

Heads of Medicines Agencies Ad hoc Working Group PSUR Synchronisation

Brussels, 3rd January 2006

To all companies holding marketing authorisations for innovative medicinal products¹

RE: Harmonisation of Product Birthdates and Synchronisation of Periodic Safety Update Reports (PSURs) of products authorised through national or mutual recognition procedures in the EU

Dear Marketing Authorisation Holder,

This letter is sent by EFPIA on behalf of the ad hoc Working Group on the synchronisation of PSUR submissions. Representatives from the national medicines agencies, EFPIA, AESGP and EGA participate in this working group. This group operates under the auspices of the European Risk Management Strategy Facilitation Group of the Heads of Medicinal Agencies.

You may be aware that, as part of the European Risk Management Strategy, there is an initiative to increase the effectiveness of PSUR information by sharing the PSUR assessment workload throughout the EU. At present PSUR work sharing is difficult to achieve because, for many products, PSUR submission is based upon national birth dates. Harmonisation of product birth dates throughout the EU will enable PSUR submissions to be synchronised which will have advantages for both Industry and Regulatory Authorities.

Harmonisation of birth dates in the EU is now being taken forward by a working group formed from representatives from Member States and European trade associations. It is proposed that harmonised EU birth dates are set by mutual agreement between member states and the marketing authorisation holders of innovator products. Once agreement has been reached the dates will be published on the Heads of Medicines Agencies website (www.heads.medagencies.org). It is envisaged that MAHs of generic products will also adopt the same birth dates for their related products. PSUR submission throughout the EU will then be based upon these birth dates. Further details can be found in the document: *'Towards Harmonised Birth Dates of Medicinal Products in the EU'* (see annex 1)

Initially the scheme will focus on chemical synthetic substances which have been authorised through national or MR procedures and will not include herbals, homeopathics, vaccines or blood products. In addition, substances authorised in the EU before December 1976 will not be included at this stage (see annex 1).

¹ Innovative medicinal product: medicinal product containing a certain active substance for which the company is the first MAH in the EU

New legislation

By 30 October 2005 the revised pharmaceutical legislation regarding nationally authorised medicinal products came into force. One of the changes is that the five years interval between the submissions of PSURs has been shortened to three years. Another change is that an application for the renewal of a marketing authorisation has to be submitted six months, instead of three months, before the marketing authorisation ceases to be valid. How to switch from 5-yearly to 3-yearly PSURs has been described in the document *Transitional measures for submission of PSURs for nationally authorised medicinal products for human and veterinary use* (see annex 2)

There is an agreement among the EU Member States that for all medicinal products authorised through mutual recognition, a renewal of the marketing authorisation is needed after 30 October 2005 independent of the date of their authorisation. In principle marketing authorisations renewed after 30 October 2005 remain valid for an unlimited time. Marketing authorisation holders may ask for an early renewal to achieve that the submission of a PSUR coincides with the renewal application for the product concerned. Detailed guidance is given in the "Guideline on the Processing of Renewals in the Mutual Recognition and Decentralised Procedures, revision 1, October 2005" (www.heads.medagencies.org). Also information on the PSUR that should accompany the renewal application is given in the guideline e.g. the possibility to use PSUR addendum reports and line listings.

For medicinal products authorised through national procedures and for which the marketing authorisation has been renewed already once, it is to be decided by the national agencies whether another renewal is needed after 30 October 2005.

Request

Can you please provide proposals for harmonised EU birth dates of applicable products for which you consider yourselves to be the innovator or have taken over ownership of the innovator product. It is strongly recommended that the date given is a single date for all products containing the same active substance for which you are MAH. In this regard same active substance includes:

- different salts,
- esters, ethers or,
- complexes of the same active moiety.

There is no need to mention each salt separately, however, esters and other derivatives may have names which differ substantially from the name of the active moiety and should therefore be mentioned separately with the same birth date.

If an International Birth Date (IBD) is already in place in certain areas it is advised to propose this as harmonised EU birth date. It is a great advantage that information on all indications, dosage forms and regimens for a given substance authorised to one MAH should be included in a single PSUR with a single data-lock point based upon the birth date of the first product. In exceptional cases where it is considered appropriate that separate PSURs are prepared this should be indicated and explained.

For fixed combination products it is strongly recommended to use the harmonised EU birth date of one of the single substance products. For the content of PSURs of fixed combination products there are two options: either a separate PSUR for the combination with cross-reference to the single substance product PSURs or the inclusion of the combination data within one of the single substance product PSURs.

You are also requested to indicate what the date of the first data lock point (DLP) for the PSURs of the relevant products after 30 October 2005 will be, taking into account annex 2.

It would be appreciated if you could provide this information in alphabetic order of the names of the active substance (INN if assigned) as an Excel sheet in the following format before 1st March 2006:

Active substance name (INN)	Innovator brand name (for fixed combination products only)	Proposed EU birth date	First DLP after 30 October 2005

The Excel sheets should be sent by e-mail to EFPIA christinlisejulou@efpia.org

Once agreement has been reached on harmonised EU birth dates and related DLPs these will be published on the website of the Heads of Medicines Agencies. Further information regarding the timing of the application of the harmonised EU birth dates will be given in due time.

Yours sincerely,

W.F. (Pim) van der Giesen, PharmD, PhD
Chairman of the ad hoc WG on the
synchronisation of PSUR submissions

c/o Medicines Evaluation Board
P.O. Box 16299
2500 BE The Hague
The Netherlands
Tel: +31 70 356 7483
e-mail: w.vd.giesen@cbg-meb.nl