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SCIENCE MEDICINES HEALTH

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Committee for Veterinary Medicinal Products (CVMP)

Concept paper on the revision of the Guideline on data requirements for the replacement of established master seeds (MS) already used in authorised immunological veterinary medicinal products (IVMPs) by new MS of the same origin and merge with the Reflection paper on the replacement of cell lines used for the production of immunological veterinary medicinal products

Agreed by Immunologicals Working Party (IWP)	22 April 2026
Adopted by CVMP for release for consultation	18 June 2026
Start of public consultation	26 June 2026
End of consultation (deadline for comments)	30 September 2026

The proposed guideline will replace the "Guideline on data requirements for the replacement of established master seeds (MS) already used in authorised immunological veterinary medicinal products (IVMPs) by new master seed of the same origin"(EMEA/CVMP/IWP/105504/2007) and the "Reflection paper on the replacement of cell lines used for the production of immunological veterinary medicinal products" (EMA/CVMP/IWP/37620/2014).

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

Keywords	Master seeds, IVMPs, replacement, quality, safety, efficacy

Introduction

The "Guideline on data requirements for the replacement of established master seeds (MS) already used in authorised immunological veterinary medicinal products (IVMPs) by new master seed of the

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same origin "(EMEA/CVMP/IWP/105504/2007) was adopted in July 2009 and came into effect on 1 February 2010.

The "Reflection paper on the replacement of cell lines used for the production of immunological veterinary medicinal products" (EMA/CVMP/IWP/37620/2014) was adopted in September 2015.

The guideline (GL) applies to the replacement of a vaccine organism (e.g. virus, bacteria, fungus) master seed (MS) by a MS of the same origin. It applies also to the replacement of the master cell seed (MCS) used to produce a vaccine organism by an MCS of the same origin. The reflection paper (RP) contains complementary/additional information to this guideline and is applicable in situations where it is not possible to replace the MCS by a pre-MCS or a post-MCS but needs to be replaced by a cell seed of the same defined cell line obtained from a different supplier or laboratory or by a cell seed of a different defined cell line.

This document intends to outline the items to be considered in relation to applications for variations for the replacement of MS and to provide advice on the scientific data to be presented for the different options for replacement of seed material that are being considered by the applicant.

This concept paper addresses the need to revise the guideline, which is based on the requirements of Directive 2001/82/EC. The focus of the revision of the guideline is to reflect the new definitions and terminology used in accordance with the current Regulation 2019/6 and the European Pharmacopoeia. In addition to administrative changes made to align the guideline with Regulation (EU) 2019/6, it is also necessary to revise the scientific requirements in accordance with the current legislation and to amend the references to the legislation, where applicable.

The revision also includes merging the guideline and reflection paper mentioned above based on the complementing content of both documents. However, guidelines and reflection papers differ in their respective levels of regulatory binding force. Upgrading a reflection paper to a guideline entails converting its exploratory, principle, based considerations into binding regulatory requirements. It should be noted, nevertheless, that the intention is not to broaden the scope of the originally proposed considerations, but rather to consolidate them within a single guideline document.

1. Problem statement

It was agreed that, in addition to updating the GL itself, it would be beneficial for both regulators and pharmaceutical industry to have the content of the GL and the RP merged in one comprehensive document. This document would address any replacement of MS, including MSV, MSB and MSC, and provide detailed guidance on the data requirements for the different replacement options.

In the documents currently in force, the following difference in scope is identified:

The GL covers data requirements for replacement of all MS (MSV, MSB, MCS) by MS of the same origin, e.g. the MSs pre-master or post-master-seed. For replacement of MCS however, the information provided in the GL on data requirements is very brief.

In contrast, the RP contains detailed data requirements for replacement of MCS only and refers to replacement of an MCS by an MCS of the same defined cell line, which may be obtained from the same source or different commercial suppliers or laboratories and replacement of an MCS by an MCS that is derived from a different cell line than the defined cell line on which the original MSV was based on.

The final guideline aims to avoid the generation of new data after the replacement of MS, wherever possible, particularly when such data would require animal safety and efficacy trials. At the same time, it also aims to ensure that the quality, safety and efficacy of the IVMP remain the same after the change of any seed material.

2. Discussion (on the problem statement)

Based on the issues described above, the following points will be considered during the revision:

- Update on legal basis - alignment to Regulation (EU) 2019/6 and European Pharmacopoeia.
- Update of references to the legislation applicable - articles of Regulation (EU) 2019/6, monographs of European Pharmacopoeia.
- Changes to GL content based on the agreed approach of merging GL and RP (addition of possible subcategories of the master seed replacement scenarios mentioned in the RP).
- Compilation of information under different scenarios with the same requirements to avoid replication of information.
- Clarification of some requirements for better understanding (e.g. information on correlation between the batch potency test and the efficacy of the vaccine).
- Deletion of obsolete requirements (e.g. delete the obsolete requirement for a batch safety test).
- Deletion of redundant requirements (e.g. requirements on master seed testing, when the reference to Ph. Eur. covers all relevant aspects).
- Inclusion of a summary table for easier overview of all possibilities of replacement of seed material and overview of the requirements.
- Other administrative changes and clear layout of GL including numbering of individual chapters and sections, use of common abbreviations for individual master seeds.

3. Recommendation

The Immunologicals Working Party (IWP) recommends revising the "Guideline on data requirements for the replacement of established master seeds (MS) already used in authorised immunological veterinary medicinal products (IVMPs) by new master seed of the same origin "(EMEA/CVMP/IWP/105504/2007) and merging this guideline with the "Reflection paper on the replacement of cell lines used for the production of immunological veterinary medicinal products" (EMA/CVMP/IWP/37620/2014) based on the complementing content of both documents.

The issues listed above shall be considered in the revision.

4. Proposed timetable

Q2 2026 Concept paper adopted by CVMP and released for public consultation

Q3 2026 Deadline for comments from stakeholders

Q1 2027 Adoption of the draft guideline by CVMP for release for consultation

Q2 2027 Deadline for comments from stakeholders

Q3 2027 Expected date for adoption by CVMP and publication of the revised guideline

5. Resource requirements for preparation

The revision of the guideline will involve the IWP (including a drafting group composed of rapporteur, co-rapporteur and 2-3 IWP members).

The IWP drafting group will meet virtually as required (e.g. 2-3 virtual meetings). Discussion is foreseen in at least 2 IWP plenary meetings.

6. Impact assessment (anticipated)

The revision of the guideline and merging with the reflection paper is expected to clarify the data requirements to support variation applications for replacement of master seeds. Such replacement becomes necessary mostly because the seed material is depleted or for other justified reasons.

It is envisaged that the final guideline provides clearer guidance on data requirements for all scenarios involving master seed replacement.

Clearer guidance should enable applicants to prepare a tailored data set and help to avoid generating new data unnecessarily, particularly when such data would require are gained through animal safety and efficacy trials in alignment with the 3Rs principles. At the same time, it also aims to ensure that the quality, safety and efficacy of the IVMP remain the same after the change of any seed material.

Overall, the revision of the guideline is expected to positively influence the assessment of variation procedures for master seed replacements submitted under Regulation (EU) 2019/6, and ultimately, to contribute to the availability of veterinary vaccines, thereby benefiting both public and animal health.

7. Interested parties

Veterinary pharmaceutical industry, veterinary consultants, EU regulatory authorities involved in assessment on variation applications.

8. References to literature, guidelines, etc.

Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products

Relevant Ph. Eur. monographs and chapters