PSUR Repository – Interactive Q&A

Interactive Q&A session with MAHs on the new functionality provided in release 1.04.00

Presented by Kristiina Puusaari on 28 October 2015

Outline of Today's Q&A session

- PSUR Repository background and latest news

- Release v1.04.00 – main changes

- Release v1.05.00 – sneak preview

- Q&A

- Support and Guidance

- Contact information and useful links

PSUR Repository background and latest news

- As per the Article 107b paragraph 1 and Article 28(2) regulation 726/2004) all PSUR procedures shall be submitted **electronically**. Accepted formats are eCTD and NeeS.

- **xml delivery files must be used for all PSUR and PSUR supplementary information submissions from 1 September 2015**, it is no longer possible to use filenaming conventions to send PSURs and supplementary information sequences related to PSURs

- During transitional period it is strongly recommended to submit to the PSUR repository to ensure that all MAHs are familiar with the system

- Phased implementation allowing both MAHs and NCAs get used to the system – simulated mandatory use anticipated from early 2016 for EU Single Assessment procedures

- The use of the PSUR Repository will become **mandatory for all PSURs from June 2016** after which the PSURs should only be submitted to the repository via eSubmission Gateway/Web Client.

- MAHs access to the PSUR Repository is limited to the access to create delivery files for submissions

Release v1.04.00 – summary of main changes

- Major change to the product selection functionality – only products containing the relevant active substance(s) are displayed in the product selection window

  - Limits the available products to those in scope

  - No more 'product short name' search for EU PSUR Single Assessment

  - Removing limitations for Generic products

  - Removing limitations for product search due to language differences

- Ability to indicate 'associated' submissions – i.e. to be used when one single PSUR covers multiple products with individual eCTD lifecycles. This functionality allows 'deduplication' of submissions for NCA reviewers

- Addition of MAH contact email address (new mandatory field)

Release v1.05.00 – sneak preview to main changes

- Mainly changes to NCAs – very little impact to MAHs apart from defect fixes:

  - API – allows automated retrieval of PSURs from the Repository by the NCAs

  - Improved notifications and workflow support – post-audit functionalities (for NCAs)

  - Other notifications related functionality

MAHs access to PSUR Repository

Do MAHs have access to the PSUR Repository?

- The MAH access to PSUR Repository is limited to the create delivery file screen

Is EMA providing any portal or link for MAH to check upcoming MAH submissions?

- There are no plans to create a portal access for MAHs at the moment.

- Upcoming deadlines and submissions can be currently checked from EURD list.

Can response to PRAC recommendation be submitted as supplementary information?

- Any PSUR related submission after the initial PSUR submission for which a 'success acknowledgement' has been received should be submitted as 'supplementary information'

- This includes all follow up sequences from the MAHs, such as responses, comments, supplementary information etc.

- This does not include updated product information (PI) which is requested after the PRAC adoption, this is currently provided via Eudralink and there is no change to this practice.

Is my product included in CAP/NAP or NAP/NAP PSUSA procedure?

- This information is available in the EURD list, if you look at the 2 last columns on the right hand side of the table you can see columns called CAP and NAP.

- If the column for CAP is empty, as in the top row of the example, your procedure is NAP/NAP

- If both columns are filled, as the middle row in the example, your procedure is mixed CAP/NAP and finally if only CAP field is filled, your procedure contains only CAPs

List of Union reference dates and frequency of submission of periodic safety update reports (PSURs)

Related Information:
Introductory cover note to the List of European Union reference dates   http://www.ema.europa.eu/docs/en_GB/document_library/Other/2012/10/WC500133157.pdf
Requests for amendments of the EU reference dates list   http://www.ema.europa.eu/docs/en_GB/document_library/Template_or_form/2012/10/WC500133160.xls
The PSUR assessment procedure will start according to the Timetables   http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/docu
Single Assessment Reports of PSURs are shared among all Marketing Authorisation Holders involved in the concerned procedure.

Active substances and combinations of active substances	European Union reference date (EURD) Not Available* = EURD not provided during the consultation phases	PSUR Submission Frequency	DLP	Submission date (According to the timelines defined in GVP Module VII, Section A)	Are PSURs required for products referred to in Articles 10(1), 10a, 14, 16a of Directive 2001/83/EC as amended? Yes/No	Publication Date (in accordance with Article 107(7) of Directive 2001/83/EC as amended)	Notes	Procedure number of the PSUR single assessment (DLP)	PRAC representative of the PSUR single assessment procedure	(Lead) Member State of the PSUR single assessment procedure	Centrally authorised product(s) (CAP)	Nationally authorised product(s) (NAP)
nitrendipine	31/03/1985	3 years	31/03/2015	29/06/2015	No	01/10/2012	PRAC Rapporteur name updated on 30/09/2015 Lead MS was added on 06/03/2015	PSUSA/00002171/201503	Jan Neuhauser	Austria		NAP
nitric oxide	01/08/2001	1 Year	23/06/2015	01/09/2015	Yes	06/10/2015	PSUR Frequency and Next DLP was amended on 30/09/2015. Next DLP was amended on 06/03/2015	PSUSA/00002172/201506	Julie Williams	United Kingdom	CAP	NAP
nivolumab	04/09/2014	6 months	03/07/2015	11/09/2015	No	06/10/2015	New CAP authorised on 19/06/2015	PSUSA/00010379/201507	Brigitte Keller-Stanislawski	Germany	CAP	

To whom I need to submit my PSUR prior to mandatory use (1/3)

- There is **no change** to the existing submission rules for submissions to NCAs during the transitional period – both, pure single NAPs and products included in the EU PSUR Single Assessment (PSUSA) procedure

- Submission to PSUR Repository is strongly recommended for all PSURs and supplementary information, responses etc.

- The PRAC Representatives are appointed by the PRAC

Centrally Authorised Products (CAPs):

- To the European Medicines Agency – **mandatory** submission through eSubmission Gateway/ Web Client **including XML delivery file** created in the PSUR Repository user interface

- All CAP submissions are automatically available to all PRAC members – no additional submissions to any NCAs or PRAC member/experts are no longer required

- Check requirements from updated CAP Dossier Requirements document

To whom I need to submit my PSUR prior to mandatory use (2/3)

<u>NAPs incl. products authorised via Mutual Recognition Procedure (MRP), Decentralised Procedure (DCP) and National products:</u>

<u>Mixed CAP/NAP PSUSA procedure</u>:

- To all Member States in which the medicinal product has been authorised <u>submission requirements for PSURs</u> (i.e. via CESP or CD/DVD)

- To the PRAC Representative i.e. the person named in the EURD list. The submissions should be sent as per the <u>submission requirements for PSURs</u> (i.e. via CESP or CD/DVD)

- Additionally to the European Medicines Agency – submission through eSubmission Gateway/ Web Client including XML delivery file created in the <u>PSUR Repository user interface</u>. Optional, but **strongly recommended** before the mandatory use

Note: Pure, single NAPs (products for which the active substance has been authorised in just one member state) are outside the PSUSA procedure and are not covered by these submission rules!

To whom I need to submit my PSUR prior to mandatory use (3/3)

NAPs incl. products authorised via Mutual Recognition Procedure (MRP), Decentralised Procedure (DCP) and National products:

NAP/NAP PSUSA procedure:

- To all Member States in which the medicinal product has been authorised submission requirements for PSURs (i.e. via CESP or CD/DVD)

- To the Lead Member State appointed (by CMDh) for the procedure (even if the product is not authorised in that Member State) submission requirements for PSURs (i.e. via CESP or CD/DVD). There is **no** need to submit to the PRAC Representative even though the name is mentioned in the EURD list.

- Additionally to the European Medicines Agency – submission through eSubmission Gateway/ Web Client including XML delivery file created in the PSUR Repository user interface. Optional, but **strongly recommended** before the mandatory use

Note: Pure, single NAPs (products for which the active substance has been authorised in just one member state) are outside the PSUSA procedure and are not covered by these submission rules!

Please provide clarity on dispatch of MRP submission to PRAC? When we should send to PRAC rapporteur? Whether All PRAC Rapporteurs have access to PSUR repository?

- All submissions for PSUSA procedures containing CAPs, either single CAPs or mixed CAP/NAP procedures must be submitted to the PRAC Representative.

- All CAPs must be submitted using the xml delivery file via eSubmission Gateway / Web Client and all CAP submissions are then automatically available to all PRAC members via the Common Repository and the PSUR Repository.

- All NAPs included in a mixed CAP/NAP PSUSA procedure must be submitted to the PRAC Representative according to the NCA requirements via CESP or CD/DVD before the submission deadline.

- All PRAC Representatives have access to the repository but this does not negate the transitional period requirement to submit directly to the NCAs.

- Products included in a NAP/NAP procedure do not need to be submitted to the PRAC Representative as they are managed by the **Lead Member State** appointed by the **CMDh**

Can we submit to the member state of PRAC rapporteur via CESP?

- Yes, all NAPs included in a mixed CAP/NAP PSUSA procedure must be submitted to the PRAC Representative according to the NCA requirements via CESP or CD/DVD before the submission deadline.
- If the procedure does not contain any CAPs i.e. is a NAP only procedure there is no need to submit to the PRAC Representative even though their name is mentioned in the EURD list.

Does NAP/NAP mean that the product is registered via national procedure only by all MAHs?

- By NAP/NAP we mean procedures that contain only NAPs (incl. MRP/DCP) i.e. there are no Centrally Authorised Products included in the procedure

Regarding 'always submit to the NCA' - I presume this is only until June 2016

- Yes, once the mandatory use starts on 13 June 2016 there should be **no** submissions to the NCAs. All PSURs should be submitted to PSUR Repository only.

Why do we have to send all sequences to the PSUR Repository when a PSUR included in a single assessment is covering multiple products that have different registration type (and therefore format and/or lifecycle)? The main document, i.e. the PSUR, will be exactly the same across all sequences so why send it multiple times? (I assume the EMA is not hosting the NAP lifecycle, and even less if the submission is in Nees format)?

- The submissions to the PSUR Repository are not for the benefit of the EMA alone. It is correct, the EMA does not hold the NAP product lifecycles, however, the reason for the PSUR Repository is not the EMA – the repository will replace all individual PSUR submissions to all NCAs and once the use of the repository is mandatory the only source of the PSURs is the Repository. All NCAs will in future retrieve all PSURs, including NAP PSURs, from the repository only. If they do not have access to their own, relevant lifecycle sequences in the repository it might break the product lifecycle.
- To reduce the number of duplicate submissions we encourage the MAHs to harmonise the product lifecycles across all products.
- Grouping of associated submissions will indicate to the NCAs that certain submissions contain the same documents reducing the NCA workload as they will not need to download all submissions but only those that are relevant to them and they can easily see that other submissions contain the exactly the same document if the grouping has been used correctly.

- It is the **responsibility of each MAH** to ensure that their product date is up to date in Art. 57 – this should be done **well in advance of any PSUSA procedure** and must be done **prior** to the procedure Data Lock Point (**DLP**).

- Known defect affecting products for which the product information is incorrect in the Art. 57 database at the time of the DLP – once this defect is fixed all updates to product information in Art. 57 database will be reflected once the Art. 57 and the PSUR Repository are synchronised overnight. Number of procedures are complex and the product list will be presented through a pre-generated list – any changes to these products require an ad hoc request to EMA well in advance of the submission deadline

- Known defect showing both deleted/transferred products/licences and current licences is yet to be fixed – you will not be charged a fee for the deleted products even if they are selected in the repository delivery file.

What happens if one or more of the products are missing from the PSUR Repository interface and I can create a delivery file with only some of the products

- It is important to select all products, as listed in the Annex I, from the PSUR Repository interface. Please ensure that Art. 57 database is up to date at all times (especially important when the DLP is approaching) and check the available products well in advance before the submission deadline so you have sufficient time to contact EMA and if necessary update Art. 57 if your products are missing/incorrect in Art. 57. This should be done ideally before the receipt of the advice note and before the procedure DLP to ensure that the products are included in the procedure scope.

- Occasionally some products might not be available regardless of the best efforts of the MAH and the EMA and you might be advised by the EMA (PSUR Repository team) to select only the available products and indicate in the cover letter (if still possible to change it) that some products are missing due to a technical issue. If you are unable to update the cover letter as you have already submitted to the relevant NCAs do not worry – PSUR Repository colleagues will inform the product team incl. PRAC Representative/Lead Member state of the technical issue so that they can include the missing products in the procedure scope. Please ensure that you can provide proof of the submission (CESP receipt) to the relevant NCAs.

What if all the products that the PSUR is covering are missing from the PSUR Repository interface and I am unable to create a delivery file for my submission

- Contact EMA via PSURrepository@ema.europa.eu as soon as possible (product listing becomes available in the PSUR Repository after the Data Lock Point (DLP)) so that we can investigate why the products are missing.

- In **majority** of cases this is due to **incorrect legal basis in Art. 57 database**. It is the legal requirement of the MAHs to keep the Art. 57 database up to date and ensure that the products have correct legal basis in the database. Known defect affecting the normal 24 hours synchronisation cycle – normally once the Art. 57 is updated the products will become available through the PSUR Repository over night for majority of products. Occasionally for complex procedures this might take much longer!

- There is a known defect that is affecting products that have had updates in Art. 57 after the DLP – these products are not available for selection and will require a special workaround solution – if your product is affected, contact EMA as soon as possible.

What if I accidentally forget to add one or more of the products included in my PSUR and I only notice this after I have submitted the package?

- You should contact the EMA procedure assistant/procedure manager to inform that the PSUR covers additional products not listed in the PSUR Repository so that they can ensure that the correct scope is reflected.

What will happen if a product is mistakenly added to the xml file that should not be added?

- As the new version of the system only displays the products linked to the procedure you are now less likely to accidentally select incorrect product, but if this has happened and you only realise after the submission you should contact the EMA procedure assistant/procedure manager to inform them of this error so that they can ensure that the correct scope is reflected.

If you do not know who your procedure assistant is, contact PSURrepository@ema.europa.eu and you will be directed to the correct person!

17

Does the new version of the system allow a single xml for NAP (MRP/DCP) products with different invented names covered by a harmonised eCTD cycle?

Yes, as in the release 1.03 it is possible to select multiple eCTD format submissions for MRP/DCP products with harmonised lifecycle. This is now much easier as you don't need to search for products with 'short name' but you can select all the products from the list displayed for the procedure.

eCTD products with individual lifecycle including CAPs must always be submitted separately but should be associated together with the new group ID functionality.

Do you create 2 delivery files if you have a product where the MRP is in eCTD and the NAPs are in NeeS?

- Yes, you must create 2 delivery files as you can never mix eCTD and NeeS submissions, they must be submitted separately with their own xml delivery files and submission sequences. You should however associate them together using the 'Group ID' if both submissions contain the same PSUR document.

How would you create the zip file when the submission contains multiple sequences with the same number as in your example (2x0000)?

- The zip file should only ever contain a single submission sequence. The example was referring to a scenario where the MAHs might wish to indicate different 'sequences' for different products authorised in different member states. As NeeS format is more flexible is possible to use the same submission sequence as the sequence 0000 for NCA 1 and sequence 0010 for NCA 2.

- If you are including multiple, country specific cover letters in the package you might wish to indicate the different sequences for different NCAs.

For NeeS, how would you create zip file when submission contains several NeeS sequences but only one delivery file?

- The zip file should only ever contain single submission sequence – different sequence numbers can be indicated for NeeS submissions in the single delivery file but as the submission does not contain metadata the same submission can be indicated as sequence 0001 for one NCA and sequence 0008 for another NCA.

Can we group non sequenced (0000) NeeS in one "sequence" in same delivery file or we need to create separate sequences (under same delivery file) per application?

- There is no technical limitation preventing the addition of all non-sequenced products to one 'sequence' in the delivery file and this is by far the easiest and most recommended solution.

- This depends on the preference of the MAH and the NCAs. NCAs have indicated to the EMA that they wish to include the PSURs as part of the product lifecycle, however, they have not expressed a specific wish relating to the non-sequenced NeeS.

If you would like to check the XML file once created the products selected in the product selection function are not shown just the PRD number - why?

- The product short name is displayed in the xml delivery file – however as this concept is no longer used in the product selection it might be more meaningful to display the full product names in the xml.

- This has been raised as a potential change request with the PSUR Repository team and if it is considered a justified CR it will be prioritised by the PSUR Repository Advisory Group (PRAG).

	MAH name	Product full name	Drug ingredient	Country...	Authorisation No...	EM
✔	STADA ARZNEIMITTEL AG	Acutral, (37,5 mg + 325 mg), tabletki powlekane	TRAMADOL HYDROC...	PL	11190	
	STADA ARZNEIMITTEL AG	Acutral Effervescent, (37,5 mg + 325 mg), tabletki m...	PARACETAMOL, TRA...	PL	16460	
✔	APOTEX EUROPE BV	Algopara 37.5 mg/325 mg filmtabletta	TRAMADOL HYDROC...	HU	OGYI-T-22332	PT
	PHARMA-REGIST LTD	Anaki 37,5 mg/325 mg filmtabletta	TRAMADOL HYDROC...	HU	OGYI-T-21155	
	APOTEX EUROPE BV	Apo-Tramadol/Paracetamol 37.5 mg/325 mg	TRAMADOL HYDROC...	CZ	07/089/13-C	PT
✔	APOTEX EUROPE BV	ApoPatram	TRAMADOL HYDROC...	PL	20857	PT
✔	GRÜNENTHAL GMBH	Artason 37.5 mg/325 mg filmsko obložene tablete	PARACETAMOL, TRA...	SI	5363-I-843/12	FR

```
<EU_Periodic_Safety_Update_Report>
- <Product_List>
    <short_name>APOPATRAM</short_name>
    <ema_number/>
    <sequence_number>0000</sequence_number>
  - <Medicinal_Product_List>
    - <Medicinal_Product>
      - <Marketing_Authorisation_Holder>
        - <Organisation_Name>
            <Organisation_Name>APOTEX EUROPE BV</O
          </Organisation_Name>
        </Marketing_Authorisation_Holder>
      - <Medicinal_Product_Identifier>
          <identifier>PRD827023</identifier>
        - <Medicinal_Product_Identifier_Type>
            <identifier_type>AV_NUMBER</identifier_type>
          </Medicinal_Product_Identifier_Type>
        </Medicinal_Product_Identifier>
      - <Marketing_Authorisation_Procedure>
        - <Marketing_Authorisation_Procedure_Type>
            <procedure_type>7</procedure_type>
          </Marketing_Authorisation_Procedure_Type>
        </Marketing_Authorisation_Procedure>
      </Medicinal_Product>
    </Medicinal_Product_List>
  </Product_List>
- <Product_List>
    <short_name>ACUTRAL</short_name>
    <ema_number/>
    <sequence_number>0000</sequence_number>
```

Is there a possibility to see how many countable units have to submit a PSUR to calculate the fee for each MAH?

- For information on PhV fees and the Advice note, please review the section 'Calculating the fee' on the Pharmacovigilance fees payable to the European Medicines Agency website.

- Also view the Q&A on the PhV fees and if you have any specific fee related questions you can submit them to EMA using the EMA Fees Query Form.

Going back to the point about updating Art 57 database; when we were sent the invitation to update the system, we were also sent exported line listings which made checking the information in Art 57 easier. However this information was sent after the DLP. Are there any plans to bring this communication forward to before the DLP?

The MAHs will be receiving the Advice notes on the DLP date. There are no plans to send the Advice note before the DLP.

In some exceptional cases (complex procedures) the MAHs will receive Advice notes within the month of the DLP (after the 15th of the month of the DLP). Even in these cases, the data cut-off will be the DLP date.

It is important to note that in case the data in Art. 57 is erroneous or if the product is not entered promptly in Article 57 (before DLP), the MAHs will miss the opportunity to receive an advice note.

- Following the latest release of the PSUR Repository some defects and issues have been encountered and due to these technical issues there is a number of products missing from the procedure scopes. These issues affect products that have had changes in Art. 57 since the DLP. These defects do not allow the usual refresh of the products in PSUR Repository and hence even if the product was added/updated in Art. 57 it will not appear be in the repository.

- EMA colleagues are working very hard to fix this issue but in the meanwhile ensure that you have made your submission to the NCAs and to the PRAC Representative/lead member state as relevant! The submission to the NCAs is very important and should not be postponed/missed due to issues with the PSUR Repository during the transitional phase.

- You should contact EMA (PSURRepository@ema.europa.eu) to inform of the missing products and you will be given specific instructions regarding your submission.

- Do not submit your PSURs via Eudralink or via email unless you have been advised to do so! Any unexpected PSUR submission via Eudralink or email will be rejected and the PSUR is considered non-submission!

24

What is the grouping of associated submissions and when can I use it?

- If a single PSUR document has been prepared by the MAH covering multiple products that have their own eCTD or mixed eCTD and NeeS lifecycles the MAH can indicate in the delivery file that submissions have same content.

- Multiple different xml delivery files and multiple different packages will still need to be submitted but products can be associated together with a 'group ID'.

- It is optional to use the grouping of associated submissions

Can I associate together multiple eCTD or mixed eCTD and NeeS submissions?

- Yes, it is possible to associate different eCTD format submissions or mixed eCTD and NeeS format submissions together.

Should PSURs for duplicate products be submitted as associated submissions?

- Yes, a duplicate submission is a perfect example of an associated submission. Normally a single PSUR document has been prepared by the MAH covering both products. Due to eCTD lifecycle requirements a separate submission is required for both products however it is now possible to associate these submissions to each other by using the new grouping function.

Will the system detect the different submissions for the same PSUR and assign it the same group id number?

- Unfortunately the system is not able to detect that same document is included in multiple submissions, this must be done by MAH when creating the xml delivery files by associating the submissions to each other using the new grouping function.

When we are creating a "group of associated submissions" can we mix different formats before creating a sequence (i.e. eCTD or NeeS)?

- You can associate submissions in different formats (eCTD and NeeS) to each other but both have to be sent as individual, separate submissions. You must not include eCTD and NeeS submissions within the same submission sequence

- Multiple different xml delivery files and multiple different packages will still need to be submitted but products can be associated together with a 'group ID'.

If I have multiple Nees packages to submit with different sequences do I need to group them? Or is the grouping function mainly for eCTD?

- It is possible to associate NeeS submissions but this functionality would rarely need to be used for grouping of associated NeeS submissions as submissions in NeeS can normally cover multiple different products in the same sequence – it is possible to simply create one single xml delivery file covering all different NeeS products and indicate the sequence number for each different NCA (if needed) in the delivery file. The single delivery file can then be submitted with a single submission sequence. Multiple sequences/packages inside single zip file are not accepted.

If we have multiple associated NeeS sequences how do we create the delivery file? Can we insert all sequences along with the delivery file in the zip file? and if we have NeeS sequences with the same number (e.g. 2x0000) how do we do it?

- You can normally include all NeeS format products in the same delivery file and either have them in one single 'sequence' or you can indicate different 'sequence numbers for different products' in the xml delivery file. You must only include one actual submission sequence in to the package. Alternative approach is to submit multiple separate NeeS submissions.

EUROPEAN MEDICINES AGENCY

Do I use the same xml delivery file to associate submissions together?

- No. You will need to create different xml delivery files for each submission – this can be done by simply removing the 'sequence(s)' from the delivery file – all other information should stay intact. Each xml delivery file and each submission should cover a unique set of products selected from the product list.

- Multiple different xml delivery files and multiple different packages will still need to be submitted but products can be associated together with a 'group ID'.

Can I associate together submissions from 2 different MAHs?

- Yes, it is possible to associate together submissions included in the same procedure from two different MAHs if both submissions include exactly the same PSUR document.

- Both MAHs should indicate the same 'Group ID' when they create the xml delivery files. It is very important that both submissions relate to the same procedure and contain exactly the same PSUR document. One of the MAHs should generate a 'New Group ID' and share the group ID with the other MAH. If both MAHs generate their own Group IDs the submissions will be not associated together.

For products where there is no eCTD lifecycle for a nationally authorised licence but there is an eCTD lifecycle for a different licence, will the submissions be associated, i.e. is one eCTD sufficient or do we need to submit separate NeeS build for the national licence?

- You should always submit to the PSUR Repository exactly the same sequences as you submit to the NCAs – in future you will no longer submit directly to the NCAs but only to the PSUR repository however the NCAs will still need to keep their own product lifecycles and hence require the same submissions to be available through the repository as would have been sent directly to them previously.

- If you have submitted both to NCAs; eCTD for a licence and NeeS for another licence and both include the same PSUR document you should associate these submissions together by using the group ID.

- If these submissions contain different PSUR documents they should not be associated together but both should be submitted via the eSubmission Gateway to the PSUR Repository.

When grouping the associated products, a group ID should be generated again for PSUR Supplemental information (a new one), the one we generated during the PSUR should not be repeated right?

- This is correct. You should only ever associate together the same (identical) document with identical content – never associate the original PSUR and supplementary information submission as these do not contain the same document.

- If you are providing supplementary information, for example responses or MAH comments and you have created a single document covering multiple products, you should associate these products together similar way as PSURs can be associated. It is possible to associate supplementary information even though the PSURs weren't initially associated as this functionality was not available

When NAP submissions to the PSUR Repository become mandatory will there be a requirement for a "Letter of Delegation" (similar to art 31 submissions)?

- If the MAH wishes to provide a letter of Delegation in the submission it is accepted but it is not a requirement at the moment.

When RMP is part of the PSUR submission, will RMP be accepted/rejected. And again how wll the applicant come to know its status?

- RMPs should not be submitted as a part of PSUR submission. The PSUR Single Assessment covers only the PSURs and if an RMP is included in the submission it might be overlooked/ignored and it will not be assessed. This might lead to issues as the RMP submission has not been considered received. We strongly recommend submitting all RMP submissions as separare lifecycle sequences.

- RMPs are allowed to be submitted for some CAP products

Should we use a specific sender ID for the PSUR repository i.e. we should not use the sender ID that we use for non-PSUR applications?

- No, you should use the same senders ID for PSUR submissions as you are using for all other product lifecycle submissions via the eSubmission Gateway. The same Gateway account and user ID should be used for PSUR submissions and all other eSubmissions to EMA – there is no need to create new account for PSURs.

- Do not confuse the 'User ID' with your 'Routing ID'. The user ID is used to log in to the Web Client and has '-admin'. The Routing ID can be found under section 'Technical details' in the registration form.

Technical Details

	TESTING	PRODUCTION
Account Status	ENABLED	ENABLED
Routing ID	ESUBTEMAPSUR	ESUBPEMAPSUR

What should we do if we should submit several packages with the same filename according to annex 3. Should we always contact the PSUR repository before sending the files?

- The filenames are no longer validated for PSUR submissions as the submission **metadata is provided via XML delivery file.**

- The filenaming conventions in Annex 3 are simply examples of potential names, but the most important rule is to give the submission package a **meaningful** name for technical support and archiving purposes.

- It helps if different packages have slightly different filenames – this is particularly useful if multiple packages are sent for same procedure and if one of the submissions fails it will be easier to identify which one of the submissions failed if the filenames are different.

- There is no need to contact the EMA prior sending several packages – sending multiple submissions for same procedure is now possible as the defect relating to this issue was fixed in the August release.

What should we do if we should submit several packages with the same filename according to annex 3. Should we always contact the PSUR repository before sending the files?

- The filenames are no longer validated for PSUR submissions as the submission **metadata is provided via XML delivery file.**

- The filenaming conventions in Annex 3 are simply examples of potential names, but the most important rule is to give the submission package a **meaningful** name for technical support and archiving purposes.

- It helps if different packages have slightly different filenames – this is particularly useful if multiple packages are sent for same procedure and if one of the submissions fails it will be easier to identify which one of the submissions failed if the filenames are different.

- There is no need to contact the EMA prior sending several packages – sending multiple submissions for same procedure is now possible as the defect relating to this issue was fixed in the August release.

- It is no longer necessary to submit packages in sequential order – the defect affecting the submissions has been fixed.
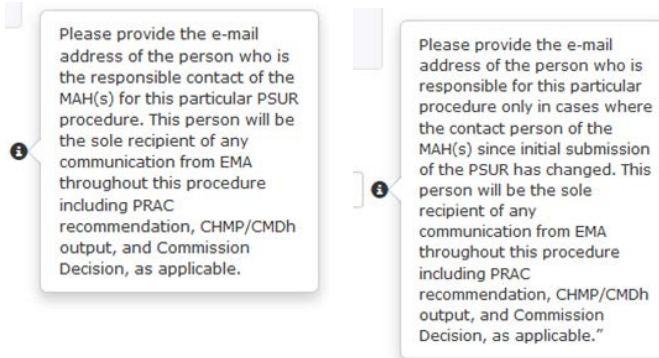
I have missed the submission deadline and I am unable to create an xml delivery file, what can I do?

- Built in business rules prevent the creation of xml delivery file after the submission deadline. This deadline is linked to the EURD list where the deadlines are published

- If you have missed the submission deadline, for any reason, and are unable to create the xml delivery file – contact the EMA (PSURRepository@ema.europa.eu) as soon as possible to check if the product can still be included in the procedure

- In order for EMA to create the xml delivery file for you, please provide:
  - The procedure number (e.g. PSUSA/00001234/201509)
  - Submission format (eCTD or NeeS)
  - The list of product names/presentations/strengths to be included i.e. the Annex I
  - Sequence number(s)
  - Applicant (senders) Routing ID
  - Contact email address

- EMA can prepare a delivery file and provide it to you via email to enable you to make the submission, however this should be an exception – always make sure you have enough time to submit on time before the deadline!

Submission date
(According to the timelines defined in GVP Module VII, Section A)

EUROPEAN MEDICINES AGENCY

What is the way to communicate if the contact person is leaving the company and some other person is taking ownership of the product?

- The contact person details are to be provided in the xml delivery file and these are used for all communication from the EMA.

- The contact person is the MAH responsible person for the procedure – i.e. for example the local affiliate.

- If there are changes to the contact person or to their contact details the MAH should inform the procedure assistant as soon as possible by email – you must not wait for the next submission to provide this information via xml delivery file.

ℹ Please provide the e-mail address of the person who is the responsible contact of the MAH(s) for this particular PSUR procedure. This person will be the sole recipient of any communication from EMA throughout this procedure including PRAC recommendation, CHMP/CMDh output, and Commission Decision, as applicable.

ℹ Please provide the e-mail address of the person who is responsible for this particular procedure only in cases where the contact person of the MAH(s) since initial submission of the PSUR has changed. This person will be the sole recipient of any communication from EMA throughout this procedure including PRAC recommendation, CHMP/CMDh output, and Commission Decision, as applicable."

Regarding the cover letter, are local affiliates able to submit their own cover letters? Or does this mean that the cover letter submitted through the repository should then be circulated locally for all submissions?

- It is possible to include a single common cover letter covering all licences in the submission – there is no need to circulate the cover letters separately. During the transitional period when MAHs are submitting directly to the NCAs they can already start including the multiple cover letters in the submissions or continue making separate submissions to each NCA. It will be good to bear in mind that more harmonised approach will be easier in future when the use of the repository becomes mandatory

- Some MAHs prefer to include both, the local cover letters and common cover letter in the submission – this is also fine and acceptable
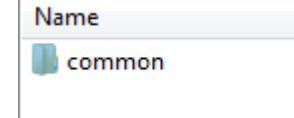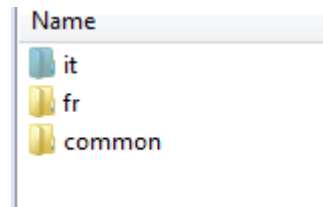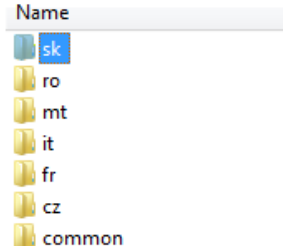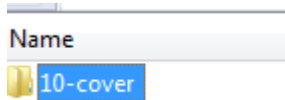
Can I submit to the PSUR Repository on behalf of my local representatives?

- Many companies/MAHs like to centralise the sending of submissions, including PSURs – the eSubmission Gateway / Web Client and the PSUR Repository allow submissions on behalf of other MAHs/local representatives

- There are no restrictions in place on the submissions on behalf of another MAH or submissions by a consultancy or CRO

- Supplementary information submissions/submissions of responses can be made directly by the local offices even if the 'initial' PSUR was submitted by a 3rd party

As a future enhancement, could you append the product name/unique identifier to the delivery xml file for it to clearly show which submission it is associated with?

- This has been logged as a new change request to the system. All new change requests will be prioritised by the PSUR Repository Advisory Group (PRAG) and implemented in future releases if considered necessary/useful.

We had an experience while dispatching a MRP submission. We created delivery file with all the countries details however when we received acknowledgement, it shows only first country details only. Is this a normal acknowledgement? Is EMA looking to modify it?

- This has been raised to the technical development team, however as the Gateway acknowledgments and the PSUR Repository delivery files are different and generated by different systems this will need to be carefully considered.

How to avoid problems

- Only one package and delivery file should be included per zip file

- Do not add NeeS submissions inside eCTD zip file or on the same delivery file

- Do not add eCTD submission inside NeeS zip file or on the same delivery file

- Do not rename the delivery file

- Always use the "Advanced Mode" for all transmissions via the Web Client, also for submissions smaller than 10MB to receive the Acknowledgements from the eSubmission Gateway / Web Client

  - A new version of the eSubmission Web Client will be available later this autumn – this new version will introduce improvements, for example 'default' selection of large file applet

Support and guidance

PSUR Repository:
http://esubmission.ema.europa.eu/psur/psur_repository.html

eSubmission Gateway and Web Client:

http://esubmission.ema.europa.eu/esubmission.html

- User documents
- Multimedia tutorials
- Training dates
- Who to contact

PSUR Repository Support

- PSUR Repository related queries: **PSURRepository@ema.europa.eu**

- Procedure related queries (prior to Procedure Manager allocation): **PSURquery@ema.europa.eu**

- Technical validation issues (e.g. missing or 'Failure' Acknowledgements): **ectd@ema.europa.eu**

Contact information and useful links

- **Gateway Registration Documentation** (contact info, forms, guidance documents): http://esubmission.ema.europa.eu/esubmission.html

- **Gateway Registration team:** esubregistration@ema.europa.eu

- **Technical issues during webclient set-up:** gatewaysupport@ema.europa.eu

- **Technical validation issues** (e.g. 'Failure' Acknowledgements): ectd@ema.europa.eu

- **EU Guidance on eCTD & NeeS:** http://esubmission.ema.europa.eu/tiges/cmbdocumentation.html

- **EURD LIST:** http://www.ema.europa.eu/docs/en_GB/document_library/Other/2012/10/WC500133157.pdf

- **Dossier Requirements for CAPs:** http://www.ema.europa.eu/docs/en_GB/document_library/Regulatory_and_procedural_guideline/2009/10/WC500003980.pdf

- **Dossier Requirements for NAPs:** http://www.hma.eu/314.html

- **Procedural guidance on PSURs:** http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000041.jsp&mid=WC0b01ac0580023e7d

- **CMDh Best Practice Guide on the use of eCTD in the MRP/DCP:** http://www.hma.eu/fileadmin/dateien/Human_Medicines/CMD_h_/procedural_guidance/eSubmissions/CMDh_084_2008_Rev.4_2015_06_clean.pdf

Thank you for your attention

Further information

psurrepository@ema.europa.eu

European Medicines Agency

30 Churchill Place • Canary Wharf • London E14 5EU • United Kingdom

Telephone +44 (0)20 3660 6000 **Facsimile** +44 (0)20 3660 5555

Send a question via our website www.ema.europa.eu/contact

Follow us on 🐦 **@EMA_News**