15 December 2011
EMA/CHMP/BWP/552050/2011
Committee for Medicinal Products for Human Use (CHMP)

Overview of comments received on 'Guideline on the warning on transmissible agents in summary of product characteristics (SmPCs) and package leaflets for plasma-derived medicinal products' (EMA/CHMP/BWP/360642/2010 rev. 1)

Interested parties (organisations or individuals) that commented on the draft document as released for consultation.

Stakeholder no.	Name of organisation or individual
1	Plasma Protein Therapeutics Association PPTA

7 Westferry Circus ● Canary Wharf ● London E14 4HB ● United Kingdom
Telephone +44 (0)20 7418 8400 **Facsimile** +44 (0)20 7418 8416
E-mail info@ema.europa.eu **Website** www.ema.europa.eu

1. General comments - overview

Stakeholder no.	General comment (if any)	Outcome (if applicable)
1	The standard texts provided for the patient leaflet in this guideline (section 4.1, 1.3 and 4.4) could be improved in order to increase the readability. Suggestions to improve these standard texts are: • shortening the text • use of bullet points and • move the most important information on the beginning of the paragraph (see specific proposals below). Further, it would be helpful if the Guideline had a proposed **standard heading to be used in the PL for the prescribed standard texts** suggested in lines 224-241, 265-267, 269-285 and 287-298	Noted. See comments on lines 224-241, 256-267, 269-285 and 287-298.

2. Specific comments on text

Line no.	Stakeholder no.	Comment and rationale; proposed changes	Outcome
120	1	Proposed change: For better understanding of the history please quote here also the *NfG on plasma derived products (CPMP/BWP/269/95, rev. 4)* which includes the chapter 6. We understand that the NfG rev 4 is finalized and will be published soon.	Agreed.
156	1	Comment: The statement:<The measures taken may be serious for pregnant women (fetal infection) and for individuals with immunodeficiency or increased erythropoiesis (e.g. haemolytic anaemia).> seems to be abbreviated in comparison to the old NOTE FOR GUIDANCE ON THE WARNING ON TRANSMISSIBLE AGENTS CPMP/BPWG/BWP/561/03. Proposed change: The previous text provided clearer information and should be reintroduced <The measures taken may be of limited value against non-enveloped viruses such as <HAV> <and> <parvovirus B19>. <Parvovirus B 19 infection may be serious for pregnant women (fetal infection) and for individuals with immunodeficiency or increased erythropoiesis (e.g. haemolytic anaemia).>	Agreed. The text has been modified.
223	1	Proposed change: The statement <Rapporteur to include text> should be removed.	Agreed.
269	1	Proposed change: It would be helpful if the Guideline had a proposed **standard heading to be used in the**	Not agreed.

Line no.	Stakeholder no.	Comment and rationale; proposed changes	Outcome
		PL for the prescribed standard texts in lines 269-285. (See general points)	The QRD template recommends the main headings to be included in section 2 of PL. The inclusion of additional sub-headings is optional and depends on the information and overall structure of the section.
282-285 and 295-298	1	Proposed change: Suggestion to move this most important information in the entire paragraph from the bottom to the beginning of the paragraph.	Not agreed. The structure of the Warning Statement of immunoglobulins is maintained in order to be consistent with the structure of the text of the Warning Statements of other type of plasma derived medicinal products.
282-283	1	Proposed change: The sentence could be shortened: Immunoglobulins have not been associated with hepatitis A or parvovirus B19 infections ~~possibly because the antibodies against these infections, which are contained in the product, are protective~~. Nevertheless it is strongly recommended that every time you receive a dose of XX the name and batch number of the product are recorded in order to maintain a record of the batches used.	Not agreed. Immunoglobulins produced in the past did not include specific virus testing or sufficient effective virus inactivation/removal measures. This statement is still considered valid from a scientific point of view and is reassuring for the patient.
225-228 and 270-273 and 288-291	1	The preventive measures could be clearer structured and thereby shortened using bullet points. Proposed change: ~~When medicines are made from human blood or plasma, certain measures are put in place to prevent infections being passed on to patients. These include~~	Agreed.

Line no.	Stakeholder no.	Comment and rationale; proposed changes	Outcome
		~~careful selection of blood and plasma donors to make sure those at risk of carrying infections are excluded, and the testing of each donation and pools of plasma for signs of virus/infections.~~ ~~Manufacturers of these products also include steps in the processing of the blood or plasma that can inactivate or remove viruses.~~ When medicines are made from human blood or plasma, certain measures are put in place to prevent infections being passed on to patients. These include • careful selection of blood and plasma donors to make sure those at risk of carrying infections are excluded • the testing of each donation and pools of plasma for signs of virus/infections, • steps in the processing of the blood or plasma that can inactivate or remove viruses.	
284-285 and 297-298	1	Insert an optional reference to section 3. HOW TO <TAKE> <USE> X in case a treatment diary is recommended and the patient can find further instruction about what information to be recorded in this treatment diary in section 3 (e.g. the injected volume, flow rate, the number and location of injection site). Proposed change: Nevertheless it is recommended that every time you receive a dose of XX the name and batch number of the product are recorded in order to maintain a record of the batches used <(see section 3. HOW TO <TAKE> <USE> X)>.	Not agreed. This comment only applies to specific situations where a patient information is recorded by the patient in a treatment diary. In order to avoid increasing the complexity of the guideline, the current text is maintained. The current reference to batch record is considered sufficient.

Line no.	Stakeholder no.	Comment and rationale; proposed changes	Outcome
273-278	1	Proposed change: Change the order of the paragraphs for Immunoglobulins: first list the preventive measures, then say for which transmissible agents they are considered effective and then note that there is still a remaining risk. Proposed change: Manufacturers of these products also include steps in the processing of the blood or plasma that can inactivate or remove viruses. ~~The~~ These measures taken are considered effective for enveloped viruses such as human immunodeficiency virus (HIV), hepatitis B virus and hepatitis C virus (liver inflammation) < … >. ~~Despite these measures~~ However, ~~when medicines prepared from human blood or plasma are administered,~~ the possibility of passing on infection cannot be totally excluded. This also applies to any unknown or emerging viruses and other types of infections.	Not agreed. See response to comment '282-285' and '295-298'.
277-278	1	Proposed change: Include lay terms for the virus. Proposed lay term underlined: human immunodeficiency virus (HIV, <u>the AIDS virus</u>), hepatitis B virus and hepatitis C virus <u>(liver inflammation)</u>	Not agreed. The virus names are considered sufficient. The change as proposed includes references to the infecting agent (the AIDS virus) together with the virus related diseases (liver inflammation). In order to maintain consistency, the current text only referring to the infecting agents is preferred.