13 July 2012 **BY E-MAIL**
DGSanco12006

SANCO-VARIATIONS-GUIDELINES@ec.europa.eu

European Commission

DG Sanco

1049 BRUSSELS

Subject: Review of the Variations Guidelines

Dear Madam, Sir,

PPTA greatly appreciates the efforts of the European Commission to regularly update the guideline on the details of the various categories of variations taking into account the input from stakeholders such as PPTA.

We would like to take the opportunity to reiterate our previous concerns pertaining to the onerous requirements associated with the Plasma Master File (PMF) 2nd step procedure. In one of our previous submission in May 2010 we have presented a case study describing the 2nd step procedures before and after the implementation of EC/1234/2008. We demonstrated that the workload for the company and also the involved regulatory authorities significantly increased because for this step "of purely administrative nature" (Guideline on PMF and VAMF "Second Step") now each single product dossier has to be updated resulting in an increase of electronic sequences from 1 to 100.

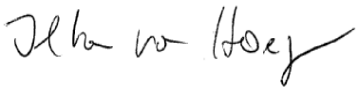
We believe that the current procedure is a waste of already limited resources on the side of the manufacturers as well as on the side of the National Competent Authorities (NCA). It is also not in line with the EC's better Regulation Initiative that aims to avoid unnecessarily complicated regulatory procedures.

We would therefore respectfully like to propose to simplify the PMF 2nd step procedure.at least for the "*inclusion of an updated/amended PMF, if the properties of the medicinal products are not affected"*. For this case, we would consider a mere notification of the concerned competent authorities, without necessity to provide a product or PMF related sequence, as fully sufficient. Regarding the documentation we would propose to provide the product specific declaration of applicability and expert statement. However, documents that are already available for all competent authorities elsewhere (e.g. PMF certificate, evaluation report), should just be quoted by referencing, as is common practice e.g. for pharmacopoeia monographs. This referencing procedure should be possible for all changes to a PMF.

A concrete proposal to change the Guidelines on the details of the various categories of variations Regulation (EC) No 1234/2008 Article 4(1)(a) and the PMF 2nd Step Guideline is reflected in the attached guideline excerpts, which would lead to a significant simplification for the industry as well as for the authorities without any loss of relevant information.

We hope that you will consider our proposal and remain at your disposal for further discussion.

Yours sincerely,



Dr. Ilka von Hoegen

Senior Director, Quality and Safety

Attachments:

- Proposed update for 2nd step guideline

- Proposed update for Guidelines on the details of the various categories of variations Regulation (EC) No 1234/2008Article 4(1)(a))