**PREFACE**

**VBRN Procedures and Technical Guidelines**.

**History**

The amendments to Directive 2001/82/EC as described in Directive 2004/28/EC came into force on 31 October 2005. In order to effectively implement the requirements of Article 81 (OBPR) and Article 82 (OCABR) in a harmonised and codified manner, a number of documents were elaborated in close collaboration with the European Commission and the Veterinary Pharmaceutical Committee (VPC) and, following a pilot phase, were adopted at the 18th meeting of the VPC (20 March 2007). The VPC mandated the EDQM and the CA/OMCL network for IVMPs (VBRN, for Veterinary Batch Release Network) to continue to develop specific procedures and guidelines that would facilitate the implementation of the relevant articles of the Directive and specifically to promote the mutual recognition required under Article 82 by enhancing transparency and mutual confidence.

In addition, a recommendation document ‘Recommendations on the Implementation of Article 82 of Directive 2001/82/EC, as amended by Directive 2004/28/EC for the Official Control Authority Batch Release’ was endorsed by the VPC on 20 March 2007. It provided an additional framework for the application and development of the system and in particular, the evolution of the restricted list of products to be tested based on risk analysis.

The elements of Article 81 are subsumed into Regulation (EU) 2019/6, Article 128 paragraph 1. The elements of Article 82 are subsumed into Regulation (EU) 2019/6, Article 128, paragraphs 3-9.

Regulation (EU) 2019/6 repeals Directive 2001/82/EC as amended and is applicable as of 22/01/22.

VBRN documents related to OCABR and OBPR should be read in light of the above and have been updated to reflect the new references in the legislation.

**Present situation**

Regulation (EU) 2019/6, Article 128, paragraphs 3-9 stipulates that, for reasons of human or animal health, a member state may request samples of each batch of a given IVMP to be submitted to a Competent Authority (CA) for official testing by an Official Medicines Control Laboratory (OMCL) before that batch is released on to the market. This possibility is referred to as Official Control Authority Batch Release (OCABR). In addition, the article obliges member states to recognise each other’s test results such that any given batch of IVMP for which OCABR is requested is only tested by one CA/OMCL in the EU/EEA.

In the interests of promoting the free movement of goods and to avoid the unnecessary duplication of effort, a procedure has also been elaborated to provide a platform that allows one member state to recognise the evaluation of protocols submitted by the marketing authorisation holder (MAH) under Reg. (EU) 2019/6 Article 128 paragraph 1, by another member state. Recognition is by agreement between member states and is based on good will and mutual confidence. This procedure is referred to as Official Batch Protocol Review (OBPR).

The procedures and their associated guidelines are applicable in all EU/EEA member states. OCABR and OBPR performed following these procedures are also valid in Switzerland in application of the Mutual Recognition Agreement (MRA) between the latter and the EU (Chapter 15 of Annex 1). Reciprocally, OCABR and OBPR performed in Switzerland according to their specific procedure and resulting in the issue of the relevant certificate will be recognised by the EU/EEA.

A list of IVMPs eligible for OCABR using a common restricted testing scheme, as permitted under paragraph 6 of Article 128, can be found in Annex 1 of the ‘EU Administrative Procedure for Application of Official Control Authority Batch Release of Immunological Veterinary Medicinal Products According to Article 128’. The list was established by the relevant member states based on risk assessment and is evaluated regularly and updated as necessary based on the data available and taking into consideration all elements relevant to the current situation.

**NOTE FOR USERS**

**VBRN Procedures and Technical Guidelines**

The documents elaborated by the EDQM and the VBRN comprise 2 procedures, 5 model templates for submission of protocols by the MAH and 15 product-specific guidelines with restricted test lists for OCABR by an OMCL. The product-specific guideline for erysipelas vaccine (inactivated) was made obsolete by the removal of erysipelas vaccine (inactivated) from the restricted list (in force from 01/09/17) following a review procedure and common decision by the VBRN members.

A Marketing Information Form (MIF) is also available. It should be completed by the MAH and presented, with the batch release certificate (OCABR or OBPR) to the member state where the batch will be marketed.

All guidelines and procedures are available exclusively on the EDQM website (<http://www.edqm.eu/en/Veterinary-OCABR-Guidelines-1531.html>). The complete list is presented in a table from which the files may be downloaded. The table indicates the date of entry into force of the relevant document and the last date on which it was updated on the website.

The guidelines will be updated on an on-going basis as needed. New and revised versions will be posted on the website within one month of their date of entry into force. Users are encouraged to visit the site regularly to ensure they are using the most recent versions.

### Recent additions and revision updates are highlighted in the right side bar of the same page.

Each individual guideline is clearly identified on the title page. For continuity and transparency, previous guideline names and other editorial information are provided.

# Administrative Procedures

The procedure for a harmonised application of OBPR and the procedure for application of OCABR clearly outline the steps to be followed by OMCLs and MAHs. They also contain a number of annexes with templates for communication between MAHs and OMCLs and between OMCLs, including model certificates for OCABR and OBPR.

|  |  |
| --- | --- |
| **EU Administrative Procedure For Harmonised Application of Official Batch Protocol Review of Immunological Veterinary Medicinal Products According to Article 128** | **EU Administrative Procedure for Application of Official Control Authority Batch Release of Immunological Veterinary Medicinal Products According to Article 128** |
| Annex I | model letter from a Competent Authority of a Member State to the Marketing Authorisation Holder as regards the requirement of Official Batch Protocol Review of Immunological Veterinary Medicinal Products | Annex I | SHORT LIST OF IVMPs for which a restricted test list for OMCLs has been agreed and list of associated guidelines for OMCLs |
| Annex IIa  | EU/EEA Official Batch Protocol Review Certificate of Approval for Immunological Veterinary Medicinal Products | Annex II  | model letter from a Competent Authority of a Member State to the Marketing Authorisation Holder as regards Official Control Authority Batch Release of Immunological Veterinary Medicinal Products  |

|  |  |  |  |
| --- | --- | --- | --- |
| Annex IIb | EU/EEA Official Batch Protocol Review for Immunological Veterinary Medicinal Products: Form for Notice of Failure/ Non-Compliance | Annex IIIa  | EU/EEA Official Control Authority Batch Release Certificate For Immunological Veterinary Medicinal Products |
| Annex III | Model Letter for Important Information exchange between the official contacts points of the EU VBRN | Annex IIIb | EU/EEA Official Control Authority Batch Release For Immunological Veterinary Medicinal Products: Form For Notice Of Failure/ Non-Compliance |
| Annex IV\* | The current list of official contact points for the EU VBRN | Annex IV\* | The current list of official contact points for the EU VBRN |
|  | Annex V | Model Letter for Important Information exchange between the official contacts points of the EU Veterinary Batch Release Network (VBRN)  |

\*Users are reminded that Annex IV, the list of official VBRN contact points, is updated as soon as changes in contact details are made known to the EDQM. The most recent contact details for the network of EU/EEA and MRA partners are found separately on the EDQM website (<https://www.edqm.eu/fr/ocabrobpr-pour-medicaments-immunologiques-veterinaires-miv>). Users are advised to check the update status regularly to ensure that they have the most recent contact details.

**Marketing Information Form**

The form facilitates recognition of certificates throughout the EU and should be completed by the MAH and provided to the CA/OMCL when submitting an OCABR or OBPR certificate.

**Manufacturer’s protocol for submission of an IVMP to a Competent Authority for OBPR/OCABR**

The model protocol templates are provided for use by manufacturers. They have been developed to harmonise the presentation of relevant information by the MAH when submitting batches for OBPR or OCABR. They should be used whenever application of either of these procedures is requested by a Competent Authority. They have been developed for five general product types and should be considered as models only. An attempt has been made to list all appropriate production steps and controls as required by the MA and the relevant monograph(s) of the Ph. Eur. It is possible however that a protocol for a specific product may differ in detail from the model provided. The essential point is that all relevant details demonstrating compliance with the MA and the Ph. Eur. monograph(s) (where they exist) for a particular product should be given in the protocol submitted by the manufacturer. This is explained clearly in the introduction of each guideline.

# Product-Specific Guidelines

The product-specific guidelines are available for all IVMPs eligible for OCABR using a common restricted testing scheme, as permitted under paragraph 6 of Article 128. The guidelines are to be used by the CA/OMCL when applying OCABR to the given products. They describe the restricted list of tests to be performed by the OMCL as commonly agreed by the relevant member states. They also indicate the samples to be supplied to the OMCL by the MAH for testing.

**Decision Flowchart**

A flowchart has been devised as a tool to summarise briefly the decision process to be followed by a Competent Authority with respect to the control of IVMPs. It situates the correct use of the procedures for OBPR and OCABR,, emphasises the need for risk-based analysis, notes the potential special situations and exceptions and suggests the proportion of IVMPs expected to be covered by each approach. The Decision Flowchart can be found at <https://www.edqm.eu/medias/fichiers/ivmp_flowchart.pdf>.

**List of OMCLs able to provide OCABR certificates**

A given batch of IVMP should only undergo OCABR testing in one member state and all of the others shall recognise the test results. An EU OCABR certificate obtained in one member state can be used to apply for batch release in any other member state requiring OCABR or OBPR. To help manufacturers, a list of OMCLs that can perform OCABR for the different product categories in Annex I of the EU Administrative Procedure for application of OCABR for IVMPs according to Article 128, according to the product-specific guidelines, and that have an externally audited quality system applying the ISO:IEC 17025 standard, is available from a link on this page https://www.edqm.eu/en/ocabrobpr-immunological-veterinary-medicinal-products-ivmps. The list will be updated when the EDQM is informed of changes by the CA/OMCLs involved.