EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Product information management

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Part 1 – Definition of product information

- For the purposes of the centralised and referral procedures product information is consisted of the following annexes:

- Annex I – Summary of Product Characteristics (SmPC)
- Annex II – Conditions of the Marketing Authorisation
- Annex IIIA – Labelling
- Annex IIIB – Package Leaflet (PL)
- Annex 127a*, *if applicable,* – Conditions or restrictions with regard to the safe and effective use of the medicinal product to be implemented by the member states

* Former Annex IV

Part 1 – Main actors

- Quality Review of Documents group (QRD)
- Pharmaceutical industry
- European Medicines Agency (EMA)
- Patients' & consumers' organisations
- Health Care Professionals, as appropriate

Part 1 - QRD

Linguistic aspects of Product Information are handled within the QRD group. QRD was established in June 1996.

Composition:

- European Medicines Agency (chair & secretariat)
- Member States (1 Human + 1 Vet)
- European Commission
- Norway + Iceland (as observers)
- Translation Centre, based in Luxembourg
- Candidate Member States (as observers)

Part 1 - QRD mandate (under review)

- To ensure clarity, consistency and accuracy of the medicinal product information and of its translations.
- To verify the terminology used in translations.
- To promote legibility of patient information.
- To contribute to the development of common understanding on the implementation of legislation and guidelines.

Part 1 - QRD areas of activities

- Product Specific or General Issues
- **User testing**
- Standard terms
- Legislation, Guidance/Reference documents updates
- Translation services/CdT
- **Product Information Quality Review**

Part 1: PI Quality Review - Pre-Opinion

New applications & Line extensions

A. During the evaluation process English only PI will undergo a preliminary “technical” check (Day 110 PIQ technical) by EMA staff => template compliance, correct location of information, linguistic issues, consistency across annexes, etc.

- Issues to identify:
  - combined PL
  - expression of strength issues
  - standard terms
  - qualitative & quantitative composition - INN (salt/esters)
  - completeness of package leaflet compared to SmPC
  - labelling simplification (art. 63(1)(3) of Dir 83/2001)

Part 1: PI Quality Review - Pre-Opinion

B. After clock stop the EN PI will again undergo a linguistic review by both the MSs and EMA (QRD sub-group meeting to be held at the request of the applicant).

- Sub-group meeting not mandatory. Only if major issues, otherwise, in writing or T/C
- Project Team Leader/Member (PTL/PTM) presence required in the meeting (chair)
- 2 MS to participate & 2 representatives max. from applicant

Part 1: PI Quality Review – Pre-Opinion

- In this phase MS participate on a voluntary basis
- The focus is not only on the quality of the EN language
- Although not in the scope, scientific issues can be identified and referred to the Rapporteur/Co-rapporteur.
- Identify possible issues for discussion with QRD group.
- Focus of the patients' review is the package leaflet from a readability point of view
- Health Care Professionals (HCP) can be involved when specific expertise is required.

Part 1: PI Quality Review – Pre-Opinion

- Renewals: thorough review of the EN PI by EMA/MSs/Patients. Particular attention on PL and user testing, compliance with new requirements.

- Referrals: Art. 30, 31 of Dir. 83/2001 – Art 13 of Reg. 1234/2008 – Art 29 paediatric procedures of Reg. 1901/2006. Thorough review of EN PI by EMA/MSs only if full set of annexes submitted.

- Variations of any type: **NO** review/involvement of QRD.

Part 1: Generics/hybrids/biosimilars

- For generics:
  - the EN review will be performed only by EMA staff during pre- and post-Day 120. No involvement of MSs or patients.
  - The SmPC should strictly follow the originator's, excluding the Quality parts. When not all indications applied for relevant parts should be removed from the generic PI annexes.
  - The user testing requirement applies, however a bridging report can be submitted to prove similarity to the successfully user tested PL of the originator.
- For hybrids and biosimilars normal QRD pre-opinion process to apply with Member States' participation.

Part 1: Small & Medium sized Enterprises (SME)

- For SMEs:
  - Exact same procedural steps apply to both pre- and post opinion phases.
  - As a financial incentive, translations are carried out by the Translation Centre (CdT) in Luxembourg on behalf of the SME. The role of the applicant in the post-opinion linguistic process is played by CdT.
  - Only IS & NO are provided directly by the SME.
  - For any post-authorisation procedure translation cost is taken over by the SME.

Part 1: Examples of EN PI review

Example of QRD comments on SmPC

Example of QRD comments on labelling

Example of QRD comments on package leaflet

Part 1: Example of labeling simplification

MINIMUM PARTICULARS TO APPEAR ON SMALL IMMEDIATE PACKAGING UNITS
{Syringe label}

1. NAME OF THE MEDICINAL PRODUCT AND ROUTE(S) OF ADMINISTRATION

{invented name} 30 mg
Icatibant
sc

2. METHOD OF ADMINISTRATION

3. EXPIRY DATE

EXP

4. BATCH NUMBER

Lot

5. CONTENTS BY WEIGHT, BY VOLUME OR BY UNIT

30 mg/3 ml

6. OTHER

XXX

Part 1: PI Quality Review – Post-opinion 1

- Total duration of the process = 27 days

QRD members (14 days)=>review the quality of national translations against the EN original => copy to EMA of their comments + an overall feedback on the quality of the translations.

The applicant (5 days)=> final translations, incorporating the MS' comments, electronically to the EMA.

EMA (3 days)=> check if all MS' comments have been implemented before sending the final translations to the EC.

Part 1: PI Quality Review – Post-opinion 2

Procedures subject to linguistic review:

New applications, Line extensions, Renewals, Variations II, Referrals, Annual reassessments, Variations Type IB (affecting annexes), Urgent Safety Restrictions (USRs).

- Delays are monitored and can justify non payment if of unacceptable length (even if only 1 country has not submitted comments the process is blocked!)
- Quality of work provided my MS monitored via Corrigenda procedures

Part 1: Quality of translations/Statistics 2010

New applications/Line extensions

100% compliance

Post-authorisation procedures

97% compliance

Part 2: Mock-ups & Specimens review

Definitions

- Mock-Up: copy of the flat artwork design in full colour.
- Specimen: sample of the actual printed outer carton, packaging material and package leaflet.

❖ The whole review process is carried out by EMA staff on the basis of the principles outlined in the following document:

'*The Revised Checking Process of Mock-Ups and Specimens of outer/immediate labelling and package leaflets of human medicinal products in the Centralised Procedure*'

Part 2: Mock-ups & Specimens review

Scope

- New applications/line extensions (the process is running in parallel to the standard QRD/PIQ processes)

- Renewals

- Transfers

- Other post-authorisation procedures (on a case by case basis)

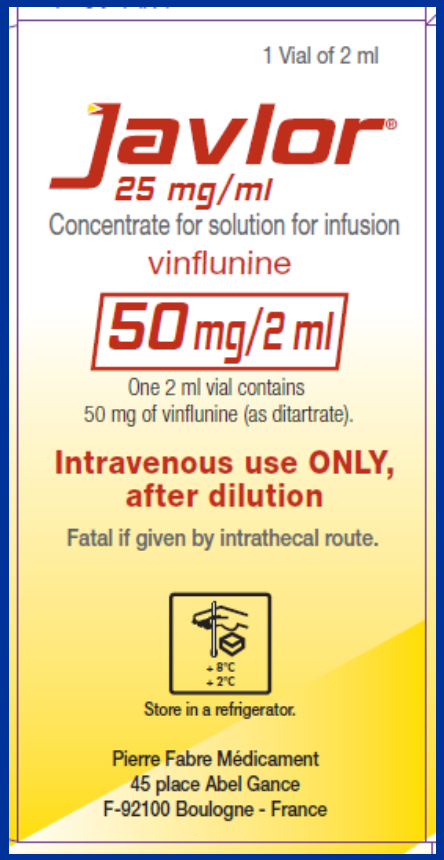
Part 2: Mock-ups & Specimens review

Review focuses mainly on legibility/readability:

- Overall lay-out and design.
- Use of colour/pictograms.
- Differentiation between strengths.
- Presentation critical labelling information

Part 2: Mock-ups & Specimens review

Critical information



Labelling must contain all elements required by **Article 54 of Directive 2001/83/EC** or a lesser set of particular where the provision of **Article 55** apply.

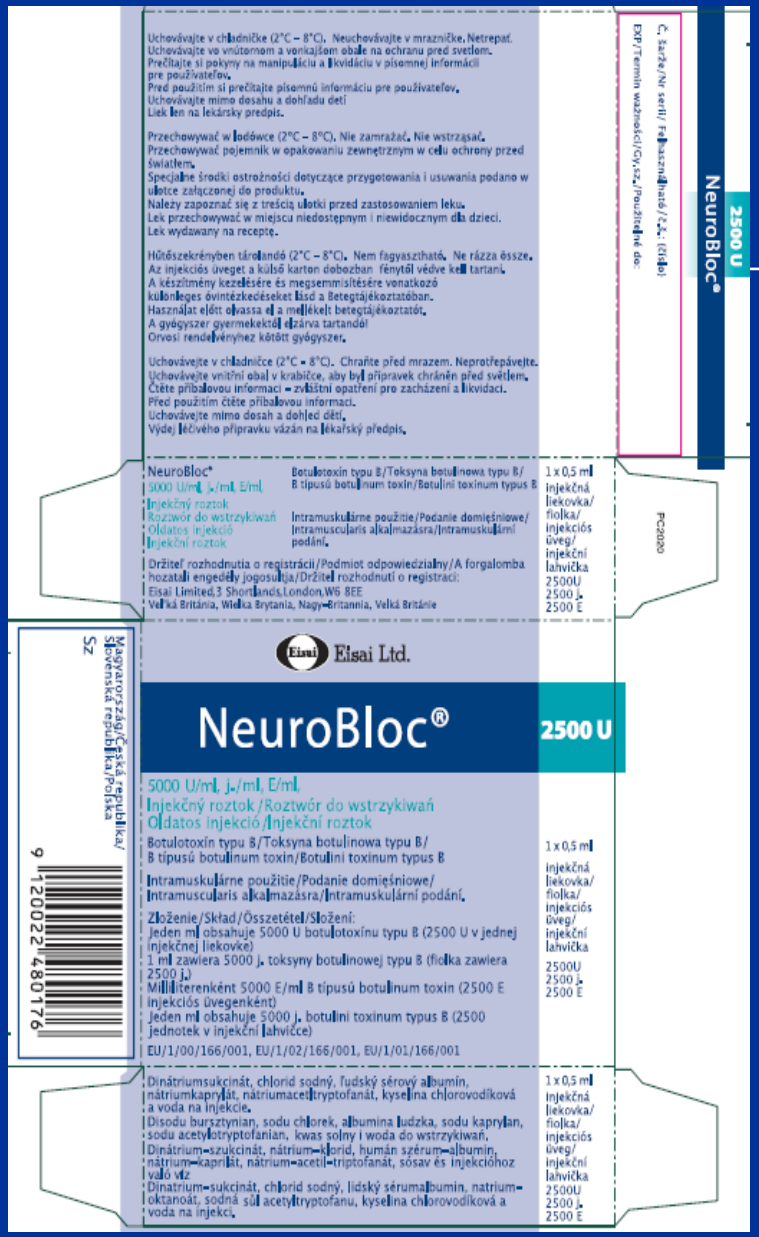
Certain items are considered critical for the safe use of the medicine:

- **Name** of the medicinal product
- **Strength**
- **Total content** (where relevant)
- **Route of administration**

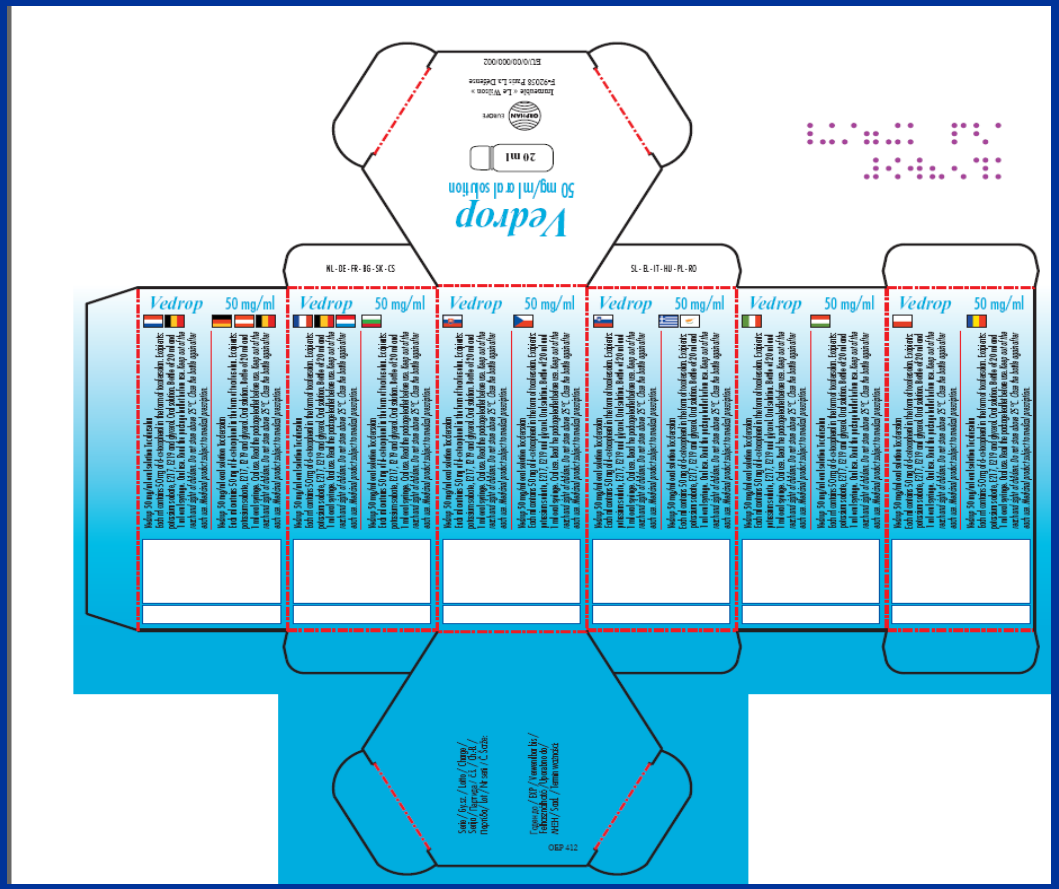
Display of this information: together, using large font and in the same field of vision.

- **Warning** and **storage conditions.**

Multilingual Packs



➢ Multilingual Challenge?



Useful links

- Human QRD page

(http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general_content_000199.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac0580022bb3)

Part 3: Name Review Group (NRG) Introduction

- The Name Review Group (NRG) has been set up by the CHMP to perform reviews of invented names.

- The NRG is composed of representatives from EU Member States and is chaired by an EMA representative. Representatives of the European Commission and the Agency Secretariat also participate in the work of the group. Other relevant experts (e.g. WHO experts) are consulted on a case-by-case basis.

Part 3: The NRG review criteria

❖ EMA is obliged to consider whether the invented name proposed for a medicinal product by its manufacturer could create a public-health concern or potential safety risk.

In particular, the invented name:

- should not convey misleading therapeutic or pharmaceutical connotations;
- should not be misleading with respect to the composition of the product;
- should not be liable to cause confusion in print, handwriting or speech with the invented name of an existing medicinal product.

Part 3: NRG guideline (H)

- The criteria applied by the NRG when reviewing the acceptability of proposed names are detailed in the Guideline on the acceptability of names for human medicinal products processed through the centralised procedure – rev 5

(http://www.ema.europa.eu/docs/en_GB/document_library/Regulatory_and_procedural_guideline/2009/10/WC500004142.pdf)

- **Contact points**

For any queries please contact the group directly **nrg@ema.europa.eu**

Part 3: Procedural aspects (H)

- (H) 6 meetings per year at the EMA
- Up to 4 names proposed
- 18 months before planned submission => names to be sent to EMA
- Final endorsement from CHMP

HVALA!
ANY QUESTIONS?