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

London, 31 October 2011

REPORT FOR RELEASE: September and October 2011

September 2011 product discussions

Ten products reached day 90 of the mutual recognition procedure (MRP) and twelve products reached day 210 of the decentralised procedure (DCP).

	MRP	DCP	Referrals
Procedures reaching D90 (MRP), 210 (DCP) or D60 (referrals)	13	18	4
Products*:	10	12	2
Immunological	1	1	
Pharmaceutical	9	11	2

* 1 product includes all strengths and pharmaceutical forms submitted but does not include duplicate applications, which are counted separately

CMDv referral procedures [article 33(1) of Directive 2001/82/EC]

Of the MRPs/DCPs ending in September, none were referred to the CMDv. Four ongoing CMDv referral *procedures* (involving 2 *products*) were finalised in September. In each case the applicant attended the CMDv to present an oral explanation. One referral involving three different strengths of a generic product ended positively, since the applicant was able to satisfy the objecting CMS on the outstanding quality issue by amending the release specifications for the active substance and specifying storage conditions for the product. For the other referral, the CMDv could not reach agreement so the procedure was referred to the CVMP under article 33(4) of Directive 2001/82/EC - see table below for details.

Proc. no.	Product	Active subs.	Legal basis	CMS	D60	Grounds for ref.	Outcome
IE/V/0269/001/DC	Nuflor 300 mg/ml solution for injection for cattle and sheep	florfenicol	Line ext. Annex I Reg. (EC) 1234/2008	BE, DE, DK, EL, ES, FR, IT, LU, NL, PT, UK	20 Sept 2011	France: PSR to animal health - one indication not accepted Denmark: potential serious risk (PSR) to animal health - dose rate not accepted	Objection from France resolved, indication retained in SPC; Objection from Denmark not resolved, referred to CVMP under article 33(4)
BE/V/0024/001/MR	Amoxiclav-VMD // Clavucill 40/10 mg; 200/50 mg; 400/100 mg tablets for dogs & cats	Amoxicillin & clavulanic acid	Article 13.1 generic	DE, SE, DK, ES, FR, NL, PL, PT, RO	20 Sept 2011	France: PSR to animal health regarding the quality of the product	Resolved, agreement reached between the Member States
BE/V/0024/002/MR							
BE/V/0024/003/MR							

October 2011 product discussions

Six products reached day 90 of the mutual recognition procedure (MRP) and nine products reached day 210 of the decentralised procedure (DCP).

	MRP	DCP	Referrals
Procedures reaching D90 (MRP), 210 (DCP) or D60 (referrals)	10	14	1
Products*:	6	9	1
Immunological	0	0	0
Pharmaceutical	6	9	1

* 1 product includes all strengths and pharmaceutical forms submitted but does not include duplicate applications, which are counted separately

(October continued)

CMDv referral procedures

Of the MRPs/DCPs ending in October, two DC *procedures* involving two *products* were referred to the CMDv since the Reference and Concerned Member States could not reach agreement by day 210. One referral procedure involves a hybrid application under article 13(3) of Directive 2001/82/EC for a systemic antibacterial product indicated for a food-producing species. The other referral involves an application under article 13(b) for a 'fixed combination' antiparasitic product indicated for a food-producing species. These two referral procedures are scheduled to conclude shortly after the December meeting of the CMDv.

One ongoing CMDv referral *procedure* (involving 1 *product*) was finalised in September. The CMDv could not reach agreement so the procedure was referred to the CVMP under article 33(4) of Directive 2001/82/EC - see table below for details.

Proc. no.	Product	Active subs.	Legal basis	CMS	D60	Grounds for ref.	Outcome
IE/V/0268/001/DC	Selenate Long Acting 50 mg/ml Suspension for Injection for Cattle	Selenium (as barium selenate)	Article 13.1 generic	AT, BE, CZ, DK, EE, FR, DE, HU, LV, LT, PL, RO, SK, ES, SE, UK	25 Oct 2011	Potential serious risk to human health related to withdrawal period	Not resolved, referred to CVMP under article 33(4)

CMDv updates and advice to applicants

1. 2011 CMDv Rules of Procedure

In September the revised CMDv Rules of Procedure were adopted and are now published on the CMDv website (http://www.hma.eu/uploads/media/CMDv_rules_of_procedure_adopted_15.09.11_EMACMDv371112011_FINAL_01.pdf).

2. Joint (virtual) meeting with CMDh

On 8 September the two CMD groups held a joint discussion on points of common interest:

- Ongoing revision of the Notice to Applicants, Volume 2A, Chapter 1 (human equivalent to the veterinary Volume 6A, Chapter 1);
- Transparency initiatives within both CMDs;
- Impact of the new human pharmacovigilance legislation on CMDh;
- The variation classification guideline.

3. CMDv 2010 annual report

This document is now available on the CMDv website following final adoption in October (http://www.hma.eu/uploads/media/A.06_Final_CMDv_annual_report_2010_14.10.11_EMA-CMDv-190220-2011.pdf).

4. Variation worksharing applications

4.1. September

Two informal worksharing procedures involving only purely-national marketing authorisations (MAs) were received and accepted, pending the outcome of an ongoing discussion by the CMDv on the correct classification of a variation to remove the target animal batch safety test (TABST) for a vaccine (see section 5 below for the conclusion of this discussion). One formal worksharing

application was accepted for a mix of MRP/DCP MAs for a Type II variation to reduce the withdrawal period.

4.2. October

The CMDv noted a request for a new worksharing procedure involving a centrally-authorised product and two products authorised via MRP. The CVMP will lead the worksharing procedure, as foreseen by variation Regulation (EC) 1234/2008. Three informal worksharing procedures and two formal worksharing procedures were accepted, all relating to quality (Part II) changes.

5. Other information on variation applications

5.1. Guidance from the CMDv on variation worksharing applications

The CMDv adopted a template letter (http://www.hma.eu/uploads/media/CMDv-TEM-023e_template_worksharing_letter_of_intent.doc) for applicants to use when submitting a pre-submission notification of a variation worksharing application to the CMDv. The template is applicable for both informal and formal worksharing procedures (see June/July 2011 CMDv Report for Release for definitions of formal/informal) and its use is recommended for all new worksharing requests to the CMDv. It is foreseen to update the CMDv Best Practice Guide for worksharing (CMDv/BPG/018) with some minor changes based on practical experience. A change already agreed is that the applicant should propose a National Competent Authority (NCA) to act as the Reference Authority and it is recommended that the applicant discusses the worksharing procedure with this NCA before sending the pre-submission notification to the CMDv. However it should be noted that, after discussion of the proposed application, the CMDv may choose to appoint a different Reference Authority if this is more appropriate to the MAs involved in the worksharing procedure. The CMDv has also agreed that a copy of the CMDv approval letter should be annexed to the application form at time of submission of the concerned variation worksharing application in the Member State(s).

5.2. Variation classification requests

In October the CMDv received a request to recommend the classification of a variation under article 5 of the variation Regulation. The change needing a classification was a decrease in vial size for a multi-dose vaccine and its diluent, whilst maintaining the antigen content of the vaccine within the vial (and per dose) but with a change of the dose volume and of the antigen concentration per ml. The CMDv considered that this change required a line extension instead of a variation; the CMDh and EMA were in agreement with this conclusion.

5.3. Classification of the variation to waive the target animal batch safety test (TABST) for immunological veterinary medicinal products (IVMPs)

At their October meeting the CMDv reached an agreement that the waiving of the TABST for IVMPs could be handled as a default (unforeseen) Type IB under B.II.d.z ‘Change in control of the finished product’ (z = unforeseen ‘other’ variation).

5.4. Public consultation paper on review of the Variation Regulation (EC) No. 1234/2008)

The CMDv submitted comments to the European Commission as part of the above public consultation process and supported the proposed initiative to extend the scope of the Regulation to include purely-national Marketing Authorisations.

6. Electronic submissions

Applicants should note that a new version of the veterinary e-submission guideline (version 2.1) is now available on the EMA website and that an updated version of the VNeeS checker (September 2011) is also available on the EMA, French and Belgian NCA websites.

- Summary of changes to the guideline: A correction with regard to the folder structure (annex) for immunologicals, it now includes the option to submit up to 6 parts.

- Changes to the VNeeS checker: reflects the amended annex version for immunologicals. Also, this version is more user-friendly than the previous one (2.0) since it is possible to run the test directly on the medium submitted (CD), or on write-protected drives. The updated checker can also generate a table of contents (TOC) for each part of the dossier and a general table of contents (GTOC) for the overall dossier.

For future applications, applicants should use this latest version of the checker, i.e. version 2.1 for any submission check (initial applications, MRLs, and post-authorisation, including responses to questions). Please note that if the applicant and NCA are running different versions of the VNeeS checked, this will lead to problems during validation.

7. Combined dosing schedule in SPC

In order to find a harmonised approach between Member States, the CMDv discussed the inclusion of combined dosing schedules referring to different strengths of the same product in section 4.9 of the SPC. The majority view was that combined dosing schedules were acceptable within section 4.9 of the SPC. There were some divergent views from certain Member States so if an applicant proposes to include a combined dosing schedule, it is advisable to discuss this in advance with the Reference Member State (RMS).

8. Using 'poultry' as the terminology for target species

The CMDv discussed the problematic use of the general terms 'poultry' or 'fish' in section 4.1 (target species) of the SPC. Whilst it is recognised that this terminology was accepted for older originator products, it is no longer acceptable for new, stand-alone applications to use these terms without listing the specific species for which the product is intended. However, for abridged applications, the target species is copied from the SPC of the reference product. It was agreed by the CMDv that 'poultry' or 'fish' is no longer appropriate terminology to describe the target species but not all Member States could agree to the SPC of the generic being restricted to those specific species where data is present in the dossier of the reference product due to the legal/regulatory issues of introducing discrepancies between the SPCs of the generic and reference products. Whilst no conclusion was possible on how to deal with new generic applications citing poultry or fish as target species, the CMDv strongly endorses the principle of listing specific target species in section 4.1 of the SPC for full new (unabridged) applications.

9. CMDv documents

- The CMDv's "Recommendation for Mutual Recognition Procedure after finalisation of an article 34 referral procedure with a positive decision by the EC" was adopted at the October meeting and will be published on the CMDv website

  (http://www.hma.eu/uploads/media/C.01_CMDv_Recommendation_for_MRP_after_art._34_referral_19.10.11_EMEA-CMDv-422851-2009_Final.pdf). A pilot procedure has been finalised successfully for the product 'Soludox 500 mg/g powder for use in drinking water for pigs and chickens' (MAH: Eurovet Animal Health BV). The purely national authorisations are included in a newly created MRP (NL/V/0167/001/MR). Marketing Authorisation Holders whose products authorised on a purely-national basis have either recently been the subject of, or are currently involved in, an article 34 referral are encouraged to contact the CMDv via the secretariat to discuss a potential transfer to mutual-recognition status for these MAs.
- The document currently published on the CMDv website showing medicines authorised for use in bees in each EU Member State was updated and re-adopted in October. The latest version is now published on the CMDv website (http://www.hma.eu/uploads/media/136_Questionnaire_-_Bee_products_in_EU_24.10.11_EMA-CMDv-36668-2009.pdf).

10. Borderline product working group

The second meeting of this new working group took place in October. Several documents were discussed:

- Contact points in each Member State for issues relating to classification of borderline products;
- Overview of the regulatory framework relevant to the classification of borderline products;

- Existing documents on the CMDv website identified to be updated: 'Colostrum and colostrum substitutes'; 'Ectoparasiticidal products'; 'Ectoparasiticidal collars' and 'Pre-dipping requirements'.

Two case-specific discussions took place. For one product, further discussion was necessary on whether the product is considered as a veterinary medicinal product or not (depending its function or presentation). For the second case, the majority view of the members of the borderline working group (15 for vs 3 against) was that there should be no inclusion of non-VMP[1] devices included in the packaging of a VMP (and therefore no mention of the non-VMP device in the product literature). The rationale was that inclusion of non-VMP devices in the packaging of a VMP was not directly related to the use of the VMP and was promotional in nature.

11.Notice to applicants working group

The information contained in Volume 6A, Chapter 7 'General Information' of the Notice to Applicants (NtA) is out of date and there are currently no plans to update the documents in their current format. The CMDv is looking into updating the relevant information for publication on the CMDv website. This was discussed at the CMDv NtA working group in October and the exercise of collecting up to date national information has started. Parallel discussions are taking place at CMDh.

12.Generic of an expired reference product

The CMDv received a clarification from the European Commission on what course of action is open to Member States should they have potential serious risk (PSR) concerns on the safety and efficacy of a generic product whose reference product has been (voluntarily) withdrawn from the market. The CMDv was advised that in the circumstances where the reference product is no longer on the market, and in the absence of any other already authorised generic product of the withdrawn reference product, a Member State may trigger a referral based on article 33(4) of Directive 2001/82/EC.

13.CMDv interested parties meeting

The CMDv interested parties, IFAH-Europe, EGGVP and AVC, attended a meeting with the CMDv on 16 September. Points discussed on the agenda were:

- CMDv informal worksharing procedures
- Update on the progress of the CMDv's pilot SPC harmonisation procedure
- The Commission's review of the veterinary legislation
- Improvement of fee information published on websites of national agencies and possibility of systematically invoicing for national fees
- Access to documents

14.Start of new discussions on labelling at CMDv interested parties meeting

In the context of the ongoing review of the European veterinary legislation, IFAH-Europe raised the issue of labelling at the latest meeting of the CMDv interested parties in September. IFAH-Europe presented an overview of their proposals for reducing the current requirements for labelling (within Title V of Directive 2001/82) with the objective of addressing the administrative burden and availability problems resulting from current labelling requirements. It was agreed that it was preferable for the CMDv and stakeholders to further discuss proposals for revision of the labelling requirements and to present the outcome of those discussions to the Commission. The Czech Republic agreed to act as rapporteur for the CMDv on this important topic.

Information

CMDv documents are available on www.hma.eu/cmdv.html
For further information, please contact the Secretariat at the European Medicines Agency, 7 Westferry Circus, Canary Wharf, London, E14 4HB, UK cmdv@ema.europa.eu

[1] VMP: veterinary medicinal product