European Medicines Agency

London, 1 December 2006
Doc. Ref. EMEA/CHMP/BWP/480303/2006 - Corr

OVERVIEW OF COMMENTS RECEIVED ON DRAFT GUIDELINE ON ENVIRONMENTAL RISK ASSESSMENTS FOR MEDICINAL PRODUCTS CONSISTING OF, OR CONTAINING, GENETICALLY MODIFIED ORGANISMS (GMOS)

Table 1: Organisations that commented on the draft Guideline as released for consultation

	Name of Organisation or individual	Country
1	European Vaccine Manufacturers	Belgium
2	Institut Scientifique de la Santé Publique	Belgium
3	Pharmaceutical Research and Manufacturers of America	USA
4	European Federation of Pharmaceutical Industries and Association	Belgium

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Table 2:Discussion of comments

GENERAL COMMENTS - OVERVIEW
Several comments with respect to the PROCESS of evaluation and consultation of Competent Authorities and consistency of wording and definitions with Directive 2001/18. > The text was improved but it is more appropriate to lay down further procedural details such as criteria for the selection of the lead consulted CA in an SOP once sufficient experience with the procedure has accumulated.
The review of the ERA for GMO medicinal products should be conducted through the normal process of evaluation of medicinal products and by EMEA experts only (i.e. concerns about involvement of Competent Authorities). > The evaluation follows the normal evaluation process with the exception that CA are consulted in accordance with Regulation (EC) 726/2004. This has no impact on the evaluation time.
Module 1.6.2 does not take into account the specificity of the GMO medicinal products. The guideline refers to Annexes II, III and IV of Directive 2001/18/EEC, which have been written for GMOs in general. The content of the annexes should be adapted to reflect the specific requirements related to the manufacture of medicinal products. > This was clarified in the 'legal basis' of the guideline and in 4.2 'Information requirements for module 1.6.2, and the objectives and principles of the environmental risk assessment to be performed'.
Clarification was required on definitions and wording. Some references to the applicable legislation were misleading. >The text was improved to provide clarification. References to the legislation were made clearer.
There is little description given in this document that would allow an applicant to ensure that the ERA meets the requirements for submission of the reviewer. > The guidance was improved to provide more extensive description of the steps conducted to perform the ERA.
The ERA (module 1.6.2) is part of an integrated information package and not a stand-alone document. Therefore, reference to other parts of the dossier should be allowed so that unnecessary duplication and inconsistency can be avoided throughout the submission. > Although the ERA (module 1.6.2) will be reviewed together with the rest of the submission by EMEA, the ERA must also be presented as a self-standing document to allow distribution to Competent Authorities as part of the necessary consultation in accordance with Regulation (EC) 726/2004. Specifying a self-standing module 1.6.2 is the only way to avoid a breach of confidentiality.

SPECIFIC COMMENTS ON TEXT

GUIDELINE SECTION TITLE

Section	Comment and Rationale	Outcome
4.5	Day 181-210: 'the applicant includes any product literature particulars	This point is addressed in relation to step 5. Application of management

Centralised procedure steps integrating the evaluation of the ERA	arising from the ERA and risk management in the relevant parts of the English product literature to be sent to EMEA and all CHMP members'. It is not appropriate to require such information at this stage of the procedure.	strategies for risks from the marketing of the GMO(s). It should also be noted that the product information is part of the marketing authorisation and must be approved together with the opinion on the benefit/risk of the medicinal product in accordance with the pharmaceutical legislation.
5.1 Introduction	Criteria should be developed and proposed for clarifying when a monitoring plan should and should not be required.	Specific guidance is not provided as the need for a post-marketing environmental monitoring plan should be evaluated on a case-by-case basis on the basis of the ERA and conclusions on the environmental impact of the medicinal product.
5.4 Methodology	- Discussion should be included in the EMEA guidance document about protection of confidential business information and of how it will be protected at the time that the risk assessments are made public. - Step 1: Define the term 'population dynamics changes' to provide a context for identifying these changes. - Step 2: Provide a methodology for estimating the uncertainty when the effect is not/cannot be quantified. - Step 2: No acceptable extrapolation methodologies are cited for use by applicants to determine the effects on population dynamics (an undefined term). - Step 4: some discussion on acceptable methodologies for determining the uncertainty for an identified risk would be useful.	Publication and deletion of proprietary confidential information will follow EMEA's general policy for the publication of European Public Assessment Reports. This has been clarified in the guideline. The section on 'methodology' was improved to provide further clarification.