Guidance document on the content of the <Co-> Rapporteur’s day 80 critical assessment report for generic medicinal products (Article 10.1 only)

Non-clinical and clinical aspects – generic medicinal products

<Invented Name>

<(Active Substance)>

EMEA/H/C/<xxx>

Applicant:

This template/guidance is for the initial assessment of generic applications (legal basis Article 10.1) in the EU Centralised Procedure.

From a (non)clinical perspective, the primary basis for such assessment is usually the demonstration of bioequivalence. If, apart from bioequivalence studies, non-clinical data have been submitted for example to qualify impurities or to support the introduction of a new salt, a non-clinical assessment has to be performed. By analogy, additional clinical data may have been submitted (e.g. therapeutic equivalence studies) requiring a clinical assessment. In these cases the template should be supplemented with relevant headings from the respective templates of the Rapporteurs’ Day 80 assessment report for full initial Marketing Authorisation Applications.
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## Administrative information

<table>
<thead>
<tr>
<th>Administrative information</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>&lt;Invented name&gt;</strong> name of the generic medicinal product:</td>
<td></td>
</tr>
<tr>
<td><strong>INN (or common name) of the active substance(s):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Active substance(s):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Applicant:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Applied Indication(s):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Pharmaco-therapeutic group (ATC Code):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Pharmaceutical form(s) and strength(s):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Rapporteur contact person:</strong></td>
<td></td>
</tr>
<tr>
<td>Name: Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td><strong>&lt;Co-Rapporteur contact person&gt;:</strong></td>
<td></td>
</tr>
<tr>
<td>Name: Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td><strong>EMA Product Team Leader:</strong></td>
<td></td>
</tr>
<tr>
<td>Name: Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td><strong>Names of the Rapporteur assessors (internal and external):</strong></td>
<td></td>
</tr>
<tr>
<td>Non-clinical: Name(s) Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td>Clinical: Name(s) Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td><strong>&lt;Names of the Co-Rapporteur assessors (internal and external)&gt;:</strong></td>
<td></td>
</tr>
<tr>
<td>Non-clinical: Name(s) Tel: Fax: Email:</td>
<td></td>
</tr>
<tr>
<td>Clinical: Name(s) Tel: Fax: Email:</td>
<td></td>
</tr>
</tbody>
</table>
List of abbreviations
Generic medicinal product are defined as having the same Qualitative and Quantitative composition in active substances and the same pharmaceutical form as a reference medicinal product and whose bioequivalence with the reference product has been demonstrated by appropriate bioequivalence studies.

The different salts, esters, ethers, isomers, mixtures of isomers, complexes or derivatives of an active substance shall be considered to be the same active substance, unless they differ significantly in properties with regards to safety and/or efficacy. In such cases the, additional information providing proof of the safety and/or efficacy of the various salts, esters, or derivatives of an authorised active substance must be supplied by the applicant.

Also the purpose of an abridged application is to avoid the need for repetitive and unnecessary tests and trials (Recital 10 of Directive 2001/83 as amended which states that “there are reasons of public policy for not conducting repetitive tests on humans or animals without over-riding cause”).

Bioequivalence studies in humans studies may not be required if the applicant can demonstrate that the generic product meets relevant criteria for exemption as defined in appropriate detailed guidelines. [See Note for Guidance on the Investigation of Bioavailability and Bioequivalence CPMP/EWP/QWP/1401/98]

1. Non-clinical assessment

FOR GENERIC APPLICATIONS WITHOUT NON-CLINICAL DATA

Consider the paragraph below if no new non-clinical data have been submitted.

<A non-clinical overview on the pharmacology, pharmacokinetics and toxicology has been provided, which. The overview justifies why there is no need to generate additional non-clinical pharmacology, pharmacokinetics and toxicology data. The non-clinical aspects of the SmPC are in line with the SmPC of the reference product. The impurity profile has been discussed and was considered acceptable. >

Provide the conclusion by using one of the following two options:

<The rapporteur considers that the non-clinical overview is based on up-to-date and adequate scientific literature. It is agreed that no further non-clinical studies are required. >

<The rapporteur considers that the non-clinical overview on the pre-clinical pharmacology, pharmacokinetics and toxicology is not adequate because /.../> If the second option is chosen, provide a detailed description of the missing information, the impact this lack of information has, and any potential requests for additional data. This should then be translated into the draft list of questions (section 4).
In case the generic contains a different salt, esters, ethers, isomers, mixtures of isomers, complexes or derivatives of the active substance, include the appropriate statement:

<A summary of the literature with regard to non-clinical data of {medicinal product} and justifications that the different <salt><ester><ether><isomer><mixture of isomers><complex><derivative> of the active substance does not differ significantly in properties with regards to safety and efficacy of the reference product was <not>provided and was <not>accepted by the CHMP. This is <not> in accordance with the relevant guideline and additional non clinical studies were <not> considered necessary.>

FOR GENERIC APPLICATIONS INCLUDING NON-CLINICAL DATA

New non-clinical data might exceptionally have been submitted to qualify impurities, to support the introduction of a new salt, or because new non-clinical data have become available in the framework of an update or by clinical experience, e.g. regarding pregnancy, lactation, QT, etc, which may impact the SPC. In such case a new non-clinical assessment has to be preformed. Points of interest such as recently published and clinically relevant animal data presented in the overview may be stated and commented here if necessary.

Use the relevant headings (Pharmacology, Pharmacokinetics, Toxicology) from the template of the Rapporteurs’ Day 80 non-clinical assessment report for full initial Marketing Autorisation Applications to describe such information. The below structure only provides the high-level headings; subheading should be added as appropriate. Also the assessment may have had an impact on the SPC sections 4.6 and 5.3 (toxicology, mutagenicity, carcinogenicity, reproductive toxicity: teratogenicity, pregnancy, breastfeeding), which should be reflected hereunder.

1.1. <Introduction>

1.2. <GLP aspects>

1.3. <Pharmacology>

1.4. <Pharmacokinetics>

1.5. <Toxicology>

FOR ALL GENERIC APPLICATIONS THE SECTION "Ecotoxicity/environmental risk assessment" IS REQUIRED. Choose from one of the two options below.

1.6. Ecotoxicity/environmental risk assessment

FOR GENERIC APPLICATIONS WITHOUT ECOTOXICITY / ENVIROMENTAL DATA

<No Environmental Risk Assessment was submitted. This was justified by the applicant as the introduction of <Product Name> manufactured by <Manufacturing Authorisation Holder> is considered unlikely to result in any significant increase in the combined sales volumes for all <active substance>
containing products and the exposure of the environment to the active substance. Thus, the ERA is expected to be similar and not increased.

FOR GENERIC APPLICATIONS WITH ECOTOXICITY / ENVIRONMENTAL DATA

<Summary of main study results>

<table>
<thead>
<tr>
<th>Substance (INN/Invented Name):</th>
<th>CAS-number (if available):</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PBT screening</strong></td>
<td></td>
</tr>
<tr>
<td>Bioaccumulation potential - log $K_{ow}$</td>
<td>OECD107 or ...</td>
</tr>
<tr>
<td>Potential PBT (Y/N)</td>
<td></td>
</tr>
</tbody>
</table>

**PBT-assessment**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Result relevant for conclusion</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bioaccumulation</td>
<td>log $K_{ow}$</td>
<td>B/not B</td>
</tr>
<tr>
<td>BCF</td>
<td></td>
<td>B/not B</td>
</tr>
<tr>
<td>Persistence</td>
<td>DT50 or ready biodegradability</td>
<td>P/not P</td>
</tr>
<tr>
<td>Toxicity</td>
<td>NOEC or CMR</td>
<td>T/not T</td>
</tr>
</tbody>
</table>

**PBT-statement:***
The compound is not considered as PBT nor vPvB
The compound is considered as vPvB
The compound is considered as PBT

**Phase I**

<table>
<thead>
<tr>
<th>Calculation</th>
<th>Value</th>
<th>Unit</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>PE&lt;sub&gt;surf&lt;/sub&gt; water, default or refined (e.g. prevalence, literature)</td>
<td>µg/L</td>
<td>&gt; 0.01 threshold (Y/N)</td>
<td></td>
</tr>
<tr>
<td>Other concerns (e.g. chemical class)</td>
<td></td>
<td>(Y/N)</td>
<td></td>
</tr>
</tbody>
</table>

**Phase II Physical-chemical properties and fate**

<table>
<thead>
<tr>
<th>Study type</th>
<th>Test protocol</th>
<th>Results</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adsorption-Desorption</td>
<td>OECD 106</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ready Biodegradability Test</td>
<td>OECD 301</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aerobic and Anaerobic Transformation in Aquatic Sediment systems</td>
<td>OECD 308</td>
<td>DT&lt;sub&gt;50&lt;/sub&gt;, water =</td>
<td>Not required if readily biodegradable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>DT&lt;sub&gt;50&lt;/sub&gt;, sediment =</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>% shifting to sediment =</td>
<td></td>
</tr>
</tbody>
</table>

**Phase IIa Effect studies**

<table>
<thead>
<tr>
<th>Study type</th>
<th>Test protocol</th>
<th>Endpoint</th>
<th>value</th>
<th>Unit</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Algae, Growth Inhibition Test/Species</td>
<td>OECD 201</td>
<td>NOEC</td>
<td>µg/L</td>
<td>species</td>
<td></td>
</tr>
<tr>
<td>Daphnia sp. Reproduction Test</td>
<td>OECD 211</td>
<td>NOEC</td>
<td>µg/L</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fish, Early Life Stage Toxicity Test/Species</td>
<td>OECD 210</td>
<td>NOEC</td>
<td>µg/L</td>
<td>species</td>
<td></td>
</tr>
<tr>
<td>Activated Sludge, Respiration Inhibition Test</td>
<td>OECD 209</td>
<td>EC</td>
<td>µg/L</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Phase IIb Studies**

<table>
<thead>
<tr>
<th>Study type</th>
<th>Test protocol</th>
<th>BCF</th>
<th>L/kg</th>
<th>%lipids:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bioaccumulation</td>
<td>OECD 305</td>
<td>BCF</td>
<td>L/kg</td>
<td></td>
</tr>
<tr>
<td>Aerobic and anaerobic transformation in soil</td>
<td>OECD 307</td>
<td>DT50</td>
<td>%CO₂</td>
<td>for all 4 soils</td>
</tr>
<tr>
<td>Soil Micro organisms: Nitrogen Transformation Test</td>
<td>OECD 216</td>
<td>%effect</td>
<td>mg/kg</td>
<td></td>
</tr>
<tr>
<td>Terrestrial Plants, Growth Test/Species</td>
<td>OECD 208</td>
<td>NOEC</td>
<td>mg/kg</td>
<td></td>
</tr>
<tr>
<td>Earthworm, Acute Toxicity Tests</td>
<td>OECD 207</td>
<td>NOEC</td>
<td>mg/kg</td>
<td></td>
</tr>
<tr>
<td>Collembola, Reproduction Test</td>
<td>ISO 11267</td>
<td>NOEC</td>
<td>mg/kg</td>
<td></td>
</tr>
</tbody>
</table>

<Invented name>

Guidance document on the content of the <Co-> Rapporteur's day 80 critical assessment report for generic medicinal products (Article 10.1 only)
EMA/133717/2013
Sediment dwelling organism | NOEC | mg/kg | species

Assessor’s comment

1.7. Conclusions on non-clinical aspects

In case new non-clinical data was provided conclude on these data.
Also conclude on the environmental risk assessment.

State if the SPC of the generic product is identical to the reference product. Normally it should be, but any differences should be mentioned here. State whether the differences are justified or not.

State those issues that need to be clarified. These should be carried forward to the benefit risk assessment in the Clinical part of this report, and listed in the List of Questions as appropriate.

Provide the conclusion by using one of the following two options:

<There are no objections to approval of TRADE NAME from a non-clinical point of view.>

OR

<As stated above, there are issues that need to be clarified, see list of questions.>

Obligation to complete post-authorisation measures: In case non-clinical issues have been identified for inclusion in Annex II as conditions. Any measure identified as a condition needs to be well motivated, notably the need for a condition should be explained in the context of a positive benefit/risk balance:

The Rapporteur considers the following measures necessary to address the non-clinical issues:

2. Clinical assessment

2.1. Introduction

Describe the Product profile: Indications and dosage (SPC sections 4.1 and 4.2), pharmacodynamics and pharmacokinetics of the active substance PK summary of substance and formulation; absorption, distribution, metabolism, elimination data of special interest in respect of bioequivalence studies (linearity, elimination time etc.) (see e.g. text books such as Goodman & Gilman, Martindale etc)

Relevant for the assessment are the Guideline on the Investigation of Bioequivalence (CPMP/EWP/QWP/1401/98) as well as the Guideline on Bioanalytical method validation (EMEA/CHMP/EWP/192217/09) Note for guidance on modified release oral and transdermal dosage forms: section II (pharmacokinetic and clinical evaluation) (CPMP/EWP/280/96) Question number of the Questions & Answers: Positions on specific questions addressed to the Pharmacokinetics Working Party (EMEA/618604).
2.1.1. GCP aspects

GCP aspects (general)

In this section specifically address:

- Any concerns raised during the assessment about compliance with GCP or related regulatory and ethical requirements (data accuracy or protocol compliance and compliance with ethical aspects).

- Statement on application of ethical standards in clinical trials, where appropriate (Art 8 (ia) of the amended Directive; Art 9.4(c) and Art 127 (a) of the new Regulation) "The applicant has to provide a statement to the effect that clinical trials conducted outside the community were carried out in accordance with the ethical standards of Directive 2001/20/EC.", where applicable.

- Discuss the need for a GCP inspection. Detailed information on triggers for inspection can be found in the document "Triggers for inspection of bioequivalent trials" which is available from your local GCP inspectorate or EMA inspection sector.

GCP aspects of Human Bioequivalence studies

Bioequivalence studies are normally the sole clinical studies provided with an application for a standard generic product. Careful consideration should be given to the need for a GCP inspection of the clinical and laboratory phases of the bioequivalence study. Particular points to consider include:

- Has the clinical site been inspected previously by EU inspectors?
- Has the laboratory site been inspected previously by EU inspectors?

This information should have been provided or will be sought by EMA.

Are there issues that may act as triggers for inspection?, e.g.:

- Lack of inspection experience with the site
- Indications from the dossier that there may be problems with the analytical laboratory analysis or with the clinical conduct of the study.
- Location of the clinical and laboratory sites

To request a GCP inspection:

- Contact your local GCP inspectorate.
- Contact EMA inspection sector - GCP inspection coordination.
Determine with them the clinical trial(s), sites and special concerns or issues to be addressed/the inspection. EMA inspection sector formulates the formal inspection request for review by the inspectors and agreement by the Rapporteur prior to adoption by CHMP (day 90 or 120).

2.2. Exemption

In this section describe two different kinds of biowaiver:

- exemption for strength(s)
- BCS-based Biowaiver

Refer to the respective requirements of the applicable Guideline on the Investigation of Bioequivalence (CPMP/EWP/QWP/1401/98).

Also this section should be used to justify an exemption from the requirement to perform bioequivalence studies for e.g. certain dosage forms in accordance with the above-mentioned guideline.

2.3. Clinical pharmacology

2.3.1. Pharmacokinetics

To support the application, the applicant has submitted <NUMBER> bioequivalence study(ies), <NUMBER> pharmacodynamic studies, <NUMBER> therapeutic equivalence studies.

State the reasons for submitting more than one bioequivalence trial. If there is more than one clinical study, each of them should be described separately using the below structure.

Table 1. Tabular overview of clinical studies

Study <NUMBER>: <TITLE>

Methods

Study design

Detailed description of the study design including drug intake procedures (fasting state or with food), wash-out time, meals served fed/fasted condition, constituents of meal (in fed studies), multiple/single dose, applied dose, wash-out period, blinding, crossing-over, randomization, sampling schedule, analysed compound (parent and/or metabolites) and matrix (plasma, urine data).

In case of a steady-state study, relevant details (multiple dosing).

Information about investigator, study site, protocol number, study duration, bioanalysis facility, biostatistician and/or biostatistical institute.
Assessor’s comment

Critical assessment of the adequateness of the study design.

Test and reference products

Detailed information of the reference product (name) strength, pharmaceutical form, MAH, date of authorisation in EU and the detailed information (such as MA batch number and country of origin) of the batches used in the studies need to be provided in tabular format.

The following information should be included: Actual strength vs. nominal strength of the test and reference products employed in the bioequivalence study, batch size of the test product employed in the bioequivalence study and commercial batch size.

Assessor’s comment

The assessment should address if required data were given, if the test product is identical to the formulation intended to be marketed.

Population(s) studied

Description of number of subjects included in the study, number of subjects included in PK- and statistical analysis, drop-outs (reason why in detail), ethnicity, gender, age, health status, etc.

Assessor’s comment

The assessment should address if populations chosen is according to guidelines, inclusion/exclusion criteria ok, sample size calculation ok, ethnicity, gender, age, health status, etc. Assess potential protocol deviations/violations.

Analytical methods

Detailed description of analytical methods used, with emphasis on the performance characteristics of assay validation and quality control.

Provide all details relevant for the assessment of the validity of the bioanalytical method in accordance with the Guideline on Bioanalytical method validation (EMEA/CHMP/EWP/192217/09).

Assessor’s comment

Address if the analytical method acceptable, validated, handling of samples adequate. Assess potential protocol deviations/violations.

Pharmacokinetic variables

Summarise Pharmacokinetic variables and their generation (Non-compartmental/compartmental, PK analysis software. Choice of primary and secondary variables)
Assessor’s comment

Assess if Pharmacokinetic variables and methods were adequate.

Statistical methods

Description of statistical methods including prospectively defined acceptance criteria.

Assessor’s comment

Assess if the statistics described were adequate, methods acceptable (transformations, parametric tests, handling of missing values, outliers, basis of bioequivalence, whether there were protocol deviations/violations and if any widening of the acceptance criteria has been adequately justified).

Results

Summarise the relevant data for the bioequivalence assessment in the below tables rather than copying detailed statistical outputs from the clinical study report.

Table X  Pharmacokinetic parameters for <analyte> (non-transformed values)

<table>
<thead>
<tr>
<th>Pharmacokinetic parameter</th>
<th>Test</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>&lt;arithmetic&gt;</td>
<td>&lt;SD&gt;</td>
</tr>
<tr>
<td></td>
<td>&lt;geometric&gt; mean</td>
<td>&lt;CV%&gt;</td>
</tr>
<tr>
<td>&lt;AUC(0-t) &gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;AUC(0-72h) &gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUC(0-∞)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C&lt;sub&gt;max&lt;/sub&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T&lt;sub&gt;max&lt;/sub&gt;*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table X  Statistical analysis for <analyte> (ln-transformed values)

<table>
<thead>
<tr>
<th>Pharmacokinetic parameter</th>
<th>Geometric Mean Ratio Test/Reference</th>
<th>Confidence Intervals</th>
<th>CV%*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;AUC(0-t) &gt;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;AUC(0-72h) &gt;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C&lt;sub&gt;max&lt;/sub&gt;</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* estimated from the Residual Mean Squares

In case steady state studies have been performed, similar tables should be produced reporting the parameters AUC<sub>0-t</sub>, C<sub>max</sub>, C<sub>min</sub>, and fluctuation index (PTF%).
**Assessor’s comment**

**Safety data**

Provide a very brief summary of the adverse events observed in the bioequivalence study. No conclusion in terms of comparison between test and reference should be made based on these data.

**Conclusions**

Based on the presented bioequivalence study(ies) <(INVENTED) NAME> is considered bioequivalent with <REFERENCE PRODUCT>.

OR

Due to the following reasons < ELABORATE ON THE REASONS > <(INVENTED) NAME> is not considered bioequivalent with <REFERENCE PRODUCT>.

If applicable; The results of study <STUDY NUMBER> with <XXmg> formulation <CAN/CAN NOT> be extrapolated to other strengths <XX mg>, according to conditions in the relevant Guidelines.

**2.3.2. Pharmacodynamics**

No new pharmacodynamic studies were presented and no such studies are required for this application.

If applicable, usually no new data required and given. Required, if bioequivalence cannot be shown by pharmacokinetic studies in order to substantiate therapeutic equivalence.

**Assessor’s comment**

**2.3.3. Post marketing experience**

Consider any evaluation of the safety data submitted (if the product has already been on the market elsewhere outside EU). However this is rarely available; Note that this information relates to the medicinal product and not the active substance.)

The following case is more likely:

No post-marketing data are available. The medicinal product has not been marketed in any country.

**2.3.4. Discussion on clinical aspects**

Discuss critical design elements particularly if different from the standard cross-over design, e.g. parallel design, fed versus fasting state, investigation in patients, etc. Any relevant of the analyte (parent versus metabolite) as well as the bioanalytical method should be discussed. Also reflect on the pre-specified acceptance criteria for bioequivalence, particularly if scaling is applied for highly variable drugs (e.g. has a replicate design been employed to estimate the CV?) or for narrow therapeutic index drugs.
For the results, state whether the pre-set bioequivalence criteria were met. Also summarise any issues with regard to the conduct of the study (e.g. withdrawals/replacement of subjects). In case of conduct of more than study against the EU reference product, assess the conclusiveness of the available data.

Any concerns with regard to the GCP compliance of the study should be clearly described and discussed.

2.3.5. Conclusions on clinical aspects

Conclude on clinical aspects and carry forward open issues to the list of questions.

In case the generic contains a different salt, esters, ethers, isomers, mixtures of isomers, complexes or derivatives of the active substance, include the appropriate statement:

<A summary of the literature with regard to clinical data of {medicinal product} and justifications that the different <salt> <ester> <ether> <isomer> <mixture of isomers> <complex> <derivative> of the active substance does not differ significantly in properties with regards to safety and efficacy of the reference product was <not> provided and was <not> accepted by the CHMP. This is <not> in accordance with the relevant guideline and additional clinical studies were <not> considered necessary.>

Obligation to complete post-authorisation measures: In a limited number of cases in the context of a standard MA clinical data that are considered as “key” to the benefit risk balance may be requested as a condition of the MA. In case clinical issues have been identified for inclusion in Annex II as conditions, use the following statement. Any measure identified as a condition needs to be well motivated in the CHMP AR, notably the need for a condition should be explained in the context of a positive benefit/risk balance:

<The Rapporteur considers the following measures necessary to address the clinical issues:>

3. Pharmacovigilance

3.1. Pharmacovigilance system

<The applicant has provided documents that set out a detailed description of the system of pharmacovigilance. A statement signed by the applicant and the qualified person for pharmacovigilance, indicating that the applicant has the services of a qualified person responsible for pharmacovigilance and the necessary means for the notification of any adverse reaction occurring either in the Community or in a third country has been provided.>

<The Rapporteur considers that the Pharmacovigilance system as described by the applicant fulfils the requirements and provides adequate evidence that the applicant has the services of a qualified person responsible for pharmacovigilance and has the necessary means for the notification of any adverse reaction suspected of occurring either in the Community or in a third country.>

<The Rapporteur considers that the Pharmacovigilance system as described by the applicant has the following deficiencies: <list the deficiencies>
<Provided that the deficiencies are rectified prior to the applicant placing the medicinal product on the market, the CHMP may consider that the Pharmacovigilance system will fulfil the requirements. The applicant must ensure that the system of pharmacovigilance is in place and functioning before the product is placed on the market>

Assessor’s comment

3.2. Risk management plan

All new and updated EU-RMPs submitted under the centralised procedure will require assessment by the PRAC according to the new 2010 pharmacovigilance legislation and the Good pharmacovigilance practices (GVP) that are a set of measures drawn up to facilitate the performance of pharmacovigilance in the European Union (EU). The GVP modules refer to the implementing regulation, a legally binding act published by the European Commission in June 2012. Further information can be found on the EMA website http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general_content_000258.jsp&mid=WC0b01ac05800241de

At Day 80 the CHMP rapporteur should have performed the first overall assessment of the application, together with identification of any major issues in the RMP. To assist the PRAC in the provision of their Advice it would be helpful for the CHMP rapporteurs to flag to the PRAC Rapporteur any particular issues and concerns that were identified during the assessment of the dossier that could impact the Risk Management Plan. This includes any particular nonclinical safety findings, gaps in the clinical pharmacology package, potential safety signals from the clinical trials, etc. At this stage it is particularly important that safety concerns are identified (important identified risks, important potential risks, important missing information). This is even more essential if these issues were not identified by the applicant in the dossier and are therefore unlikely to be reflected in the RMP.

The PRAC will provide the CHMP with its advice on the evaluation of the Risk Management Plan. This advice will in part be based on the assessments of the dossier by the (Co-)Rapporteur hence the Day 80 assessment reports will be an important source of information for the PRAC Rapporteur.

Once the PRAC Advice is received, this will be integrated into the draft D120 List of Questions for discussion by the CHMP. It is important to note that this PRAC Advice may also contain proposed questions on the Risk Management Plan to be added to the CHMP List of Questions. If the CHMP deviates from the PRAC advice then this will be discussed in the List of Questions (see guidance there).

Issues and/or concerns for consideration by the PRAC Rapporteur when assessing the RMP:

Provide issues and concerns that were identified during the overall assessment of the application and that should be considered in the assessment of the Risk Management Plan by the PRAC.
4. List of questions as proposed by the Rapporteur

Non-clinical aspects

Major objections

<None.>

<Pharmacology>

<Pharmacokinetics>

<Toxicology>

Other concerns

<None.>

<Pharmacology>

<Pharmacokinetics>

<Toxicology>

Clinical aspects

Major objections

<None.>

<Pharmacokinetics>

<Pharmacovigilance system>

<Risk management plan>

Other concerns

<None.>

<Pharmacokinetics>

<Pharmacovigilance system>

<Risk management plan>
5. Recommended conditions for marketing authorisation and product information

6. List of references