NL (I)VMP-assessor's Comment on the Public Consultation paper-NR-2007-10-24

Section 3: Key item 1. first paragraph.
If all authorized medicinal products would be subject to the same rule, why does the draft regulation addresses products authorized by a national, decentralized / mutual recognition or centralized procedure as separate chapters in a way that differences are difficult to see?
Preferably separate document for pharmaceutical (pharmacologically active substances) and immunobiologicals should be drafted, for both human and veterinary medicinal products (resulting in 4 documents).

Variations should be classified according their impact on safety and efficacy of the product as authorized (in one or more member states). How the product was authorized becomes less relevant, if the same rules apply to all types of procedures.
Reference made in the "work-sharing" section (6, Key item 4) in terms of "lightening the procedures" appears misleading, as it implies that the type of variation can change, due to the way it is dealt with.

Section 4: Key item 2.
4.1 Design space.
Difference should be made between products based on pharmacological activity (mainly chemicals) and immunobiologicals. It is not clear why "design space" should be sought in the use of authorized pharmacologically based products, meaning in practice. This kind of "experiments" should preferably be carried out under controlled conditions.

4.2 Continuous improvement.
Not every change results in an improvement. Allowing more flexibility would also open the door for trying out the effects of changes made for other reasons (e.g. economics, not for a better benefit risk balance).

Companies are always looking for ways to introduce changes in the most easy way. So there should be no misunderstanding on the type of variation.

Section 7 Key item 5
Type IB by default.
This implies unambiguous definitions of type IA and type II variations. If not, this will lead to extensive discussions on the possible impact of a variation on efficacy and safety.

Section 8.
8.1 Other proposals.
2nd bullet point: Annexes are legally binding texts; guidelines are not. Although a guideline offers more flexibility to the producers, it is likely to result in more work for the authorities.
3rd bullet point: unclassified variations should not exists; it probably means that definitions are not clear. Moreover, according to the proposals, unclassified variation are type IB by nature.

8.2 Grouping variations.
Grouping of variations depends on their impact on efficacy and safety. The problem is that there is no definition of "highest risk". Again, such an approach may lead to a discussion on every variation that has been submitted, slowing down the process.