European Medicines Agency
Veterinary Medicines and Inspections

London, 2 May 2007
Doc. Ref. EMEA/146160/2007

**OVERVIEW OF COMMENTS RECEIVED ON
GUIDELINE ON REQUIREMENTS FOR AN AUTHORISATION UNDER EXCEPTIONAL CIRCUMSTANCES FOR VACCINES FOR USE IN BIRDS AGAINST AVIAN INFLUENZA
EMEA/CVMP/IWP/222624/2006**

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

Add name followed by link to individual received comment (upon publication by Web Services)

	Name of Organisation or individual	Country
1	IFAH Europe	

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Table 2:Discussion of comments

GENERAL COMMENTS - OVERVIEW		
IFAH-Europe supports the development of this guideline and is grateful for the opportunity to comment. We regard it is very important that the guideline does not exclude new technology (such as DNA vaccines or VLP vaccines) that may bring different tools in the near future to tackle the Avian Influenza crises. We also strongly believe that inactivated vaccines should not require additional information related to GMOs.		
SPECIFIC COMMENTS ON TEXT		
GUIDELINE SECTION TITLE		
Line no.[1] + paragraph no.	**Comment and Rationale**	**Outcome**
2. SCOPE 1st paragraph, 1st sentence	Why is it restricted to "vaccine in birds against highly pathogenic avian influenza virus infections"? As we know, vaccines have been used also to control low path H5 or H7 infections (as in Italy against H7N3, H5N9 or in the US against H7N2). Please remove the word "highly" to include the LPAI H5 and H7 as defined in the definitions.	Not accepted – the guideline is intended to apply only to vaccines intended for emergency use against highly pathogenic avian influenza.
2. SCOPE 1st paragr	The wording "routine preventive use" is in contradiction with the scenarios/terms defined on page 3. As it will only create confusion, "routine preventive use" should be replaced by "routine vaccination" as this is (we believe) what is meant.	Not accepted – the guideline is intended to apply only to vaccines intended for emergency use against highly pathogenic avian influenza. Scope clarified to exclude “routine and preventive vaccination”.
4. TYPES OF VACCINES	It is not very clear which subunit antigens are allowed or not for the different types of vaccines, especially regarding the DIVA requirements. o It should be made clear that these types of vaccines proposed are examples and not a list excluding future developments. o 2nd bullet point: "produced in recombinant vectors" is not the appropriate wording since expression systems do not necessarily require the use of recombinant vector. Please replace it by a more general term. o 3rd bullet point: Inactivated vaccines will have by definition both HA and NA but for live recombinant viruses it is stated that they will be "engineered to express an appropriate H". Although in	It was not thought likely that DNA or VLP vaccines would be considered for emergency use but in that this section refers to examples of the types of vaccine that might be used for avian influenza in general the suggested amendments were agreed.

[1] Where applicable

	practice it is not relevant, does this mean that NA genes cannot be used in live recombinant viruses? This "restriction" is not mentioned for the purified "subunit" vaccines. o The guideline should also include the category of DNA vaccines as the technology may improve significantly in the near future and may bring innovative tools to tackle an avian influenza crisis. It should also include the category of "VLP vaccines" (if it does not fall under "subunit" vaccines).	
5.2 ANALYTICAL (QUALITY) REQUIREMENTS 1st bullet point, last sentence	The words "highly pathogenic" should be removed since we may have outbreaks with low path H5 or H7 against which vaccination is used (e.g. in Italy). A low path H5 or H7 may be epidemiologically relevant.	Not agreed – the guideline is intended to apply only to vaccines intended for emergency use against highly pathogenic avian influenza.
5.2 ANALYTICAL (QUALITY) REQUIREMENTS 6th bullet point (eggs for production)	As regards the "ability of the inactivation process applied to the antigen also to inactivate extraneous agents", this cannot be on the full list of extraneous agents (15-20 agents). Agents like the *Chicken infectious anemia virus* and reovirus will not be inactivated by usual procedures, but have no chance to be present in the vaccines however. This should be limited to extraneous agents likely to be present in the allantoic fluid harvest in case of flock contamination, as defined by a risk analysis. When the inactivation process does not bring sufficient guarantee, an extraneous agents test on the final product (serology) may complete the information.	Agreed but with deletion of the reference to serology.
5.2 ANALYTICAL (QUALITY) REQUIREMENTS Last bullet point	Inactivated vaccines are by definition not a GMO. If a GMO is used as master seed and then is inactivated no additional information should be required.	Agreed – sentence deleted.
5.3 SAFETY REQUIREMENTS	o As above, inactivated vaccines are by definition not a GMO. o What we miss here it is the use of the principle of bridging data between or at least within an H subtype.	1st bullet: Agreed – sentence deleted 2nd bullet: No change - this principle is already adequately covered in the text.
5.4 EFFICACY REQUIREMENTS	What is the expected minimum level in reduction of excretion? Just to pass the statistical analysis?	It was not considered feasible to define a minimum expected level of reduction of excretion because is considered acceptable is likely to vary depending on the epidemiological situation in the field.

DEFINITIONS	The definition of LPAI is not in line with that one used by the OIE. This should be synchronized (see proposal).	Not agreed – the definitions used are those in Annex 1 of Directive 2005/94/EC. The guideline is applicable to highly pathogenic avian influenza as defined here rather than the OIE category of "notifable" avian influenza.