Webinar on Submissions of Parallel Distribution Notifications for CAPs

June 2022

Presented by Anna Fiodorova, Asta Musvicaite, Kinga Buzantowicz, Francesca Borrello and Marloes Verwoerd
Procedures Office, Committees and Quality Assurance Department, Human Medicines Division

Welcome to the Webinar on Submissions of Parallel Distribution Notifications for CAPs

Housekeeping rules for the virtual meeting

- Please make sure your microphone is muted when not speaking.
- Please include your questions in the chat. We will be monitoring them and providing replies. During the Q&A at the end of the presentation we will reply to as many questions as time allows. All questions will be included in a Q&A document and posted in our website, even the ones not responded during the session.
- Please use the chat function if you want to take the floor or alternatively raise your hand. Please indicate your name and affiliation when taking the floor.
- In case of an urgent technical issue (e.g. connection problems, updated slide deck...etc) please contact esther.cozar@ema.europa.eu
- The webinar will be recorded

Agenda

Topic	Speaker
Introduction	Virginia Rojo
OMS/IRIS technical part	Anna Fiodorova
IRIS demo	Asta Musvicaite
Initial Notifications	Kinga Buzantowicz
Annual Updates	Francesca Borrello
Product specific requirements	Marloes Verwoerd
Q&A session	All

OMS/IRIS technical part

Presented by Anna Fiodorova
Procedure Manager, Procedures Office, Committees and Quality Assurance Department, Human Medicines Division

Technical questions

- IRIS & OMS
- AskEMA/Service Desk
- General:
  - IRIS user roles
  - Contact point on the submission
  - IRIS Forum

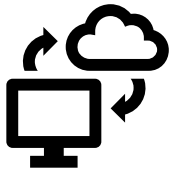
IRIS and OMS

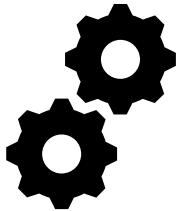
- IRIS consumes organisation data from Organisation Management Service (OMS)
- When a new organisation is created in OMS, it appears in IRIS shortly after
- When a change to an existing organisation is made in OMS, the respective change request for the PD notice needs to be submitted in IRIS (Change of name/address)
- Re-packager details in OMS can be updated by the re-packager himself or any other user who holds the required documentation to support the change request
- All PD notifications must be **submitted from** the address (LOC-ID) which corresponds to the **legal address** of the Wholesale Distribution Authorisation (WDA)

AskEMA vs Service Desk

Service Desk is a technical support channel:

- Access to IRIS and other EMA systems
- Submission process issues
- Data in the public register
- Organisation data in OMS

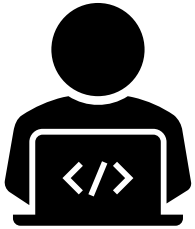




AskEMA is intended for:

- General enquires
- Product information
- Annexes to the marketing authorization
- PD procedures-related questions

Service Desk



- Service Desk tickets should be detailed and contain:
  - System used (i.e. IRIS)
  - Organisation name and LoC-ID
  - Type of submission, submission number **EMA/PD/******
  - Product, EU presentation number, pharmaceutical form (if submission/draft number is not available)
  - Explanation of the issue supported with print screens
  - One SD ticket per issue

The more detailed you are, the faster your ticket will be routed to the correct recipient

General (1)

- At least two managers per submission. Manager can change contact point on the submission.
- See permission rules: [IRIS guide to registration v2.3 (europa.eu)]

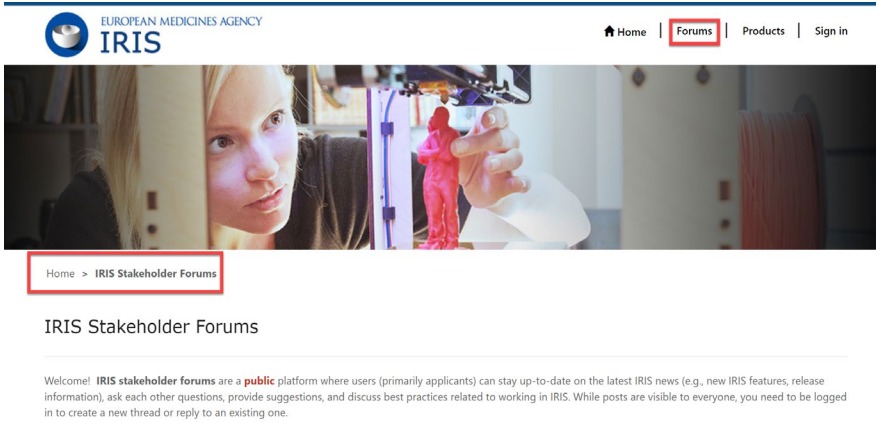
IRIS user access roles

Activities	IRIS Industry/Parallel Distribution **User Admin**	IRIS Industry/ Parallel Distribution **Manager**	IRIS Industry/Parallel Distribution **Contributor**	IRIS **Individual** User
Approve IRIS Industry/Parallel Distribution Users in EMA Account Portal	✓			
Create/delete their own draft submissions in IRIS Portal		✓		✓
Edit/view their own submissions in IRIS Portal		✓		✓
Allocate contributors/managers to their own draft submissions in IRIS Portal		✓		
Edit/view specific submissions in IRIS Portal		✓	✓	
Submit submissions in IRIS Portal		✓		✓

- Arrange handover and access in case of long-term absence/leave

General (2)

- Only the person listed as contact point on submission receives communication. Manager can change the contact point.
- Make use of IRIS **Forum.**



Initial notifications

Presented by Kinga Buzantowicz
Procedure Manager, Procedures Office, Committees and Quality Assurance Department, Human Medicines Division

Initial notifications

- Validation and regulatory checks
- Errors in the submission form
- Grounds for invalidation or negative outcome
- Mock-up and labelling
- Standardisation and naming convention
- Annex requirements
- Checklist and other guidance documents

Validation and regulatory check

- Validation
  - ✓ Details of the Applicant (WDA) – legal address
  - ✓ Details of repackager(s) (MIA) – manufacturing site address
  - ✓ Other information on the submission form: Sourced presentations, MSO, MSD, repackaging method(s), annex date
  - ✓ Case documentation (correct product, EU number, file naming and format)
- Regulatory check
  - ✓ Content check of submitted documentation: Patient leaflet/Instructions/PAC in line with the latest annex (EPAR/EC)
  - ✓ Mock-up containing all relevant information from the annex
  - ✓ Labelling with images of the outer carton or fully labelled outer carton, and inner packaging

Note: The requirements for Veterinary products are the same as for Human products. The differences are only related to the veterinary legislation (e.g. absence of Braille and FMD features)

Errors in the submission form (leading to invalidation)

- Submission made by an individual rather than organization
- Submission made from a different address (LOC-ID) than the legal address of the applicant in WDA or manufacturing site address for repackagers in MIA
- Same MSO and MSD (except countries sharing the same language e.g. AT and DE)
- Wrong repackaging method(s) – outer carton defines the repackaging method
- Sourced presentation(s)/pharmaceutical form(s) which cannot be used as distributed (e.g. sourced syringe cannot be distributed as syringe with a needle guard)
- Wrong repackagers (e.g. no valid MIA or no secondary packaging/batch certification authorised)

Examples of grounds for invalidation or negative outcome

(list not exhaustive)

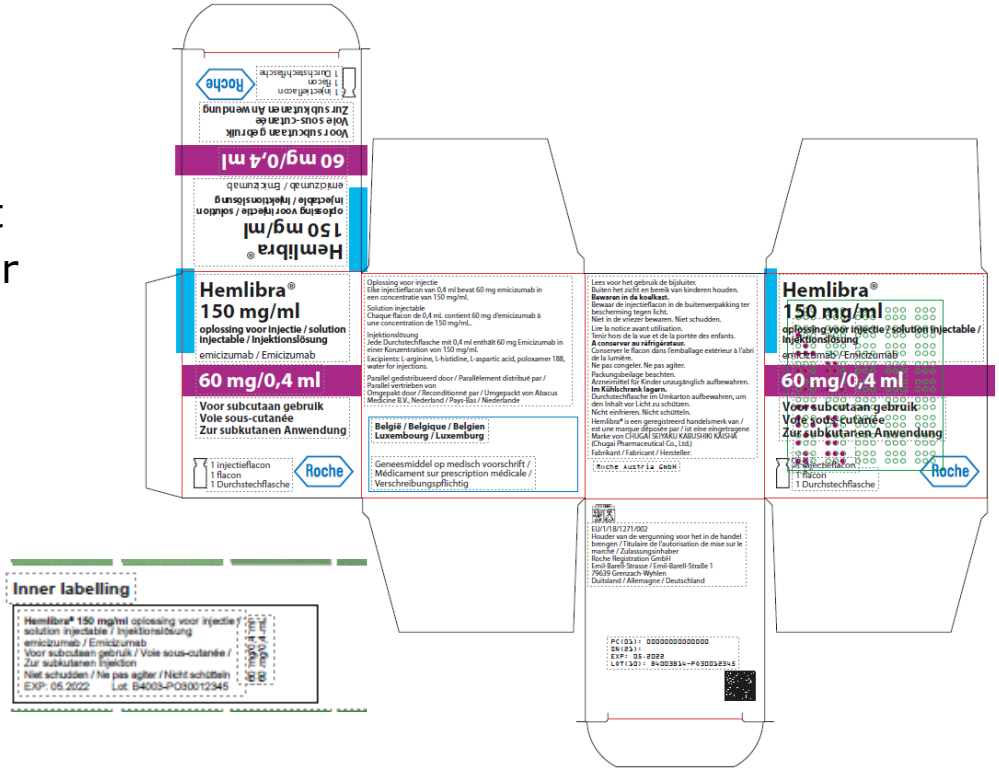
- Administrative errors in the submission form (no changes to the form after the submission)
- Missed response deadline (25 days for all comments from validation and regulatory check)
- Unauthorised changes to the documentation/submission form
- Partial implementation of requested changes and/or no clarification for non-implementation provided
- Incomplete or wrong documents provided (e.g. wrong EU number, missing labelling or mock-up files)

REMEMBER: 24h cooling-off period to withdraw an application - free of charge - in case of errors detected

Mock-up and Labelling (1)

A **mock-up** is a file containing a flat design of the outer/intermediate packaging (in full colour) and/or the text for the outer/immediate and for the inner packaging.

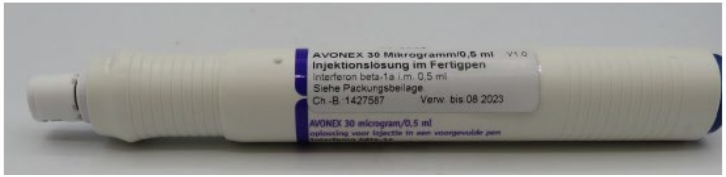
The mock-up must be submitted in the <u>text editable format</u> and contain all information required by the annex including Human readable data (terms), Exp/Lot and unique 2D identifier (or a placement)

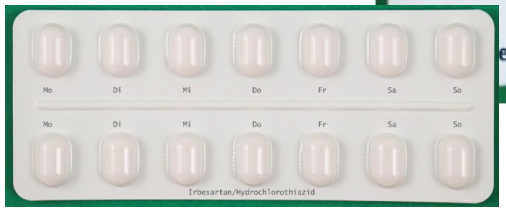


Mock up and Labelling (2)

A **labelling** is a file containing images of an outer carton (in case of reboxing) or fully labelled original outer carton (in case or relabelling), labelling of the intermediate packaging and of the inner packaging.

All images must be in <u>full colour.</u>





Standardisation and naming convention

- Standard naming convention to be followed:

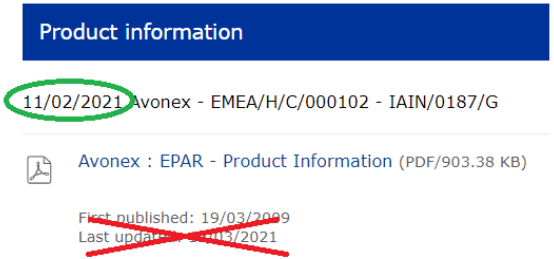
  YYYY.MM.DD Product Name”_”last three digits of the EU number”_”Subject”

- Examples of subjects:
  - ‘Cover’ for cover letters
  - ‘Leaflet’ for package leaflet(s)
  - ‘Mockup’ for mock-ups of the outer carton/intermediate carton and inner labels
  - ‘Labelling’ for images of outer carton, fully labelled intermediate carton and inner packaging
  - ‘Braille’ for braille text

REMEMBER: File names should not exceed 100 characters and must not contain any special characters such as ‘/’ or ‘&’. They must not be password protected or include security settings.

Annex requirements

- Latest version of annex available on EC website or EMA EPAR
- Yearly update (YU) can only be used if previous variations included (example of Avonex below)
- Yearly updates only published on EC website
- For safety updates we advise to follow the monthly list (3 months to implement safety changes)



Checklist and other guidance documents

- FAQ about Parallel Distribution
- Checklists for initial notification and annual update
- IRIS guide to registration and RPIs
- IRIS guide for Parallel Distribution applicants
- List of centrally authorised products requiring a notification of a change for update of annexes
- EMA PD procedural and regulatory guidance

Annual Updates

Presented by Francesca Borrello
Procedure Manager, Procedures Office, Committees and Quality Assurance Department, Human Medicines Division

Annual Update Notifications

- How to create an Annual Update and scope/s of change in IRIS
- Annual Update: DO and Tell procedure
- Purpose of Annual Update
- Scope of change/s
- Frequent mistakes in the form

Annual Updates (AU): DO and TELL

- **IMPORTANT:** Parallel Distributors should consult the Public Register prior to submission.
- We kindly ask applicants to use the published Guidance in advance of submission of an annual update for parallel distribution. The AU checklist was created to facilitate the submission of valid notifications, please refer to the following documents available on the EMA website (IRIS Guidance, AU Checklist and FAQs).
- There is a cooling-off period of 24h from submission to withdraw the application free of charge.
- The same grounds for invalidation or negative outcome previously explained for Initial Notifications are also applicable to AUs.

DO AND TELL (2)

- AUs is to notify the Agency of **any changes introduced to the medicinal product through the last year**. Changes are implemented by the PD and notified with the AU. AU is a DO and TELL procedure:

PD implements changes

Notification of changes with AU submissions

- The annual update should be submitted for all active notices.

Purpose of the annual update:

Combine all scopes of changes occurring within one year to one pharmaceutical form of a medicinal product with one Member State of destination in one application. It is aimed at maintaining an up-to-date database.

Mandatory changes due to the urgent safety update notified no later than three months before the submission of the annual update can be included in its scopes of changes.

For Annual update we require to see the product the way it is currently brought to market. Therefore, we ask you to provide us with colour copies of all sides of the outer packaging and of pictures of the product itself with the labelling attached to it.

REMINDER: submissions should include colour copies and mock-up as indicated in the Checklist for AUs.

SCOPE OF CHANGE:

Scope of change should be used when in addition to the revision of the product information in line with the updated annex, PD wishes also to add/remove Member State of Origin and/or Member State of Destination, addition/removal of re-packager, addition of sourced pack size presentation.

- Do not create a scope of change when you are updating to the latest annex only.
- **No change'** annual update should be submitted when the product has been distributed in parallel for 12 months with no change to the product information (**no new annex** since the last annual update or first initial notice issued for the concerned pharmaceutical form and member state of destination) and/or **no change to the scope of initial notice** (no changes to MSO/MSD, no changes of repackaging method, no change of re-packagers etc.)

Frequent mistakes in the form (1)

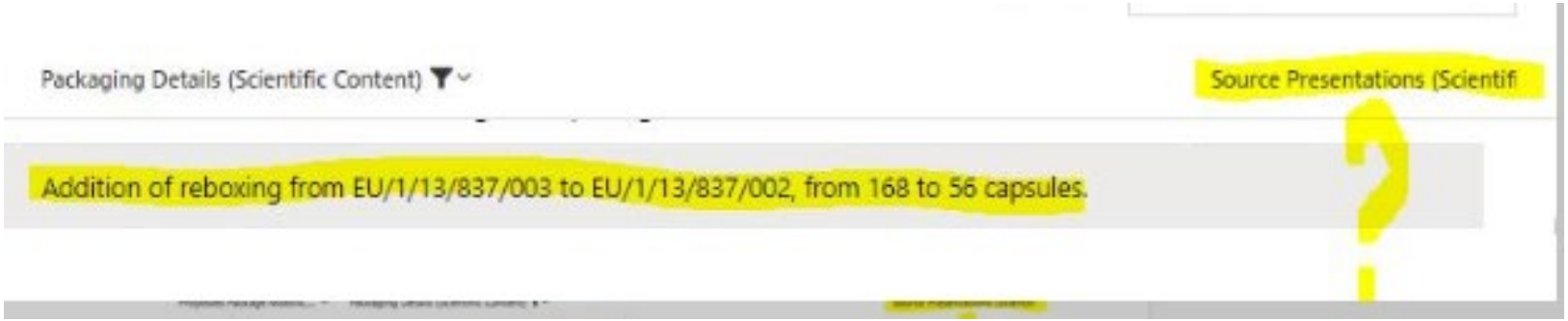
	MSO	MSD	Scope of change		
1st example	AT-DE	AT-DE	Removal DE as MSD		x incorrect AT should also be removed from MSO as is not possible to source and distribute in the same country
2nd example	IE-(UK)NI	IE-(UK)NI	Removal IE as MSD Removal of UK(NI) as MSO		✓ correct

Frequent mistakes in the form (2)

		Scope of change		
3rd example	Renvela EU/1/09/521/003 – bottle without outer carton	Addition of reboxing as repackaging method		**x** incorrect EU/003 is marketed as bottle without outer carton. PD cannot create an outer carton as this will create a non authorised presentation; only relabelling is possible
4th example	Repackaging method in the IN: relabelling	Addition of reboxing as new repackaging method	colour copies for reboxing provided	✓ correct

PACK SIZE not reported correctly

	Packaging details		Scope of change		
1st example	Sourcing EU/003 to distribute as EU/002		Addition of pack size in the free text field instead of in the source presentation field		**X incorrect** ⇩ **INVALIDATION**



PACK SIZE reported correctly

	Sourced presentation field		**Scope of change**		
2nd example	Sourcing EU/003 to distribute as EU/002		Addition of pack size in the source presentation field		✓ **Correct** There is no need to add the same presentation that is distributed (sourcing EU/001 to distribute EU/001) only change of pack sizes should be reported.

Product specific requirements

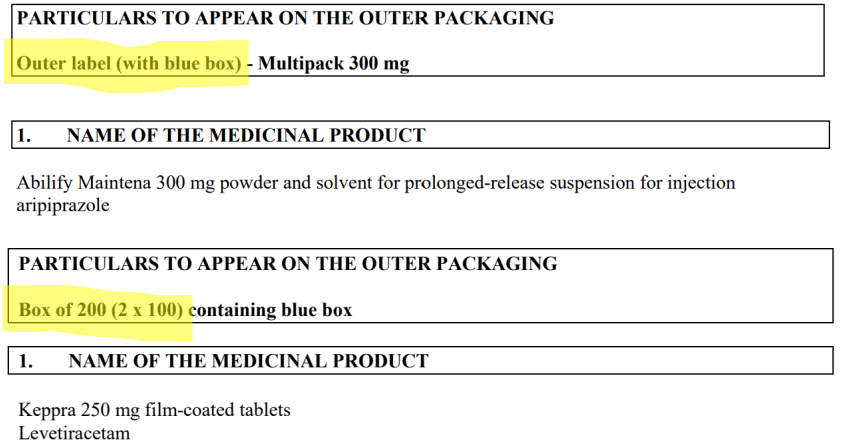
Presented by Marloes Verwoerd
Procedure Manager, Procedures Office, Committees and Quality Assurance Department, Human Medicines Division

Product specific requirements

- Multi-packs
- Colour schemes
- Renvela
- Family of breezhalers
- Keppra

Multi-packs: outer label versus outer carton

Take extra care when looking at the multipack option: some annexes specify that the outer packaging should be an outer label. In this case the intermediate boxes are bundled together with a large label on which the blue box is printed. In these instances, Parallel Distributors cannot create a new outer box, because it would create a new presentation.



PARTICULARS TO APPEAR ON THE OUTER PACKAGING

Outer label (with blue box) - Multipack 300 mg

1. NAME OF THE MEDICINAL PRODUCT

Abilify Maintena 300 mg powder and solvent for prolonged-release suspension for injection
aripiprazole

PARTICULARS TO APPEAR ON THE OUTER PACKAGING

Box of 200 (2 x 100) containing blue box

1. NAME OF THE MEDICINAL PRODUCT

Keppra 250 mg film-coated tablets
Levetiracetam

Colour schemes on outer carton for safe administration of the medicinal product

Packaging design of the products distributed in parallel must comply with the terms of marketing authorisation when the annexes of the marketing authorisation (Annex I, IIIA or IIIB) indicate a particular location of the text on the packaging, its colour and/or font type.

In addition, in case an originator's packaging contains product safety-related design elements which have been included to support the safe and correct use of the product (colours for strength identification, prominent fonts for "once daily", "oral use", etc.), parallel distributors are strongly advised to align with the originator's products on the design, colour and special fonts.

Renvela EU/1/09/521/003 – bottle without outer carton

In case of Parallel distribution, the requirements of both the Marketing Authorisation and the Falsified Medicines Directive (FMD) must be met.
According to the legislative act (Regulation No 726/2004) the parallel distributed medicinal product has to meet the conditions laid down in the marketing authorisations and in EU legislation on medicinal products. As the conditions of the FMD are provided in a delegated act, those requirements cannot prevail over the requirement of the legislative act according to which the parallel distributed medicinal product must meet the conditions of the marketing authorisation.

Family of Breezhalers – information on the inner flap of the outer carton or intermediate carton

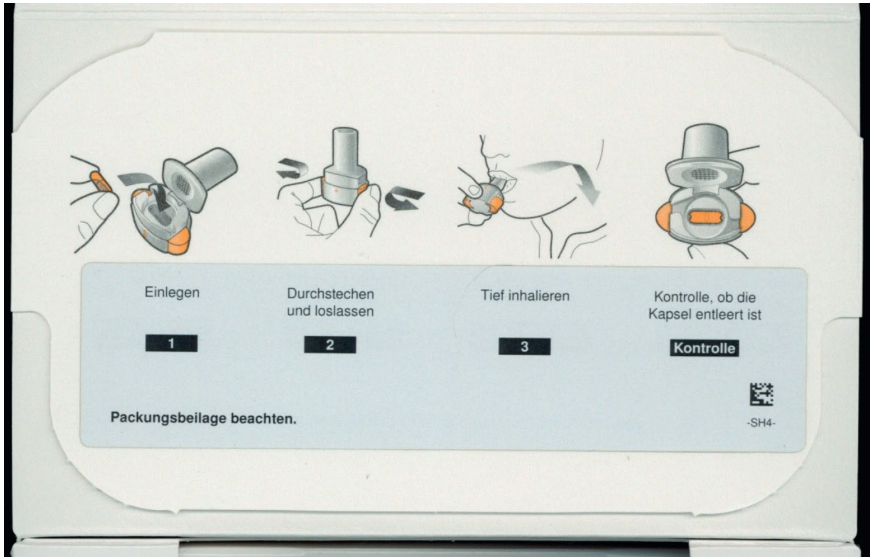
PARTICULARS TO APPEAR ON THE OUTER PACKAGING

INNER LID OF OUTER CARTON OF UNIT PACK AND OF INTERMEDIATE CARTON OF MULTIPACK

1. OTHER

1	Insert
2	Pierce and release
3	Inhale deeply
Check	Check capsule is empty

Read the leaflet before use.



Keppra – oral solution– pictograms on outer carton

Cases of accidental overdose have been reported with levetiracetam oral solution. Most of the cases occurred when the medicine was used with a wrong dosing syringe (e.g. a 10 ml syringe was used instead of a 1 ml one, leading to a 10-fold overdose). To avoid medication errors and the risk of overdose, parents and carers are advised that only the syringe provided with the package should be used to measure the dose of Keppra. The different medicine's cartons and labels will be coloured differently and clearly indicate the volume of the bottle, the volume of the dosing syringe, and the age range of the child that the medicine should be used for.

Further information

[Insert relevant information sources or contact details as applicable.]

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