Co-ordination Group for Mutual Recognition and Decentralised Procedures – Veterinary

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ANNUAL REPORT 2010

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1 Introduction

This report provides an overview of the work carried out by the Coordination Group for Mutual Recognition and Decentralised Procedures (CMDv) in 2010: the realisation of planned activities following the CMDv Work Plan 2010 (EMA/CMDv/696111/2009) and new items that emerged during the year.

To summarise, the year confirmed the trend of the previous year with a further slight decrease in the number of accepted products, particularly those submitted under the mutual recognition procedure. Sixty day referral procedures to CMDv decreased by two thirds from the previous year and less than half were referred to CVMP (mainly on bioequivalence, environmental and efficacy grounds).

Any follow-up actions are included in the Work Plan 2011 (EMA/CMDv/577088/2010) and/or will be included in future meeting agendas.

An explanatory list of abbreviations used in this report is provided in Annex I.

2 Organisational issues

2.1 Members

The CMDv is composed of one representative from each Member State of the European Economic Area (EEA) and an observer from the European Commission.

Esther Werner was the chairperson throughout the year and in 2010 entered the third year of her three year appointment. The vice-chairpersons during the Spanish and Belgian presidencies of the Council of the European Union were Carmen Sanchez Martinez for Spain and Christophe Debruyne and Valerie Van Merris for Belgium. The European Commission was represented at the meetings by Martinus Nagtzaam.

Members from Belgium, Lithuania, Poland and Slovenia were replaced during the year. CMDv appointed a welcome partner among the CMDv representatives to help new members familiarise themselves with CMDv procedures and to facilitate their immediate participation.

A full list of members and observers is provided in Annex II. The list of CMDv members, including their professional qualifications, is published on the CMDv website (http://www.hma.eu/cmdv.html).

2.2 Meetings

CMDv held monthly meetings at the European Medicines Agency (The Agency) in London over two days (Thursday & Friday), except for the month of August. Permanent sub-groups and *ad hoc* working groups met in the margins of the main plenary session to allow in-depth discussion on document management, the implementation of the new Variations Regulation, SPC harmonisation, Notice to Applicants and legislation review. During the plenary sessions CMDv addressed policy issues, questions from industry (16 in total) and from the Member States, as well as the maintenance of the document management system. Three meetings were held with interested parties' representative organisations (IFAH-Europe, EGGVP and AVC) to discuss topics of mutual interest.

The Spanish presidency organised an informal meeting, including a joint session with CVMP in Madrid on 27th and 28th May. The following topics were on the agenda of the CMDv session: review of experience gained under the new variations regulation; update on HMA/CMDh task force on the

availability of resources in MRP/DCP; review of the draft CMDv SPC harmonisation procedure; national phase after MRP/DCP; CMDv contribution to future updates of the veterinary legislation.

The Belgian presidency also organised an informal meeting, including a joint session with CVMP in Antwerp on 27th and 28th September. The following topics were on the agenda of the CMDv session: borderline products; CMDv product discussions (virtual vs. face-to-face); prescription status of veterinary medicinal products in MRP/DCP; duplicate applications; parallel imports and policy development in relation to the use of antimicrobials in animal husbandry.

2.3 Product discussions

Product discussions in respect of MRP and DCP procedures reaching Day 78 and 198 continued to take place via a client-server based web conferencing software on Mondays and Tuesdays following the plenary sessions. Due to the successful handling of this software, no face-to-face product discussion was requested by any RMS during the plenary meeting on Friday, except for 7 products which were discussed in the framework of a referral procedure and where, on 3 occasions, the applicant attended a hearing.

3 Authorisation procedures

The core business of CMDv is to facilitate the smooth operation of the MRP and DCP and in particular to consider points of disagreement raised by Member States in relation to the assessment report, summary of product characteristics (SPC), labelling and package leaflet of a veterinary medicinal product, on the grounds of potential serious risk to human or animal health or to the environment.

Compared to the previous year authorised products slightly decreased in particular due to a fewer number of MRP applications.

3.1 Applications

A total of 156 MRP/DCP procedures were finalised, relating to 109 products. Table 1 provides an overview of the number of products that reached the end of the DCP and MRP.

	2010	2009	2008	2007	2006
MRP	**42 (57)**	50 (57)	79 (84)	76 (88)	70 (95)
DCP	**67 (99)**	68 (86)	70 (89)	26 (30)	4 (3)
Total	**109 (156)**	118 (143)	149 (173)	102 (118)	74 (98)

Table 1 MRP and DCP products (procedures) finalised

Authorised products at the end of the MRP/DCP procedures decreased by 8% compared with 2009, whilst the number of total procedures increased by 10%.

The Member States processed the applications within the legal deadlines; those taking on the role of RMS per procedure are shown below in table 2.

UK	IE	NL	DE	ES	FR	IT	AT	CZ	HU	DK	SE	PT	NO
40	23	21	17	13	13	8	5	5	5	2	2	1	1

Table 2 Reference Member States

3.2 Referrals

Disagreements leading to referrals at CMDv decreased compared to 2009 by 67%; however the number of referrals sent to CVMP for arbitration remained the same. In total 7 referral procedures reached day 60 in 2010, of which 4 were resolved and 3 were referred to CVMP.

	Reaching CMDv procedure, day 60 (and CVMP)			to CMDv as percentage of total products			to CVMP as percentage of total products		
	2010	2009	2008	2010	2009	2008	2010	2009	2008
MRP	**5 (3*)**	9 (1*)	9 (5*)	4.6%	7.6%	6%	2.8%	0,8%	3.4%
DCP	**2 (0*)**	12 (2*)	9 (4*)	1.8%	10.2%	6%	0%	1,7%	2.7%
Total	**7 (3*)**	21 (3*)	18 (9*)	6.4%	17.8%	12%	2.8%	2,5%	6.1%

Table 3 Referral procedures to CMDv (to CVMP*).

Overall the number of referral procedures to CMDv decreased by two thirds with a dramatic increase of DCP procedures resolved at day 210 thanks to the introduction of the two-phase assessment process.

The success rate of resolving disagreements during the CMDv referral procedure decreased compared to the previous year:

2010 57%

2009 87%

2008 50%

2007 43%

2006 25%

4 Policy issues

4.1 SPC harmonisation

CMDv continued to work on a procedure for SPC harmonisation. A pilot procedure started in September with the participation of a volunteer company and a list of questions was issued by the end of the year. Some issues have already been highlighted such as the importance of harmonising Part II (Quality) aspects of the SPC, and the differences in fees currently charged by the various Member States.

4.2 Legislative changes

Following the implementation of the new Variations Regulation, CMDv received a number of worksharing applications and a request for classification of an unforeseen variation. The Best Practice Guides on variations have been revised to integrate experience gained so far (all revised and new documents are listed under section 5. Document management).

In 2010 CMDv contributed to the initiative of the EC to review the pharmaceutical legislation. A new subgroup was set up with the aim of reviewing and providing comments on any amendments proposed by the European Commission to the veterinary legislation for better regulation of veterinary medicines.

4.3 Question & answer (Q&A)

Following queries received from industry and the member states, discussion took place in order to reach agreement and publish (http://www.hma.eu/49.html) the position taken by CMDv on the following:

- Referring to data in another dossier
- Global marketing authorisation and protection period

- ERA data submission

Other queries concerned issues related to:

- MUMS approval in a repeat use procedure
- Grouping of variations
- CTD format acceptance
- Trade name
- Renewal of national MA
- National implementation of variations regulation
- Authorisation status of various active substances throughout EU
- Access to documents
- Stability testing/shelf life
- Dispensing of products
- Parallel imports

All answers of general interest are made available to the public.

4.4 Harmonisation of templates for product information

Product information templates have been harmonised for centrally authorised and MRP/DCP products. The templates are now under revision for general format and content.

4.5 Transparency

The topics of transparency and access to documents were discussed at the informal meeting in Madrid and the group also noted the publication of the EMA's policy on access to documents at the end of the year. The CMDv will continue to discuss how to contribute to a consistent approach to transparency and access to documents throughout the EU regulatory network.

Following a request during an interested parties meeting, the CMDv now publishes amended documents in clean and track changed versions.

4.6 Notice to Applicants (NtA)

CMDv's proposal for an update of Chapter 1 of Volume 6 of the Notice to Applicants was worked on in the early part of the year and sent to the Commission in May, alongside the proposal from CMDh.

4.7 Other issues

CMDv discussed a number of other issues, including:

- E-submission (regular updates were received from the TIGes vet group)
- CVMP/CMDv Task Force on referrals: meetings were either held in the margins of CVMP or virtually in January, February, June, September and November.
- Discussion also continued on:
- The ASMF for biologicals: the question of how to handle older products that relied on an ASMF or a CEP was discussed with CMDh.

- Animal welfare during clinical trials (legal aspects of non-compliance with the European animal welfare directive for studies conducted in third countries)

5 Document management

The document management subgroup was set up in order to promote the quality, consistency and transparency of decision making, to ensure a smooth conduct of procedures, to facilitate the access to documents and to define the areas of responsibilities of the Member States and the secretarial support provided by the Agency respectively.

The Chair of the document management is taken over every 6 months by the representative of the current Presidency of the Council of Europe and this year Spain and Belgium took over this role.

The document management subgroup meeting took place four times and mainly gathered to carry out a thorough review of the existing guidance documents in particular following the experience gained since after the implementation of the new variations regulation.

The following Best Practice Guide documents (BPGs) were revised and finalised:

- Type IA, IB, II, work-sharing variations and renewals;
- ASMF, MRP, DCP and the processing of SPC, labelling and packaging;
- Contact with representative organisations,

Revision or new work started on the BPGs for Repeat Use procedure, Duplicate applications and Informed Consent and final discussions were carried over to 2011.

Other guidance documents were revised on:

- Actions after CVMP referral opinion;
- Product discussions, Sunset clause, Management of e-mails during procedures,

together with other internal documents relating to CMDv standard operating procedures:

- Elaboration and management of documents
- Allocation of the MRP/DCP application number

Templates have been created for internal use by CMDv during work-sharing procedures.

6 Communication and co-operation

CMDv maintained contact with other groups in the regulatory field to co-ordinate activities of mutual interest.

The CMDv chairperson updated HMA on a regular basis at their meetings and, at the request of HMA, addressed the top three priorities for work-sharing and other ideas on how to increase efficiency in The European Regulatory Network. The CMDv chairperson also provided CMDv with feedback from the HMA meetings.

Agendas and minutes were exchanged and monthly oral reports given to and received from CVMP. CVMP was consulted on matters relating to clarification on efficacy and immunological issues, and to find a common approach to referrals. Representatives of CMDv joined the CVMP task force on referrals.

Agendas and minutes were exchanged with CMDh, also monthly verbal reports were given and received. CMDv took particular interest in discussions on policy issues, e.g. regarding generics,

protection periods, validation problems, duplicate applications, rules of procedure and in documents developed by CMDh. Several documents were used as a basis for the development for veterinary documents as a matter of efficiency and consistency.

CMDv took note of the agendas and minutes of the Pharmacovigilance Working Party for medicinal products for veterinary use (PhVWP-V). The PhVWP-V chairperson and secretariat presented the latest developments at the CMDv meetings.

In the field of information technology, CMDv members and the secretariat were represented in CTS user group and TIGesVet group on electronic submission of dossiers.

Contacts with interested parties IFAH-Europe, EGGVP and AVC have been maintained and meetings were conducted in January, May and October. It was noted that a significant number of Member States who attended the plenary sessions also attended these meetings. A variety of regulatory issues were addressed, including:

- Implementation of the new Variations Regulation;
- Additional national requirements;
- Transparency of CMDv;
- Availability of generics vs. originator products;

Together with IFAH-Europe and EGGVP the survey report on MRP and DCP in 2009 was finalised. The survey on MRP, DCP and referrals in 2010 was also carried out.

7 The Secretariat

The Agency supported CMDv with a secretariat by preparing and hosting the meetings in London, coordinating and distributing meeting papers, conducting follow-up to meetings, archiving and providing advice. For each meeting the secretariat prepared minutes including highlighted actions and a report for public release. For the referral procedures the secretariat drew up timetables, notified the applicants, provided them with the list of concerns and organised hearings.

Secretarial support was also given to various sub groups.

The secretariat has played a facilitating role in supporting the work of the group to find pragmatic solutions to the intractable issues related to generics and referrals.

In 2010 the secretariat liaised closely with the CVMP, CMDh, PhVWP-V and QRD secretariats and maintained contacts with the national agencies, IFAH-Europe, EGGVP, AVC and other stakeholders.

Annex I List of abbreviations

ASMF	Active Substance Master File
AVC	Association of Veterinary Consultants
CMDh	Coordination group for Mutual recognition and Decentralised procedures (human)
CMDv	Coordination group for Mutual recognition and Decentralised procedures (veterinary)
CTS	Communication and Tracking System
CVMP	Committee for Medicinal Products for Veterinary use
DCP	Decentralised Procedure
EEA	European Economic Area (EU+Iceland+Norway+Liechtenstein)
EGGVP	European Group for Generic Veterinary Products
The Agency	European Medicines Agency
GMP	Good Manufacturing Practice
HMA	Heads of Medicines Agencies
IFAH-Europe	International Federation for Animal Health Europe
MAH	Marketing Authorisation Holder
MRP	Mutual Recognition Procedure
MS	Member State
NCA	National Competent Authorities
NtA	Notice to Applicants
PhVWP	Pharmacovigilance Working Party
QRD	Quality Review of Documents group
SPC	Summary of Product Characteristics
TIGesVet	Telematics Implementation Group on E-Submissions – veterinary sub-group)

Annex II Members, observers and the secretariat

Name	Representing	Function
Esther Werner	CMDv	Chairperson
Eugen Obermayr	Austria	Member
Christophe Debruyne	Belgium	Member (replaced) Vice chairperson 01 Jul – 30 Sep Chairperson - Packaging subgroup
Valérie Van Merris	Belgium	Member Vice chairperson 01 Oct – 31 Dec
Damyan Iliev	Bulgaria	Member
Maria Papaprodromou	Cyprus	Member
Iveta Obrovská	Czech Republic	Member
Asbjørn Brandt	Denmark	Member DK expert Nicolaj Donskov Nielsen acted as Chairperson of SPC subgroup (role shared with France)
Helen Mahla	Estonia	Member
Heidi Mustalammi	Finland	Member Chairperson – NtA subgroup
Laëtitia Le Letty	France	Member Chairperson – SPC subgroup (role shared with Denmark)
Gabriele Schweyen	Germany	Member
Ioannis Malemis	Greece	Member
Mária Szabó	Hungary	Member
Jóhann M. Lenharðsson	Iceland	Member
Paul McNeill	Ireland	Member
Virgilio Donini	Italy	Member
Renãte Kuške	Latvia	Member
Brigitte Batliner	Liechtenstein	Member
Loreta Bobrovičiūtė	Lithuania	Member (replaced)
Kristina Sudikienė	Lithuania	Member
Marc Wirtor	Luxembourg	Member (nomination expired)
Kenneth Mifsud	Malta	Member (nomination expired)
Trudy Knol	Netherlands	Member
Tora Gauslaa	Norway	Member

Marta Piwonska	Poland	Member (replaced)
Anna Kucharska	Poland	Member
Maria Azevedo Mendes	Portugal	Member
Lollita Taban	Romania	Member
Judita Hederová	Slovakia	Member
Katarina Štraus	Slovenia	Member (replaced)
Laura Maček	Slovenia	Member
Carmen Sanchez	Spain	Member Vice chairperson 01 Jan – 30 Jun
Alenoosh Abedi	Sweden	Member
Gavin Hall	United Kingdom	Member Chairperson - survey subgroup, Variations Regulation subgroup, Legislation subgroup
Martinus Nagtzaam	European Commission	Observer
Emily Drury	The Agency/ CMDv secretariat	CMDv secretary
Veronica Picciafuoco	The Agency/ CMDv secretariat	Administrative assistant
Floriana Veronese	The Agency/ CMDv secretariat	Secretarial assistant

Annex III Referrals to CMDv finalised in 2010

Product Name	Company	Legal base	Target species	Grounds	RMS	CMS	Referring CMS	Outcome
Tempestop 30% oral solution for pigs	Vetpharma Animal Health S.L.	Art. 13.a	Food producing animals	efficacy	HU	CZ, PL, PT, RO, SK	PL	Accepted
Amoxivet	Sogeval	Art. 13.2	Food producing animals	quality	FR	BE, DE, ES, HU, IT, NL, PL, PT, UK	ES, DE	Accepted
Chanectin 0.8mg/ml oral solution for sheep	Chanelle Pharmaceuticals Manufacturing	Art. 13.2	Food producing animals	bioequivalence, environmental	IE	FR, UK	FR	Accepted W.: FR
Animec 0.8mg/ml oral solution for sheep	Chanelle Pharmaceuticals Manufacturing	Art. 13.2	Food producing animals	bioequivalence, environmental	IE	BE, FR, EL, ES, PL, PT, UK	FR	Accepted W.: FR
Nisamox Lactating Cow Intramammary Suspension	Norbrook	Art. 13.2	Food producing animals	bioequivalence, withdrawal period	UK	NL	NL	Referred to CVMP
Combimox Lactating Cow Intramammary Suspension	Norbrook	Art. 13.2	Food producing animals	bioequivalence, safety	UK	IE	IE	Referred to CVMP
Combisyn Lactating Cow Intramammary Suspension	Norbrook	Art. 13.2	Food producing animals	Bioequivalence with impact on efficacy and safety	UK	BE, DK, FI, ES, AT, PT, FR, IT	FR, DK	Referred to CVMP
Clavudale 50mg	Dechra Limited	Art. 13.2	Companion animals		UK	AT, BE, CZ, DK, FI, FR, DE, EL, HU, IS, IE, LU, NL, NO, PL, PT, ES, SE	SE, NL	*Carried over to 2011*

Product Name	Company	Legal base	Target species	Grounds	RMS	CMS	Referring CMS	Outcome
Clavudale 250mg	Dechra Limited	Art. 13.2	Companion animals		UK	AT, BE, CZ, DK, FI, FR, DE, EL, HU, IS, IE, LU, NL, NO, PL, PT, ES, SE	SE, NL	*Carried over to 2011*
Clavudale 500mg	Dechra Limited	Art. 13.2	Companion animals		UK	AT, BE, CZ, DK, FI, FR, DE, EL, HU, IS, IE, LU, NL, NO, PL, PT, ES, SE	SE, NL	*Carried over to 2011*