

Variations: first experience with
worksharing and Art. 5 procedures

CMDh meeting with Interested
Parties

21 June 2010, EMA

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First experience after 5 months...

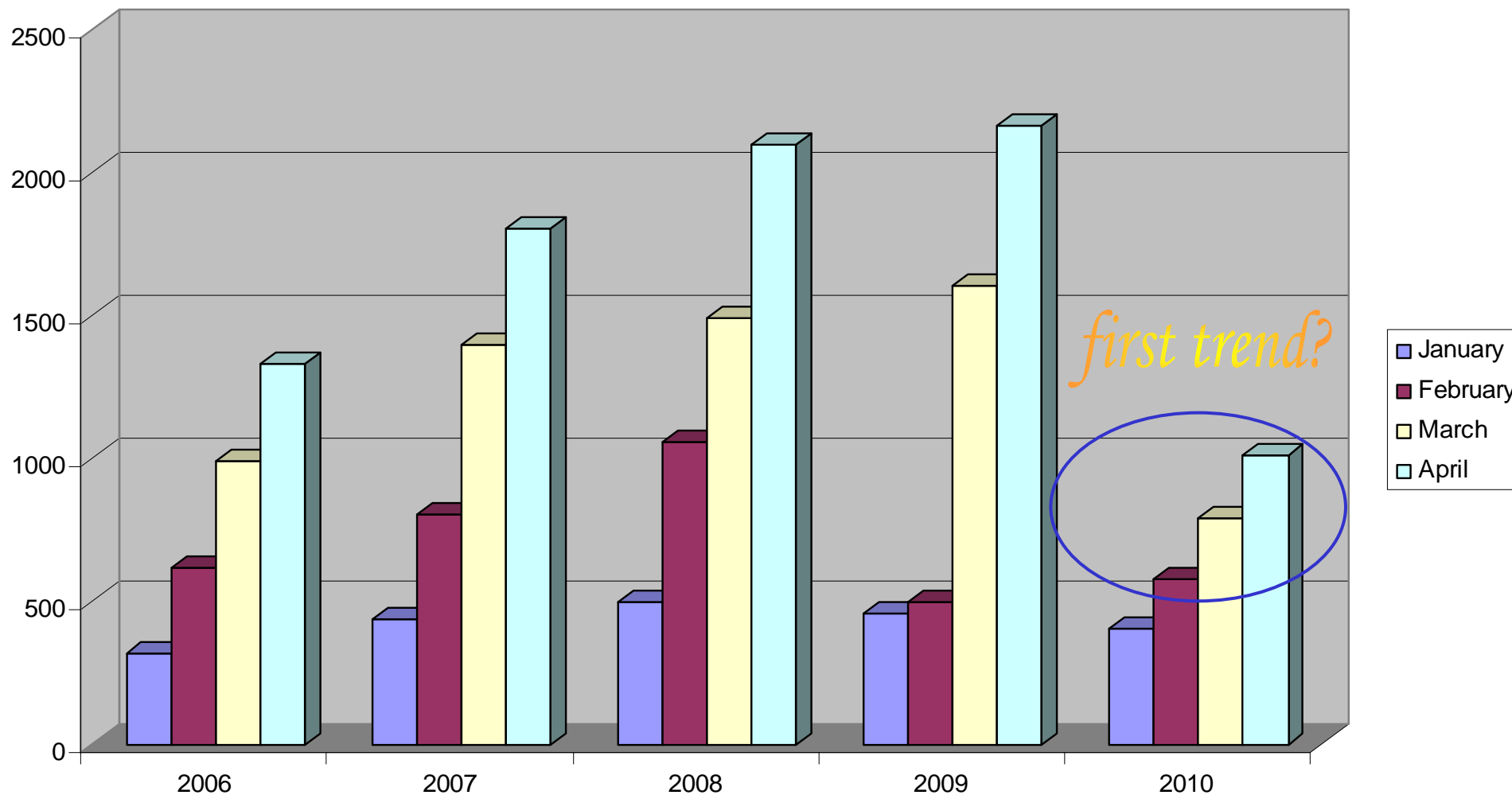
Many questions in the first 8 weeks, e.g.

- Which grouping is allowed
- Documentation to be submitted
- Unclassified variations
- Definition of one MA (incl. strength and pharmaceutical form)
- Numbering
- Electronic submission (eCTD)

Meanwhile...

- New procedures are well adapted
- Grouping in all types IA, IB and type II submitted in large numbers (but so far no extension application concerned)
- Number of IA-grouped applications for more than one MA is growing continuously
- First worksharing procedures (with NCA and EMA as reference authority) are positively finalized but only few procedures
- Many Article 5-recommendations

Submissions type IA Jan.-April 2006-2010

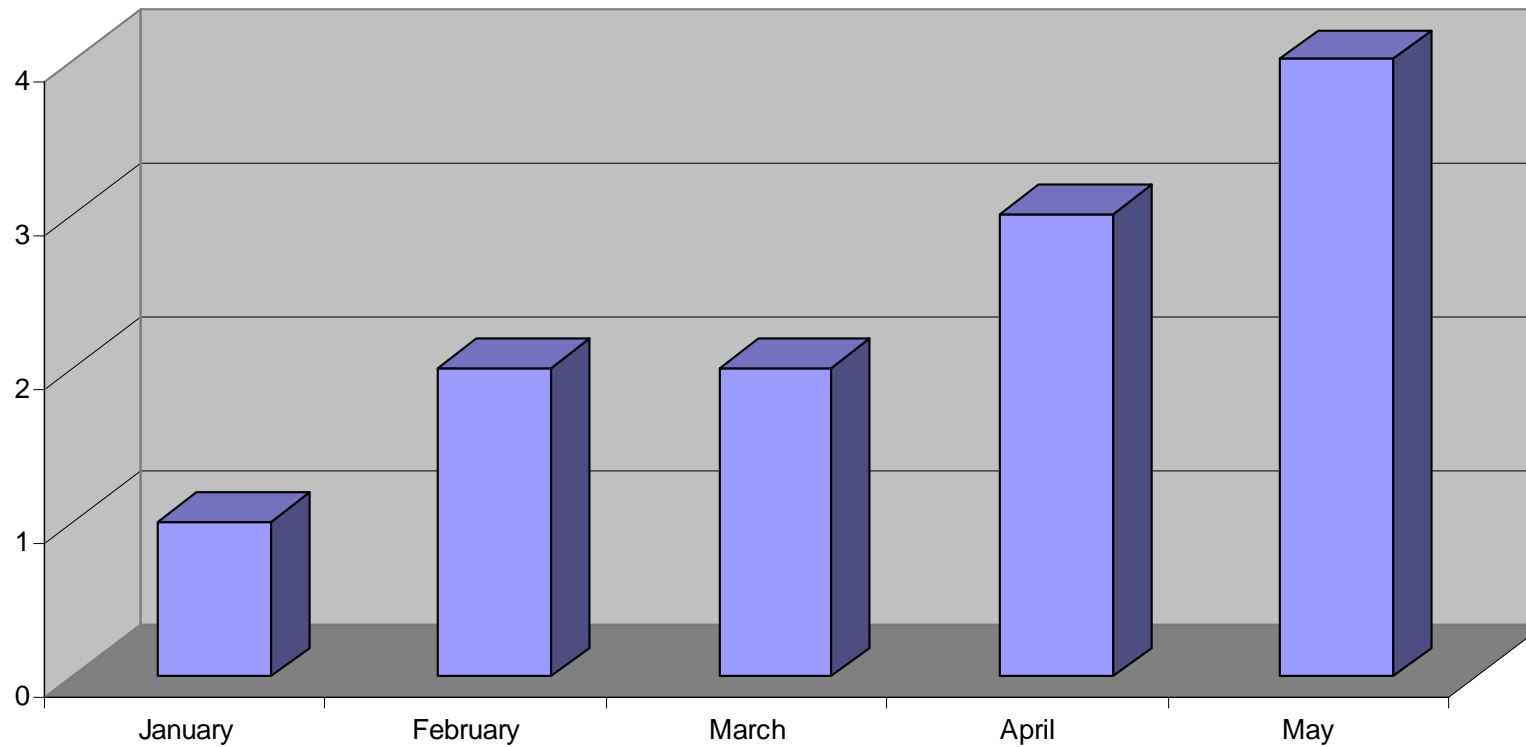


source: presse releases CMDh

Worksharing experiences (1)

- So far 7 Worksharing procedures for only MRP/DCPs have been accepted by CMDh
- 2 mixed worksharing procedures with „CAP“ and „NAP“ with EMA as reference authority
- 2 worksharing procedures positively finalized
- 1 worksharing application was rejected by CMDh as only one type IA change was concerned
 - ⇒ advice to use grouped application per RMS

Worksharing procedures applied



Worksharing experiences (2)

Content of the procedures different:

- Adaptation to PhVWP recommendations
- Significant update of SmPC due to new pharmacovigilance / clinical data
- Change in manufacturing sites (IB)
- Other changes of the quality dossier

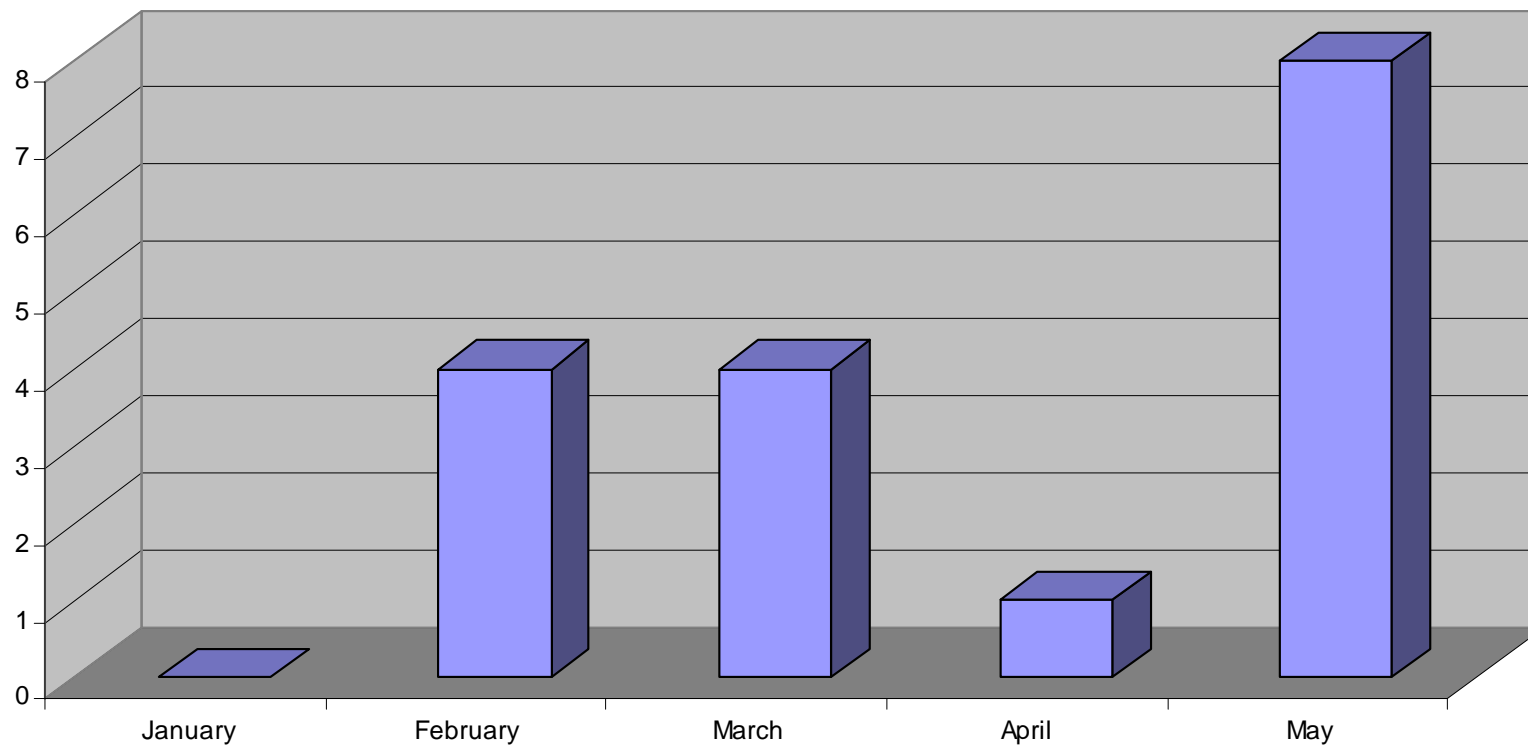
Mixed Worksharing „CAPs“ and „NAPs“

- Worksharing number will be provided by EMA shortly before submission
- The same dossier has to be submitted to EMA and all member states concerned
- Template for cover letter only for mixed worksharing applications will soon be provided by EMA
- Annex B has to be accurately completed as it is basis for the opinion

Art. 5 – Unforeseen variations (1)

- 9 recommendations published in May 2010
<http://www.hma.eu/293.html>
- 8 new requests started in May 2010
- Recommendation circulated to other groups
⇒ published by authority requested
- EC is informed, esp. in case of divergent opinions
- Deletion of commercially confidential information – publication of general aspects

Art. 5 procedures recommended



Art. 5 – Unforeseen variations (2)

You are here: [Human Medicines](#) > [CMD\(h\)](#) > [Procedural Guidance](#) > Art 5 recommendations

About CMDh
Statistics
Press Releases
Procedural Guidance
General Info
Application for MA
eSubmissions
Generics
Applicant's Responses
Renewal
Variation
Art 5 recommendations

Art.5 on Unforeseen Variations

- **CMDh Recommendation for classification of unforeseen variations according to Article 5 of Commission Regulation (EC) 1234/2008 (April 2010)**
Click [here](#)

First recommendations at the March CMDh

- 4 requests – 3 x Industry / 1 x NCA
- 2 recommendations by consensus
- 2 recommendations by majority vote

Art. 5 – Unforeseen variations (3)



CMDh Recommendation for classification of unforeseen variations according to Article 5 of Commission Regulation (EC) No 1234/2008

Section of the Classification Guideline	Date issued	Summary of the proposed change	Proposed classification	Proposed conditions, where relevant
To be confirmed	22.03.2010	Additional procedure for analysis of the breath test.	II	N/A
B.II.c.1 z) Other variation	22.03.2010	Change in specification of the excipient Maltose from in-house to USP monograph (Maltose monohydrate). LAL test will continue to be carried out as additional specification as required by the monograph of the Ph.Eur.	IB	N/A
B.II.b.3	22.03.2010	Change in the manufacturing process of the finished product: minor change in the manufacturing process of modified release oral dosage form.	IB by default	N/A
C.I.10	22.03.2010	Submission of results of assessments carried out on target patient groups in order to comply with Article 59(3) of Directive 2001/83/EC and any resulting change to the Package Leaflet.	IB ¹	N/A

Art. 5 – Unforeseen variations (4)

Section of the Classification Guideline	Date issued	Summary of the proposed change	Proposed classification	Proposed conditions, where relevant
N/A	26.04.2010	Deletion of product name from list in PL, following withdrawal of MA in the relevant CMS.	Article 61(3) notification	N/A
B.I.a.1.z	26.04.2010	Add an alternative sterilisation (gamma irradiation) site for the active substance.	IB by default	N/A
B.II.b.3.z	26.04.2010	Minor change in the manufacturing process of the finished product-Change in the holding time of an intermediate.	IB by default	N/A
B.II.b.3.b)	26.04.2010	Change in the manufacturing process of the finished product: to move the sterilising filtration from A or B to C.	IB by default	N/A
B.II.b.3	26.04.2010	Change in the manufacturing process of the finished product: minor change in the manufacturing process of solution for injection/infusion.	IB by default	N/A

Art. 5 – Unforeseen variations (5)

Press release April 2010:

Marketing Authorisation Holders are reminded that the **classification guideline** should be **carefully checked** before a request for classification in accordance with Art. 5 is sent to the CMDh. The CMDh would remind applicants that the **default position is a type IB variation**. Attention is drawn to the text in the Commission Guideline “When one or more of the **conditions** established in the Annex to this Guideline for a minor variation of type IA are **not met**, the concerned change may be submitted as a **type IB** variation unless the change is specifically classified as a major variation of type II.”.

Thank you for your attention!!
Any questions?