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# "A Comprehensive Review on Regulatory Aspects of Vaccine Development and Approval Pathways Across the Globe"

Komal S. Fundkar<sup>1</sup>, Manisha D. Gawande<sup>1</sup>, Mansi S. Ghule<sup>1</sup>, Mrunal M. Mundhe<sup>1</sup>, Neha R. Ukey<sup>1</sup>, Shivshankar M. Nagrik <sup>2</sup>, Manisha R. Jawale<sup>3</sup>, Prakash Kendre<sup>4</sup>, Somnath Vibhute <sup>4</sup>, Shirish Jain <sup>5</sup>.

<sup>1</sup>B. Pharm, Rajarshi Shahu College of Pharmacy ,Buldhana, Maharashtra, India.

<sup>2</sup> M. Pharm, Department of Pharmaceutics , Rajarshi Shahu College of Pharmacy ,Buldhana, Maharashtra, India.

<sup>3</sup> Assoc Prof. M. Pharm, Department of Pharmacology , Rajarshi Shahu College of Pharmacy ,Buldhana, Maharashtra, India.

<sup>4</sup>Assoc Prof. M.Pharm, Ph.D. Department of Pharmaceutics , Rajarshi Shahu College of Pharmacy ,Buldhana, Maharashtra, India.

<sup>5</sup> Principal, M. Pharm, Ph.D. Department of Pharmacology , Rajarshi Shahu College of Pharmacy ,Buldhana, Maharashtra, India.

## Abstract

The development and regulation of vaccines is a complex, highly controlled process involving multiple stages, from initial discovery to post-marketing surveillance. This paper outlines the essential steps in vaccine development, including exploratory research, preclinical studies, and multi-phase clinical trials, followed by regulatory submission and approval. Vaccines, being biological products, demand stringent quality control due to their derivation from living organisms. Regulatory bodies such as the USFDA, EMA, and CDSCO in India play pivotal roles in ensuring the safety, efficacy, and consistency of vaccines before and after market release. The Biologics License Application (BLA) and Marketing Authorization Application (MAA) are key regulatory documents required in the USA and EU, respectively. The document also elaborates on postmarketing surveillance and pharmacovigilance measures designed to identify rare adverse effects and ensure long-term safety and efficacy. Labeling, packaging, and international regulatory harmonization further enhance the transparency and global accessibility of vaccines. This review emphasizes the need for standardized regulatory protocols across nations to accelerate vaccine availability and maintain public trust. Understanding the mechanisms and policies adopted by leading regulatory authorities can help emerging nations streamline their vaccine approval pathways. The integration of adaptive models and real-world evidence into regulatory frameworks will be crucial for responding to future pandemics and health emergencies efficiently and equitably.

**Keywords:** Vaccine Development, Regulatory Approval, Clinical Trials, Pharmacovigilance, Post-Marketing Surveillance.

## Introduction:

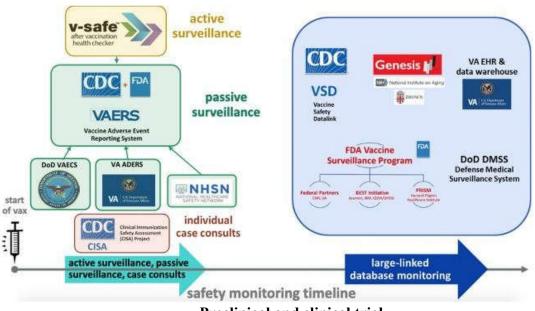
The development of a vaccine -- from first identifying the causative agent of a disease to delivering a vaccine to the public -- can take anywhere from months to years, with the average time somewhere in the 10- to 15-year range. In the United States, private companies do most vaccine development, but public agencies (e.g. the government) can also be involved in the process. In some parts of the world, the government funds and regulates the entire process. The process has changed in the modern era of vaccination, with more regulation and oversight from governmental agencies, more involvement from the public in how vaccines are marketed, and more collaboration between once-competing companies is becoming the norm. In this article, we will explore the different steps toward developing a

vaccine, as well as regulating its sale and monitoring its safety.



## Vaccine overview:

Vaccine development encompass a complex and highly regulated process ranging from preclinical data, multiple phases of <u>clinical trials</u>, biologics license application (BLA) and, lastly, post licensing safety and efficacy surveillance



Preclinical and clinical trial-



Preclinical testing occurs before clinical trials can be conducted. The goal of preclinical trials is to assess the potential <u>toxicity</u> of a new therapeutic drug using either human cell cultures or animals before the medicine can be tested "in vivo" in human participants.

Preclinical testing is required to demonstrate the safety of new vaccines before they can be tested on humans. In most cases, preclinical testing is extensive in order to gain sufficient data to reliably indicate not just the safety of a new vaccine, but also its potential efficacy, toxicity, and <u>pharmacokinetic</u> properties. In addition, preclinical trials allow scientists to model for potential drug-target interactions. New vaccines, such as those being developed for COVID-19, must go through the rigorous preclinical testing phase as part of a wider, development cycle of a vaccine. Generally, preclinical testing happens before the vaccine can be tested in clinical trials, following this, it is put under regulatory review and approval, then finally, manufacturing of and quality control of the vaccine is developed.

Here, we will discuss the steps that lead to a vaccine being approved for preclinical testing and what that involves.



Drug discovery and development

## Vaccine mfg and quality control

Biological products, including vaccines, are distinguished from chemical pharmaceuticals by being derived from living organisms with a molecular composition too complex to be defined by physical or chemical means. In addition, the inherent variability of living organisms, the potential for contamination of materials with agents coming from starting materials or the environment, require special quality control and quality assurance mechanisms.

While the manufacturer has the primary legal responsibility for the safety, quality, and efficacy of the products they sell, the National Regulatory Authorities (NRAs), in particular in the countries where vaccines are manufactured, play a critical role in assuring product quality. NRAs are responsible for the review of licensing applications, lot release, and monitoring the performance of the product in their country. The scientific competence and harmonized practices of NRAs have become essential components of the quality assurance of products moving in international trade.

As part of its program of biological standardization, WHO documents the current regulatory practices for both general and product-specific topics to support national regulatory authorities and manufacturers so that the quality of all vaccines is of assured quality.

## **Guidance on regulatory functions**

WHO first adopted recommendations for the national control of vaccines and sera in 1981. This regulatory oversight of biological medicinal products was revised in 1992 to include regulatory procedures for both manufacturing and importing countries, the function of the national control laboratory, and post-licensing monitoring. This guidance was further updated in 1994 to include recommendations for newly developing regulatory authorities.

## **Biological products, regulation and licensing**

- Guidelines for national authorities on quality assurance for biological products; Adopted at ECBS 1991, TRS No. 822, Annex 2
- <u>Regulation and licensing of biological products in countries with newly developing</u> <u>Regulatory Authorities; Adopted at ECBS 1994; TRS No 858, Annex 1</u>

## Lot release of vaccines

Lot release is a post-licensure activity conducted by national authorities on batches (lots) of vaccines before they are authorized for sale or use. While lot release has traditionally been considered to be an essential regulatory function for vaccines, it is practiced worldwide to different degrees.

Independent lot release involves the confirmation that each lot meets the specifications in the approved marketing authorization for the product and includes, as a minimum, a review of summary protocols of the results on quality tests conducted by the manufacturer. In some situations, re-testing of some critical parameters by the National Control Laboratories of the regulatory authority may be appropriate. Challenges include the increased volume of vaccines now licensed and in use, the increasing complexity of new vaccines requiring more sophisticated (and expensive) test protocols, and the increasing globalization of the industry. These factors create an increasing burden for NRAs and for the industry, and they are a particular problem for developing countries with limited regulatory experience and resources.

#### **Regulatory submission and approval**

Regulatory submissions are a very critical milestone in the life sciences industry. They are literally the translation of (mostly) 10 years' worth of R&D work into success.

Therefore, navigating regulatory submissions is a critical and often complex hurdle.

The regulatory submissions process involves 5 main stages, being:

- 1. Pre-submission
- 2. Application preparation
- 3. Submission & review
- 4. Addressing deficiencies
- 5. Approval

We aim to equip you with a clear understanding of what regulatory submissions are, why they matter, and the key steps involved in securing approval for your innovative product.

## What are Regulatory Submissions?

Think of regulatory submissions as the **gateway** for your groundbreaking drug, medical device, or biotherapeutic to reach patients.

These comprehensive packages – a.k.a. regulatory submission or a regulatory dossier – are submitted to regulatory bodies like the US Food and Drug Administration (FDA) or the European Medicines Agency (EMA).

They showcase your product's safety, efficacy, and quality, demonstrating compliance with stringent regulations. Overall, there are nine main submissions that can be made to regulatory bodies, falling into three categories. They are:

## **Drug applications:**

- New Drug Applications (NDA)
- Investigational New Drug Applications (IND)
- Abbreviated New Drug Applications (ANDA)

## **Medical Device Submissions:**

- 510(k) Premarket Notification (510k)
- Pre-market Approval (PMA)

## Other submissions:

- Bio Licenses Application (BLA)
- Marketing Authorization Application (MAA)
- Clinical Trial Application (CTA)

## The Regulatory Submission Process

Now that you have a bit of background knowledge, it's time to get into the regulatory submission process. Below is a high-level overview of the five-step journey.

- 1. **Pre-submission:** Planning and gathering data, understanding requirements, and engaging with regulators.
- 2. Application Preparation: Compiling a detailed dossier with scientific data, manufacturing information, and labeling.
- 3. Submission & Review: Submitting the dossier electronically and facing regulatory scrutiny.
- 4. Addressing Deficiencies: Responding to agency questions and addressing any identified issues.

5. Approval or Not? Receiving a final decision, with potential post-approval monitoring and reporting.

## **Submission Expertise Gap**

- **Challenge:** Hiring and retaining regulatory experts can be difficult, especially with changing business strategies and emerging product types. This can lead to skill gaps within submission teams.
- Solution: Invest in training and development for existing team members. Outsourcing specific tasks to experts or partnering with regulatory consultancies to fill temporary gaps, might be a solution for your regulatory submissions.

## Post marketing survillence and pharmacovigilance

## **Postmarket Surveillance**

Postmarketing surveillance (PMS) is defined as the identification and collection of information regarding drugs after their approval for use in a population.<sup>11</sup> The drug approval process in some countries is complicated and lengthy, which may hold drugs back from patients in desperate need of them. PMS is a method of systematically monitoring the safety and effectiveness of new drugs in the real world using a variety of patient types with many different comorbid diseases. The population of potential users after a drug is released is very different from the population studied in the premarking phase of a drug's approval. For example, few <u>clinical trials</u> will include very old patients or patients with two or more comorbidities or women that are breastfeeding.<sup>11</sup>

PMS allows for the long-term monitoring of the effects of drugs. This contrasts the followup period of randomized controlled trials that are usually shorter in duration when considering the cost of the trial.<sup>11</sup> The long-term effects, such as tolerance to the drug or <u>adverse drug reactions</u>, use PMS study designs. Especially rare <u>adverse events</u> that may not be identified in clinical trials because of the small sample side, PMS data may include thousands of patients using the medication over a period of time allowing for these rare events to be quantified and studied.

Case Study: Postmarketing Surveillance Study

Postmarketing surveillance study of the safety and efficacy of <u>sildenafil</u> prescribed in primary care to <u>erectile dysfunction</u> patients.<sup>18</sup>

The safety and efficacy of sildenafil use in primary care were studied in a total of 651 men with erectile dysfunction enrolled from primary care in Korea. Patients were followed up, and all adverse drug reactions and efficacy data were collected. 458 patients completed the study. The study found hypertension and diabetes were associated with poor efficacy. A total of 71 adverse events were reported in 56 patients (8.6%). The study concluded that sildenafil prescribed by primary care physicians was well tolerated and improved erectile function in patients with erectile dysfunction.

PMS also allows for other indications for medication use to be observed and evaluated. "Offlabel" use or using a medication for another indication not included in the official drug information can be identified and evaluated. Therefore, knowledge gained from PMS allows for the broader application of drugs to special populations, for different indications, and at doses and durations not studied in the prelaunch clinical trials.<sup>11</sup>

## Labeling and packing

## Considerations for choosing vaccine label materials

Small diameter containers require special materials and adhesives that prevent the label from edge lifting and peeling off. The right label material will:

adhere well even to moist and cold surfaces, ensure legible

printing, remain securely intact after harsh storage and

handling, and not absorb moisture or tear, even after

thawing.

Equally as important with cold chain vaccine solutions are the secondary packaging labels. For example, logistics packaging made from cardboard or plastic.

Vaccine packaging materials require thorough testing to ensure product safety. Thus, the importance of pre-tested materials with a change management protocol is a final key consideration when choosing a vaccine label solution.

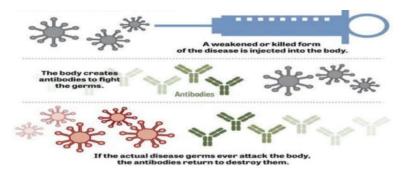
#### **International regulatory requirement**

Vaccines are one of the most significant achievements of science and public health. Many diseases that can be prevented by vaccination are now rare in the United States due to successful immunization programmes. Drugs are described as substances that are employed in the treatment, mitigation, medicine, or prevention of disease. Typically, disease-causing microorganisms, their toxins, or a denatured or dead version of one of their surface proteins are used to create vaccines [1-4]. Vaccines belong to a brand-new category of pharmaceutical medicines that can be classified as both medications and biological products. Some pharmaceutical products could be considered medications or biological products. A vaccination is a prescription medication used to increase immunity to a particular disease. An injection of a chemical known as a vaccination is given to a patient in order to treat or prevent an ailment or sickness that is brought on by a particular causative agent. The vaccine provides instructions on how to trigger an immune response in order for the body to defend itself against infectious diseases. The vaccination industry is strictly controlled and the process of creating vaccines is challenging and time-consuming [5-8]. The vaccine typically contains a component that mimics a germ in which it causes disease, this substance is frequently derived from a weakened or dead variety of the

disease-causing bacteria toxin or from its surface proteins. The material causes the immune system to become activated, allowing it to identify and destroy the substance as a threat as well as any associated microorganisms that the host may later come into contact with to stop or minimise the symptoms of a future infection by a natural or wild virus Vaccinations can be therapeutic or preventative Some vaccines provide full sterile immunity, which completely prevents infection [9-12]. Vaccine restrictions are still region-or country-specific, and they are getting more complicated every day. As a result, unified criteria for the vaccination approval process in emerging and developing nations are required. The United States Food and Drug Administration, Centre for Biologics Research and Development oversees the vaccines and associated goods. To request permission to produce and sale the vaccines in the USA, fill out the FDA Application 356h, Biologics License Application (BLA). The European Union (EU) uses a mechanism known as the Marketing Authorization Application (MAA) to control how vaccines are approved [13-15].

## Vaccine development

Millions of individuals receive them safely each year, and the majority are already employed for many years before being included in the nation's vaccination schedule. Each vaccine, like other pharmaceuticals, must pass rigorous testing that confirms its safety. The standardization process for vaccine approval is an exploratory stage, pre-clinical stage, clinical development, conducting an investigation, and acceptance stages.



#### Fig. 1: How do vaccines work, [Source:

## https://www.indiascienceandtechnology.gov.in/covid-19-vaccine/vaccine-introduction] [18]

## **Exploratory stage**

This level typically occurs in two to four years and encompasses fundamental investigations by governmental and educational researchers with federal funding to find artificial antigens that cure diseases. These antigens could be pathogen-derived compounds, attenuated viral toxins or virus-like debris. Three steps of testing are conducted on the vaccination.

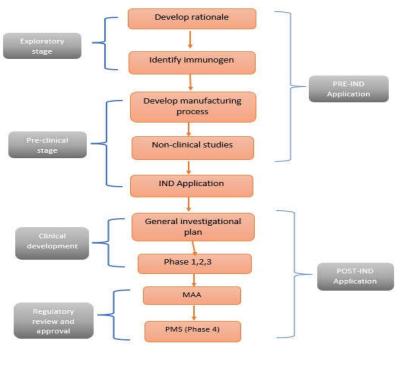
#### **Pre-clinical stage**

Pre-clinical research examines a prospective vaccine's immunogenicity or capacity to elicit an immune response as well as its safety using cell-culture methods and animal testing. Studies

provide scientists an understanding of the biological reactions they would anticipate in people; they might also recommend a secure initial dosage for the subsequent research stage, a secure way to give the vaccine. When the potential vaccine is still in the pre-clinical stage, researchers might modify it to try to increase its efficacy. The animals might also be used for challenge trials, which entail immunizing the animals before attempting to expose them to the intended pathogen. Many potential vaccines never move past this point because they don't elicit the necessary immune response. Preclinical stages typically take between one and two years and involve researchers from private enterprises.

## **Clinical development**

With IND approval, the clinical development step gets underway. Clinical testing using vaccinations on humans requires the creation of a general study plan. Phase I, II, and III clinical trials must all be conducted after receiving regulatory authority permission. It could take up to eight years to complete



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Fig. 2: The general phases of a vaccine's development cycle

## IND application

The USFDA submits an application for an IND from a sponsor, typically a commercial firm. The sponsor summarises the lab reports, discusses the proposed study, and details the manufacturing and evaluation procedures. A clinical protocol needs to be authorised by an institutional review board that represents the organization that will perform the clinical study. The application requires 30 d to be accepted by the FDA. The vaccine must undergo 3 steps of testing after the IND application is accepted [20, 21].

## Phase I vaccine trials

A small number of adults, approximately 20-80 individuals, are included in the phase I vaccine trials while creating a vaccine for kids in order to reach the target population. Scientists will first test the substance on adults before lowering the age of the test subjects. A placebo may be used in these tests if they are not blinded. The goal of phase I assessment is to determine the vaccine's security and strength of the immunological reaction.

## Phase II vaccine trials

To assess the vaccines' immunogenicity and give a preliminary design of the common adverse effects, phase II vaccine studies involving several hundred participants are conducted in order to discuss their prospective phase III studies. Sponsors are encouraged to meet with the CBER at the end of phase II testing to serve the purpose of the research.

## Phase III vaccine trials

Following the successful conclusion of phase II vaccine studies, the trials progress to bigger trials involving thousands to tens of thousands of participants. The investigational vaccination is tested in these phase III trials versus a placebo in a randomised double-blind fashion. Phase III is intended to evaluate the safety of the vaccination in a sizable population. One study found that smaller subject populations studied in early phases might not have seen any uncommon adverse effects; according to one study to find a variation for a minimal occurrence, a study would need to enrol 60k people, half of whom would be in the placebo group, or those who had not received vaccinations placebo.

## Phase IV trials

The vaccine creator might choose to do optional investigations known as phase IV trials once the vaccine is made available. The vaccine might keep evaluating its security effectiveness and other potential applications [22, 23].

## Manufacturing of vaccines

Due to this reality, vaccinations must adhere to some of the most stringent design monitoring and compliance standards of any modern manufactured product. Four skills are the foundation for the safe and reliable production of these vaccines. These includes the production procedure that specifies how the product is created, the organization's conformance with that procedure, the

product testing and related procedures, all four new vaccinations are subject to a clear regulatory approval process before being allowed to be released and distributed.

## There are four main components to the approval procedure

Preparedness of preclinical documents for animal model proof-of-concept tests, the submission of an application for an Investigational New Drug, testing for efficiency and safety, and submission of a Biologics License Application (BLA) containing required data to the FDA and EMA for approval. Propagation is the process by which the living organism employed in vaccination is multiplied or amplified. The living organism should be separated from the cells used in the propagation step in order to be isolated. Purification eliminates any compounds that are connected to the isolated living creature that will be used in the vaccine. Formulation involves the mixing of the purified product in solutions to get the desired concentration. In order to maintain the products' sterility for a longer period of time to avoid cross-contamination while extracting doses from vials, preservatives may also be added to some vaccines. Vaccines are normally packaged for transportation to healthcare

professionals after the manufacturing process is complete and placed in vials or syringes [24, 25].

Propagation Isolation Purification Formulation

## Vaccine regulations in India

Various regulatory agencies for vaccine registration are the Ministry of Health and Family Welfare, National Technical Advisory Group on Immunization, Indian Council for Medical Research, Central Drugs Standard Control Organization [27-31]. Further information of vaccine regulations in India were depicted in [fig. 3].

## Vaccines regulations in USA

Various regulatory bodies for vaccine registration in the US include Centre for Biologics Evaluation and Research, Vaccines and Related Biological Products Advisory Committee, Biologics License Application [32, 33].

#### **Regulatory approval and review**

After the Phase 3 trials, the producer must submit a CBER of USFDA on FDA form 356h biologic licence application to request permission to manufacture and commercialize the vaccine to a large population. Depending on whether the application is being reviewed as a priority or under a regular review, it could take anywhere from 6 to 12 mo to complete. Phase 4, often known as post-marketing surveillance, will start after the approval procedure. Within 15 d of the vaccination administration, any adverse events or effects must be notified to the authority [34, 35]. Regulatory approval in USA was depicted in [fig. 4].

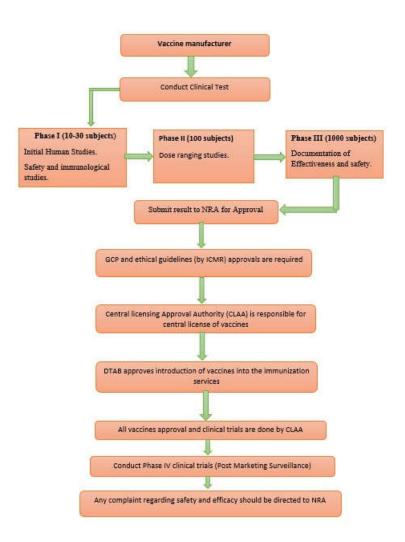


Fig. 3: Process for regulatory approval of vaccines in India

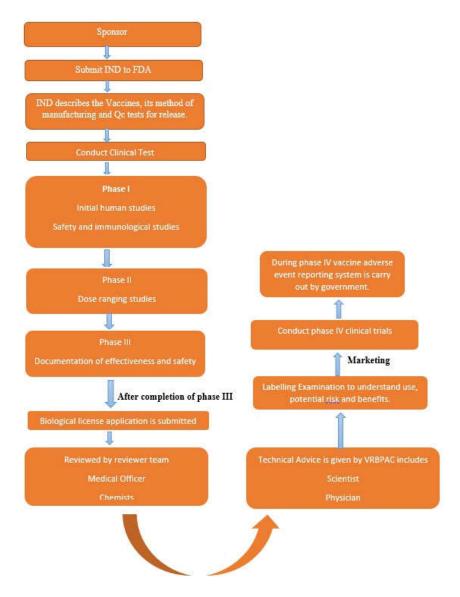


Fig. 4: Registration process of vaccines In USA

## **Biologic license application process (BLA)**

The decision to file a BLA begins the application procedure on day 1 during the application submission procedure. The meetings must be scheduled on the 45<sup>th</sup> day. The manufacturer will have 60 d to file the BLA with the appropriate materials and schedule the inspection window and other related tasks. The applicant's eligibility for priority or standard review will be decided by FDA. Additionally, if the vaccine product significantly enhances public health, the manufacturer may ask for priority consideration.

While priority reviews might take up to 6 mo, normal reviews can take up to 12 mo, if the application is chosen for priority consideration, the FDA will also let the applicant know within 60 d on day 74. It will be known if there is a routine review on day 75. The compliance of the vaccine product will be thoroughly examined the application will be distributed for review before being accepted [36-38]. Process of BLA were depicted in [fig. 5].

## Regulatory approval process of vaccines in EU

Marketing authorization registration quality assessment evaluation of quality, effectiveness, and safety of vaccines through pharmacovigilance and risk assessment plans [39, 40].

## Marketing authorization

CHMP grants marketing authorization after assessing the whole filing for the product's safety, efficiency, quality, and risk-benefit ratio. The regulatory authorities must first give their permission before reviewing the dossier for conformity in areas like clinical, laboratory testing and manufacturing. Marketing Authorisation Application (MAA) of EU were illustrated in [fig. 6].

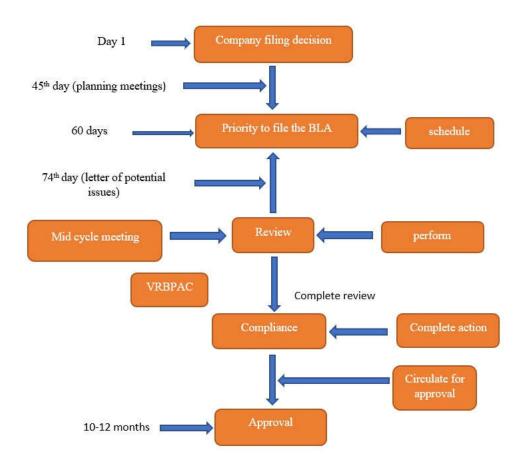


Fig. 5: Biological license application (BLA) flow chart

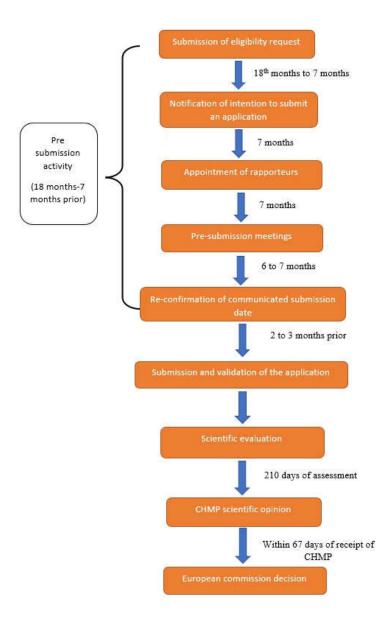


Fig. 6: Marketing authorisation application (MAA) of EU

## Registration

The EU uses Centralized, Decentralized, Mutual recognition, and Nationalised mechanisms to approve vaccines. When requesting a marketing authorization for a vaccination product, the manufacturer typically favours the centralized process, since a centralised process is used to approve a single marketing authorization for a vaccination product across the EU. Patients, as well as the healthcare system may easily get vaccines. The application made to the European Medical Agency for marketing vaccination products across the EU will be evaluated by CHMP [41-43]. Registration Process of Vaccines in EU were illustrated in [fig. 7].

## Quality assessment

The vaccines will be quality-checked before being released into the market after getting marketing authorization from the European Directorate for Quality of Medicines, which manufactures an official European control laboratory to help with the quality evaluation procedure.

#### Risk management plan and pharmacovigilance

After being released onto the market, vaccines are checked for adverse reactions to verify they meet the safety profile set throughout the product innovation. The risk management strategy is also designed to identify uncommon occurrences that would not have been obvious during clinical development.

## Vaccine antigen master file (VAMF)

In the case of the Centralised method, the vaccine manufacturer must submit an application for a vaccine antigen master file prior to MAA approval. European Medicines Agency VAMF certification 2005. The makers will be able to choose between the marketing authorization procedure and the VAMF submission process during the pre-submission meeting with the scientific committees in general, centralised procedures are recommended, and the CHMP will conduct a scientific examination of the provided dossier. EMEA 2005 adverse events in the EU vaccine are recorded using the eudra vigilance system. The patient, the doctor, or the manufacturer can all report an adverse occurrence according to the eudra vigilance system. The report will be evaluated and the CHMP will take appropriate action by either approving or rejecting the product from the marketplace in 2003 the European Medicines Agency [44-46]. Approval process of Vaccine Antigen Master File (VAMF) were illustrated in [fig. 8].

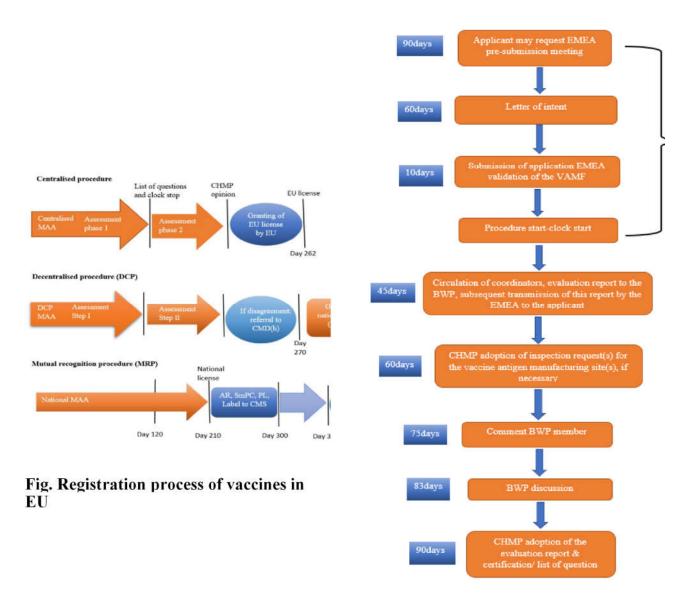


Fig. 8: Approval process of vaccine antigen master file (VAMF)

# CONCLUSION

The fundamental biotechnological advancement that significantly improves the state of world health is the development of vaccines. Before a product is released onto the market, a strict regulatory procedure must be followed to evaluate its quality efficacy and safety. The health of people living in emerging or developing nations will be improved by following standardized protocols and obtaining regulatory approval of vaccines which is secure and efficient in a coordinated manner. The development of vaccines in emerging nations will surely benefit from an understanding of the laws of developed nations like India, USA and the EU. Vaccines ensuring safety, efficacy, quality of vaccines developed through new platforms is challenging as it has no

previous regulatory experience is available in such cases. In cases of vaccines given full authorization we should keep track of adverse effects and efficacy to address new infections and reduction in mortality and morbidity in nonimmunised groups and immunised groups. Using the following steps regulators can incorporate new adaptive models to the toolkit of decision making and modifying the regulatory pathways for usage in emergency situations. Due to their complexity and the fact that they create consequences after being administered to patients, vaccination regulations are strict. Understanding the rules and MAA criteria for vaccinations in India, the United States, and the European Union was the goal of the current discussion. This work contributes to the development of uniform registration practises among EU and Indian regulations. To ensure that the immunizations are quickly available to the entire world's population, we need a standardised registration process.

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