28 May 2015
EMA/CVMP/QWP/107359/2015
Committee for Medicinal Products for Veterinary Use (CVMP)

Concept paper on the need for a single note for guidance on the chemistry of active substances

Agreed by Quality Working Party	28 May 2015
Adopted by CVMP for release for consultation	9 July 2015
Start of public consultation	22 July 2015
End of consultation (deadline for comments)	22 October 2015

The proposed guideline will replace the “Note for guidance on chemistry of new active substances” (EMEA/CVMP/541/03/Final) and “Chemistry of active substances” (3AQ5A).

Comments should be provided using this template. The completed comments form should be sent to vet-guidelines@ema.europa.eu

Keywords	Veterinary, Guideline, Chemistry, Drug substance, Active substance

30 Churchill Place ● Canary Wharf ● London E14 5EU ● United Kingdom
Telephone +44 (0)20 3660 6000 **Facsimile** +44 (0)20 3660 5545
Send a question via our website www.ema.europa.eu/contact

1. Introduction

This concept paper addresses the need to update and revise the guidance available on the chemistry of the active substance (new and existing active substances). There are currently two approved guidelines on the subject; EMEA/CVMP/541/03/Final guideline on the chemistry of new active substances and 3AQ5A guideline on chemistry of the active substance. It is felt appropriate to combine the two documents into a single guideline to provide better clarity for applicants. Additionally, since these documents were approved, there have been many changes in the regulatory requirements for example, changes to references to directives and guidelines and publication and approval of new guidance documents (e.g. Reflection paper on the requirements for selection and justification of starting materials for the manufacture of chemical active substances EMA/448443/2014).

The guidance documents therefore need to be combined and revised to be in line with all these changes and to facilitate the understanding of the applicant regarding the information required.

It also has to be noted that the CHMP guideline on the chemistry of active substances is at present under revision and as many active substances are used in human as well as in veterinary medicinal products major discrepancies between both guidelines should be avoided.

2. Problem statement

The current guidelines do not fully reflect recent developments and changes both in legislation and available guidance documents as well as nomenclature. The guideline should be clarified in certain places.

3. Discussion (on the problem statement)

The following issues will be taken into account during revision:

The combined guideline will follow the structure of the CTD (as in the huge majority of cases for veterinary medicinal products the documentation for the active substance is structured according to the CTD format).

It will be clarified that this guideline is applicable to applications which follow both the traditional and/or enhanced approaches as described in the ICH guideline Q11 on development and manufacture of drug substances.

Further clarification on the principles and concepts described in ICH guidelines on pharmaceutical development (Q8), quality risk management (Q9) and pharmaceutical quality system (Q10) as they pertain to the development and manufacture of active substances should be introduced where appropriate as the principles in them can be used for veterinary medicinal products and applicants may take advantage of the benefits of ICH Q8 – Q10 if they wish (but they are not obliged to do so).

It is important to outline that it is not intended to revise the guideline on the chemistry of new active substances in a way to reduce or replace the level of detail of the current guidelines which is of major significance.

Editorial changes and minor clarification of the current wording are necessary.

4. Recommendation

The Quality Working Party (QWP) recommends the elaboration of a single guidance document on the chemistry of the active substance which will replace the existing approved guidelines on the subject; EMEA/CVMP/541/03/Final guideline on the chemistry of new active substances and 3AQ5A guideline on chemistry of the active substance. This revision will clarify the requirements for all applications regarding active substances and will bring the guidance in line with recent development and the current EU legislation.

5. Proposed timetable

May 2015 - Discussion on concept paper in QWP.

It is anticipated that the draft guideline could be available 6 months after adoption of the concept paper and that this would then be released for external consultation for 6 months before its finalisation within another 6 months.

It is expected that the guideline will come into operation six months after adoption.

6. Resource requirements for preparation

The revision will involve the EMA-QWP Secretariat, the Joint CHMP/CVMP Quality Working Party, the CVMP, and GMP/GDP Inspectors Working Group, who would be consulted, as necessary. The QWP should appoint rapporteur and drafting group from the members of QWP.

7. Impact assessment (anticipated)

No adverse impact on industry with respect to either resources or costs is foreseen.

The revised guideline will not introduce new requirements on medicinal products already authorised and on the market.

The guidance will clarify requirements for regulators and industry with respect to the chemistry of active substances taking into account the concepts of recent development.

8. Interested parties

Pharmaceutical industry, EU competent authorities, GMP/GDP Inspectors Working Group

References

1. ICH guideline Q11 on development and manufacture of drug substances (chemical entities and biotechnological / biological entities) EMA/CHMP/ICH/425213/2011 (ICH Q11);
2. ICH guideline Q8 on pharmaceutical development EMA/CHMP/ICH/167068/2004 (ICH Q8(R2));
3. ICH guideline Q9 on quality risk management EMA/CHMP/ICH/24235/2006 (ICH Q9);
4. ICH guideline Q10 on pharmaceutical quality system EMA/CHMP/ICH/214732/2007 (ICH Q10);
5. Active substance-master-file procedure EMEA/CVMP/134/02 Rev 3/Corr;
6. Summary of requirements for active substances in the quality part of the dossier EMEA/CVMP/1069/02;
7. Chemistry of active substances 3AQ5A;
8. Test procedures and acceptance criteria for new veterinary drug substances and new medicinal products: chemical substances EMEA/CVMP/VICH/810/04 (VICH GL39);
9. Impurities in new veterinary drug substances EMEA/CVMP/VICH/837/99 (VICH GL10);
10. Impurities: residual solvents CVMP/VICH/502/99 (VICH GL18);
11. Setting specifications for related impurities in antibiotics EMA/CHMP/CVMP/QWP/199250/2009 corr;
12. Validation of analytical procedures: definition and terminology CVMP/VICH/590/98 – (VICH GL1);
13. Validation of analytical procedures: methodology CVMP/VICH/591/98 (VICH GL2);
14. Plastic immediate packaging materials EMEA/CVMP/205/04;
15. Stability testing of new veterinary drug substances and medicinal products EMEA/CVMP/VICH/899/99 (VICH GL3);
16. Photostability testing of new veterinary drug substances and medicinal products CVMP/VICH/901/00 (VICH GL5);
17. Statistical evaluation of stability data EMA/CVMP/VICH/858875/2011 (VICH GL51);
18. Stability Testing of Existing Active Ingredients and Related Finished Products EMEA/CVMP/QWP/846/99;
19. Guideline on stability testing for applications for variations to a marketing authorisation EMA/CHMP/CVMP/QWP/441071/2011;
20. Quality of water for pharmaceutical use EMEA/CVMP/115/01;
21. Investigation of chiral active substances EMEA/CVMP/128/95.