EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

01 September 2023
EMEA/288844/2009 rev. 5
Veterinary Medicines Division

# The linguistic review process of product information in the centralised procedure

Veterinary medicinal product applications

## Contents



**Official address** Domenico Scarlattilaan 6 ● 1083 HS Amsterdam ● The Netherlands
**Address for visits and deliveries** Refer to www.ema.europa.eu/how-to-find-us
**Send us a question** Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000 An agency of the European Union

# 1. Introduction

In order to ensure high quality and consistent product information (PI) of centrally authorised products (CAPs) in all Member States, a linguistic review of the product information[1] will be performed at different stages of the procedure, depending on the type of application: pre-opinion review of the English product information (EN PI), and/or post-opinion review of the translations in all EU languages.

The timeframes apply to initial marketing authorisation applications as well as to relevant post-authorisation procedures. The timeframes refer to calendar days, not working days. For applications which have been reviewed by the CVMP in an accelerated assessment procedure, the steps and/or timeframes may be shortened on a case-by-case basis, depending on the urgency by which the Commission Decision will need to be adopted.

This document presents the product information linguistic review process, and provides details on its practical implementation for the pre-opinion review of the EN PI and the post-opinion review of the translations in all EU languages. The review of a Quick Response (QR) code is not included in this document and is described in the Guidance documents on QR codes.

# 2. Pre-opinion review of the English product information

A pre-opinion review applies to all new applications for marketing authorisation (for generic, hybrid or informed consent applications, see also section 5) and to some variations requiring assessment (VRAs). This includes all VRAs under category I of the EMA/CMDv Guidance on the details of the classification of variations requiring assessment and, on a case-by-case basis, other VRAs where significant changes are proposed to the PI, e.g. in case of the addition of a new target species for non-food producing animals (see section 4.1).

The pre-opinion review of the EN PI generally consists of two steps: a review by the Agency in the first phase of the assessment procedure and a review by the Agency and the Member States during the second phase of the assessment procedure (for timelines, see Annex I).

At submission of the dossier and during assessment, only the English language version of the PI is required to be submitted. All presentations should be included in a single word file. Applicants may provide a combined Summary of Product Characteristics (SPC) and package leaflet text for different strengths of the same pharmaceutical form, if appropriate. Different pack sizes of the same strength can be presented in one labelling text. Further details on the presentation of PI text are available in a guidance document prepared by the Agency's Quality Review of Documents (QRD) group (QRD veterinary product information - annotated template (English)).

For variations, the marketing authorisation holder (MAH) should provide the full English PI (even if only some presentations are affected by the variation), indicating in tracked changes all the proposed changes to the approved PI.

During the first phase of the assessment, the Agency will review the EN PI in regard to its compliance with the QRD Convention (e.g. format, layout, margins) and QRD template as published on the Agency's website. The Agency's comments will be combined with the comments on the PI made by the rapporteurs / CVMP and a single set of comments on the PI will be sent to the applicant as part of the CVMP list of questions.

All comments are to be taken into account by the applicant/MAH when submitting the revised EN PI as part of the answers to the CVMP list of questions. If the applicant/MAH does not agree with a

[1] Annex I Summary of Product Characteristics (SPC), Annex II Other conditions and requirements of the marketing authorisation, Annex III Labelling & Package Leaflet and Annex IV (when applicable)

comment, a brief justification should be provided for this within the revised PI (if necessary, e.g. due to space restrictions in the PI, this may be further explained within the overall response document).

At the start of the second phase of the assessment procedure, the Agency will forward the revised EN PI to all EU Member States (QRD members) for comments within a given timeline, i.e. by Day 140 (initial applications) or Day 69 (variations), respectively.

Member States will review the PI in regard to its compliance with QRD recommendations, but might also address other linguistic topics. These Member State comments (QRD comments) will be combined with the comments on the PI made by the rapporteurs / CVMP and a single set of comments will be sent to the applicant/MAH at Day 180 (initial applications) or Day 83 (variations), respectively (see Annex I).

When the applicant/MAH provides another amended EN PI (e.g. in response to further comments by the CVMP, in preparation of an oral explanation or before adoption of the final opinion), this PI will not be subject to any further formal review. However, if applicable, the applicant/MAH should still justify if and why certain comments were not taken into account. The Agency will check if all the comments have been implemented before the opinion is adopted. Prior to the opinion, there might be the need for closer liaison between the applicant/MAH, CVMP and the Agency at short notice in order to conclude on final wording of the PI before adoption of an opinion.

# 3. Post-opinion linguistic review for initial marketing authorisation applications

Following the adoption of a positive CVMP opinion, applicants will provide translations of the final EN PI to the Agency at the latest 5 days after the CVMP opinion (Day +5).

Translations of the adopted EN PI are to be provided in all other EU languages plus Icelandic and Norwegian. In view of the short timeframe for finalisation of the translations and in order to optimise the quality of the translations, applicants are strongly advised to initiate the translation process well in advance of the opinion (e.g. for initial applications after Day 180).

Applicants will send via Eudralink the translations together with the QRD form 1 to the Agency (qrd@ema.europa.eu) and the Agency will forward these translations to Member States (QRD members). The Eudralink package should be presented in compliance with the Day +5 Checklist.

The following checks will apply:

| Who | When | Scope |
|---|---|---|
| Member States (QRD members) | Day +5 to Day +19 | Detailed review of all translations |
| Agency | Day +25 to Day +27 | Review of implementation of Member States comments |

Each translation will be subject to one Member State's linguistic review, co-ordinated by the national QRD member. QRD members will send their comments directly to the applicant with a copy to the Agency (Product Shared Mailbox) at the latest by Day +19 together with an overall feedback on the quality of the translations indicated in the QRD form 1.

The applicant will send the final translations with tracked changes, incorporating Member States' comments in Word format[2], as well as in clean Word and PDF format (see also User guide on how to generate PDF versions of the product information – veterinary) together with the QRD form 2 to the Agency (qrd@ema.europa.eu), with a copy to the Product Shared Mailbox by Day +25. The Eudralink package should be presented in compliance with the Checklist appended to the QRD form 2. For initial applications containing a new active substance, the applicant will also be asked to provide translations of the name of the active substance in all the EU languages (plus Latin, if used for labelling purposes), in a tabulated format ('INN table').

The Agency will check that all Member States' comments have been implemented before sending the final translations to the European Commission. In order to facilitate and accelerate this check of the implementation of the Member States' comments, the applicant should submit the QRD form 2 where they indicate for each language if all comments have been implemented.

Where comments have not been fully implemented, the applicant should provide a justification for the appropriate language(s) stating why certain comments are not reflected in the final texts. It is expected that alternative proposals should be discussed and agreed with the relevant Member State(s) before submitting final translations to the Agency. Only those areas where no such agreement was reached should be addressed in the QRD form 2, or comments that might require further follow-up (e.g. where errors were noted in the EN language version and although corrected in one language, they might require an update of several translations).

Poor quality translations or a poor implementation of Member States' comments or absence of a completed QRD form 2 may lead to a delay in transmission to the European Commission (see also section 7).

Following receipt of the final translations from the Agency, the European Commission will start the Standing Committee consultation, addressing only legal and public health matters (which means in principle no further linguistic review).

# 4. The linguistic review process for post-authorisation procedures

Detailed practical information regarding PI submission is available under Post-Authorisation Guidance on the Agency's website.

In general, at the time of submission of a post-authorisation procedure application, only the EN PI needs to be provided by the MAH, indicating in tracked changes all the proposed changes to the PI.

## *4.1. Variations*

### 4.1.1. Variations not requiring assessment (VNRAs)

In general, VNRAs do not affect the product information, and a linguistic review is therefore not foreseen.

However, in those situations where the PI is affected, translations of the PI in all languages will be provided at submission of the variation, but will not be further reviewed. The MAH is responsible for ensuring the correct implementation of the translations.

[2] Word documents to be submitted in Microsoft Word 2007 file version ( '.docx' files)

### 4.1.2. Variations requiring assessment (VRAs)

Not all VRAs affect the product information; however, if changes to the PI are introduced by the variation a linguistic review might be necessary.

In cases where the VRA introduces substantial changes to the PI (e.g. addition of a new target species, strength, pharmaceutical form), a pre-opinion review might be required and the same principles as for new applications will apply (see section 2).

For the post-opinion review the following principles apply:

- *Variations with a reduced timetable for assessment (VRA-R)*: in general, VRA-R will not or only minimally affect the product information, and a post-opinion linguistic review is therefore not foreseen. However, there might be cases where the PI is affected, and a post-opinion linguistic review might be required (e.g. G.I.19 variation). MAHs should note that for such variations special submission dates will apply (see 'VRA-R with linguistic review/monthly submissions' as published on the Agency website).
- *Variations with a standard timetable for assessment (VRA-S)*: a considerable proportion of the VRA-S affect the product information and in certain situations a post-opinion linguistic review is needed. Whilst there is no general rule that defines these variations, it is expected that such linguistic reviews might be applied to variations with substantial PI changes such as safety and/or efficacy-related VRA-S or those variations directly submitted to change the PI (e.g. G.I.1 b), G.I.3 a), G.I.4, G.I.5, G.I.6 b), G.I.18)
- *Variations with an extended timetable for assessment (VRA-E)*: in general, all VRA-E affect the product information and a post-opinion linguistic review is usually required.

Regardless of the timetable, if the PI is affected by the respective VRA, at the time of submission of the application a revised full set of annexes (SPC, Annex II, labelling and package leaflet) should be provided in English. This EN PI should be submitted as clean and highlighted version, the latter clearly showing all proposed amendments in tracked changes.

In those cases where a post-opinion linguistic review **is not** necessary (e.g. when the changes only concern deletion of text or a change to numerical characters), final translations of the PI in all languages[3] should be provided by the MAH to the Agency at the latest 5 days after the CVMP opinion (Day +5), and these will not be further reviewed by Member States. The MAH is responsible for ensuring the correct implementation of the translations.

In those cases where a post-opinion linguistic review **is** necessary, the MAH will be informed by the Agency about this, together with the timelines of the review in the communication with the opinion, and the same rules and steps as outlined above for initial applications will apply (see section 3), with the following exceptions:

- The MAH will send the translations of the adopted EN PI in all languages directly to the Member states contact points for translations review[4] by Day +5 with a copy to the Agency.
- The post-opinion review will only focus on the sections of the PI that are affected by the variation, and the MAH should therefore ensure to provide the Member States with a language version that clearly indicates the changes made in tracked changes.

[3]All EU languages plus Icelandic and Norwegian
[4] Not applicable for VRA-I, which will be submitted to grd@ema.europa.eu. The applicant should strictly follow the translations timetable steps for correct submission of translations.

### 4.1.3. Grouping of variations

MAHs may choose to group the submission of several variations affecting the same marketing authorisation. If any of the variations will need a linguistic review, the same post-opinion timelines will also apply to variations not affecting the PI, e.g. a grouped variation of a VRA-R not affecting the PI and VRA-S with PI changes will follow the review timelines for the VRA-S.

For grouping of multiple VRA-Rs where only one variation requires a linguistic review, the submission dates for VRA-R requiring linguistic review (as published on the Agency website) will apply.

For grouping of VRA-R with VRA-S or VRA-E, the grouped VRA will be processed according to the longest timetable applicable, i.e. to a standard or extended timetable and should follow the applicable submission date. To note: VRA-E under category I of the EMA/CMDv Guidance on the details of the classification of variations requiring assessment should not be grouped with non-I-variations.

### 4.1.4. Worksharing variations (including at least one centrally authorised product)

MAHs may choose to submit the same variation, or the same group of variations affecting several authorised veterinary medicinal products, which might not only include centrally authorised products (CAPs), but also nationally authorised products from the same MAH in one submission.

At submission, for all the veterinary medicinal products involved in the worksharing procedure, the EN PIs in tracked changes are to be provided.

However, considering that the same change(s) should in principle apply to all CAPs involved in the worksharing submission, the linguistic review, if required, will only be performed on **one** set of annexes of **one** CAP; if the changes differ for the products involved in the worksharing procedure, the linguistic review will be performed on the product containing the most changes.

For the post-opinion linguistic review, only **one** set of translations in all EU languages plus NO and IS for **one CAP** is to be provided to the Member states contact points for translations review by Day +5 with copy to the Agency, and each translation will be subject to one Member State's linguistic review as for other variations.

Upon finalisation of the linguistic review, it is the MAH's responsibility to correctly implement the same amendments for all the other veterinary medicinal products, as appropriate. The MAH will send the final translations of **all veterinary medicinal products** involved in the worksharing procedure in tracked changes to the Agency by Day +25, and the same rules and steps as outlined above for initial applications will apply (see section 3).

## *4.2. Re-examinations of marketing authorisations under exceptional circumstances or for a limited market*

In case the re-examination of a marketing authorisation under exceptional circumstances or for a limited market affects the SPC, Annex II, labelling and/or package leaflet, a review of the EN PI is usually required.

During the scientific assessment, a detailed pre-opinion review of the EN PI might be performed by the Agency and Member States (see section 2).

For the post-opinion linguistic review, the same principles as for variations requiring assessment will apply (see section 4.1.2).

### *4.3. Referral procedures*

For CAPs involved in referral procedures, the CVMP opinion will contain the SPC, labelling and package leaflet. Therefore, the same general principles as for the post-opinion linguistic review of variations requiring assessment will apply (see section 4.1.2).

In general, no linguistic review is performed for nationally authorised products involved in referral procedures. Exceptions would be veterinary medicinal products subject to a procedure under Article 70(11) of Regulation (EU) 2019/6 resulting in the harmonisation of the SPC or products for which substantial changes to the PI have been proposed following a Union interest referral based on Article 129(3), i.e. after imposing temporary safety restrictions. For these products, the same general principles as for the post-opinion linguistic review of variations requiring assessment will apply (see section 4.1.2).

# 5. Generic, hybrid and informed consent new applications

For **generic and hybrid applications**, there are some particular steps regarding the PI and the linguistic review, as explained below.

At submission, the applicant should provide an EN PI version. The PI of the generic and hybrid application shall be essentially similar to the reference veterinary medicinal product, apart from specific sections of the PI (e.g. quality part) that may differ[5] from the reference medicinal product. The current QRD veterinary product information template should be applied to the generic or hybrid application as far as possible and any other relevant CVMP guidance should be taken into account, e.g. Q&As on describing adverse events in the PI (EMA/CVMP/150343/2016-Rev.3), Q&As on the SPC GL for antimicrobials – clinical breakpoints in the generic SPC (EMA/CVMP/AWP/933465/2022). A pre-opinion review is not required for generic and hybrid applications.

For the post-opinion linguistic review**,** when applicable, the same general principles as for an initial marketing authorisation application apply, with the following exceptions:

- Together with the adopted EN PI and the translations in all languages submitted at Day +5, the applicant will also provide the EN PI showing in tracked changes the differences between the PI of the reference medicinal product and the new generic/hybrid product.
- If the PI of the reference medicinal product has recently been modified, the Agency will liaise with the applicant to facilitate the provision of the latest version of the translations. For example, the Agency may send the reference product PI translations validated by the Member States to the applicant of the generic/hybrid medicinal product.

For **informed consent applications**, no pre- or post-opinion linguistic review will be required, and the MAH will be responsible for ensuring compliance of the translations with the respective linguistic version(s) of the reference medicinal product.

[5] In summary, the SPC of a generic shall be essentially similar to that of the reference veterinary medicinal product, except for those parts of the SPC of the reference veterinary medicinal product that are still covered by patent law or potentially for cases when the CVMP's assessment of the quality data, bibliographic information on antimicrobial/antiparasitic resistance, data on local residues and target animal tolerance at the administration site (if relevant) or the outcome of the environmental risk assessment for generic MAAs could result in deviations in SPC content, compared to the reference veterinary medicinal product

# 6. The linguistic review process for small and medium-sized enterprises (SMEs) new applications

For the pre-opinion review, the same general principles as for the pre-opinion review of initial applications apply (see section 2).

For the post-opinion linguistic review, the same general principles as for an initial marketing authorisation application apply (see section 3), with the following exceptions:

- The SME applicant will provide **only** the English, Norwegian and Icelandic PI translations, together with the QRD form 1 to the Agency.
- For **all other EU languages**, as part of the incentives offered to SMEs according to Article 11 of Regulation (EC) No 2049/2005, the Centre de Traduction (CdT) will provide translations of the adopted EN PI, on behalf of the SME applicant[6]. The Agency will coordinate the linguistic review between the Member States and the CdT.

Upon request, the SME applicant can take over the responsibility for the translation of certain EU languages and/or request the opportunity to comment on certain EU languages during the Member States review.

# 7. Implementation and follow-up

Since the process is based on a single linguistic review of the translations and especially since specific timeframes are set, a full commitment from all parties involved is required. In particular, applicants/MAHs will have to commit to providing good quality translations and to comply with Member States' comments. If a translation is considered to be of unacceptably poor quality, the Member State concerned should inform the applicant/MAH and the Agency within 3 days of receipt of the translation. The transmission to the European Commission will be delayed until receipt of the amended translation (which would be expected to arrive within 1 week).

Applicants/MAHs are also strongly advised to liaise directly with the Member States in case of disagreement with any of the comments made or in cases where further clarification on some comments is required. Where comments have not been fully implemented, the applicant/MAH should provide a justification for the appropriate language(s) stating why certain comments are not reflected in the final texts. It is expected that alternative proposals should be discussed and agreed with the relevant Member State(s) before submitting final translations to the Agency. Only those areas where no such agreement was reached should be addressed in the QRD form 2, or comments that might require further follow-up (e.g. where errors were noted in the EN language version and although corrected in one language, they might require an update of several translations).

Poor quality translations or a poor implementation of Member States' comments or absence of a completed QRD form 2 may lead to a delay in transmission to the European Commission.

In addition, applicants/MAHs are reminded that product information should be presented in strict compliance with the QRD Convention (e.g. format, layout, margins) and the User guide on the preparation of PDF versions of the product information.

The Agency will monitor the quality of the translations, the review by the Member States and applicants/MAHs' compliance with Member States' comments as part of the Key Performance Indicators.

[6] The SME incentive only applies to new applications, for post-authorisation procedures the general principles apply

# 8. Reference documents

Agency Linguistic review webpage:
https://www.ema.europa.eu/en/veterinary-regulatory/marketing-authorisation/product-information/linguistic-review

Agency Post-Authorisation Guidance webpage:
https://www.ema.europa.eu/en/veterinary-regulatory/post-authorisation-veterinary-medicines

QRD Convention:
https://www.ema.europa.eu/documents/regulatory-procedural-guideline/quality-review-documents-qrd-convention-be-followed-european-medicines-agency-qrd-templates_en.pdf

QRD Form 1 - veterinary:
https://www.ema.europa.eu/documents/template-form/qrd-form-1-veterinary_en.docx

Checklist for the submission of day +5 translations for a post-opinion linguistic review – veterinary:
https://www.ema.europa.eu/documents/template-form/checklist-submission-day-5-translations-post-opinion-linguistic-review-veterinary_en.docx

QRD Form 2 and checklist for the submission of day +25 files – veterinary:
https://www.ema.europa.eu/documents/template-form/qrd-form-2-checklist-submission-day-25-files-veterinary_en.docx

QRD Veterinary Product Information Templates:
https://www.ema.europa.eu/en/veterinary-regulatory/marketing-authorisation/product-information/veterinary-product-information-templates

QRD Veterinary Product Information - annotated Template (English) :
https://www.ema.europa.eu/documents/template-form/qrd-veterinary-product-information-annotated-template-english-version-90_en.pdf

List of Member States Contact Points for Translations (with guidance on the sending of product information to Member States):
https://www.ema.europa.eu/documents/regulatory-procedural-guideline/member-states-contact-points-translations-review_en.pdf

QRD Reference Documents (on terminology and style):
https://www.ema.europa.eu/en/veterinary-regulatory/marketing-authorisation/product-information/product-information-reference-documents-guidelines

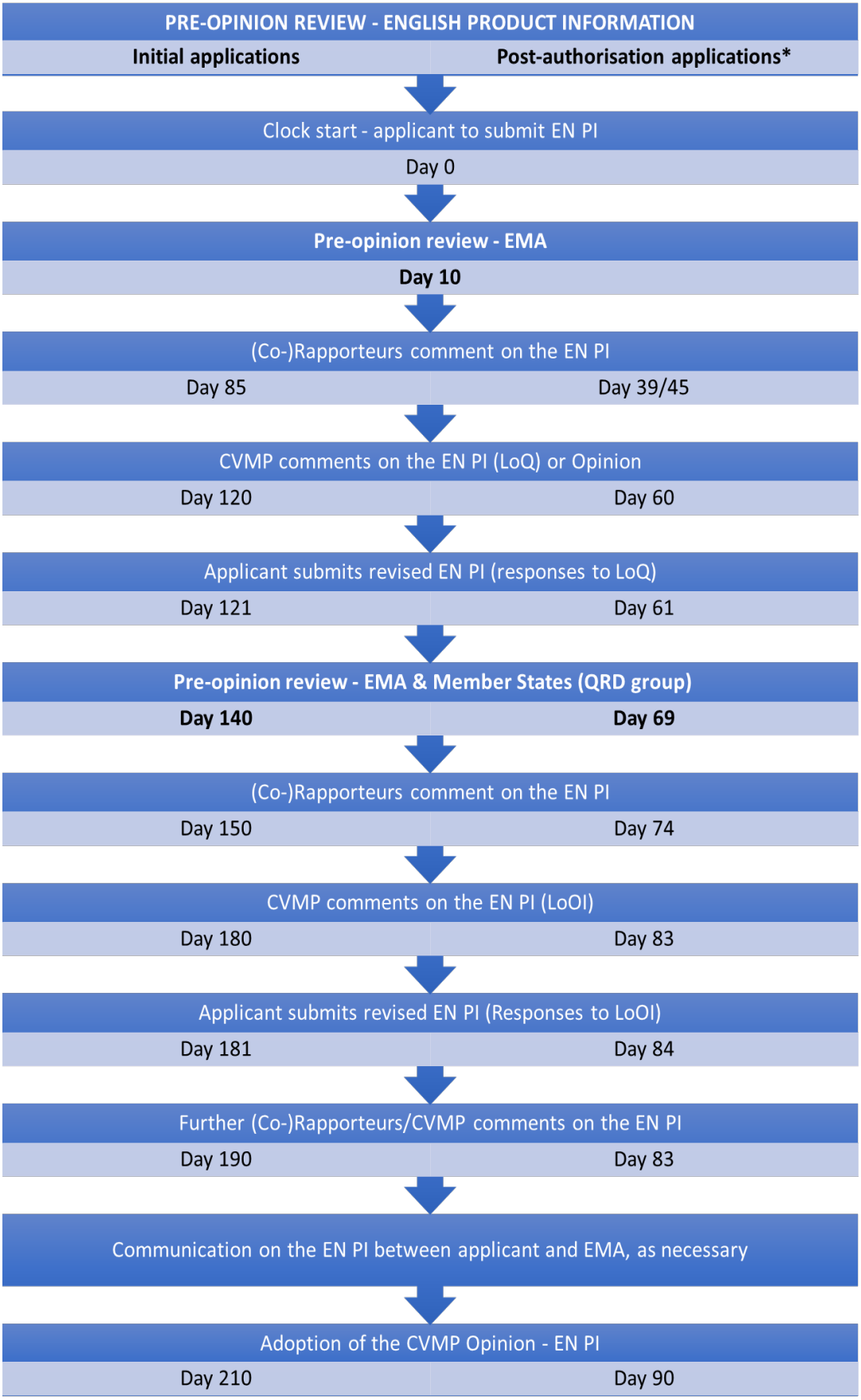
Relevant Veterinary Guidelines (e.g. CVMP Guidelines) and QRD veterinary reference documents:
https://www.ema.europa.eu/en/veterinary-regulatory/marketing-authorisation/product-information/product-information-reference-documents-guidelines

Regulation (EU) 2019/6 of the European Parliament and of the Council on veterinary medicinal products:
https://eur-lex.europa.eu/eli/reg/2019/6/oj

EMA/CMDv Guidance on the details of the classification of variations requiring assessment according to Article 62 of Regulation (EU) 2019/6 for veterinary medicinal products and on the documentation to be submitted pursuant to those variations:
https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/guidance-details-classification-variations-requiring-assessment-according-article-62-regulation-eu/6-veterinary-medicinal-products-documentation-be-submitted-pursuant-those-variations_en.pdf

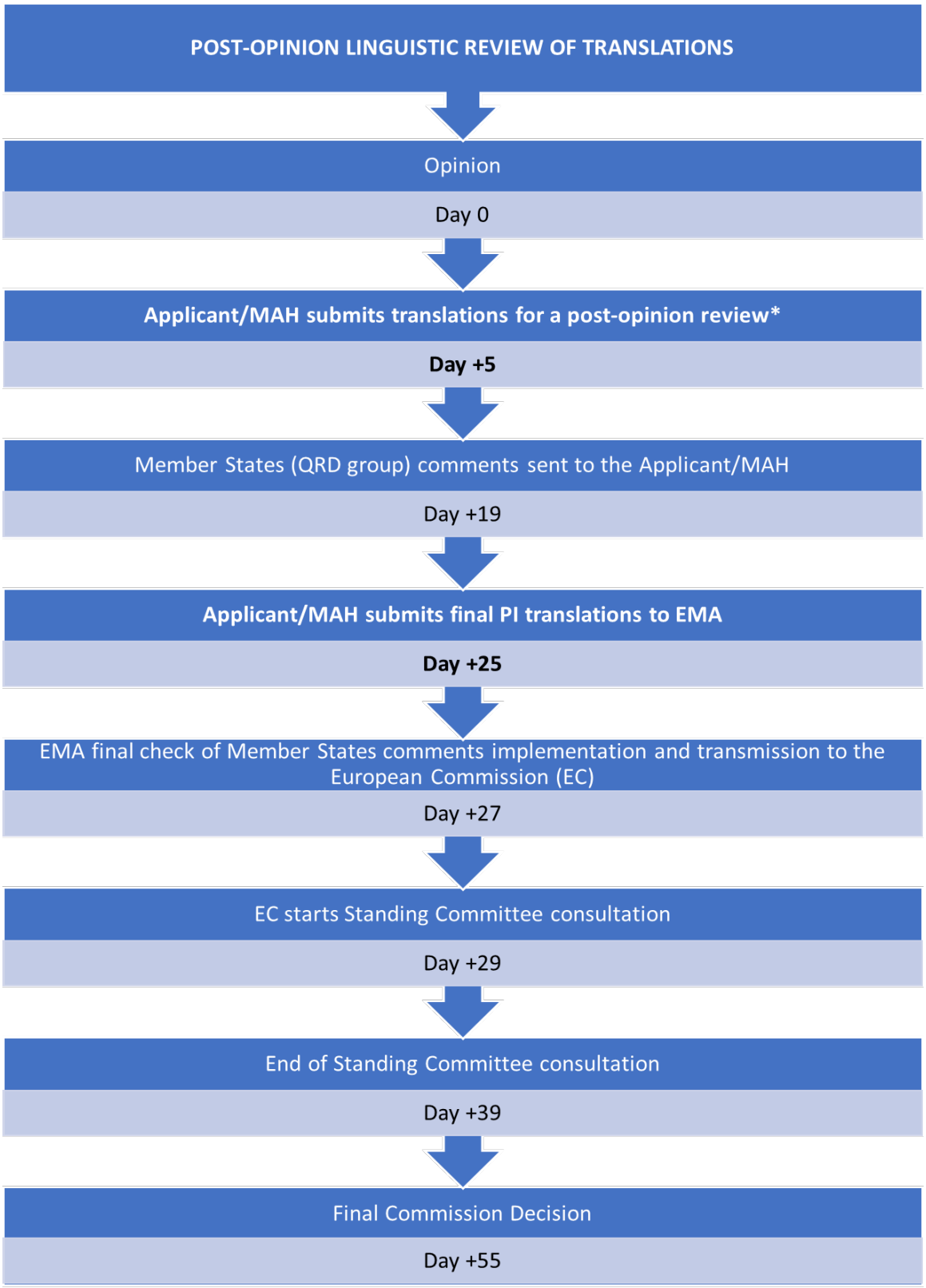
User guide on how to generate PDF versions of the product information – veterinary: https://www.ema.europa.eu/documents/regulatory-procedural-guideline/user-guide-how-generate-pdf-versions-product-information-veterinary_en.pdf

## *Annex I: Pre-opinion review timelines (EN PI only)*




*where applicable

## *Annex II: Post-opinion linguistic review timelines (translations)*




* For initial applications and VRA-I the applicant/MAH sends translations to the EMA only (grd@ema.europa.eu); for all other post-authorisation procedures the MAH sends translations directly to the Member States contact points for translations