Common application form for viral vectors contained in investigational medicinal products for human use¹

Note 1: This application form can be used for submissions in the following jurisdictions: Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Luxembourg, the Netherlands, Romania, and Spain.

Note 2: The application form must be accompanied by the SNIF (summary notification information format for notifications concerning the deliberate release into the environment of genetically modified organisms for purposes other than for placing on the market)² in the case of submissions that are made under Directive 2001/18/EC.

<table>
<thead>
<tr>
<th>Document history</th>
<th>Publication date</th>
<th>Description of main changes</th>
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<tbody>
<tr>
<td>Version 1</td>
<td>October 2019</td>
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¹ This document has not been adopted by the European Commission and, therefore, it does not contain the official position of the European Commission.
1. Introduction

Clinical trials conducted in the EU with investigational medicinal products that contain or consist of genetically modified organisms ("GMOs") must comply with the legislation governing the authorization of clinical trials.4

Clinical trials with medicinal products that contain or consist of GMOs must also comply with applicable requirements under Directive 2001/18/EC on the deliberate release into the environment of genetically modified organisms5 ("deliberate release framework") and/or under Directive 2009/41/EC on the contained use of genetically modified micro-organisms ("contained use framework").6

This application form implements the requirements of the Directive 2009/41/EC and of the Directive 2001/18/EC, as adapted to the specific characteristics of viral vectors contained in investigational medicinal products for human use.

This is an application form for medicinal products for human use that contain or consist of viral vectors (hereafter referred to as “clinical vectors”). Specific application forms developed for certain category of medicinal products prevail over this application. For example, developers of CAR T-cells should use the common application form for clinical research with human cells genetically modified by means of retro/ lentiviral vector. Likewise, developers of AAVs should use the common application form for investigational medicinal products for human use that contain or consist of AAV vectors. Finally, in case the application concerns an investigational medicinal product that has already been granted a marketing authorisation, the submission form for use in case of clinical trials with authorised medicinal products should be used.7

The application form has been endorsed by Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Luxembourg, the Netherlands, Romania, and Spain and may be used for submissions to these Member States.

2. Explanatory notes

The common application form is without prejudice to consultation requirements that exist under Directive 2001/18/EC.

In addition, certain national requirements may need to be considered by developers of medicinal products before they submit the application form to the relevant competent authorities:

3 Throughout this document, the term "GMO" should be understood as covering both genetically modified organisms as defined under Article 2(2) of Directive 2001/18/EC, and genetically modified micro-organisms within the meaning of Article 2(b) of Directive 2009/41/EC.


7 The specific application/submission forms referred to in this paragraph are only applicable in the countries that have endorsed them.
Austria:

Applicants should send separate submissions in case there are multiple sites concerned in Austria (including clinical premises, laboratories in which activities with GMOs are carried out, locations of storage of the investigational medicinal product and location of storage of samples from clinical trial subjects that contain GMOs).

Further information is available at:  
https://www.sozialministerium.at/site/Gesundheit/Gentechnik/Rechtsvorschriften_in_Oesterreich/

Belgium:

The common application form should be part of a biosafety dossier submitted by each of the clinical sites where the investigational medicinal product will be administered. However, one person (e.g. the sponsor) can be empowered by the concerned sites to submit all the necessary notifications, provided that the person responsible for the activity is clearly indicated in the form.

More information on procedural requirements and forms for the three regions is available at:  

Czech Republic:

Each clinical site as well as other institutions where the activities with GMOs will take place (e.g. laboratories that are not premises of one of the clinical sites) should submit a separate notification for deliberate release or for contained use, as appropriate. However, one person (e.g. the sponsor) can be empowered by the concerned sites/institutions to submit all the necessary notifications.

France:

For investigational medicinal products that are assessed under the contained use framework, applicants should send separate submissions in case there are multiple sites concerned in France.

Italy:

For investigational medicinal products that are assessed under the contained use framework, each clinical site (including clinical premises, laboratories in which activities with GMOs are carried out, locations of storage of the investigational medicinal product and location of storage of samples from clinical trial subjects that contain GMOs) should submit a separate notification. However, one person (e.g. the sponsor) can be empowered by the concerned sites/institutions to submit all the necessary notifications.

It is stressed that, in case the submission is made by a third party on behalf of the site, the responsibilities of the site holders and users concerned (as set out under Legislative Decree n. 206/2001) remain unchanged.

The Netherlands:

More information on national procedural requirements and forms is available at:  
https://www.loketgentherapie.nl/en/viral-vectors
**SECTION 1 – ADMINISTRATIVE INFORMATION**

1.1. Identification of the applicant.

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1.2. Identification of the sponsor (to the extent that is different from the applicant).

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<td>Telephone No:</td>
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1.3 Identification of the manufacturer of the clinical vector.

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<th>Organisation Name:</th>
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<tbody>
<tr>
<td>Manufacturing location:</td>
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**SECTION 2 – INFORMATION RELATING TO THE INVESTIGATIONAL MEDICINAL PRODUCT**

A. Virus from which the clinical vector was derived (parental virus).

A.1. *Characterisation*
2.1 Which virus was used as the parental virus in the construction of the clinical vector?

Scientific name:  
Strain and isolate:  
Other names (e.g. commercial name):  
Biosafety classification:  
Parental virus attenuated: Yes ☐ No ☐

2.2 Phenotypic and Genetic Markers.

Briefly describe the most relevant phenotypic and genetic markers of the parental virus, including information on the viral genome size and the packaging limit of the parental virus.

2.3 What is the host range of the parental virus?

Describe the hosts in which the parental virus naturally occurs, also including hosts that serve as a reservoir. For each possible host, indicate the tissue and cell tropism.

If natural hosts of the parental virus include humans, provide available information about the seroprevalence in the EU.

2.4 Zoonotic potential of the parental virus.

If humans are not natural hosts of the parental virus, provide information on the zoonotic potential of the parental virus. Describe also the natural geographic distribution of the parental virus and indicate if the parental virus is endemic in the EU.

2.5 Replication properties of the parental virus.

Provide information about the replication of the parental virus. Indicate where replication takes place (cell nucleus, cytoplasm). Is the parental virus capable of establishing latency in the natural host? What are the sequence elements involved in the reactivation process? Provide also any available information on the potential for homologous/non-homologous genomic recombination occurring in nature between viral genomes of the parental virus and related strains or members of the same viral (sub)family.

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8 Explain if the classification varies between different territories in which the clinical trial will take place.

9 This Section needs not be filled in case of replication incompetent clinical viral vectors.
A.2. Pathogenicity

2.6. What are the pathogenic properties of the parental virus and what are the available treatment methods?

Describe any pathogenic properties of the parental virus. Where relevant, provide information on pathogenic properties of the parental virus in vulnerable groups such as immunosuppressed individuals, pregnant women and small children. Describe the symptoms caused by the parental virus. Indicate also if therapeutic/prophylactic treatments exist to treat/prevent such an infection.

2.7. Provide relevant data on attenuation and biological restrictions of the parental virus.

If the parental virus is an attenuated/restricted virus, the basis for attenuation/restriction should be described. Describe the conditions (steps) needed for reversion of the attenuation/restriction and the factors that may affect reversion.

A.3. Ability to colonise

2.8. What are the transmission routes of the parental virus?

Describe possible transmission routes of the virus. Provide information on viral shedding including asymptomatic shedding of the parental virus. In the case of vector-borne viruses (e.g. arbo viruses), indicate the geographic location of the vector.

2.9. Can the parental virus survive outside the host?

Describe all survival options and the survival time of the parental virus under optimal environmental conditions, and describe the factors that may be of influence.

B. Genetic modification and manufacturing of the clinical vector.

2.10. Provide a brief description of the manufacturing process of the clinical vector.

Answer this question preferably by using a diagram that describes the various production steps.
When using plasmids for the manufacturing of the clinical vector, clear maps of the plasmids showing all the constituent parts of the vector should be provided (i.e. in addition to the “transgene plasmid”, all other plasmids such as helper, packaging and pseudotyping plasmids should be described). Explain if there are overlapping sequences in the plasmids.

Confidential information should be provided in an annex, together with the reasons why it is considered confidential. The Section of the application form to which the information refers should be clearly identified. When confidentially is claimed, a summary that can be made public should be provided in this section.

2.11. Describe the characteristics of the cell lines in which the clinical vector is produced. Also indicate which of the genetic components of the cell could possibly cause complementation or recombination.

The characteristics of all cell lines used and eventual modifications of the cell genome should be explained. Describe the cell types concerned as well as their origin (e.g. human kidney, epithelial cells). The possibility of the genetic material in the cells/cell lines causing a certain interaction with the clinical vector, such as by complementation or recombination should be discussed.

Explain if there is a risk of clinical vector modification by trans-complementing sequences. Provide also a description of the identity of these sequences. This can be done on the basis of bio-informatic analysis, such as sequence analysis, alignments or phylogenetic analysis.

Confidential information should be provided in an annex, together with the reasons why it is considered confidential. The Section of the application form to which the information refers should be clearly identified. When confidentially is claimed, a summary that can be made public should be provided in this section.


For replication-deficient and conditionally replication-competent clinical vectors, strategies to avoid the generation of replication-competent virus (RCV) should be described. Test methods for detection of replication-competent virus should be described, including information on the specificity and sensitivity thereof. Data from RCV testing at different manufacturing steps should be provided (e.g. virus seed bank, final product). Release criteria with regard to RCV testing should be specified.

Confidential information should be provided in an annex, together with the reasons why it is considered confidential. The Section of the application form to which the information refers should be clearly identified. When confidentially is claimed, a summary that can be made public should be provided in this section.
C. Clinical vector

2.13. Provide a diagram (‘map’) of the clinical vector.

Confidential information should be provided in an annex, together with the reasons why it is considered confidential. The Section of the application form to which the information refers should be clearly identified. When confidentiality is claimed, a summary that can be made public should be provided in this section.


Provide the annotated sequence of the complete genome (i.e. indicate the location of the sequences encoding the transgene expression cassette(s) and its regulatory elements). As a minimum, the sequence of the elements that could affect the replication ability, host range, tropism, ability to survive outside the host, route of transmission or pathogenic potential of the clinical vector should be provided.

Describe in what way the clinical vector deviates from the parental virus at the level of molecular characterisation.

Available data supporting genetic stability of the clinical vector should be provided. Deviations should be discussed, in particular the biological significance thereof.

Confidential information should be provided in an annex, together with the reasons why it is considered confidential. The Section of the application form to which the information refers should be clearly identified. When confidentiality is claimed, a summary that can be made public should be provided in this section.

2.15. Describe the coding genes and the regulatory sequences present in the clinical vector backbone and in the DNA inserted. A full description must be provided of the inserted or deleted genetic material, also discussing the functions of the sequences, for example:

- Expression cassette, including promoter, terminator, and enhancer sequences.
- Transgene: e.g. is the expressed product toxic or otherwise harmful to humans (other than the clinical trial subject) or other hosts? Does the transgene provide an advantage for replication/survival of the clinical vector (vis-à-vis parental virus) or alter the transmission route?
- Whether the DNA inserted into the clinical vector contains elements of which the origin or function is unknown.
- Whether the clinical vector contains elements that are not specifically intended for the therapeutic functions.
2.16. Differences between the biological profile of the clinical vector and the parental virus.

Indicate whether the clinical vector particles are pseudotyped and whether the envelope is provided in trans.

Explain differences that exist between the clinical vector and the parental virus regarding:

- Host range, including host specificity and the tissue and cell tropism.
- Transmission route.
- Pathogenic properties. Where relevant, consider potential effects in common population and in vulnerable groups such as immunosuppressed individuals, pregnant women, small children, or any other group with a higher risk.
- Ability to survive outside the host. If available, provide data on the loss of infectivity of the clinical vector on different materials or in liquids (e.g. waste water).

2.17. Potential for recombination with the parental virus in vivo and description of potential recombinants.

Discuss the potential for homologous recombination in vivo and describe all recombinants that might be generated by homologous recombination with e.g. the parental virus. Discuss the potential biological (including pathogenic) effects of any possible recombination for the population (including for vulnerable groups). Indicate whether the recombinants described have been monitored and detected in previous experiments or after administration to humans.

2.18. Biodistribution and shedding.

Detailed data on vector shedding (including information on the administered dose, the route of administration, and –where available- immune status of the treated subjects) from previous clinical
trials with the clinical vector should be provided. Where available and if relevant for the environmental risk assessment, biodistribution data should be provided.

If there is no prior clinical experience with the same clinical vector, the potential for shedding should be discussed based on non-clinical data and/or clinical experience from related clinical vectors. If the applicant relies on data from related clinical vectors, the relevance of the data to the product that is the object of this application should be explained considering, in particular, the dose and route of administration.

When shedding occurs, the estimated duration should be specified.

The methods used for detection of viral shedding including information on the specificity (including ability to detect revertants) and sensitivity thereof should be provided.

SECTION 3 –INFORMATION RELATING TO THE CLINICAL TRIAL

3.1. General information about the clinical trial.

| EudraCT-number (where available): |  |
| Deliberate release reference number (where available and applicable): |  |
| Title of the clinical trial: |  |
| Name of principal investigator: | This information may be provided in the annex with confidential information. |
| Objective of the study: |  |
| Intended start and end date: |  |
| Number of trial subjects that will take part in the study: |  |
| Indicate if an application related to the same investigational medicinal product has been submitted -or is planned to be submitted- to other EEA Member States. In the affirmative, identify the countries concerned: |  |
3.2. Intended location(s) of the study.

The applicant should provide information about the clinical sites located in the country of submission of the application.

In some jurisdictions, the following additional information should be provided:

- the location(s) of laboratories (in the country of submission) in which activities with the GMO are carried out under the framework of the clinical trial application should be stated.\(^{10}\)

- information about the location where the investigational medicinal product is stored (to the extent that the location is in the country of submission but outside the clinical site).\(^{11}\)

- information about the location where patient’s samples that contain GMO’s are stored (to the extent that the location is in the country of submission but outside the clinical site).\(^{12}\)

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<td>Contact person:</td>
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<td>Telephone No:</td>
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<td>Email Address:</td>
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<tr>
<td>Planned activities:</td>
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<tr>
<td>Containment level:</td>
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<tr>
<td>Name and contact details of the responsible person(^{13}):</td>
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\(^{10}\) Information about the location of laboratories is required for applications submitted to Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, and Spain. In case of submissions to these jurisdictions, fill in the relevant table for laboratories that conduct specialised analysis referred in the protocol of the clinical trial only; laboratories that perform standard laboratory diagnostics analysis need not be listed.

\(^{11}\) This information should be provided for applications submitted to Croatia, Germany, Ireland and Spain. This information should be provided for applications submitted to Belgium, Czech Republic and Finland, unless there is a contained use notification covering the storage of the product.

\(^{12}\) This information should be provided for applications submitted to Croatia, Ireland and Germany. For applications submitted to Belgium, Czech Republic and Finland, this information should be provided if the patient samples contain replicative and infective viruses (unless there is a contained use notification covering the storage).

\(^{13}\) The responsible person is either the person responsible for supervision and safety as provided for under V of Directive 2009/41/EC, or the responsible scientist as provided for under Annex IIIA of Directive 2001/18/EC.
3.3. Storage of the clinical vector at the clinical site.

The applicant should provide information about the storage location, conditions of storage (including restrictions of access), and the maximal storage duration.\(^{14}\)

3.4. Logistics for on-site transportation of the clinical vector.

The applicant should provide information about the logistics for in-house transportation (i.e. transfer of the clinical vector from storage to the administration site and –where applicable– site where dose is prepared). The applicant should provide information about the characteristics of the containers used addressing also disinfection procedures applied and labelling of the containers.

3.5. Information about reconstitution, finished medicinal product and administration to patients.

<table>
<thead>
<tr>
<th>Reconstitution (where applicable, summarise reconstitution steps):</th>
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<tr>
<td>Pharmaceutical form and strength:</td>
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<tr>
<td>Mode of administration:</td>
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\(^{14}\) In case of applications submitted to Austria, Belgium, Croatia, Czech Republic, Finland, France, Ireland, Italy, the Netherlands and Spain, the applicant should specify if the dose is being prepared in the hospital pharmacy. If the clinical dose is prepared at a location other than the hospital pharmacy, this should be explained.
3.6  Measures to prevent dissemination into the environment.

a)  Control measures during reconstitution (if applicable), handling and administration.

b)  Personal protective equipment.

c)  Decontamination/cleaning measures after administration or in the case of accidental spilling (i.e. decontamination/cleaning measures of potentially contaminated materials, surfaces and areas). In addition, the disinfection procedures applied should be justified by providing evidence that the chosen method is sufficiently active against the clinical vector.

d)  Elimination or inactivation of left-overs of the finished product at the end of the clinical trial.

e)  Waste treatment (including also –where applicable- decontamination and disposal of potentially contaminated waste that accumulates outside the clinical trial site). Where applicable, identify also the company responsible for waste management.
f) Are there exclusion criteria applied to the enrolment of patients in the clinical trial to
address environmental risks? Are the treated patients subject to restrictions after
administration of the product?

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g) Recommendations given to clinical trial subjects to prevent dissemination.

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h) Recommendations on donation of blood/cells/tissues/organs by the clinical trial subject.

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i) Other measures.

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3.7. Sampling and further analyses of samples from study subjects

This Section should be filled in where samples that may contain GMOs are being taken from patients in
the context of the clinical trial and the application is submitted to the following jurisdictions: Croatia,
Czech Republic, Denmark, Germany, Ireland, Italy, Hungary, the Netherlands and Spain.

a) Describe how samples will be handled/stored/transported.
To the extent that handling/ storage and transport of samples are treated under same procedures as
the clinical vector, cross-reference can be made as appropriate.

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b) Indicate whether and at which time points samples that may contain the administered clinical
vector are taken from study subjects.

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c) If samples are stored at the clinical site, describe storage location and storage conditions.

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d) Explain if there is any non-routine\textsuperscript{15} testing of the samples and indicate whether the clinical
vector is generated \textit{de novo} during the testing.

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\textsuperscript{15} Standard clinical care tests as well as tests required to fulfil long-term follow-up of clinical trial subjects need
not be mentioned.
3.8 **Emergency response plans.**

| Emergency response plans for accidental self-administration during handling or administering the clinical vector: |  |
| Emergency response plans for accidental release into the environment of the clinical vector: |  |

SECTION 4 – OTHER DATA REQUIREMENTS

4.1. **Plan of the site(s) concerned**

Applicants should provide a copy of the plan of the site where the clinical trial takes place if the application is submitted to the following jurisdictions: Austria, Belgium, Croatia, Czech Republic, Finland, France, Hungary, Ireland and Italy.

4.2. **Other information**

**Submissions to Austria:**

*In addition to the plan of the site, a description of the location of the autoclave should be provided –as appropriate- as part of the description of the measures to prevent dissemination into the environment referred in Section 3.6 (d) and (e).*

**Submissions to Belgium:**

*In addition to the plan of the site, a description of the location of the autoclave and the biosafety cabinet should be provided –as appropriate- as part of the description of the measures to prevent dissemination into the environment referred in Section 3.6 (d) and (e).*

The applicant is also asked to provide an overview (table) of the rooms involved in the CT activity by indicating for each of those the number of the room, the type of handling carried out (e.g. storage, administration of the IMP, reconstitution of the IMP) and the containment level.

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16 In the case of applications submitted in Austria, Finland, France and Ireland, information on emergency response plans is only required if the clinical vector has been classified as BSL 3 or 4. In the case of submissions to Italy, the emergency response plan does not need to be provided; an emergency response plan may, however, be requested by the authorities if appropriate.
Submissions to Czech Republic:

In addition to the plan of the site, a description of the location of the autoclave should be provided –as appropriate- as part of the description of the measures to prevent dissemination into the environment referred in Section 3.6 (d) and (e).

Submissions to France:

The plan of the site should indicate clearly the location of a PSMII or an equivalent device.

Submissions to Germany:

- The applicant is not required to provide further information in Section 3(6)(c) if he/she confirms that the disinfectant and decontamination procedure are included in the list of the Robert Koch Institute of currently approved disinfectants and disinfectant procedures or the VAH (Verbund für Angewandte Hygiene e.V) list of disinfectants.
- The applicant should explain if left-overs are stored at the clinical site and, if in the affirmative, for how long as part of the information submitted in Section 3(6)(d).
- The applicant should provide the following information on waste treatment in Section 3(6)(e):
  - Whether and for how long the waste will be stored (or frequency of waste disposal),
  - Storage location,
  - Logistics for on-site transportation of the waste (similar as asked for the clinical vector in Section 3.4), and
  - In case of chemical decontamination whether the chosen disinfectant and method is sufficiently active against the clinical vector (similar as in Section 3.6.c)
- If samples are stored at the clinical site, the maximum duration of the storage should be stated in Section 3.7 (c).

Submissions to Ireland:

- In addition to the plan of the site, a description of the location of the autoclave should be provided –as appropriate- as part of the description of the measures to prevent dissemination into the environment referred in Section 3.6 (d) and (e).
- If samples are stored at the clinical site, the maximum duration of the storage should be stated in Section 3.7 (c).

Submissions to Italy:

- In addition to the plan of the site, a description of the location of the autoclave should be provided –as appropriate- as part of the description of the measures to prevent dissemination into the environment referred in Section 3.6 (d) and (e).
  If the manufacturer of the clinical vector is located in Italy, the authorisation issued to the premises should be declared in Section 1.3.
SECTION 5 – ENVIRONMENTAL RISK ASSESSMENT

This Section should be filled in for submissions under Directive 2001/18/EC.17

A. Risk Analysis
In filling this Section, applicants may refer to relevant literature data and results from earlier preclinical and/or clinical studies.

A.1. Risks to healthcare professionals and/or close contacts of the clinical trial subject (including vulnerable groups)

5.1. Hazard identification: Provide a list of the potential adverse effects (e.g. immune reaction, integration in the genome of the exposed cells, adverse effects linked to the expression of the therapeutic gene, etc.) if transmission of the clinical vector or potential revertants to thirds -including vulnerable groups- occurs through shedding (as described in Section 2.18).

5.2. Hazard characterisation: Provide an estimate of the magnitude of each of the identified potential adverse effects (it should be assumed that each of the hazards will occur). Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.3. Exposure characterisation: Provide an estimate of the likelihood (probability) that each of the identified hazards will occur. Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.4. Risk characterisation: Considering the magnitude of each of the effects identified and the likelihood of their occurrence, characterise the risk. Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.5. Risk management strategies: The applicant should explain measures implemented to reduce the potential risks to thirds and/or the environment associated with the clinical use of the clinical vector. This includes -but is not limited to- the measures implemented to prevent the risks of accidental transfer during reconstitution, handling, administration

17 In the case of applications submitted to Italy, this Section should always be filled-in.
of the product, or during manipulation of patient’s samples (after administration of the clinical vector). The applicant should also explain the recommendations that will be provided to the clinical trial subject and/or close contacts to prevent dissemination/accidental contamination. Finally, the applicant should consider if clinical trial subjects should be prevented from donating blood/cells/tissues/organs after being administered the clinical vector. This information should be listed in Section 3.6.

A.2. **Risks to the environment**

5.6. **Hazard identification:** Provide a list of the potential adverse effects. As appropriate, consider specific environmental conditions that may affect the survival, replication or ability to colonise (wind, water, soil, temperatures, pH, etc).

5.7. **Hazard characterisation:** Provide an estimate of the magnitude of each of the identified potential adverse effects (it should be assumed that each of the hazards will occur). Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.8. **Exposure characterisation:** Provide an estimate of the likelihood (probability) that each of the identified hazards will occur. Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.9. **Risk characterisation:** Considering the magnitude of each of the effects identified and the likelihood of their occurrence, characterise the risk. Where a quantitative estimation is not possible, a category (“high”, “moderate”, “low” or “negligible”) should be assigned.

5.10. **Risk management strategies:** The applicant should implement adequate measures to prevent dissemination into the environment. These should be listed in Section 3.6.

A.3 **Overall risk evaluation and conclusions**

5.11. Evaluate the overall risk of the clinical vector for humans (healthcare professionals and close contacts of the patient) and the environment considering, as applicable, the risk management strategies described in Section 3.6.