Date of publication: 30/09/2025



Medicines & Healthcare products Regulatory Agency

Scenario	Quality	Non-clinical pharmacology and toxicology	Previous clinical trial and human experience
IMP has an MA in the UK, EU or an ICH member country and both: • is being used according to the MA • is unmodified	Instead of full quality data, non-clinical pharmacology and toxicology data, and previous clinical trial and human experience data, submit: • SmPC or equivalent • Marketing Authorisation Holder (MAH) references, e.g. company name and address • MA references, e.g. reference number of the licence		
The IMP has an MA in the UK, EU or an ICH member country and is unmodified but is being used outside the MA	Instead of full quality data, submit: • SmPC or equivalent • MAH references • MA references Submit appropriate additional information if the proposed method of use gives rise to potential safety risks (i.e. a change to the route of administration)	Submit if appropriate	Submit if appropriate
The IMP has an MA in the UK, EU or an ICH member country, is being used according to the MA, and is modified (e.g. blinding)	Submit quality data covering the proposed modification to the IMP, including detail on any downstream consequences on the IMP as a result of that modification	Instead of non-clinical pharmacology and toxicology data and previous clinical trial and human experience data, submit: • SmPC or equivalent • MAH references • MA references	
Another pharmaceutical form or strength of the IMP has an MA in the UK, EU or an ICH member country and the IMP is supplied by the MA holder	 Instead of full quality data, submit: SmPC or equivalent for the other form or strength MAH references for the other form or strength MA references for the other form or strength data relating to the IMP including relevant sections of the drug product quality IMP dossier, as per the guideline EMA/CHMP/QWP/545525/2017 	Required	Required

	Rev. 2 or EMA/CHMP/BWP/534898/2008		
	Rev. 2		
IMP has no MA in the UK, EU or an ICH member country but the active substance is part of a medicinal product with an MA in the UK or EU and is supplied by the MA holder	 Instead of full quality data, submit: SmPC or equivalent for the other medicinal product MAH references for the other medicinal product MA references for the other medicinal product data relating to the IMP including relevant sections of the drug product quality IMP dossier, as per the guideline EMA/CHMP/QWP/545525/2017 Rev. 2 or EMA/CHMP/BWP/534898/2008 Rev. 2 	Required	Required
IMP has no MA in the UK, EU or an ICH member country but the active substance is part of a medicinal product with an MA in the UK or EU and is not supplied by the MA holder	 Instead of full quality data, submit: SmPC or equivalent for the other medicinal product MAH references for the other medicinal product MA references for the other medicinal product data relating to the active substance data relating to the IMP including relevant sections of the drug product quality IMP dossier, as per the guideline EMA/CHMP/QWP/545525/2017 Rev. 2 or EMA/CHMP/BWP/534898/2008 Rev. 2 	Required	Required
IMP was used in a trial previously authorised by the licensing authority (and has not been modified from the form used in the authorised trial) and there is no new data	Instead of full quality data, non-clinical pharmacology and toxicology data, and previous clinical trial and human experience data: • reference the previous submission, e.g. by providing the CTA number (with evidence of permission from the sponsor of the previous trial, if different) • submit appropriate additional information if the proposed method of use gives rise to potential safety risks (i.e. a change to the route of administration)		
IMP was used in a trial previously authorised by the	Reference the previous submission, e.g. by providing the CTA number, and provide only the new quality, non-clinical pharmacology and toxicology, and previous clinical trial and human experience data		

licensing authority (and has not been modified from the form used in the authorised trial) but new data has since become available			
IMP was used in a trial previously authorised by the licensing authority and has not been modified but the IMP is used under different conditions (e.g. different route of administration, dose or participant population)	Reference the previous submission, e.g. by providing the CTA number, but submit quality, non-clinical pharmacology and toxicology, and previous clinical trial and human experience data where appropriate		
IMP is a placebo that is: • the same composition as the active IMP minus the active substance • manufactured by the same manufacturer as the IMP • not sterile	Not required	Not required	Not required
IMP is a placebo that has been approved for use in a previous trial in the UK	Instead of full quality data, reference the previous submission, e.g. by providing the CTA number (with evidence of permission from the sponsor of the previous trial, if different)	Not required	Not required
IMP is a placebo that does not meet the criteria above	Instead of full quality data, submit data relating to the IMP including relevant sections of the drug product quality IMP dossier, as per the guideline EMA/CHMP/QWP/545525/2017 Rev. 2 or	Not required	Not required

EMA/CHMP/BWP/534898/2008	
Rev. 2	