EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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Biologics Working Party (BWP)

Concept paper on the revision of the Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 and Annexes (Doc. Ref. EMEA/CHMP/BWP/3794/03 Rev.1)

Draft

Agreed by Biologics Working Party	10 March 2025
Adopted by CHMP for release for consultation	17 March 2025
Start of public consultation	31 March 2025
End of consultation (deadline for comments)	30 June 2025

The proposed revised guideline will replace Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 and annexes (Doc. Ref. EMEA/CHMP/BWP/3794/03 Rev.1)

Comments should be provided using this EUSurvey form. For any technical issues, please contact the EUSurvey Support.

Keywords	Plasma Master File, regulation update, standards of quality and safety for substances of human origin, collection and testing of human blood and blood components, donor eligibility, inspection of centres/establishments, traceability

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1. Introduction

The guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 (Doc. Ref. EMEA/CHMP/BWP/3794/03 Rev.1) outlines the structure and scientific data required on human plasma, from collection to plasma pool, to be submitted in a Plasma Master File (PMF) certification or included in the marketing authorisation dossier whenever the optional PMF certification scheme is not followed. The guideline has last been revised in 2007.

The publication on 17th July 2024 of "SoHO" Regulation, *Regulation (EU) 2024/1938 of the European Parliament and of the Council of 13 June 2024 on standards of quality and safety for substances of human origin intended for human application and repealing Directives 2002/98/EC and 2004/23/EC* (coming into force 7th August 2027), i.e. "SoHO", replaces the current EU Directive 2002/98/EC for blood and plasma, as well as the EU Directive 2004/23/EC for cells and tissues, by a single regulation that applies to all substances of human origin. The changes to the standards for quality and safety for substances of human origin introduced by the SoHO Regulation make the revision and amendment of the above-mentioned guideline necessary.

Furthermore, the guideline has not been revised since 2007, when it came into effect, so it is necessary to revise it to adapt it to the current technical and regulatory developments.

Several topics introduced by the SoHO Regulation trigger a revision of the current guideline, such as those regarding new terminology, inspection requirements, donor eligibility, donation testing, traceability or conditions of storage and transport of plasma.

The revision of the scientific guideline is proposed as part of the 3-year BWP workplan 2024-2026.

2. Problem statement

The current guideline on the Scientific Data Requirements for a Plasma Master File (PMF) was written to provide guidance on the structure and requirements for presentation of data on starting material in a Plasma Master File (PMF). This guidance also applies to medicinal products derived from human blood or plasma when the information about human blood/plasma is part of Module 3 of the marketing authorisation dossier.

At the time of the publication of the current guideline, the requirements in Directives 2002/98/EC, 2003/63/EC, 2004/33/EC, 2005/61/EC and 2005/62/EC applied for the collection and testing of human blood and blood components used in the manufacture of medicinal products. These directives provide detailed technical information regarding the standards of quality and safety of human blood and blood components.

The new SoHO Regulation (including blood and plasma) does not contain high level technical details, but instead it refers to technical guidelines published by the ECDC and EDQM and any coming implementing acts.

The impact of the implementation of the SoHO Regulation on the current guideline on the Scientific Data Requirements for a PMF needs to be addressed to align its content with the most updated EU regulatory requirements.

3. Discussion (on the problem statement)

A substantial change of the guideline is foreseen as the content in many of the chapters has to be adapted to the technical and regulatory developments occurred since 2007 and is also impacted by the adoption of the SoHO Regulation. Moreover, references to the blood directives need to be also updated in most chapters of the current guideline.

Some examples of the relevant aspects introduced by the SoHO Regulation that are planned to be addressed during the proposed revision of the current guideline are:

- Definitions and terminology: the SoHO Regulation introduces new terminology for blood/plasma collection centres and establishments, as well as for testing laboratories and organisations involved in importing, storage or transport (SoHO entities and SoHO establishments).

- Inspection requirements of blood/plasma collection, testing and transport/storage sites have been updated to follow a risk-based approach, in particular with respect to inspection frequency.

- PMF holders' audits requirements of blood/plasma collection and testing sites.

- Authorisation of importing SoHO establishments: the SoHO Regulation introduces regulatory considerations for the import of human plasma that is intended to be used for the manufacture of medicinal products.

- Donor eligibility criteria have been updated by the SoHO Regulation. Consequently, the references to requirements for selection/exclusion criteria in the current guideline need to be updated. In addition, reference to any coming implementing acts and current and future ECDC/EDQM guidance has to be added.

- Testing of donations has been updated by the SoHO Regulation. The references to blood directives for requirements on testing in the current guideline need to be updated and reference to any coming implementing acts and current and future EDQM/ECDC guidance needs to be added.

- Traceability: Reference to blood directives for requirements for traceability needs to be replaced by Article 42 of the new regulation on traceability and coding, where it is stated that the Commission shall adopt implementing acts concerning the minimum SoHO donor and SoHO recipient data to be kept to ensure traceability.

Last, additional topics not related to SoHO, are also planned to be reviewed and updated, in order to align the revised guideline with the state-of-the-art scientific developments as well as to the current procedure and criteria applied during the PMF assessment.

4. Recommendation

The BWP recommends the revision of the Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 (Doc. Ref. EMEA/CHMP/BWP/3794/03 Rev.1) taking into account the issues identified above.

5. Proposed timetable

The revision of the guideline is scheduled to start in 2025 as part of the 3-year BWP workplan. Public consultation is planned for 3 months. It is anticipated that a draft revised guideline will be released for external consultation during 2026.

6. Resource requirements for preparation

The development of the guideline will involve the EMA-BWP, the CHMP, and GMP/GDP Inspectors Working Group, who would be consulted, as necessary. The BWP should appoint a rapporteur and a drafting group.

7. Impact assessment (anticipated)

It is anticipated that industry and EU regulators will benefit from the proposed revised guideline, which can contribute to the harmonisation of data submission and assessment.

8. Interested parties

Interested parties with specific interest in this topic will be consulted during the revision of this guideline, including:

- PMF holders
- Plasma protein associations (International Plasma and Fractionation Association (IPFA), Plasma Protein Therapeutics Association (PPTA), European Blood Association (EBA), etc.)
- European Commission (EC), European Directorate for the Quality of Medicines (EDQM) and European Centre for Disease Prevention and Control (ECDC) and relevant EU Blood and inspection national competent authorities.
- Coordination Group for Mutual Recognition and Decentralised Procedures (CMDh)
- Within the European Medicines Agency: Biologics Working Party (BWP), Plasma Master File (PMF) Expert Group, GMDP Inspectors Working Group (GMDP IWG), Haematology Working Party (HAEMWP) and Committee for Medicinal Products for Human Use (CHMP).

9. References to literature, guidelines, etc.

PMF dossier requirements. Questions and Answers for PMF Holders (EMA/CHMP/BWP/721411/2022)

Scientific data requirements for plasma master file - Scientific guideline (EMEA/CHMP/BWP/3794/03)