

# *Quality documentation for investigational medicinal products*

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# Data Requirements

- Apply to Drug Substance and Drug Product
  - new chemical entity
  - generic, line extension
  - biotechnology/biological including vaccines
  - blood-derived product
  - vegetable-derived/herbal product
  - radioisotope
  - gene therapy
  - cell therapy
  - tissue engineered

# Data Requirements

- Stage of Development
  - Phase I
  - Phase II
  - Phase III
  - Phase IV

# Chemical Substances

- Names (including salt, hydrate etc)
- Synthetic route(s)
- Proof of structure
- Related Substances (sources, nature, amount)
- Specification (including analytical methods/validation)
- Batch analysis (preclinical, clinical lots)
- Stability

# Biotechnological Substances

- Development genetics
- Manufacture
  - Fermentation
  - Purification
- Animal-derived components
- Characterisation (including comparability)
- Impurities
- Process validation (including viral validation)
- Batch analysis
- Storage of intermediates (if prolonged)
- Specification (including analytical methods/validation)
- Batch analysis (preclinical, clinical lots)
- Stability

# Blood derived Substances

- Broadly as for biotechnology products
- Donor selection and centres
- Viral markers
- Tracing donations and quarantine
- Virus inactivation / removal
- Manufacture/process validation

# Drug Product

- Composition / formulation
- Pharmaceutical development
- Manufacture and control
- In-process controls and process validation
- Excipients specifications
- Drug product specification (including analytical methods/validation)
- Batch analysis
- Container closure system
- Stability

# Sources of Guidance

- A number of sources of guidance are available

# Sources of Guidance

- QWP Note for Guidance

Contains detailed information of the requirements for pharmaceutical data

This applies to chemical products, herbal products etc but not to biotechnology products

It came into effect on October 1 2006

# Sources of Guidance

- BWP Guideline on the Requirements for Quality Documentation Concerning Biological IMPs in Clinical Trials

Contains detailed information of the requirements for pharmaceutical data

This applies to recombinant proteins and polypeptides, their derivatives, and products of which they are components (e.g. conjugates).

Adopted for release for consultation on February 18 2010

Deadline for comments 31 August 2010

# Sources of Guidance

- GMP guidelines
- Volume 4 of "The rules governing medicinal products in the European Union"
- guidance for the interpretation of the principles and guidelines of good manufacturing practices for medicinal products for human and veterinary use

# Sources of Guidance

- Annex 2  
• Manufacture of Biological Medicinal Products
- Annex 3  
• Manufacture of Radiopharmaceuticals
- Annex 13  
Manufacture of Investigational Medicinal Products
- Annex 14  
Manufacture of products Derived from Human Blood or Human Plasma

# Sources of Guidance

Volume 10 of The Rules Governing Medicinal products in the EU  
Guidelines for clinical trials

Guidance on first time in man trials with higher risk compounds

# Sources of Guidance

- Detailed guidelines on good clinical practice specific to advanced therapy medicinal products
- Guideline on human cell-based medicinal products
- Draft reflection paper on stem cell-based therapies

# Sources of Guidance

- Commission guidance on the submission to the competent authorities
- VHP guidance

# Major Problems

- Data not summarised
- Data incomplete
- Applications not page numbered
- Applications not indexed
- Overuse of appendices
- Font size

# Major Problems

- Labelling not presented in format to be used/not presented at all
- No QP statement on GMP
- No copy of the MA (IMP) or equivalent

## What would we like

- Clearly presented applications with summarised data
- Applications following Commission guidance and structured according to the Common Technical Document
- All necessary components from the Commission guidance included with no additional documents added