



IRISH MEDICINES BOARD

# Information Day - New Variations Regulations

## Submission of Variations

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*Crowne Plaza Hotel, Santry, 22<sup>nd</sup> January 2010*

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Kevin Horan,  
IT Manager

## Topics

- Key changes in form structure
- Supporting documentation
- eCTD / NeeS / VneeS submissions
- RIO Submissions



## Application types

- New options available to indicate the application types included in the submission – user should select all that are applicable
- For submission type the valid options are:-
  - Single
  - Single + Worksharing
  - Grouping
  - Grouping + line extension
  - Grouping + line extension + work sharing
  - Grouping + work sharing

### Type of Application (tick all applicable options)

- Type IA<sub>IN</sub>
- Type IA
- Type IB unforeseen<sup>2</sup>
- Type IB foreseen<sup>2</sup>
- Type II
- Type II Art. 29<sup>3</sup>

- Single variation
- Grouping of variations
  - Including a line extension<sup>4</sup>
- Worksharing



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## Products Concerned

- Each product included in the submissions must be entered into the products concerned grid

(Invented)Name(s):	Active substance(s)	Pharmaceutical form	Strength	MA holder name(s):	MA number(s): <sup>8</sup>
Newcastle	Active X	Tablet	15mg	Test Pharma Co	PA11836/001/001
Sunderland	Active Y	Tablet	20mg	Test Pharma Co	PA11836/001/002
Leeds	Active P	Solution for injection	100IU	Test Pharma Co	PA11836/009/001
Bristol	Active P	Solution for injection	200IU	Test Pharma Co	PA11836/009/003



### Type of Change

- Each change applied for in the submission must be listed.
- All changes apply to all products in the submission.
- For each change the relevant conditions and documentation must be provided where applicable as detailed in the classification guideline.



## Type of Change

<input checked="" type="checkbox"/> <b>D.2 Change in the name and/or address of the PMF certificate holder</b>	<b>Procedure type</b>		<b>Implement. Date:</b>
	<input type="checkbox"/> 1A <sub>IN</sub>	<input checked="" type="checkbox"/> 1B <sup>9</sup>	
I <sup>≡</sup>			
<b>A.5 Change in the name and/or address of a manufacturer of the finished product, including quality control sites</b>	<b>Procedure type</b>		<b>Implement. Date:</b>
<input checked="" type="checkbox"/> a) Manufacturer responsible for batch release	<input checked="" type="checkbox"/> 1A <sub>IN</sub>	<input type="checkbox"/> 1B <sup>9</sup>	01/01/2010
<input type="checkbox"/> b) All other	<input type="checkbox"/> 1A	<input type="checkbox"/> 1B <sup>9</sup>	<b>Implement. Date:</b>

- For 1A and 1A<sub>IN</sub> changes an implementation date must be provided.
- For 1A and 1A<sub>IN</sub> where a condition is not met as per the classification guide this change will default to a type 1B .
- For variations not listed in the guideline the “other variation” option should be selected.



## Justification for grouping / Work Sharing

- When grouping or work sharing is applied for a justification must be provided

**PRECISE SCOPE AND BACKGROUND FOR CHANGE, AND JUSTIFICATION FOR GROUPING, WORKSHARING AND CLASSIFICATION OF UNFORESEEN CHANGES (if applicable)**

*(Include a description and background of all the proposed changes. In case of grouping and worksharing a justification should be provided in a separate paragraph. If a variation concerns an unforeseen change, include a justification for its proposed classification).*

Test background for change



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## Present / Proposed

PRESENT <sup>10,11</sup>	PROPOSED <sup>10,11</sup>
All changes outlined here apply to all of the products listed	All changes outlined here apply to all of the products listed
PA11836/001/001  Current text for this product	Proposed text for this product

- In the present and proposed section where data is applicable to all products a single entry for the present and proposed is suitable.
- For slight differences in text between each product it is recommended that the applicant provide a present and proposed section for each product in the submission.





### Supporting information

- Where a submission contains more than one product the supporting documentation to be provided e.g. summary of product characteristics ,labelling ,package Leaflet etc..
- Each document should clearly indicate the licence number that it refers too.



## Electronic Submissions

- IMB strongly recommends the use of electronic submissions for both human and veterinary submissions in the following formats:
  - Electronic Common Technical Document (eCTD).
  - Non eCTD Electronic Submission (NeeS).
  - Veterinary Non eCTD Electronic Submission(VNeeS) .
  - RIO Online Submission and Tracking Portal.



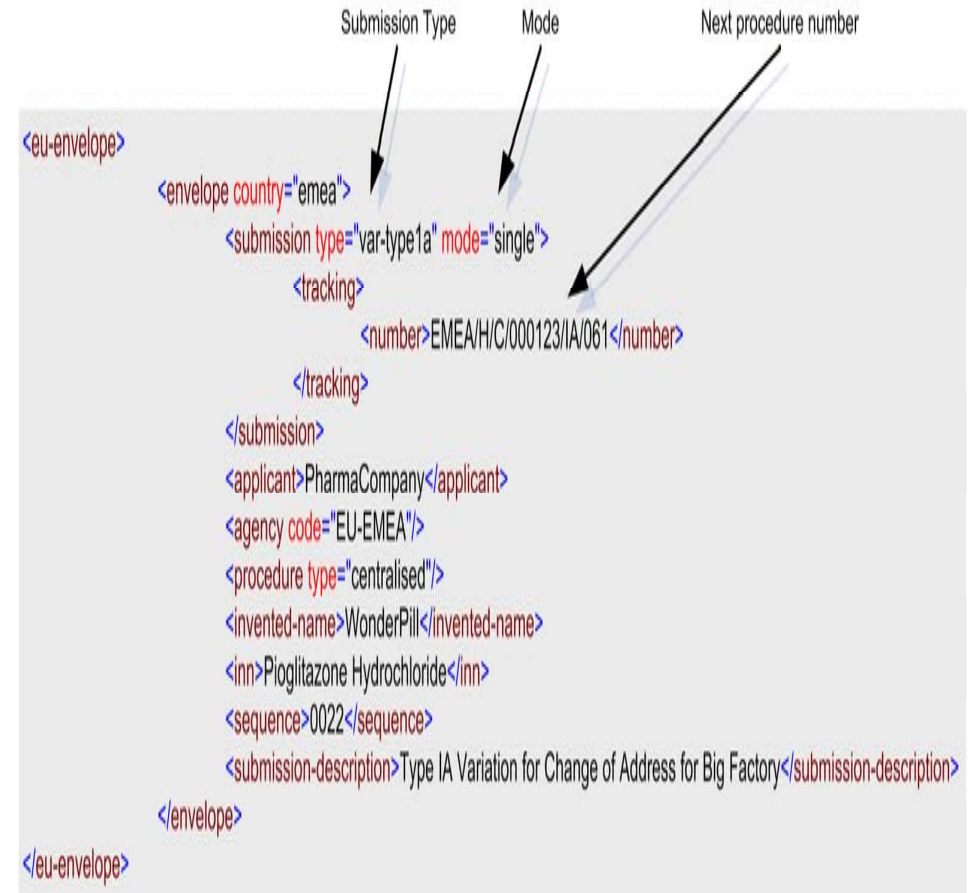
### eCTD / NeeS / VNeedS

- For a grouped variations with a mix of variation types the “highest” variation type should be used.
- Current eCTD specification does not provide the capability to use grouped or work sharing across multiple MA’s , the applicant should create separate eCTD sequences for each MA in the submission.
- For eCTD / NeeS / VNeedS , grouped submissions can be provided on a single CD / DVD with each of the MA’s in a separate folder on the disk.



## eCTD

- Changes to the envelope element of the eCTD eu-regional.xml file
  - Submission type
    - Var-type1b
    - Var-type2
    - Extension
  - Mode
    - Single
    - Grouping
    - Extension
  - For work sharing a “tracking” number is provided and referenced in the envelope in the tracking section.



### RIO

- No major changes to the current process.
- System provides the applicant with the ability to submit grouped variations.
- System will generate a single standard application form and guideline document containing all products.
- System will provide multi-document upload.
- Available by mid February



## RIO

- Drop down filtering system on the change types linked to the conditions and documentation.

http://localhost:60061/Forms/HM/VAR/v2/AddVariationChange.aspx - Windows Internet Explorer

**Add Variation Change**

Section : II. QUALITY CHANGES 1 ACTIVE SUBSTANCE a) Manufacture ▾

Sub Section : 1. Changes in the manufacturer of a starting material/reagent/intermediate used in the manufacturing process ▾

Change No : 1A The proposed manufacturer is part of the same pharmaceutical group as the currently approved manufacturer ▾

Type : 1Ain ▾

Implementation Date : 12 Jan 2010

Add change



## RIO

- Once a change is selected you will be able to add conditions and documentation to the change.

Change No	Change Text	Type	Date	
2A	Change in the specification parameters and/or limits of the immediate packaging of the finished product Tightening of specification limits	1B	09/01/2010	<div><p>Conditions</p><ul style="list-style-type: none"><li><input type="checkbox"/> 1 Change following granting of or amendment to ATC Code by WHO.</li><li><input type="checkbox"/> 2 Change following granting of or amendment to ATC Vet Code.</li></ul><p><a href="#">Save</a> <a href="#">Close</a></p></div> <a href="#">Add documentation</a>
182	Change in the shelf-life or storage conditions of the finished product Extension of the shelf life of the finished product - After first opening (supported by real time data)	1B	01/02/2010	<a href="#">Add conditions</a> <a href="#">Add documentation</a>

[Add change](#) [Update](#)



## References

- Application for variation to a marketing authorisation December 2009
- Classification guideline for variations
- EMA/ CMD(h) explanatory notes on variation form for human medicinal products only
- eCTD Variations Q&A document
- Guide to electronic submissions - Human Medicines 2009
- Guide to electronic submissions - Veterinary Medicines 2009
- The IMB website [www.imb.ie](http://www.imb.ie) will be updated regularly to reflect any changes or guidance





Thank You

For further information or comments  
please Email: [kevin.horan@imb.ie](mailto:kevin.horan@imb.ie)



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