Date: 8 May 2023

Version 7

Inactivated veterinary vaccines

Summary of information required for biosecurity risk assessment



SUMMARY OF INFORMATION REQUIRED FOR THE BIOSECURITY RISK ASSESSMENT OF INACTIVATED VETERINARY VACCINES

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Document Version Control History				
Version No.	Date Revised	Section Revised	Revision	
1	13 October 2011	N/A	N/A	
2	5 May 2013	All	Replaced 'AQIS' with 'DAFF' Updated TSE policy details	
3	24 June 2015	All	Replaced 'DAFF' with Department of Agriculture Made compliant with online accessibility requirements Updating Annex disease lists in Appendix 1	
4	23 May 2016	All	Update department name and contact details	
5	4 July 2018	Appendix 1	Transfer 'Lumpy skin disease virus' from Annex 3 to Annex 1	
6	1 February 2021	All	Replaced 'Department of Agriculture and Water Resources' with 'Department of Agriculture, Water and the Environment'.	
			Updated the Privacy Policy	
			Updated section 13.1	
			Replaced references to Annex diseases with references to diseases of animal biosecurity concern	
			Removed Appendix 1	
			Replaced 'kGray' with 'kGy'	
			Updated the web location of the 'Review of Published Tests to Detect Pathogens in Veterinary Vaccines Intended for Importation into Australia (Second Edition)'.	
7	8 May 2023	All	Update name of department to 'Department of Agriculture, Fisheries, Forestry'.	
			Update department contact email address.	

Date: 8 May 2023

Introduction

This Summary of Information (SOI) document is to be used by applicants who wish to apply for an Import Permit for inactivated veterinary vaccines. The document not only outlines the information required to assess these applications but also provides a reference as to how the information is to be presented to the Department of Agriculture, Fisheries and Forestry (the department).

The department assesses Import Permit applications for inactivated veterinary vaccines according to the requirements of the following policies:

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- 'Specific Quarantine Requirements for the Importation of Inactivated Veterinary Vaccines (an addendum to the guidelines for submissions to import veterinary vaccines), December 1997';
 and
- 'Guidelines for managing the risk of transmitting transmissible spongiform encephalopathies (TSEs) via veterinary vaccines and other in vivo veterinary products, October 2012'

Applicants will note that under each section of the SOI there is a heading 'Guidance on Policy Requirements'. The points under this heading are a useful summary of the relevant policy requirements. The points are for guidance only. Applicants who require clarification on specific points of policy must refer to the relevant policy document or contact the department using imports@agriculture.gov.au.

Applicants will also note the heading 'Evidentiary Requirements' under each section of the SOI. The department's assessing officers are required to review documents as the principal means of verifying compliance with relevant vaccine policy requirements. Those documents outlined under 'Evidentiary Requirements' must be presented by the applicant in support of their Import Permit application.

The department may impose requirements in addition to those specified in this SOI where applicants/manufacturers have not demonstrated an appropriate level of control of biosecurity risk during the veterinary vaccine manufacturing process. Examples of additional requirements include pathogen testing of vaccine intermediates/final product, increased documentation requirements or on-site audit requirements.

Dossier format

The department requires supporting documentation to be presented in a format that will maximise the efficiency of the assessment process. All supporting documentation must be provided in a dossier specific for the department's assessment which is supplementary to this SOI. Dossiers may be in electronic or hard copy format. The department will not accept dossiers that have been prepared for other regulatory agencies as supporting information for an Import Permit application.

Dossiers presented to the department must be annotated in a way that allows easy reference between the SOI and the dossier. The department requires information in dossiers to be indexed in the following way:

Index

Preliminary Information Requirements

- 1) Standards of Manufacture/Sourcing of Ingredients
- 2) Master Seed Viruses (MSV)
- 3) Master Seed Bacteria (MSB)
- 4) Master and Working Cell Seeds
- 5) Working and Production Seeds Viral and/or Bacterial
- 6) Nutritive factors
- 7) Trypsin and other enzymes of animal origin
- 8) Fermentation broths and culture media
- 9) Components of avian origin and embryonated eggs
- 10) Other materials of animal origin
- 11) Inactivation
- 12) Final Product Viral Vaccines
- 13) Final Product Bacterial Vaccines

Applicant's declaration

Applicants must provide documentation according to the Evidentiary Requirements outlined in each section of this SOI. For example, where the SOI requires applicants to provide a copy of a current certificate demonstrating compliance of the manufacturing facility with a code of Good Manufacturing Practice (GMP), a copy of this certificate must be included in the '1. Standards of Manufacture/Sourcing of Ingredients' section of the dossier.

It is appreciated that not all sections of the dossier will be relevant to every vaccine product e.g. vaccines are not always manufactured using nutritive factors derived from serum. Where this is the case, manufacturers must provide a declaration within the relevant section of the dossier confirming the absence of the component in vaccine manufacture.

Import Permit applications for new vaccine products that are submitted without a correctly formatted dossier will be rejected with no refund of application or assessment fee.

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Equivalence

Australia is a signatory to the World Trade Organisation's Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). Under the SPS Agreement, the department is authorised to develop science-based policies and impose measures that prevent the introduction of diseases and pests into Australia. It is also an obligation under the SPS Agreement that the department considers risk management measures that might be equivalent to current policy requirements.

This obligation extends to the department's veterinary vaccine assessments. Applicants may present a case for equivalence to the department where a particular vaccine is not compliant with Australia's import requirements but the applicant believes that biosecurity risks are managed through alternative, equivalent means. Cases for equivalence may be presented as an appendix to the dossier submitted in support of the Import Permit application.

The department will review the case for equivalence and consider whether advice from Animal Biosecurity (AB) branch or an external agency (e.g. an external government laboratory) is necessary for a complete assessment of the case. AB is the principal source of scientific/technical policy advice to assessing officers however it may be necessary for advice to be sought from other entities.

Once all relevant information relating to the case for equivalence has been collated and reviewed by the department, including advice from AB, a decision will be made as to whether the measures outlined in the case provide a level of biosecurity risk control that is equivalent to current policy requirements.

Where it is determined that the case does not provide an equivalent level of biosecurity risk control, the department will not issue an Import Permit for the vaccine.

In preparing a case for equivalence it is important to remember that the department adopts a tiered approach to risk management and that risk controls should be applied at the point at which the risk is created. The implication of this approach is that biosecurity risk control steps for one stage of the manufacturing process may not be considered effective in mitigating the biosecurity risk for another stage. For example, the biosecurity risk of a master seed that has not undergone extraneous agent testing as required by the policy may not be mitigated by the chemical inactivation step of the final bulk vaccine antigen.

Import Permit applications for non-compliant vaccine products that are not accompanied by a considered and well drafted case for equivalence relating to the areas of non-compliance will be rejected with no refund of application or assessment fees.

Preliminary Information Requirements

1. Table for applicant to complete

Table 1 Product information

Name of vaccine	
Target species	
List all antigens in final product	
Active against	
Manufacturer	
Importer	
List the name of the dossiers submitted in support of the application	

2. Complete list of biological materials

Biological materials are those derived from animals, plants and/or a process of microbial propagation. A complete list of biological materials used during vaccine production must be provided in Table 2. This list defines the scope of the biosecurity risk assessment.

Table 2 List of all biological components used during vaccine production

Name and reference code for all master seed organisms/viruses:
Name and reference code for all working and production seed organisms/viruses:
Name and reference code for all master and working cell seeds:
Complete list of biological products used during production:

3. Flowchart of production

Manufacturers must provide a flowchart of production outlining each major step of the production process. The flowchart of production must make specific reference to each biological component used and the point at which that biological component is used.

4. Registration and volumes of sale of vaccine in other countries

For some assessments, the registration of a vaccine product in another country may be used by assessing officers to mitigate certain biosecurity risks. The department requests that applicants provide a table listing the countries that have registered the vaccine for distribution and use in their animal health industries. The department also requests that the table includes figures on the volumes of sale of the vaccine in each country.

Applicants must also provide a summary of records of reported adverse reactions to the vaccine and subsequent investigations.

Information Requirements

1. Standards of manufacture/sourcing of ingredients

1.1 Guidance on policy requirements

- The manufacturing facility must comply with an appropriate code of Good Manufacturing Practice (GMP). This is to ensure principles of quality assurance are built into every step of production (e.g. final product quality, traceability of raw materials, and appropriate records management practices).
- The department will assess the principles of quality assurance adopted by the manufacturing facility to ensure they operate in accordance with Australia's import requirements i.e. the control of biosecurity risk.
- The manufacturing facility must be subjected to regular audits and must be approved for manufacture of veterinary vaccines by the relevant government competent authority.
- All sterilisation procedures must be validated and verified for the specific product, container type, configuration and volume and must be supported by GMP standards and procedures.
- All materials of animal origin used in the production process must be sourced from countries with high standards of animal health and veterinary services.
- The source of all materials of animal origin used during production must be certified. This certification must be unequivocal and preferably be issued by the government of the source country. Manufacturer's certification may be accepted provided the manufacturer is operating under a quality assurance system accepted by the department as adequate to ensure compliance with Australian biosecurity requirements. There must be an auditable trail from the country of origin of the source animals to the batch of finished vaccine destined for Australia.
- The department's list of "Pathogens of highest animal biosecurity concern" (formerly referred to as the Annex 1 list) can be accessed at https://www.agriculture.gov.au/sites/default/files/documents/pathogens-of-highest-biosecurity-concern.pdf. This list includes pathogens exotic to Australia which pose such a major economic and social threat to this country that sourcing of potentially contaminated products from affected countries will not be considered unless the product is effectively sterilised. In addition to country freedom, testing of certain products for pathogens included on this list may be required especially where documentation concerning origin is unsatisfactory.
- The department's list of "Transmissible spongiform encephalopathies" (formerly referred to as the Annex 2 list) can be accessed at https://www.agriculture.gov.au/sites/default/files/documents/transmissible-spongiform-encephalopathies.pdf. This list contains prion diseases e.g. scrapie and bovine spongiform encephalopathy (BSE). These agents are difficult to detect and generally extremely resistant to inactivation. Vaccines produced using products sourced from the relevant species in affected countries will not be approved.

• The department's list of "Pathogens of major animal biosecurity concern" (formerly referred to as the Annex 3 list) can be accessed https://www.agriculture.gov.au/sites/default/files/documents/pathogens-of-major-animal-biosecurity-concern.pdf. This list includes other animal diseases which are either other exotic pathogens, potentially exotic strains of an endemic pathogen or are potential contaminants of economic and social concern to Australia. The department may also identify other potential contaminants of concern during the risk assessment.

- The department will not approve the importation of vaccines manufactured in facilities that store or handle infectious agents included on the department's list of "Pathogens of highest animal biosecurity concern".
- Avian vaccines produced in facilities handling virulent avian influenza or Newcastle disease virus will not be approved.

1.2 Evidentiary requirements

Manufacturers must provide:

- **1.2.1** A copy of the current GMP certificate for their facility.
- **1.2.2** A copy of the registration/approval document issued to the facility by the government competent authority in the country of vaccine manufacture.
- **1.2.3** A complete list of microorganisms and viruses held at the manufacturing facility. NB. The manufacturing facility includes all buildings on site including production buildings, QC, and R&D areas.
- **1.2.4** A case in the form of a written declaration or procedural document demonstrating how the vaccine product is protected from contamination with microorganisms/viruses held at the manufacturing facility. Manufacturers must also provide a site floor plan in support of their case.
- **1.2.5** A complete list of products manufactured at the facility.
- **1.2.6** A complete list of current Standard Operating Procedures in use at the manufacturing facility.
- **1.2.7** Evidence that all sterilisation procedures have been validated and verified for the specific vaccine product, container type, configuration and volume and must be supported by GMP standards and procedures. A copy of the Standard Operating Procedure outlining the sterilisation validation process is an example of the evidentiary requirement that may be submitted to the department to demonstrate compliance with the policy requirement.
- **1.2.8** Assessing officers will conduct a documentation traceback audit of the vaccine manufacturing process to verify that the quality management system supports effective traceability. Manufacturers must be able to demonstrate a document control system that allows the department to review all relevant batch production records for a batch of vaccine that was recently manufactured and released for distribution. The paper trail must include, but not be limited to, the following documents:

• The batch-specific Certificate of Analysis for a batch of vaccine recently manufactured and released for distribution.

- Copies of reports for tests undertaken on the final vaccine product (or bulk inactivated antigen prior to filling).
- Copies of the manufacturing facility's raw material specifications for all biological products used during manufacturing.
- Copies of Certificates of Analysis for specific batches of animal derived product used to manufacture the vaccine batch.
- Copies of in-process batch control records (e.g. thermocouple data for autoclave sterilisers).

Manufacturers must provide copies of the complete document audit trail in the '1. Standards of Manufacture/Sourcing of Ingredients' section in the supporting dossier.

2. Master seed viruses (MSVs)

2.1 Guidance on policy requirements

- All MSVs must be tested for:
 - Bacterial and fungal contamination as per the United States Code of Federal Regulations,
 Title 9 (9CFR) 113.27(c) or European Pharmacopoeia (Ph. Eur.) 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Extraneous viruses as per 9CFR 113.55 and 113.200; or as per Ph. Eur. Vaccines for Veterinary Use 0062; and
 - Pathogens included on the department's lists of "Pathogens of highest animal biosecurity concern" and "Pathogens of major animal biosecurity concern" (see 1.1) which are pathogenic to the species (see Note)
 - a) From which the virus was originally isolated; and
 - b) Of all cell lines used for propagation and maintenance since original isolation of the virus; and
 - c) Of all nutritive factors of animal origin previously used on these cell lines; and
 - d) For which the vaccine is intended; and
 - e) Any other pathogen determined during assessment of the application to be a potential contaminant.
- MSVs derived from bovine, ovine or caprine animals (or other species considered susceptible to TSEs) will be assessed according to the requirements of the TSE policy (see Introduction). Applicant should refer to the TSE policy for further information.

Note: Assessing officers may take into consideration countries of origin and potential for contamination before and after any processing or treatments.

2.2 Evidentiary requirements for MSVs

2.2.1 Manufacturers must provide a full and well-documented history of the master seed (in prose and tabulated form). The history must include the species of origin, country of origin, date of isolation, and passage history. The history must also identify all cell lines and nutritive media used for the transport, storage, and propagation of the MSV.

Template for submission of tabulated MSV history

The department requires applicants to use

Table 3 as a template for submission of the MSV history:

Table 3 Template for submission of tabulated MSV history

Seed designation	Passage	Biological raw materials		Comments
		Material	Lot numbers	
Original isolate	X - ?			
Pre-MSV	X - 1			
MSV	X			

A completed table must include specific details of all biological raw material (e.g. nutritive factors) and cell lines used during establishment of the MSV.

- **2.2.2** Manufacturers must also provide copies of test reports for all general and specific extraneous agent tests performed on the MSV. The reports must:
- Be specific for the designated MSV that will be used to manufacture vaccine for the Australian market; and
- Outline the protocol that was used to test for each extraneous pathogen.

3. Master seed bacteria (MSB)

3.1 Guidance on policy requirements

- All MSB must be tested for:
 - Identity and purity such that the MSB is shown to contain only the species and strain of bacterium stated; and
 - Pathogens included on the list of "Pathogens of highest animal biosecurity concern" which occur in the country of origin of, and are pathogenic to the species:
 - a) From which the MSB was originally isolated; and
 - b) Of all culture media ingredients of animal origin used since original isolation of the bacteria unless effectively sterilised; and
 - c) Any other pathogen determined on assessment of the application to be a potential contaminant.
- MSB derived from bovine, ovine or caprine animals (or other species considered susceptible to TSEs) will be assessed according to the requirements of the TSE policy (see Introduction). Applicant should refer to the TSE policy for further information.

3.2 Evidentiary requirements for MSB

3.2.1 Manufacturers must provide a full and well-documented history of the master seed (in prose and tabulated form). The history must include the species of origin, country of origin, date of isolation, and passage history. The history must also identify all culture media used for transport, storage, and propagation of the bacteria.

Template for submission of tabulated form of MSB history

The department requires applicants to use Table 4 as a template for submission of the MSB history:

Table 4 Template for submission of tabulated form of MSB history

Seed designation	Passage	Biological raw	v materials	Comments
		Material	Lot numbers	
Original isolate	X - ?			
Pre-MSB	X - 1			
MSB	X			

A completed table must include specific details of all biological raw material (e.g. growth media) used during establishment of the MSB.

3.2.2 Manufacturers must also provide copies of test reports for all general and specific extraneous pathogen tests, and non-pathogen related testing, performed on the MSB. The reports must:

- Be specific for the designated MSB that will be used to manufacture vaccines for the Australian market; and
- Outline the protocol for each test.

4. Master and working cell seeds

4.1 Guidance on policy requirements

- The department will only accept the use of primary cell cultures if they have been derived from specific pathogen free (SPF) herds or flocks.
- The country of origin of the cell line must have been free of major exotic pathogens included on the department's list of "pathogens of highest animal biosecurity concern" for the relevant species of origin at the time of creation of the cell line.
- If of ovine or caprine origin, the country of origin must not be scrapie affected at the time of, or within the six-year period after, the creation of the cell line.
- If of bovine origin, the country of origin must not be BSE affected at the time of, or within the six-year period after, the creation of the cell line.
- The department requires master and working cell seeds to be tested in accordance with the requirements of the Ph. Eur. Chapter 5.2.4 (Cell cultures for the production of veterinary vaccines).
- The department requires master and working cell seeds to undergo karyological and identity testing.
- All master cell seeds must be tested for:
 - Bacterial and fungal contamination as per 9CFR 113.26 or Ph. Eur. 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Extraneous pathogens as per 9CFR 113.51 for primary cell lines or as per 9CFR 113.52 for master and production (working) cell lines; and
 - Extraneous pathogens as per Ph. Eur. Vaccines for Veterinary Use 0062 and 5.2.4; and
 - Pathogens included on the department's lists of "pathogens of highest animal biosecurity concern" and "pathogens of major animal biosecurity concern" which are pathogenic to the species:
 - a) From which the cell line was originally isolated; and
 - b) Of all nutritive factors of animal origin previously used on the cell line since its creation; and
 - c) For which the vaccine is intended.

Testing of the master and working cell seeds must be completed as described below:

	MCS	WCS	cells from WCS at highest passage level
general microscopy	+	+	+
bacteria/fungi	+	+	-
mycoplasma	+	+	-
viruses	+	+	-
identification of species	+	-	+
karyology	+	-	+

Testing should be carried out on a culture of the MCS, WCS or on cells from the WCS at the highest passage level used for production and derived from a homogenous representative sample.

4.2 Evidentiary requirements for master and working cell seeds

4.2.1 Manufacturers must provide a full and well documented history of the master and working cell seed (in prose and tabulated form). The history must include the species of origin, country of origin, date of creation, and passage history. The history must also identify all nutritive factors used during creation of the seeds.

Template for tabulated form of master and working cell seed history

The department requires applicants to use Table 5 as a template for submission of the seed history:

Table 5 Template for tabulated form of master and working cell seed history

Seed designation	Passage	Biological raw materials		Comments
		Material	Lot numbers	
Original cellular extract	X - ?			
Pre-master cell seed (MCS)	X - 1			
MCS	X			
Working cell seed	X + ?			

A completed table must include specific details of all biological raw material (e.g. nutritive factors) used during creation of the seeds.

4.2.2 Manufacturers must also provide copies of test reports for all general and specific extraneous agent tests, and all non-pathogen related testing, performed on the MCS and WCS. The test reports for the MCS must be specific for the designated MCS that will be used to manufacture vaccine for the Australian market. The test reports for the WCS must be specific for the designated WCS currently being used in the manufacturing facility to manufacture vaccine. All test reports must outline the protocol for each test.

5. Working and production seeds (viral or bacterial)

5.1 Guidance on policy requirements

• All working and production viruses and bacteria must be tested for potential pathogens as per the relevant 9CFR or Ph. Eur. requirement or as determined by the department on assessment of the application.

5.2 Evidentiary requirements for working and production seeds (viral and bacterial)

5.2.1 Manufacturers must provide a copy of the Standard Operating Procedure, or equivalent quality system document, outlining the testing undertaken on all working/production seeds used during vaccine production. If not referenced in the Standard Operating Procedure, the manufacturer must provide a declaration attesting to the specific standard against which the working/production seed has been tested (e.g. 9CFR or Ph. Eur.).

Information requirements for production processes

6. Nutritive factors e.g. serum, foetal serum, serum albumins, serum products

6.1 Guidance on policy requirements

- The country and species of origin of all nutritive factors must be government certified.
- The department will not approve a vaccine for import which is manufactured using nutritive factors sourced from a country affected by a relevant "pathogen of highest animal biosecurity concern" disease for the species of origin.
- Nutritive factors derived from bovine, ovine or caprine animals (or other species considered susceptible to TSEs) will be assessed according to the requirements of the TSE policy (see Introduction).
- Nutritive factors must be tested for:
 - Bacterial and fungal contamination as per 9CFR 113.26 or Ph. Eur. 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Other extraneous pathogens as per 9CFR 113.53 or Ph. Eur. 0062; and
 - Pathogens included on the lists of "pathogens of highest animal biosecurity concern" and "pathogens of major animal biosecurity concern" which are pathogenic to the species of origin of the nutritive factor; and
 - Bluetongue virus, if of bovine or ovine origin (regardless of country of origin); and
 - Any other pathogen determined during assessment of the application to be a potential contaminant.

6.2 Evidentiary requirements

- **6.2.1** Manufacturers must provide a copy of the government certificate for all nutritive factors used during manufacturing. Government certificates must be for a batch of nutritive factor recently used and must attest to the country and species of origin.
- **6.2.2** Manufacturers must also provide a copy of their raw material specification (RMS) or equivalent quality system document for all nutritive factors used during manufacturing. The RMS document must outline all testing and/or treatment undertaken prior to use.
- **6.2.3** Manufacturers must also provide a copy of the supplier's Certificate of Analysis or equivalent quality system document for all nutritive factors used during manufacturing. The Certificate of Analysis must be specific to a batch recently used and must outline any testing and/or treatment undertaken by the supplier.

Please note: Applicants may satisfy the requirements of **6.2.1** – **6.2.3** as part of the documentation traceback audit requirements of **1.2.9**.

7. Trypsin and other enzymes of animal origin

7.1 Guidance on policy requirements

- The country and species of origin of all animal enzymes must be government certified.
- The department will not approve a vaccine for import which is manufactured using animal enzymes sourced from a country affected by a relevant "pathogen of highest animal biosecurity concern" disease for the species of origin.
- Animal enzymes derived from bovine, ovine or caprine animals (or other species considered susceptible to TSEs) will be assessed according to the requirements of the TSE policy (see Introduction).
- Animal enzymes must be tested for:
 - Bacterial and fungal contamination as per 9CFR 113.26 or Ph. Eur. 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Other extraneous pathogens as per 9CFR 113.53 or Ph. Eur. 5.2.5; and
 - If of porcine origin:
 - a) Porcine parvovirus; and
 - b) Porcine pestivirus (CSF); and
 - c) Porcine reproductive and respiratory syndrome (PRRS) virus; and
 - d) Transmissible gastroenteritis (TGE) virus; and
 - e) Aujeszky's disease (pseudorabies) virus.
 - If of bovine origin
 - a) Bovine parvovirus; and
 - b) Bovine pestivirus (BVD); and
 - c) Vesicular stomatitis virus; and
 - d) Infectious rhinotracheitis virus

Note: Testing for the porcine and bovine pathogens above is not necessary if the country of origin is free of the disease and the audit trail is conclusive for country of origin.

 Any other pathogen determined during assessment of the application to be a potential contaminant.

7.2 Evidentiary requirements

- **7.2.1** Manufacturers must provide a copy of the government certificate for all enzymes of animal origin used during vaccine manufacturing. Government certificates must be for a batch of enzymes recently used and must attest to the country and species of origin.
- **7.2.2** Manufacturers must also provide a copy of their raw material specification (RMS) or equivalent quality system document for all enzymes of animal origin used during vaccine manufacture. The RMS document must outline all testing and/or treatment undertaken on each batch prior to use.

7.2.3 Manufacturers must also provide a copy of the supplier's Certificate of Analysis (CofA) or equivalent quality system document for all enzymes of animal origin used during manufacturing. The CofA must be specific to a batch recently used and must outline any testing and/or treatment undertaken by the supplier.

Please note: Applicants may satisfy the requirements of **7.2.1** – **7.2.3** as part of the documentation traceback audit requirements of **1.2.9**.

8. Fermentation broths and culture media

8.1 Guidance on policy requirements

- All ingredients contained in microbial culture media must be provided for assessment. The country and species of origin of each ingredient of animal origin must be specified along with details of any processing, treatments or testing of either the ingredients or final medium.
- Unless effectively sterilised (refer to 2.3.3 in policy) prior to use, meat extracts must not be sourced from countries affected by diseases included on the department's list of "pathogens of highest animal biosecurity concern" for the relevant species of origin. Additional testing will also be required for the relevant pathogen(s) of highest animal biosecurity concern if sourced from such countries.
- Animal ingredients derived from bovine, ovine or caprine animals (or other species
 considered susceptible to TSEs) will be assessed according to the requirements of the TSE
 policy (see Introduction).
- Unless effectively sterilised prior to use, either the individual ingredient of animal origin or the microbial culture medium must be tested for:
 - Bacterial and fungal contamination as per 9CFR 113.26 or Ph. Eur. 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Extraneous pathogens as per 9CFR 113.53 or Ph. Eur. 5.2.5; and
 - Pathogens included on the department's lists of "pathogens of highest animal biosecurity concern" and "pathogens of major animal biosecurity concern" which are pathogenic to the species of origin of any ingredients of animal origin; and
 - Any other pathogens determined during assessment to be a potential contaminant.

8.2 Evidentiary Requirements

- **8.2.1** Manufacturers must provide a copy of their raw material specification (RMS) or equivalent quality system document for all microbial culture media used during manufacturing. The RMS document must outline all testing and/or treatment undertaken on each batch prior to use.
- **8.2.2** Manufacturers must also provide a copy of the supplier's Certificate of Analysis (CofA) or equivalent quality system document for all microbial culture media used during manufacturing. The CofA must be specific to a batch recently used and must outline:
- The country and species of origin of each ingredient of animal origin; and
- Any processing/treatments undertaken on the ingredients of animal origin or final medium;
 and
- All tests undertaken on the individual ingredients of animal origin or final culture medium/fermentation broth product.

Please note: Applicants may satisfy the requirements of **8.2.1** – **8.2.2** as part of the documentation traceback audit requirements of **1.2.9**.

9. Components of avian origin and embryonated eggs

9.1 Guidance on policy requirements

- Embryonated eggs and avian cell lines used for the growth and production of the inactivated vaccine should be derived from SPF flocks. The use of eggs from healthy non-SPF flocks free from the presence of certain agents and their antibodies will require additional assurances of safety and approval by the department. SPF flocks must be under veterinary supervision and approved by the relevant government authority in the country of origin.
- The principles, procedures and testing regime for SPF flocks must be as described in Ph. Eur. Chapter 5.2.2 (Chicken flocks free from specified pathogens for the production and quality control of vaccines). Flocks must also be tested for other avian pathogens included in the department's "pathogens of major animal biosecurity concern" of the policy.
- Avian cell lines and non-SPF derived embryonated eggs must be sampled and tested for extraneous pathogens listed in Ph. Eur. Chapter 5.2.2 and included on the department's list of "pathogens of major animal biosecurity concern".
- Other components/ingredients of avian origin must be derived from either:
 - A country free from clinical avian influenza and virulent Newcastle disease in their commercial poultry flocks provided the product is derived from such flocks; or
 - SPF flocks: or
 - Commercial poultry flock which vaccinates against avian influenza and Newcastle disease and there have been no outbreaks in the flock or within a 25 km radius for the preceding 3 months.
- Other components of avian origin must be tested for extraneous avian pathogens as listed in Ph. Eur. Chapter 5.2.2 and included on the department's list of "pathogens of major animal biosecurity concern" unless effectively sterilised (refer to 2.3.3 in policy).
- Avian cell lines and components of avian origin (unless effectively sterilised) must also be tested for bacteria, fungi, mycoplasma, salmonella and adventitious viruses as per 9CFR 113.26, 113.30, 113.31, 113.34.
- Components of avian origin and eggs must be tested for any other pathogens determined during assessment of the application to be a potential contaminant.

9.2 Evidentiary Requirements

9.2.1 When SPF eggs or avian cell lines derived from SPF eggs are used during manufacturing, manufacturers must provide:

- A copy of the government health certificate demonstrating approval of the SPF flock by the competent authority in the country of origin; and
- A copy of the government health certificate or equivalent government endorsed quality system document demonstrating current test results of the SPF flock testing program (Ph. Eur. Chapter 5.2.2 and the department's list of "pathogens of major animal biosecurity concern").

9.2.2 When non-SPF avian cell lines, embryonated eggs or other components of avian origin are used during manufacturing, manufacturers must provide:

- A copy of their raw material specification (RMS) or equivalent quality system document for the components of avian origin used during manufacturing. The RMS document must outline the country and species of origin and all testing/treatments undertaken; and
- A copy of the supplier's Certificate of Analysis (CofA) or equivalent quality system document for all components of avian origin used during manufacturing. The CofA must be specific to a batch recently used and must outline the country and species of origin and all testing/treatments undertaken by the supplier.

Please note: Applicants may satisfy the requirements of **9.2.1** – **9.2.2** as part of the documentation traceback audit requirements of **1.2.9**.

10. Other materials of animal origin

10.1 Guidance on policy requirements

- The country and species of origin, processing and any pathogen testing must be detailed with the application. Appropriate government health certification and other documentation providing an audit trail must be provided.
- Materials of animal origin must not be sourced from countries affected by diseases included on the department's list of "pathogens of highest animal biosecurity concern" for the relevant species of origin unless effectively sterilised.
- Animal ingredients derived from bovine, ovine or caprine animals (or other species considered susceptible to TSEs) will be assessed according to the requirements of the TSE policy (see Introduction).
- All other materials of animal origin must be either effectively sterilised or be tested for:
 - Bacterial and fungal contamination as per 9CFR 113.26 or Ph. Eur. 2.6.1; and
 - Mycoplasmas as per 9CFR 113.28 or Ph. Eur. 2.6.7; and
 - Extraneous pathogens as per 9CFR 113.53 or Ph. Eur. 5.2.5; and
 - Pathogens included on the department's lists of "pathogens of highest animal biosecurity concern" and "pathogens of major animal biosecurity concern" which are pathogenic to the species of origin of the material of animal origin; and
 - Any other pathogen determined during assessment to be a potential contaminant.

10.2 Evidentiary requirements

10.2.1 Manufacturers must provide either:

- A copy of the government certificate for all animal materials used during manufacturing. The
 certificate must be for a batch recently used and must attest to the country and species of
 origin of each material of animal origin; or
- A copy of the Certificate of Analysis (CofA) or equivalent quality system document for all animal materials used during manufacturing. The document must be specific to a batch recently used and must attest to the country and species of origin of each material of animal origin.

Applicants should refer to the '1. Standards of Manufacture/Sourcing of Ingredients' section of the SOI for direction as to whether a government certificate or CofA is required for other materials of animal origin.

- **10.2.2** Manufacturers must also provide a copy of their raw material specification (RMS) or equivalent quality system document for all animal ingredients used during manufacturing. The RMS document must outline all testing and/or treatment undertaken on each batch.
- **10.2.3** If a Government Certificate was provided to satisfy point 10.2.1 above, manufacturers must also provide a copy of the supplier's Certificate of Analysis (CofA) or equivalent quality system document for all animal ingredients used during manufacturing. The CofA must be specific to a batch recently used and must outline any testing/treatments undertaken by the supplier.

Date: 8 May 2023

Please note: Applicants may satisfy the requirements of **10.2.1** – **10.2.3** as part of the documentation traceback audit requirements of **1.2.9**.

11. Inactivation

11.1 Guidance on policy requirements

- The inactivating agent and inactivation procedure must be shown to inactivate the vaccine organism under conditions of vaccine manufacturing.
- Complete inactivation must be achieved within 2/3 of the total inactivation time.
- Prior to inactivation, the bulk vaccine should be a homogenous suspension free from particles that may not be penetrated by the inactivating agent.
- A suitable test for complete inactivation of vaccine organisms must be carried out on the finished vaccine. The protocol for this test would normally be the same as the test carried out on the harvest material. If the presence of adjuvant or other substances render this impractical, then the test should be performed prior to the addition of the adjuvant. Bulk antigen so sampled shall not be stored except in the vessel from which the sample was taken.

Additional guidance on policy requirements for viral vaccines:

A test for complete inactivation must be performed on the viral harvest immediately after the
inactivation procedure and, if applicable, the neutralisation or removal of the inactivating
agent. The test selected should be appropriate to the vaccine virus being used and should
consist of at least two passages in cells, embryonated eggs or, where necessary, in animals.
The number of cell samples, eggs or animals should be sufficient to ensure appropriate
sensitivity of the test. For cell cultures, at least 150 cm2 of the cell culture monolayer should
be inoculated with 1.0 ml of harvest. No evidence of the presence of any live virus or
microorganism should be observed.

Additional policy requirements for bacterial vaccines:

• A test for complete inactivation must be performed on the bacterial harvest immediately after the inactivation procedure and, if applicable, the neutralisation or removal of the inactivating agent. The test selected should be appropriate to the vaccine organism being used and should consist of at least two passages in production media or in media prescribed in the relevant Ph. Eur. monograph. No evidence of any live microorganism should be observed.

11.2 Evidentiary requirements for inactivation of bacterial and viral vaccines

- **11.2.1** Manufacturers must provide a copy of the inactivation kinetics study specific for the organism and the inactivant used during manufacturing i.e. the inactivation kinetics study must be reflective of the conditions of vaccine manufacturing. The study must also demonstrate complete inactivation of the bulk antigen within 2/3 of the total inactivation time.
- **11.2.2** Manufacturers must also provide a declaration confirming that prior to inactivation the bulk antigen was a homogenous suspension free from particles. The declaration must also outline the process followed by the manufacturer when bulk antigen is found to have not been completely inactivated. The declaration must be on manufacturer's letterhead and must be signed and dated by a member of the manufacturer's Quality Assurance team.

11.2.3 Manufacturers must also provide a copy of the Standard Operating Procedure, or equivalent quality system document, outlining the testing for complete inactivation performed on bulk antigen and/or finished product.

12. Final product – viral vaccines

12.1 Guidance on policy requirements

- Every batch of the inactivated final bulk (or final container) viral vaccine must be sampled and tested in general in accordance with either 9CFR 113.200 or Ph. Eur. 0062.
- Every batch of the inactivated final bulk (or final container) viral vaccine must be sampled and tested for bacterial and fungal sterility as per 9CFR 113.26 or Ph. Eur. 2.6.1.
- Every batch of the inactivated final bulk (or final container) viral vaccine must be sampled and tested for freedom from mycoplasma as per 113.28 or as per Ph. Eur. 2.6.7.
- Every batch of the final bulk (or final container) viral vaccine must be sampled and tested for freedom from other extraneous pathogens by the following:
 - As per the Ph. Eur. monograph for the specific inactivated viral vaccine; or
 - By any other method determined appropriate by the department.
- In addition, every batch of the final bulk (or final container) avian viral vaccine must be sampled and tested for freedom from the following:
 - Avian leucosis viruses as per either Ph. Eur. 2.6.4 or 9CFR 113.31; and
 - Extraneous viruses using fertilised eggs as per Ph. Eur. 2.6.3 or 9CFR 113.34; and
 - Salmonella as per either 9CFR 113.30 or other method determined appropriate by the department.
- Additional testing may be necessary as determined during assessment of the application.

12.2 Evidentiary requirements for viral vaccines

- **12.2.1** Manufacturers must provide a copy of the Certificate of Analysis, or equivalent quality system document, for batches of final viral vaccine product. The document must demonstrate compliance with the above testing requirements.
- **12.2.2** Manufacturers must also provide a copy of a test report for a batch of vaccine that was recently manufactured and released by the manufacturer's Qualified Assurance team.

Please note: Applicants may satisfy the requirements of **12.2.1** – **12.2.2** as part of the documentation traceback audit requirements of **1.2.9**.

13. Final product – bacterial vaccines

13.1 Guidance on policy requirements

- Every batch of the inactivated final bulk (or final container) bacterial vaccine must be sampled and tested in general in accordance with either 9CFR 113.100 or Ph. Eur. 0062.
- Every batch of the inactivated final bulk (or final container) bacterial vaccine must be sampled and tested for bacterial and fungal sterility as per 9CFR 113.26 or Ph. Eur. 2.6.1.
- Every batch of the final bulk (or final container) bacterial vaccine must be sampled and tested for freedom from other extraneous pathogens by the following:
 - As per the Ph. Eur. monograph for the specific inactivated bacterial vaccine; or
 - By any other method determined appropriate by the department
- Additional testing may be necessary as determined during assessment of the application.

13.2 Evidentiary requirements for bacterial vaccines

- **13.2.1** Manufacturers must provide a copy of the Certificate of Analysis, or equivalent quality system document, for batches of final product. The document must demonstrate compliance with the above testing requirements.
- **13.2.2** Manufacturers must also provide a copy of a test report for a batch of vaccine that was recently manufactured and released by the manufacturer's Quality Assurance team.

Please note: Applicants may satisfy the requirements of **13.2.1** – **13.2.2** as part of the documentation traceback audit requirements of **1.2.9**.

Applicant declaration

I declare that the information provided in this document and in supporting dossiers is accurate and that the Department of Agriculture, Fisheries and Forestry will be advised of any changes to the production process that affect the content of these documents.

I authorise the exchange of information relating to the vaccine product outlined in this Summary of Information document between agencies within the department, including the Australian Pesticides and Veterinary Medicines Authority (APVMA). I understand that this information will be used by the agencies for the purpose of ensuring compliance of the vaccine product with the regulatory requirements of each agency.

Signature:	
Name:	
Date:	
Position:	
Company name and address:	

Privacy notice

Personal information means any information or opinion about an identified, or reasonably identifiable, individual. Personal information that is collected under or in accordance with the *Biosecurity Act 2015* is also 'protected information' under the Biosecurity Act.

The Department of Agriculture, Fisheries and Forestry is authorised under the Biosecurity Act to collect your personal information for the purposes of determining import conditions for your inactivated veterinary vaccine product and for other related purposes. If you fail to provide some or all of the relevant personal information requested in this form, the department may be unable to process the import permit application that relates to this form.

Information collected by the department will only be used or disclosed under the Biosecurity Act. The department may disclose your personal information to the Department of Health and the Australian Pesticides and Veterinary Medicines Authority, and other Australian Government agencies, persons or organisations where necessary for these purposes. It will not usually be disclosed overseas. It will only be disclosed if authorised under the Biosecurity Act.

See our <u>Privacy Policy</u> to learn more about accessing or correcting personal information or making a complaint. Alternatively, telephone the department on +61 2 6272 3933 (or +61 3 8318 6700 outside Australia).

Appendix 1 – Definitions

'Effective sterilisation' - means treating in such a way as to completely inactivate all conventional adventitious agents including viruses. Examples of effective sterilisation are autoclaving at 121°C for 15 minutes, 50 kGy gamma irradiation or any other treatment which has been demonstrated to achieve a 6-log reduction in titre for all potential contaminants.

Additional points for consideration:

- Prions proteins are also a potential contaminant of concern for the department. Prion proteins are highly resistant to treatment and the department relies upon country freedom for the relevant species of origin.
- A level of titre reduction higher than 6 log will be required where there is reasonable likelihood of contamination e.g. if the average level of contamination in a product is 2 logs, treatment must achieve at least an 8 log (i.e. 6+2) reduction in titre.
- All sterilisation procedures should be validated, verified for the product, container type, configuration and volume and be supported by GMP standards and procedures. For example, in the case of autoclaving of culture media and other substrates, the autoclaving conditions should be validated for each media, for each container type and for each autoclave load configuration.
- *'Government certificate'* a document issued by the government agency/competent authority responsible for certification of agricultural products in the country of origin. International requirements for government certification are outlined on the website of the World Organisation for Animal Health (www.oie.int). Further to the overarching international requirements for government-to-government certification the department requires the certificate to meet the following:
 - the certificate must have been issued and dated within the last 6 months; and
 - the certificate must be sealed with the stamp/seal of the issuing national competent authority.
- 'Manufacturer's declaration' a document issued by the manufacturer containing a written declaration as per the requirement outlined in the SOI. Manufacturer's declarations must be on manufacturer's letterhead and must be signed by a suitable member of the manufacturer's quality assurance/control team and dated within the last 6 months.

Appendix 2 – Further information on testing to detect extraneous agents in master seeds/raw materials

A critical aspect of the biosecurity risk assessment for Import Permit applications for vaccine products is the review of extraneous agent testing in master seeds (master seed viruses, master seed bacteria, master cell seeds) and raw materials used during manufacturing. It is a policy requirement that master seeds/raw materials undergo testing to demonstrate, to an appropriate level of confidence, that they are free from extraneous agents.

In March 2013, Animal Biosecurity (AB) branch published the document 'Review of Published Tests to Detect Pathogens in Veterinary Vaccines Intended for Importation into Australia (Second Edition)'. This Review document provides clarification on the tests that are considered acceptable for extraneous pathogen testing of master seeds and raw materials for use in vaccine manufacture.

The department acknowledges that there may be other validated unpublished test methods that are equally reliable and sensitive, including some test methods that remain commercial-inconfidence and are unpublished. These will be assessed by the department on case-by-case basis with input from AB and may lead to an update of the Review document.

Applicants may view the document at $\underline{\text{https://www.agriculture.gov.au/biosecurity/risk-analysis/animal/review-of-published-tests-to-detect-pathogens/ba2013-05-review-tests-to-detect-pathogens.}$

How does the department use this document during the assessment of my Import Permit application?

This document is used as the principal reference for determining whether testing (general or specific) is suitable for the purposes of detecting extraneous agents in master seeds or raw materials used in manufacture of vaccines for the Australian market.

Prior to submission of the vaccine Import Permit application, applicants must ensure that the test reports for master seeds/raw materials submitted to the department in support of the application clearly outline the test method used for each test. In addition, applicants should review the list of test methods currently accepted by the department to determine whether additional testing of master seeds/raw materials will be required.

The department will accept a test demonstrating freedom of the master seed/raw material which has been conducted in accordance with the requirements of the Review document. Where the document indicates that the test method is unsuitable for detection of extraneous agents, the department will require additional testing to be undertaken in accordance with the requirements of the Review document. Applications that are submitted for vaccines manufactured using master seeds/raw materials that have been tested using methods deemed unsuitable will be rejected.

Where the master seed/raw material has been tested using a method not referenced on the Review document, the assessing officer will consult with AB on the suitability of the method for detection of extraneous agents.