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Patient Health Protection

Pre-accession product information linguistic review process (PALC III)

Product information linguistic review process

Extension of Commission Decisions on marketing authorisation of medicinal products approved via the centralised procedure to Croatia in 2013

1. Introduction

Commission Decisions concerning marketing authorisations (MAs) are addressed to a private person/company i.e. Marketing Authorisation Holder (MAH) and are valid in the whole territory of the European Union (EU). When a country joins the EU, such decisions extend automatically to the territory of the new Member State. However, MAHs are legally obliged to provide translations in the new official language as of the date of accession (01/07/2013). It is proposed that the practical realisation of this extension will occur shortly after the accession during the next variation, notification procedure, etc. It should be recognised that availability of these extended annexes will be an essential requirement also to proceed with ongoing regulatory activity for existing centrally approved products (CAPs) and/or new applications after the accession date.

This procedure aims at facilitating phasing in of Commission Decisions related to the EU centralised procedure, in order to avoid delays of supply of relevant medicinal products in Croatia after EU enlargement and prevention of circulation of such products with sub-standard quality translations with potential public health concerns. It is proposed to conduct a pre-accession check in order to avoid peaks of activity both for regulators and industry precipitated by the phasing-in process.

2. General considerations

The proposed pre-accession linguistic review procedure is aiming to ensure a good standard of quality for the translations of around 900 centrally authorised products. To this end MAHs are strongly

* Revised to reflect the delay in the accession date of Croatia until July 2013, in particular extending the timetable for sending slots and the total number of centrally authorised products. Additional guidance given in section 2 regarding the maintenance of the HR PI following the completion of the PALC review and before the actual accession of Croatia. Furthermore, addition of the latest template version v.8 throughout the document.

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encouraged to initiate translation activities as early as possible and to participate actively in this process in order to avoid difficulties in marketing these products during the post-accession period.

In order to keep an overall control of the workflow of translations towards the Croatian National Competent Authority (NCA) and to help them with their internal organisation, the European Medicines Agency (EMA) will draw a plan where specific dates of sending translations will be identified. Moreover, a maximum number of products per sending date will be fixed. The principle of first come - first serve will apply with regard to the priority of products to be submitted to the Croatian NCA.

Consideration should be given to ongoing/recent regulatory activity with respect to the choice of the approved reference texts chosen. However, a pragmatic approach is needed to avoid any concentration of activity just prior to the accession.

MAHs are requested to prepare and submit linguistic version in **the Croatian (HR) language** reflecting the English (EN) reference text. In cases where the pre-accession linguistic review process is ongoing for a specific CAP and where in the meantime a finalised Variation procedure (CxMP Opinion or EMA Notification) has lead to changes to any of the Annexes, MAHs should liaise with the QRD secretariat in due time to discuss the submission of updated translations to the Croatian NCA. Where appropriate, such Variation changes could be introduced during the last checking stages of the pre-accession review process, i.e. day 70-80. In such case and in order to facilitate the review process, the updated translation should clearly indicate (highlighted track changes) the parts which have been amended by the Variation procedure concerned.

Applicants may present the SmPCs, Annex II, Labelling and Package Leaflets for different strengths of the same pharmaceutical form in one document. Different pack-sizes of the same strength can be presented in one labelling document. For human products, the strength or presentation to which alternative text elements refer should be clearly indicated with grey-shaded titles. However, MAHs are reminded that when the texts have to be officially forwarded to the EMA/EC after enlargement, e.g. as part of a Notification or Variation procedure, translations will have to be provided in the same form as the approved EN reference text, i.e. Annexes separated according to the different strengths/pharmaceutical forms, etc.

The latest versions (v. 8 for Human products & 7.3.1 for Veterinary products) of the QRD Product Information (PI) template together with the previous versions (v. 7.2 and 7.3.1 for Human products and 7.1, 7.2 and 7.3 for Veterinary products) are available on the EMA website for the translation of the PI Annexes in HR. The HR translation should reflect the adopted EN reference text (based on the template versions indicated above) and the corresponding HR template should be used. Where the EN reference text deviates from standard QRD template headings and/or statements, the translations should strictly reflect the adopted EN text and should not use the headings/statements provided in the translated templates.

To ensure the quality of translation and to facilitate the process of linguistic review, MAHs are strongly advised to find a translator with sound knowledge of the language and with experience in translating medical terms. While for existing MAs reference documents in English are already available in the public domain, in case of pending new applications/line extensions and variations attention should be paid to the confidential character of documents and secure exchange of documents ensured.

Documents should be submitted in electronic format only, in MS Word.

In order to accelerate the process, both MAHs and the NCA are strongly advised to use Eudralink as the most suitable and secure way to exchange PI files. The big advantage of Eudralink is the high capacity limit, which allows the sending of large files in one single transmission. To obtain a Eudralink account, please contact the Eudralink helpdesk at: eudralink@ema.europa.eu.

Note: For those products that have already gone through the PALC process before the revision of the accession date, as well as for those products that will go through a number of post-authorisation changes between the completion of the PALC process and the actual accession of Croatia in the EU, MAHs are advised to maintain internally a Croatian version of the PI reflecting all changes made in the English PI through the various regulatory procedures since PALC III Day 80 (i.e. final HR version agreed by the Croatian NCA). This highlighted HR PI version will need to be submitted to the Croatian NCA as part of the post-opinion linguistic review of the first procedure following the date of accession.

3. Linguistic review process for centrally authorised products (backlog)

Step 1

EU MAH shall submit electronically to the EMA (qrd@ema.europa.eu) the following documents:

- Form 1. In particular, the MAH should specify in Form 1 which version is submitted for the product information (e.g. II/05) and on which template version the translation is based (e.g. v 8, 7.3.1 or 7.2).
- Full set of Product Information Annexes (includes Annex I, II, IIIA and IIIB, and Annex IV if applicable, i.e. all SmPC, Labelling and PL texts for all strengths and pharmaceutical forms of the product concerned, as well as Annex II, and Annex IV if applicable) in the English language as reference text (see point 2 above).
- Full set of Annexes in the Croatian language in a combined form (see point 2 above). The complete set of Annexes must be presented sequentially (i.e. Annex I, II, IIIA, IIIB) as one document.
- In addition, a copy of the proposed text for blue box requirements may be included (optionally), too (as a Word text, not a package mock up as such).
- In cases of multiple identical MAs, where the Product Information and the holder of the MA are identical, MAHs are allowed to submit the translations of only one MA together with a declaration confirming that the texts are identical and that translations of the other MAs will be provided at a later stage (after enlargement, e.g. as part of a Notification or Variation procedure).

Step 2

Upon receipt of the translation from the MAH, the EMA will take the following steps in line with the agreed timeline:

- Send Form 1 to the Croatian NCA.
- Send SmPC, Annex II, Labelling and PL in the Croatian language, as well as the relevant EN reference document through Eudralink to the NCA.
- The checking process will start only when the electronic version, sent by the EMA, reaches the NCA.
- Inform the MAH that the translation has been received and sent to the Croatian NCA and confirm date by which the MAH should expect linguistic comments.

In order to avoid possible delays due to non-receipt, the NCA will be asked to confirm receipt of the translations.

QRD secretariat will periodically circulate reminders to the NCA in order to ensure timely receipt of comments.

DAY 1-60

Step 3

The NCA shall check documents submitted for a linguistic review.

- The reviewer will have 60 days to check the HR translation against the approved EN reference text. It is important to note that the review should be based only on the approved EN reference text and the already authorised text should not be adapted to the latest QRD template in Croatian.
- If during the 60-day period the reviewer concludes that the translation is of unacceptable quality, he/she should immediately inform the MAH as early as possible in the process and discuss further steps to be taken. Upon agreement the MAH shall address in due time the problems identified by the NCA in order to allow sufficient time for the completion of the review by day 60.
- In case further clarifications on linguistic issues are needed, the NCA reviewer may contact directly the person responsible for the translations indicated by the MAH in Form 1. The EMA should not be informed at this stage.
- By day 60, at the latest, the NCA shall send their comments in the form of track changes directly to the MAH with a copy to the EMA (qrd@ema.europa.eu).

DAY 60-70

Step 4

The EU MAH will have 10 days to check the revised version and implement the comments.

- By day 70 the MAH should submit electronically to the EMA (qrd@ema.europa.eu) the final translation, incorporating the comments of the NCA.
- In order to facilitate and accelerate the check of the implementation of the NCA's comments, the MAH should indicate in response Form 2 if all comments have been implemented or not. In the latter case, a justification should be provided stating why certain comments are not reflected in the final texts. A poor implementation, lack of justification or absence of a completed Form 2 may lead to a delay in the agreement on the final texts. MAHs should proactively liaise with the NCA to resolve any disputed issue before they submit their final day 70 version to the EMA.
- Upon receipt of the final translation from the MAH, the EMA shall forward it together with Form 2 to the NCA for the final check.

DAY 70-80

Step 5

The Croatian NCA will perform the final check within the next 10 days (day 70-80).

- In case the NCA is still opposing the justification provided by the MAH in Form 2 then they should liaise directly with the person responsible for the translation to try to find a common agreement.
- By day 80 and provided that all issues have been dealt with, the NCA shall inform the MAH about documents finally accepted in writing with the reference to the documents' version accepted. Copy

of the letter [*template of the letter to be provided by the EMA*] shall be send electronically to the EMA (qrd@ema.europa.eu) in order to include information in the database.

- The MAH should provide by day 80 the clean and final translations to the EMA (qrd@ema.europa.eu), together with a declaration confirming that the translations attached are those agreed with the NCA.

4. Timetable for the sending of translation slots to the Croatian NCA

The total number of already authorised products for Human use via the centralised procedure is approximately 749. Having regard to:

- The length of the timeline for the checking of translations (80 days);
- The fact that the whole process should be completed by July 2013;
- The expected average time for the checking of one product is 7,5 hours, and
- The balance to be ensured between workload and available resources from the side of the NCA, the following plan is proposed:

Maximum 14/15 products will be sent for checking twice every month, on the 1st and on the 15th (first sending date: 01/03/2011, last sending date: 15/04/2013).

01/03/2011	15/03/2011	01/04/2011	15/04/2011	01/05/2011	15/05/2011	01/06/2011
14 products	14 products	14 products	14 products	14 products	14 products	14 products

15/06/2011	01/07/2011	15/07/2011	01/08/2011	15/08/2011	01/09/2011	15/09/2011
14 products	14 products	14 products	14 products	14 products	14 products	14 products

01/10/2011	15/10/2011	01/11/2011	15/11/2011	01/12/2011	15/12/2011	01/01/2012
14 products	14 products	14 products	14 products	14 products	14 products	14 products

15/01/2012	01/02/2012	15/02/2012	01/03/2012	15/03/2012	01/04/2012	15/04/2012
14 products	14 products	14 products	14 products	14 products	14 products	14 products

01/05/2012	15/05/2012	01/06/2012	15/06/2012	01/07/2012	15/07/2012	01/08/2012
14 products	14 products	14 products	15 products	15 products	15 products	15 products

15/08/2012	01/09/2012	15/09/2012	01/10/2012	15/10/2012	01/11/2012	15/11/2012
15 products	15 products	15 products	15 products	15 products	15 products	15 products

01/12/2012	15/12/2012	01/01/2013	15/01/2013	01/02/2013	15/02/2013	01/03/2013
15 products	15 products	15 products	15 products	15 products	15 products	15 products

15/03/2013	01/04/2013	15/04/2013
15 products	15 products	15 products

The total number of already authorised products for Veterinary use via the centralised procedure is approximately 151. Having regard to:

- The length of the timeline for the checking of translations (80 days);
- The fact that the whole process should be completed by July 2013;
- The expected average time for the checking of one product is 7,5 hours, and
- The balance to be ensured between workload and available resources from the side of the NCA, the following plan is proposed:

Maximum 5/6 products will be sent for checking once a month, on the 1st of each month (first sending date: 01/03/2011, last sending date: 01/04/2013).

01/03/2011	01/04/2011	01/05/2011	01/06/2011	01/07/2011	01/08/2011	01/09/2011
5 products	5 products	5 products	5 products	5 products	6 products	6 products

01/10/2011	01/11/2011	01/12/2011	01/01/2012	01/02/2012	01/03/2012	01/04/2012
6 products	6 products	6 products	6 products	6 products	6 products	6 products

01/05/2012	01/06/2012	01/07/2012	01/08/2012	01/09/2012	01/10/2012	01/11/2012
6 products	6 products	6 products	6 products	6 products	6 products	6 products

01/12/2012	01/01/2013	01/02/2013	01/03/2013	01/04/2013
6 products	6 products	6 products	6 products	6 products

5. Handling of Croatian product information annexes for Generic/Hybrid/Informed Consent (IC) centrally authorised products

MAHs of reference medicinal products on which centrally authorised Generic/Hybrid/IC medicinal products have been based on are advised on the following: considering that the product information of the reference medicinal product is generally the driver for amendments impacting on the product information of the respective generic/hybrid/IC products, MAHs of the reference products are advised to try to use the earlier slots of the process to submit their HR translations. The first HR translation received by the Agency will be the one sent to the Croatian authorities for review and will also be used as the reference text for the rest of generic/hybrid/IC products as well as for the reference one.

Once the full review of the first HR translation received is finalised, the EMA will proactively inform the rest of affected MAHs and will provide them with the approved text to be used as the basis of their translations. These will need to be clearly highlighted to indicate which parts of the annexes are different so that the HR NCA can focus on the review of those differences.

6. Pending new Marketing Authorisation Applications and Line Extensions

For products for which a CxMP Opinion shall be adopted as of March/April 2013, the translation of the agreed SmPC, Annex II, Labelling and Package Leaflet/Insert text, and Annex IV if applicable, in Croatian is to be provided after adoption of the CxMP EN opinion according to the timetable and procedure agreed for current MSs.

The Product Information linguistic review process for new applications in the Centralised Procedure should then apply.

For Human medicinal products please refer to Doc. Ref: EMA/5542/02/Rev 4 which can be downloaded from the following web address:

http://www.ema.europa.eu/pdfs/human/regaffair/554202en.pdf

For Veterinary medicinal products please refer to Doc. Ref: EMA/288844/2009 Rev 4 which can be downloaded from the following web address:

http://www.ema.europa.eu/docs/en_GB/document_library/Regulatory_and_procedural_guideline/2009/10/WC500005250.pdf