3) The product should not have properties that make it undesirable.

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WHO's OTC reclassification guideline

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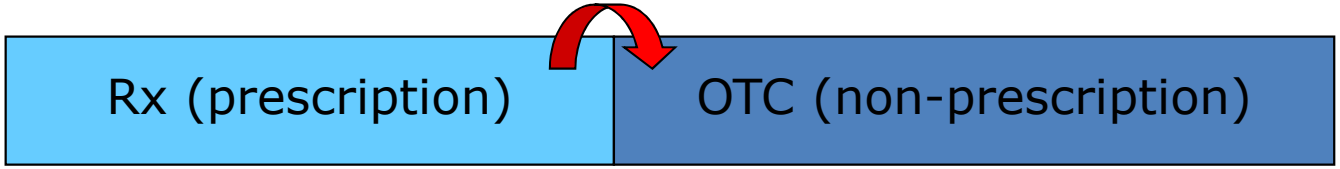

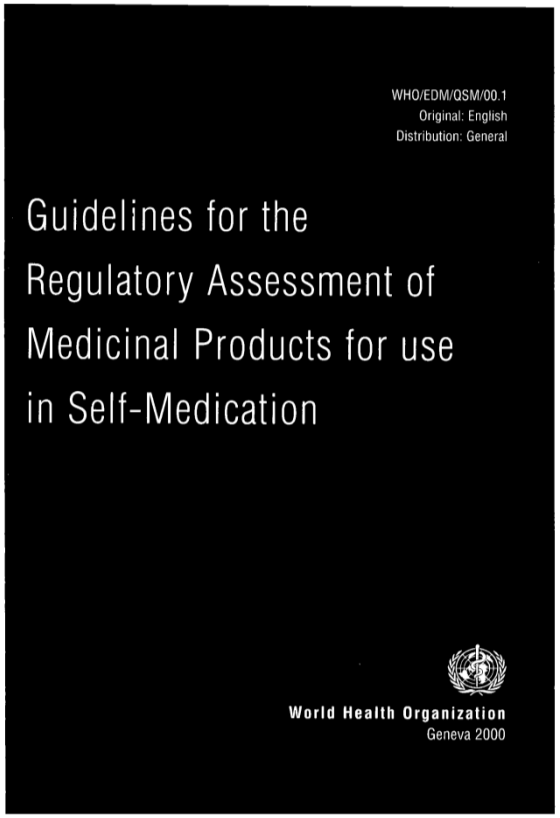

Additional Criteria.

(1) The use of the product has been sufficiently extensive or in high enough volume.

(2) The product has been marketed on prescription for at least five years.

(3) Its adverse events give no cause for concern, and their frequency has not increased unduly during the marketing period.

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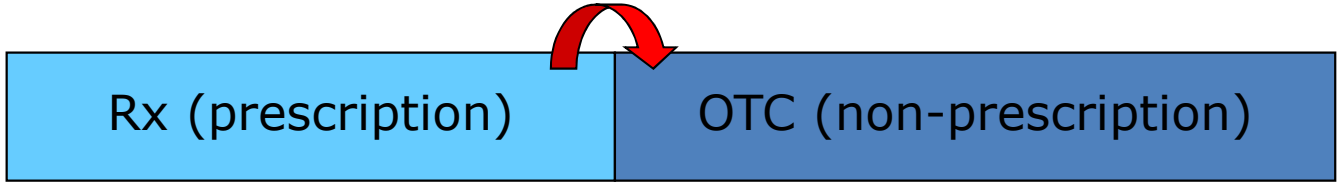
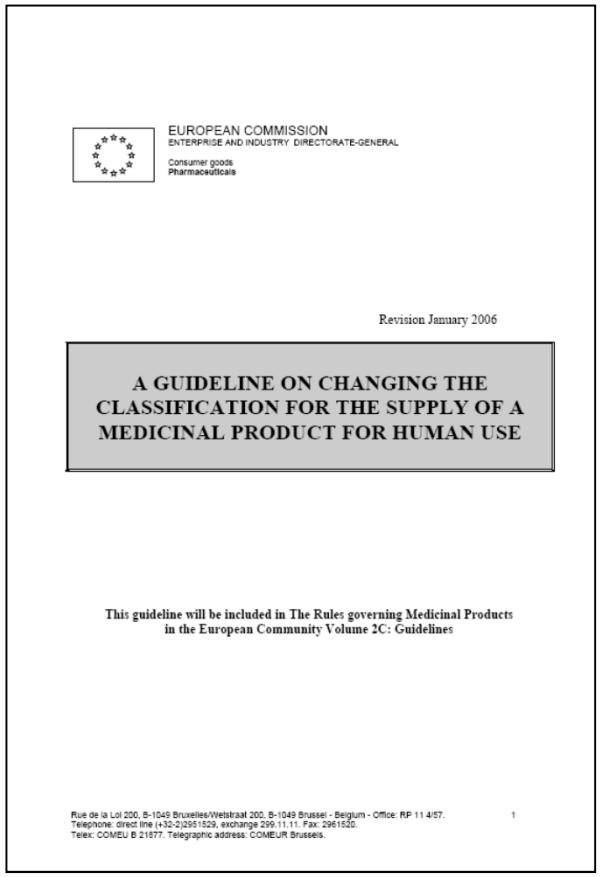
EU guideline on changing the classification of the supply of a medicinal product for human use (2006) - 2001/83/EC

EU





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ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL
Consumer goods
Pharmaceuticals

Revision January 2006

A GUIDELINE ON CHANGING THE CLASSIFICATION FOR THE SUPPLY OF A MEDICINAL PRODUCT FOR HUMAN USE

This guideline will be included in The Rules governing Medicinal Products in the European Community Volume 2C: Guidelines

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Guideline of Rx-to-OTC switch

(1) Medicinal products should not present a danger either directly or indirectly, even when used correctly, if utilized without medical supervision.

DIRECT DANGER

- low general toxicity and no relevant reproductive toxicity, genotoxic or carcinogenic properties
- low risk of serious type A adverse reactions and very low risk of serious type B reactions in the general population
  - Note: The criterion of danger can take account of the possibility of preventive action. For example, serious type A reactions can be acceptable if there is a clear identifiable risk group that can be excluded even in the absence of medical supervision.

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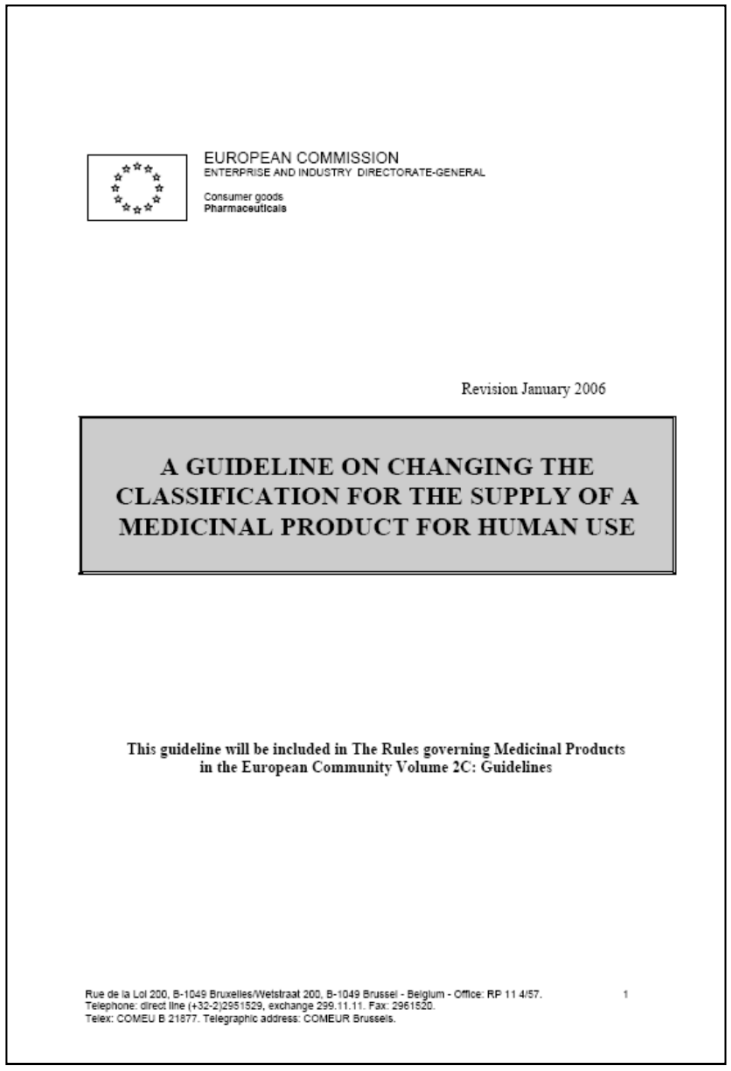

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Guideline of Rx-to-OTC switch (cont)

INDIRECT DANGER

- Use of the medicine should not delay diagnosis and definitive treatment and jeopardise the chance of more successful therapy.
  - Note: Package leaflet and or label warnings may be necessary to prevent treatment from ”masking” the development of a serious disorder.

- Wider use of the medicine should not increase the risk of resistance to the product, or if the symptom is found in diverse range of underlying pathologies, or where the patient cannot easily discern the underlying disease.

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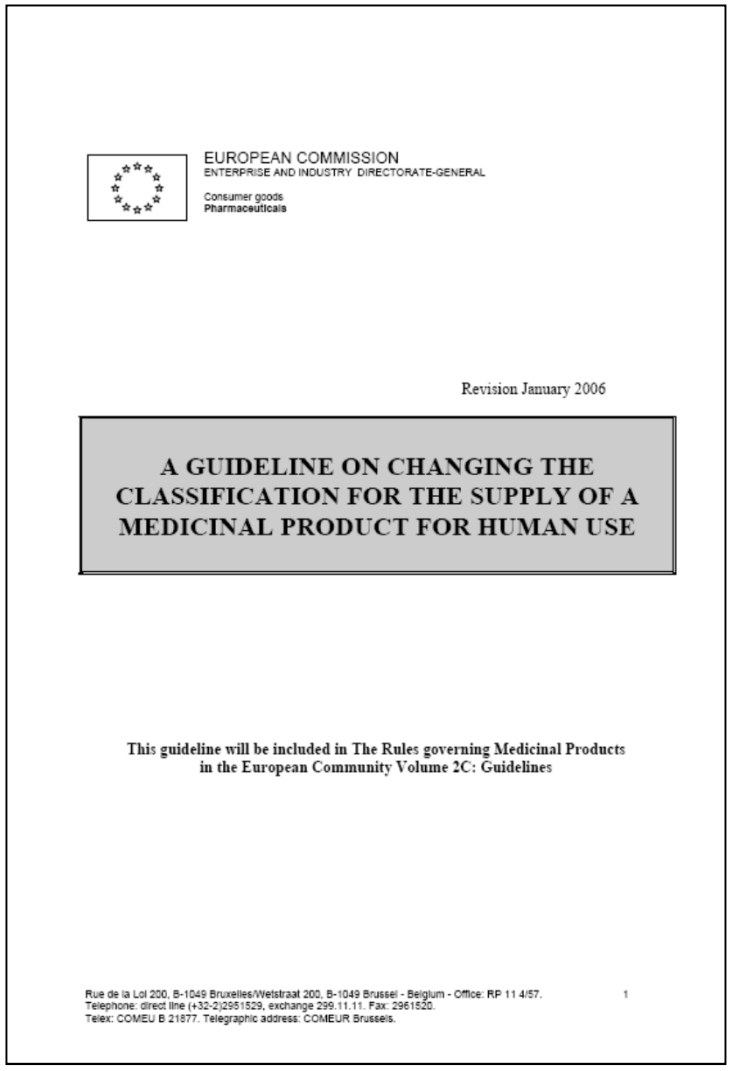

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Guideline of Rx-to-OTC switch (cont)

SELF-ASSESSMENT CONDITIONS/SYMPTOMS

- Able to assess the disease, the condition, the duration of symptoms and their reoccurrence and consequences
- Able to exclude similar conditions which is not unsuitable for such medicine treatment
- Able to understand contraindications, interactions, warnings and precautions
  - Note: availability of appropriate information sources that would assist the patient in achieving this, including written information or the advice of pharmacist and other health care professionals.

INCORRECT USE

- low risk & consequences, when it is misused (off-label use, longer use, overdose)

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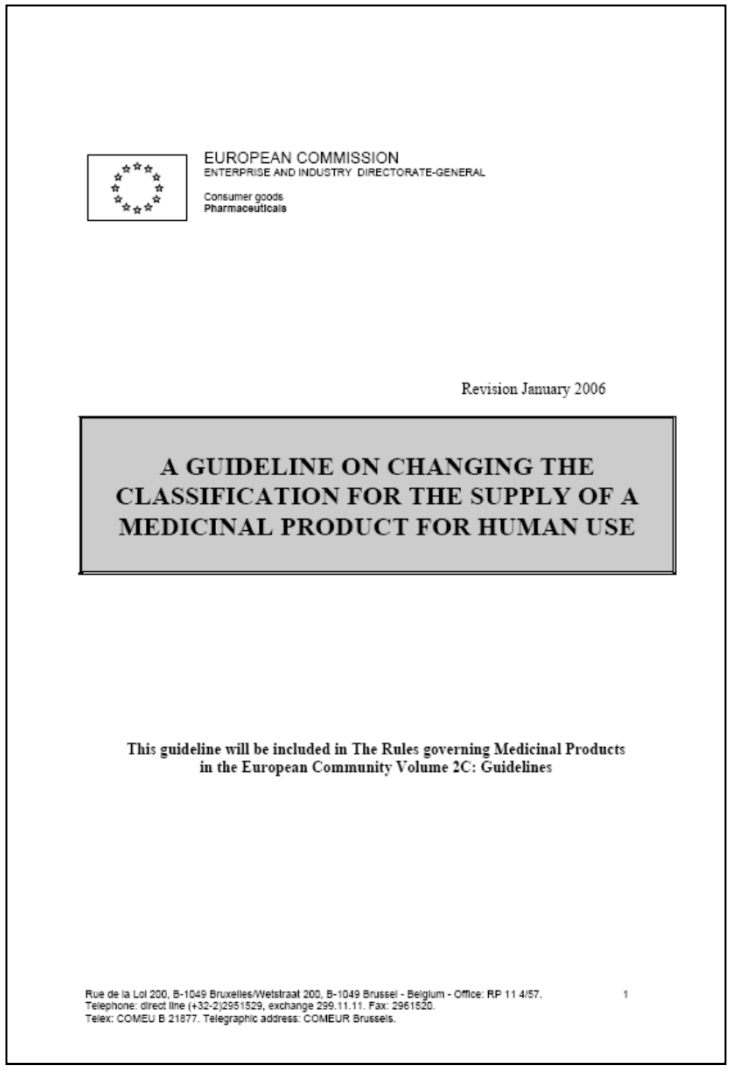

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Guideline of Rx-to-OTC switch (cont)

(2) Medicinal products shall not frequently and to a very wide extent be used incorrectly, and as a result are likely to present a direct or indirect danger to human health.

(3) Medicinal products shall not contain substances or preparations thereof the activity and/or side-effects of which require further investigation, for example:-

- Recent authorization/limited experience
- New strength, dose, route of administration, indication, new age group or combination of substances.

(4) Medicinal products shall not be administered parenterally (for injection)

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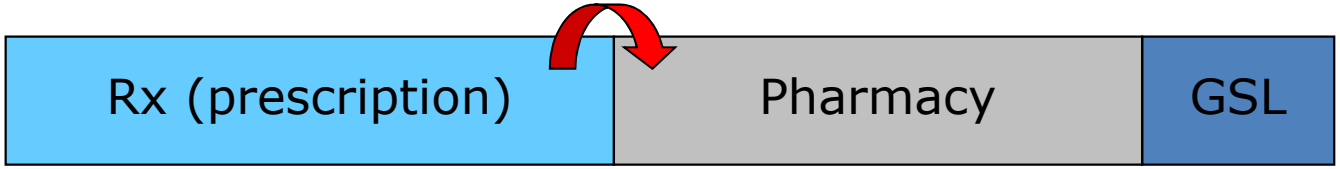
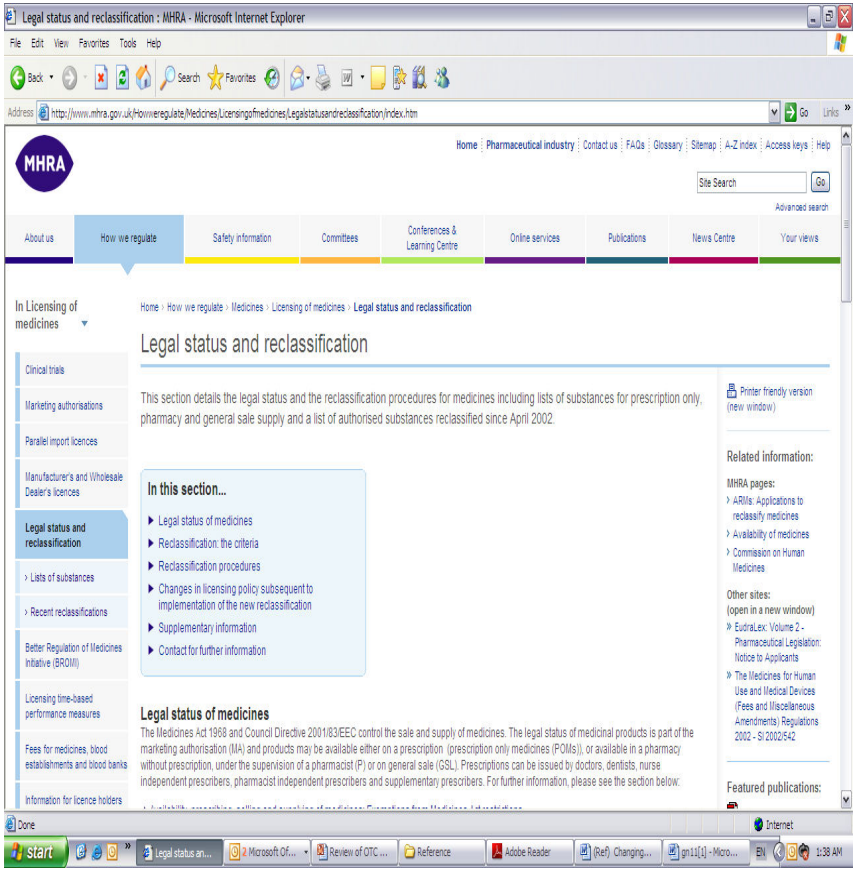
UK MHRA guideline #11: Changing the legal classification in the UK of a medicine for human use

UK





Guideline of POM-to-P switch

1) should not have a direct or indirect danger exists to human health, even when used correctly, if used without medical supervision; or

2) there is no frequently incorrect use which could lead to direct or indirect danger to human health; or

3) further investigation of activity and/or side-effects is not required; or

4) not to be administered parenterally.

Note: this is same as EU guideline on changing the classification of the supply of a medicinal product for human use (2006) - 2001/83/EC

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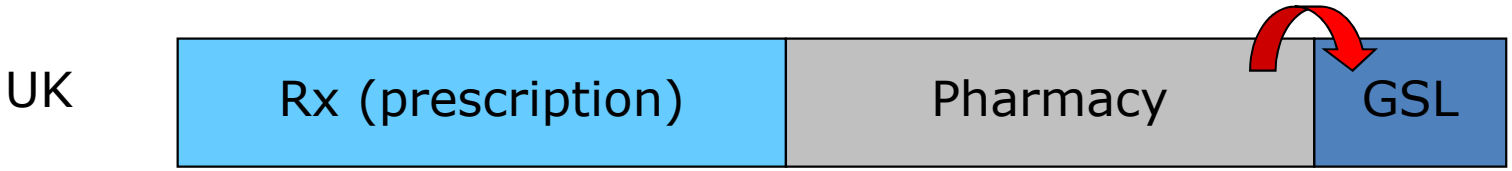

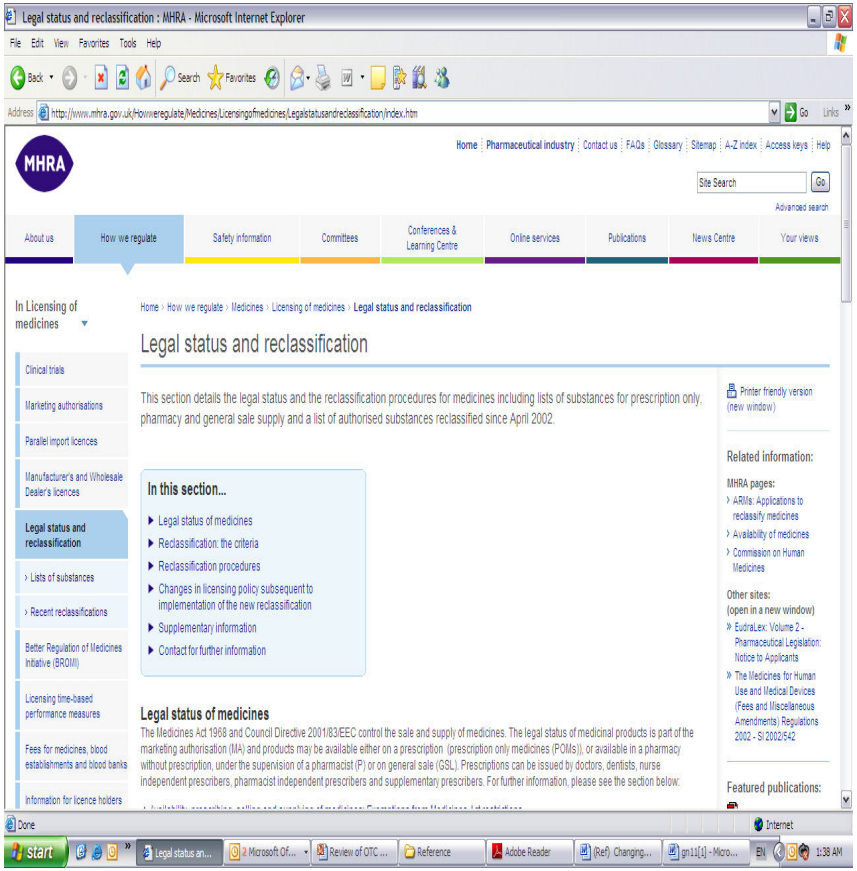

Guideline of P-to-GSL switch

1) hazard to health and risk of misuse is small and that significant special precautions in handling are not required.

2) must not be categorized in group of Anthelmintics, Parenterals, Eye drops, Eye ointments, Enemas, Irrigations used for wounds, bladder, vagina or rectum, Aspirin or Aloxiprin for administration to children

3) No need to get professional advice at the time of purchase.

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Common Practice in Reclassification

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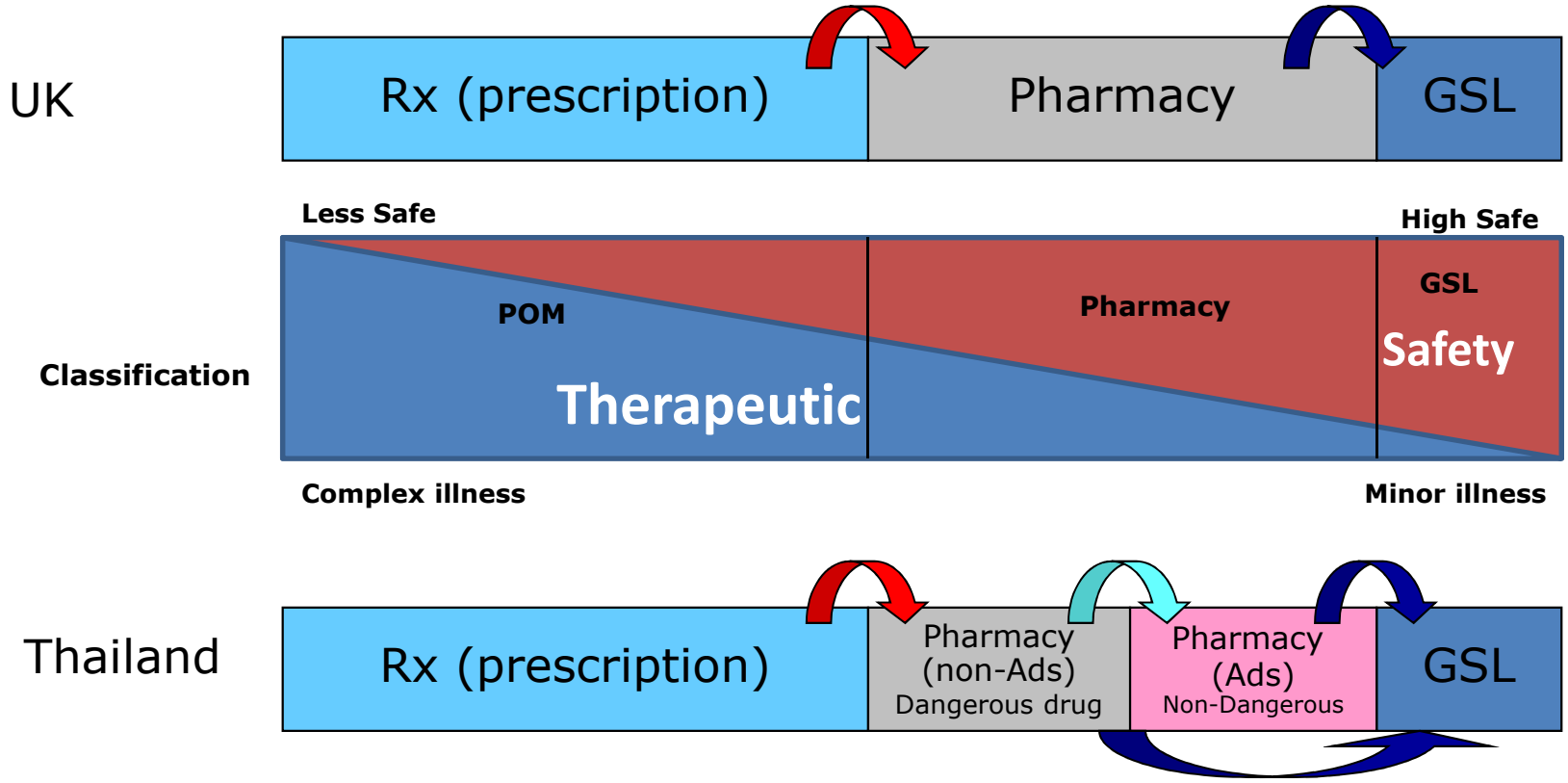
Common Practice in Reclassification



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Draft
Thailand Reclassification guideline

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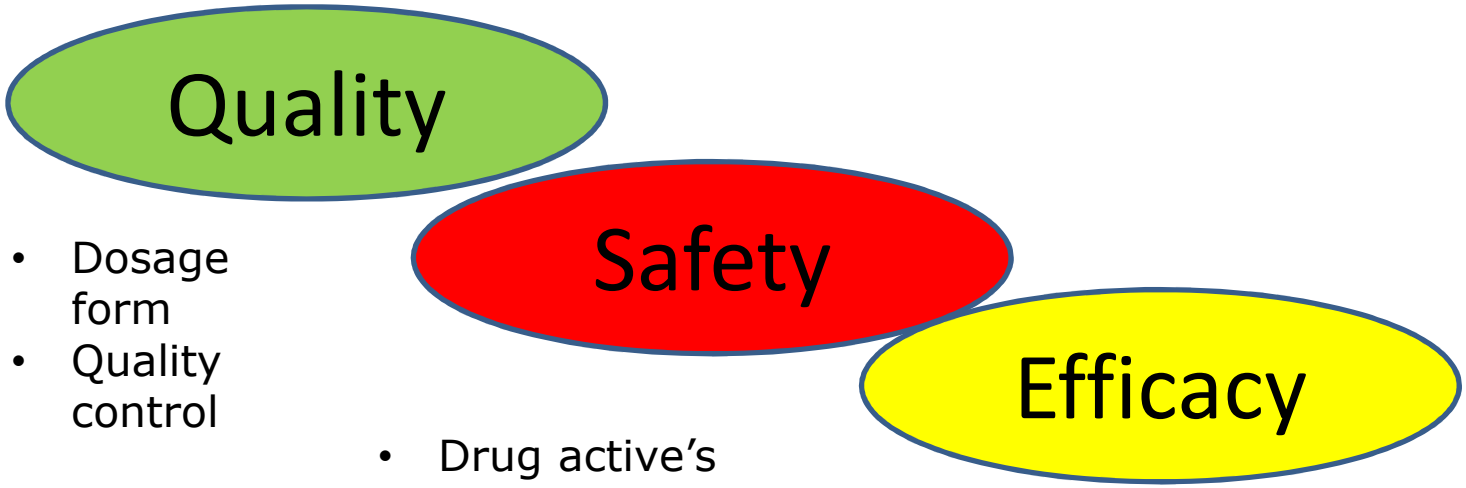
General factors to be considered in reclassification



- Dosage form
- Quality control

- Drug active's clinical safety
- Disease
- In/Post-market's clinical safety

- Proven efficacy
- Patient compliance
- Widen drug access

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Drug Classification

THAILAND drug classification

Specially Controlled Drug	Dangerous Drug	Drug which not classified as Dangerous Drug and Specially Controlled Drug	Household Remedy Drug(Self-care, GSL)

Healthcare professional advertising | ***direct-to-consumer advertising***

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Specially Controlled Drug

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Drug which classified as Specially Controlled Drug

1. Chance of incidence of **danger caused directly by drug**, even if used correctly without supervision by physician because drug has:

	Antineoplasitics e.g. Paclitaxel	**Antivirals** e.g. Zidovudine
1.1 High General toxicity	✓	✓
1.2 Reproductive Toxicity, Genotoxicity ,Mutagenicity	Clastogenic (in vitro , in vivo)	Mutagenic in 5178Y/TK+/- mouse lymphoma assay
1.3 Serious ADR type A frequency : Very Common - Common	Anemia	Bone marrow depression
1.4 Serious ADR type B frequency : Very Common - Rare	Polyneuropathy	Immune reconstitution syndrome. Autoimmune disorders
1.5 Serious Drug-Drug interaction or Drug-Food interaction	Drug interaction with enzyme inhibitors e.g. ketoconazole and other imidazole antifungals, erythromycin, fluoxetine, gemfibrozil, cimetidine or enzyme inducers e.g.rifampicin, carbamazepine, phenytoin, efavirenz, and nevirapine) involving CYP2C8 and CYP3A4.	Drug interaction to Antiretroviral Agents , Doxorubicin, Phenytoin, ganciclovir

Drug which classified as Specially Controlled Drug (Con't)

2. Possibly cause serious **indirect harm** from the treatment which masks actual symptoms requiring medical care e.g. cancers or heart diseases, despite of correct usage without physician supervision.

Example: Oral corticosteroid e.g. Prednisolone, Cortisone.

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Drug which classified as Specially Controlled Drug (Con't)

3. Its use requires physician supervision or it has frequent incorrect use

Example: Steroid containing products for inhalation

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Drug which classified as Specially Controlled Drug (con't)

4. Indication purposed for the treatment of symptoms or diseases of which cannot diagnosed by the patient him/herself.

Example: Antipsychotic drugs

General Anaesthetic

Drug which classified as Specially Controlled Drug (con't)

5. Highly negative impacts to society even though there is evidence to support the safety and can be classified as dangerous drug such as

Narcotic drugs or

Psychotropic drugs or

A drug led to addiction when abuse or

A drug used by unintended purpose to violate laws, etc.

Example: Misoprostol

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Dangerous Drug

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Drug which classified as **Dangerous Drug**

1. No characteristics of specially controlled drug

2. Administration not required under physician supervision. Pharmacist can give proper and safe instructions to patients.

Example: Antiviral drugs for external use

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Drug which is not Dangerous or Specially Controlled Drug (non- Dangerous Drug)

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Drug which not classified as Dangerous or Specially Controlled Drug

1. No characteristics of Dangerous Drug and Specially Controlled Drug.

2. Not an injectable dosage form.

Drug which not classified as Dangerous Drug and Specially Controlled Drug(con't)

3. Low risk with well supportive data in patients require specialized care such as elderly, pregnant women, lactating women and patients with hepatic and renal impairment.

Example: Mucolytic

Active Ingredient	**Acetylcysteine**
Dosage Form	Effervescent tablet, Granule
Indication	Used to dissolve mucus and to facilitate expectoration during respiratory diseases
Pregnancy risk factor	B
Dose adjustment in renal and hepatic disease	Not required
Use in pediatrics and geriatrics	No toxic concern

Ref: Drug information handbook

Drug which not classified as Dangerous Drug and Specially Controlled Drug(con't)

4. Administration not required an instruction from physicians or pharmacists ; easy to use when following the instructions on a label or package insert.

Example : Mouthwash

Household Remedy Drug

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Household Remedy Drug (Self-care, GSL)

1. No characteristics specified under the category of Specially Controlled Drugs or Dangerous drugs
2. Not formulated as injection form
3. Indication for treatment of disease or symptom which can be self-diagnosed
4. Administration is not complicated in User Instructions of product insert
5. Low risk with well supportive data in patients require specialized care such as Elderly, Pregnant women, Lactation women, and patient with liver and renal impairment

Household Remedy Drug (Self-care, GSL)

Example: Carbon for Anti-diarrhea

Activated charcoal 250-350 mg

Indication: Treatment of diarrhea

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Drug Reclassification Status

- Status :
  - Drug Reclassification Application Guideline
    - Public hearing : 24 September 2014

Adobe Acrobat Document

  - Drug Reclassification Guideline
    - Public hearing : 7 July 2015
  - Announcement : Target in November 2015

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Three Years Roadmap

2015	2016	2017
• Implement Drug Reclassification guideline • Implement Drug Reclassification Application guideline	• Review of submitted application	• Roll Out to whole drug system

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Thank you

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