





- SAAHA represents majority of product importers, manufacturers / suppliers.
- When compared to Human Pharmaceutical and Crop Protection, the Animal Health market is relatively small.
- Antimicrobials, Anthelmintic/Endectocides, Ectoparasiticides and Vaccines are by far represent about 85 % of the market.
- Registration of Animal Health Products follows similar procedures and principles to those for Human Medicines, with a number of differences.
- Veterinary medicinal products are frequently used under conditions not encountered with Human Medicines.
- Veterinary products treat a large number of very different species.
- Animal farming conditions may range from "harsh environment" to "controlled"/ intensive production facilities.
- Most animal products are administered according to animal weight and treatment weights may range from a few grams to tons.
- Veterinary medicinal products ae frequently used under conditions not encountered with human medicines.





- Acts directly applicable to the registration of veterinary products are the Medicines and Related Substances Act (101 of 1965) and the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act 36 of 1947).
 - Act 101/1965 is administered by DoH and is responsible for registration of all Human Medicinal Products and certain Veterinary Products.
 - Act 36/1947 is administered by DAFF, responsible for regulation of stock remedies amongst other things.
 - Generally, products for use by vets registered under Act 101 and products to be used by farmers or consumers are registered under Act 36.
- Other Acts:
 - Foodstuffs, Cosmetics and Disinfectants Act (Act 54 of 1972) controls drug residues.
 - Animal Diseases and Parasites Act (Act 35 of 1984) controls importation and use of vaccines, plus treatment of specific controlled diseases.
 - Veterinary and Paraveterinary Professions Act (Act 19 of 1982) controls professional conduct of vets and other professionals (incl. vet nurses, vet technicians & vet reps)
 - Pharmacy Act as with Human Medicines, manufacture and registration of vet products controlled by Act 101/1965 require supervision of a pharmacist for various functions.
 - Abbatoir Hygiene Act (Act 121 of 1992).



✓ Act 101

- Vet dossiers are separated and processed separate to human dossiers. Vet dossiers are reportedly moving as fast as fast-track dossiers, but that responses from the Vet Clinical Committee are slower. Some responses taking as long as 5 months, although the official requirement is 2 weeks.
- Once dossier evaluations are up to date, vet unit will address the backlog and look then look at old medicines.
- Current registration times reported by members:
 - ✓ Updates: 18 months
 - New applications: 36 months
 - ✓ New chemical entities: 5 yrs
 - Package inserts: 2-3 yrs
 - ✓ Pre-screening: 12 months

✓ <u>Act 36</u>

- ✓ Stats given not representative of members 'submission.
- Adverts approval taking aprrox 60 days for approval.
- Act 101/1965 is administered by DoH and is responsible for registration of all Human Medicinal Products and certain Veterinary Products.
- Both Acts101 and 36 expressed concern at the poor standard of vet dossiers and stock remedies dossiers, respectively.



- Backlogs
- Not predictable
- Inconsistencies
- Harmonisation of Acts 101 & 36?

CHALLENGES