



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

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POSITION PAPER

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Requirements for starting material of animal origin

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1. INTRODUCTION

CMDv aims with this document to clarify the requirements for the declaration of the country or geographical region of origin, for starting materials of animal origin used for the manufacturing of veterinary medicinal products.

2. LEGAL BASIS

- Directive 2001/82/EC as amended by Directive 2009/9/EC, Annex I, Title I, Part 2, Section C.1.4 and Title II, Part 2. Section C.2.1
- European Pharmacopoeia (Ph.Eur.),
Chapter 5.2.5, *Substances of animal origin for the production of veterinary vaccines*
Chapter 5.1.7, *Viral safety*
- Note for Guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products (EMEA/410/01 rev 2) Ph.Eur. Monograph (01/2008:1483) *Products with risk of transmitting agents of animal spongiform encephalopathies*

3. CMDv POSITION

Starting materials are defined as all components used in the production of the veterinary medicinal product as they are introduced into the manufacturing process.

Where source materials of animal origin are used in the manufacture of veterinary medicinal products, the origin, including geographical region and history of starting materials shall be described and documented.

Information has to be provided on all substances of animal origin used at any stage in the manufacturing procedure.

Two steps to guarantee the quality of the substances of animal origin are mentioned in the Ph.Eur.: risk assessment and risk management.

The risk assessment must take account of the animal diseases occurring in the country of origin of the animals used as a source of the substance, the potential infectious diseases occurring in the source species and the likely infectivity in the source organ or tissue. The source animals and their geographical region is an important element of the risk assessment for minimising the risk.

The principle of risk assessment is to consider various factors that may influence the potential level of infectious particles in the veterinary medicinal product and factors related to the use of the veterinary medicinal product that determine or influence the risk to the recipients.

For each of the potential risks identified by the risk assessment, and taking into account the proposed use of the substance, the risk must be controlled by the use of one or a combination of the followings measures:

- placing restrictions on the source of the material and auditing this;
- using validated inactivation procedures;
- demonstrating the ability of a production step to remove or inactivate extraneous agents;
- testing for extraneous agents.

The control measures indicate that all substances of animal origin used in the manufacture (including blending) of veterinary medicinal products must be from a known and documented source (including species of origin and country of origin of source animals and tissues).

A focus group meeting with representatives from industry, EMEA, IWP and CMDv took place. The objectives of the meeting were to come up with recommendations reflecting the agreement to have risk assessment for all starting materials and to have the geographical origin of starting materials of animal origin in the dossier only for substances where the risk assessment had shown a need for this geographical origin to be included. It should be possible for a manufacturer to define the region of geographic origin as part of the risk assessment rather than limited to a country a priori. It was suggested that these recommendations are applied to new marketing authorisation applications only as the existing marketing authorisations already had a risk assessment performed. However, it should also be possible (but not mandatory) for manufacturers to add risk assessment for existing substances through relevant post authorisation procedures such as Type II variations or renewals.

The recommendations of the Focus Group Meeting on Substances of Animal Origin are published at the EMEA website.

<http://www.emea.europa.eu/pdfs/vet/press/pos/41352109en.pdf>

4. CONCLUSION

The underlying objective of all guidance documents available on the provision of details on the geographic origin of starting materials is to have authorised veterinary medicinal products (i.e. IVMPs and pharmaceuticals) free of live extraneous agents. The goal is to have substances free of live extraneous agents at disposal, and all measures intended to ensure freedom of live extraneous agents have to be considered. This includes details of the geographic origin for substances of animal origin whatever the species of origin (bovine or not). As milk is included in the starting material of animal origin, the same type of data might be requested for this component.

In particular, the addition of a new country as source for a given substance can dramatically change the initial risk assessment, as the initial restrictions, the inactivation/removal procedures and/or the absence of testing for some extraneous agents (because these were exotic to the initial list of sourcing countries) might become insufficient or inadequate.

In order to guarantee the correct assessment of the quality of a veterinary medicinal products, the details of the geographic origin for starting materials of animal origin whatever the species of origin (ruminant or not) or the tissue (milk included) have to be provided, unless it can be proven that the geographical origin of the substance has no impact on the risk assessment with regard to extraneous agents.

In particular, any change of the geographical origin for a substance of animal origin has to be declared, unless it was already proven in the initial dossier that the geographical origin of the substance has no impact on the risk assessment with regard to extraneous agents.