1 20 February 2015
2 EMA/CHMP/QWP/126334/2015
3 Committee for Medicinal Products for Human Use (CHMP)

4 Concept paper on the need for revision of the guideline 5 on the requirements to the chemical and pharmaceutical 6 quality documentation concerning investigational 7 medicinal products in clinical trials

8

Agreed by QWP	February 2015
Adopted by CHMP for release for consultation	26 February 2015
Start of public consultation	30 March 2015
End of consultation (deadline for comments)	30 June 2015

9

10 The proposed guideline will replace “Guideline on the Requirements to the Chemical and
11 Pharmaceutical Quality Documentation concerning Investigational Medicinal Products in Clinical Trials”
12 (CHMP/QWP/185401/2004 final)

13

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

14

Keywords	Guideline, Clinical Trial, Quality

15

16

30 Churchill Place ● Canary Wharf ● London E14 5EU ● United Kingdom
Telephone +44 (0)20 3660 6000 **Facsimile** +44 (0)20 3660 5555
Send a question via our website www.ema.europa.eu/contact

Introduction

This concept paper addresses the need to update and revise the CHMP/QWP/185401/2004 final Guideline on the Requirements to the Chemical and Pharmaceutical Quality Documentation concerning Investigational Medicinal Products in Clinical Trials. This guideline was originally adopted on 23rd March 2006 and came into operation on 1st October 2006. The new Regulation (EU) No. 536/2014 on clinical trials on medicinal products for human use, repealing Directive 2001/20/EC will become applicable not earlier than 28 May 2016. An update of the guideline is therefore needed to be in line with the new Regulation, as well as to reach a higher level of harmonisation across the EU Member States, based on experiences gained with current version of the guideline.

1. Problem statement

The current guideline does not fully reflect the recent development and changes both in legislation and scientific experiences. It is felt that the guideline needs to be more detailed in order to give clearer requirements to the Sponsors on quality data to be submitted as well as a clearer reference to the assessors in their evaluation work, thus reaching a higher level of harmonisation among the Member States.

2. Discussion (on the problem statement)

The references to Directive 2001/20/EC and „Detailed guidance for the request for authorisation of a clinical trial on a medicinal product for human use to the competent authorities, notification of substantial amendments and declaration of the end of the trial" should be replaced by the references to the new Regulation (EU) No. 536/2014 on clinical trials on medicinal products for human use, repealing Directive 2001/20/EC.

There are differences in the approach to clinical trials applications among the assessors as well as sponsors, therefore requirements should be specified more precisely for critical aspects (e.g. synthesis description, impurities, shelf-life extension, in-use stability, non-standard drug product manufacturing processes, specifications).

The section covering amendments (substantial / non-substantial) should be revised based on experiences obtained – the table of examples should be updated with most-frequent changes.

Information included in the Q&A document published on the EMA web site should be implemented into the guideline[3].

Since the new Regulation does not refer specifically to the Marketing Authorisations in the MRA-partner countries this information should be updated to be in line with the Regulation

The requirements on auxiliary medicinal products should be implemented into the guideline.

3. Recommendation

The Quality Working Party recommends revision of the Guideline on the Requirements to the Chemical and Pharmaceutical Quality Documentation concerning Investigational Medicinal Products in Clinical Trials in order to refer to the new Regulation (EU) No. 536/2014 and to more specify requirements on quality of drug substances and drug products.

The Quality Working Party acknowledges that the transitional period is defined in the Regulation (Article 98), in which clinical trials could be started either in line with the Directive 2001/20/EC or the new Regulation (EU) No. 536/2014, or continued in accordance with the Directive. Due to this transitional period, if appropriate, the scientific updates can be transferred to the current guideline.

4. Proposed timetable

February 2015 – Discussion and adoption of 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 3 months before its finalisation within another 3 months.

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

5. Resource requirements for preparation

The revision will involve the EMA-QWP Secretariat, the Joint CHMP/CVMP Quality Working Party, the CHMP, 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.

6. Impact assessment (anticipated)

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

The guidance will clarify requirements for regulators and industry with respect to requirements on documentation submitted for clinical trials applications.

7. Interested parties

Pharmaceutical Industry, EU Competent Authorities, GMP/GDP Inspectors Working Group, Clinical Trials Facilitation Group, European Commission.

8. References to literature, guidelines, etc.

1: CHMP/QWP/185401/2004 final Guideline on the Requirements to the Chemical and Pharmaceutical Quality Documentation concerning Investigational Medicinal Products in Clinical Trials;

2: Regulation (EU) No. 536/2014 on clinical trials on medicinal products for human use, repealing Directive 2001/20/EC;

3: European Medicines Agency: Scientific guidelines: Q&A on quality: Part 2: Specific types of products - Quality of investigational medicinal products: Q5
http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000072.jsp&mid=WC0b01ac058002c2b0#section11