

Question & Answer N. 111/2009
Application under the fixed combination route

Status	Public
---------------	---------------

QUESTION

Can a fixed combination product be submitted as a bibliographical application when there is no published bibliography on the combination but there is well established use of the combination in certain EU countries (i.e. on the market for > 10 years with no reported SARs) and well-established use of each individual active for the target species in many EU countries?

ANSWER

The first point to make is simply to confirm that it is not possible to submit an application under the fixed combination route, as the use of the actives in combination is not new. It is also not possible to submit the proposed application as a bibliographic under Article 13 a ii of Directive 2001/82 unless there is published scientific literature on the combination to demonstrate well established use.

However, the applicant would be free to submit a full application under Article 12 of the above Directive, using published scientific literature on the individual actives supported by studies showing that there are no adverse interactions when the actives are used in combination. Information regarding the benefit of using the combination for the indications claimed should also be provided.

The safety and efficacy of the combination "in use" should be clearly established and the field clinical trials according to GCPs of the combination are always necessary.