



**Certification of Substances Division**



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**Certification of suitability to Monographs of the European Pharmacopoeia**

**Procedures for management of revisions/renewals of certificates of suitability to the European Pharmacopoeia monographs**

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## **PROCEDURES FOR MANAGEMENT OF REVISIONS/RENEWALS OF CERTIFICATES OF SUITABILITY TO THE EUROPEAN PHARMACOPOEIA MONOGRAPHS**

### **Introduction:**

This document should be read in conjunction with the EDQM “Guideline on Requirements on Revision/Renewal of Certificates of Suitability to the European Pharmacopoeia monographs” (PA/PH/CEP (04) 2, as amended), which describes the conditions to be fulfilled as well as the documentation to be submitted for each request for revision.

The procedures for the management of revisions of certificates of suitability (CEPs) are described below and have been revised according to the revised European Regulation for Variations to Marketing Authorisation Applications.

The revised system includes:

- Introduction of a “Do and Tell” procedure where some notifications may be submitted within 12 months of implementation
- Introduction of “Minor revision by default”, for the changes which are not described in the EDQM guideline for revisions
- Introduction of “grouped procedures” for changes affecting more than one CEP application
- The possibility to submit several changes in the same request for revision was already in place and is maintained. Consequential changes are considered as part of the original variation.
- Some changes to procedural aspects and deadlines for the treatment of revisions of CEP applications for alignment with the EU Regulation.

Following the initial assessment of the request for revision, a single deficiency letter may be sent. Should the response not sufficiently address the request for information, the application for revision will be rejected.

### **1. Implementation**

All requests for revision/renewal received from **1<sup>st</sup> March 2010** will be treated according to this updated policy.

### **2. How to apply for a request for revision/renewal ?**

#### **Application form:**

A specific EDQM application form for revisions/renewals is to be submitted with each request for revision. It can be downloaded from the EDQM website.

### **Documentation to be submitted:**

Each application for a revision/renewal should include:

- A cover letter
- A description of the kind of changes with reference to the EDQM Guideline for revision/renewal, as well as data showing, where applicable, that the conditions have been met. Consequential changes should be identified and the relation between the changes should be described.
- Supportive information, including comparative data with the previous version of the dossier (in tabular format) showing the approved and the proposed section and highlighting the changes
- Updated version of each relevant section of the dossier.

The documentation to be submitted for each request for revision/renewal is described in the EDQM “Guideline on Requirements on Revision/Renewal of Certificates of Suitability”.

### **Fees and timelines:**

The fees and timelines depend on the kind of revision. Timelines are described in Section 4. Fees are described in the EDQM application form. They have to be paid after validation of the request by EDQM and receipt of an invoice.

## **3. Procedures**

### **3.1 Notifications**

Annual reporting: With the exception of Immediate Notifications which have to be submitted immediately, reporting of notifications may be done by way of an annual report compiling all the notifications that have been implemented within the last 12 months.

The evaluation of validity of a notification or a group of notifications is completed by EDQM within 30 days after receipt of a valid request. Then either an acknowledgement of a valid notification is sent to the holder or a revised certificate is granted if necessary.

If the notification is incomplete at receipt, clarification may be requested by EDQM prior to sending any confirmation of a valid or rejected notification.

However, if the conditions for a notification are not met, or if the application is largely deficient a letter of rejection is sent to the holder. This means that the applicant will have to resubmit the appropriate package of data and again pay the relevant fee.

### **3.2 Minor revisions**

The applicant may send an application containing one or several unrelated minor changes and notifications (“grouped minor changes”).

T0 (within 5 working days after receipt of a valid request): a letter of acknowledgement of receipt is sent to the applicant.

T 30 days (T 60 days for grouped minor revision): either the request is approved\*, or a letter of request for additional information is sent (clock-stop).

If clock-stop: the applicant is requested to submit a reply within 30 days. Failure to submit a reply in time will lead to the rejection of the request for revision.

New T0: within 5 working days after receipt of the applicant's response by the Certification Secretariat.

New T 30 days: Approval\*, or letter of rejection of the request if the answer is deemed deficient. If the application is rejected, the applicant will have to resubmit the appropriate package of data and again pay the relevant fee.

**\*Approval:**

Either a letter of approval is sent to the holder or a revised certificate is granted, where necessary (when the content of the CEP is affected by the changes).

### **3.3 Major revisions**

The applicant may send an application containing one major change with no or several unrelated minor changes and notifications.

T0 (within 5 working days after receipt of a valid request): a letter of acknowledgement of receipt is sent to the applicant.

T 60 days: either the request is approved, or a letter of request for additional information is sent (clock-stop).

If clock-stop: the applicant is requested to submit a reply within 30 days. Failure to submit a reply in time will lead to the rejection of the request for revision.

New T0: within 5 working days after receipt of the applicant's response by the Certification Secretariat.

New T30 days (except TSE certificates: 60 days): Approval, or letter of rejection of the request if the answer is deemed deficient. If the application is rejected, the applicant will have to resubmit the appropriate package of data and again pay the relevant fee.

When the request is approved, a revised certificate is granted.

### **3.4 Renewal**

The holder of the certificate shall apply for the renewal of their certificate at least **6 months prior to its expiry date**. Considering the time taken for the assessment of the dossier, failure to submit a request for renewal sufficiently in advance could lead to a gap between the expiry date of the certificate and its renewal.

Introduction of minor changes or notifications in the application is possible at the time of renewal. Introduction of major changes is not accepted.

T0 (within 5 working days after receipt of a valid request): a letter of acknowledgement of receipt is sent to the applicant.

T 90 days: either the request is approved, or a letter of request for additional information is sent (clock-stop).

If clock-stop: the applicant is requested to submit a reply within 30 days.

New T0: within 5 days after receipt of the applicant's response by the Certification Secretariat.

New T30 days (except TSE certificates: 60 days): Approval or new request for information.

When the request is approved, a renewed certificate is granted.

### **3.5 Monographs revisions**

When a revised monograph is published in a supplement or a new edition of the European Pharmacopoeia, a letter is sent by the Certification Secretariat to the respective holders of certificates, who are asked to update their dossier accordingly.

The holder is requested to submit the data within 90 days.

T0: within 5 working days of receipt of the data, acknowledgement of receipt is sent and the clock starts.

T90 days: either approval, or a letter of request for additional information (clock-stop).

If clock-stop: the applicant is requested to submit a reply within 30 days.

New T0: within 5 working days after receipt of the applicant's response by the Certification Secretariat.

New T30 days: Approval or new request for information.

When the data are approved, either a letter of approval is sent or a revised certificate is granted, where necessary.

### **3.6 Grouped revisions for the same dossier**

It is possible to apply for a group of changes in the same request for revision. This has an impact on the deadlines as described in the respective sections above, and on the fees as described in the table in the application form.

### **3.7 Grouped submission for the same change affecting several dossiers**

In the case the same change or group of changes applies to more than one Certificate of Suitability from the same holder, it is possible to apply for a grouped submission.

The conditions for such grouping are that:

- the different dossiers affected by the same group of changes are held by the same holder
- there is no or limited need for product specific impact assessment (this should be justified by the applicant)
- individual documentation should be submitted at the same time for each affected CEP application.

The deadline and fee for a grouped submission will depend on the kind of change applied for, and will be treated according to the respective procedures described above (e.g. a single notification affecting several CEP applications will be treated as a group of notifications).

### 3.8 Transfer of holdership

The evaluation of validity of a transfer of holdership is completed within 30 days after receipt of a request, and a revised certificate is granted.

If the request is incomplete at receipt, it is rejected without asking for any additional information and a letter of rejection is sent to the holder. This means that the applicant will have to resubmit the appropriate package of data and pay the relevant fee.

## 4. Fees and timelines

The fees for the different kinds of revisions are available in the application form, and published on the EDQM website [www.edqm.eu](http://www.edqm.eu)

Type of revision	EDQM Timelines (original assessment)	EDQM Timelines (answer to deficiency letter)
Simple notifications (immediate or annual)	30 days	n/a
Multiple notifications (max 3, immediate or annual)	30 days	n/a
Grouped notifications (> 3, immediate or annual)	30 days	n/a
Simple minor revision	30 days	30 days
Multiple minor revisions (max 3, may include minor changes and notifications)	60 days	30 days
Grouped minor revisions (>3 minor changes and notifications)	60 days	30 days
Major change (may include minor changes and notifications)	60 days	30 days (TSE: 60 days)
Renewal	90 days	30 days (TSE: 60 days)
Monograph revision	90 days	30 days
Transfer of holdership	30 days	n/a