

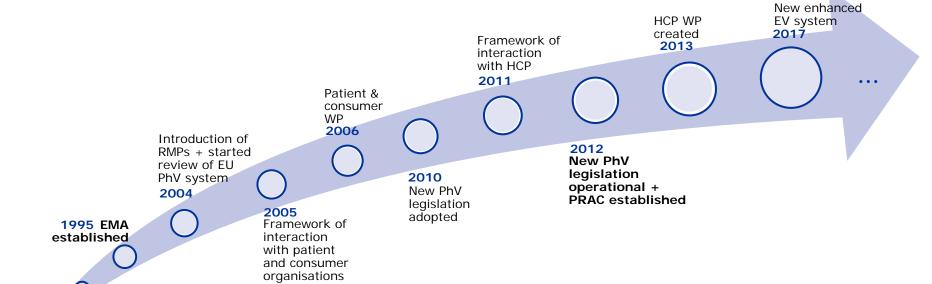
Overview of the EU Pharmacovigilance system

 2^{nd} International Awareness Session - The EU medicines regulatory system and the European Medicines Agency

Presented by Aniello Santoro on 9 March 2018 Pharmacovigilance and Epidemiology Department



A bit of history



First EU legislation on medicines

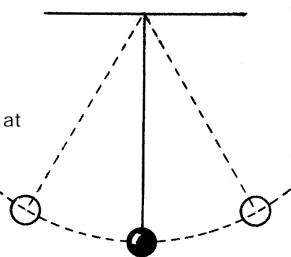
1965



Goals of EU PhV System

Health Promotion

- Fulfill unmet medical needs
- Plan evidence generation through life cycle
- Plan for optimal risk management at authorisation
- Robust PhV systems support authorisation decisions

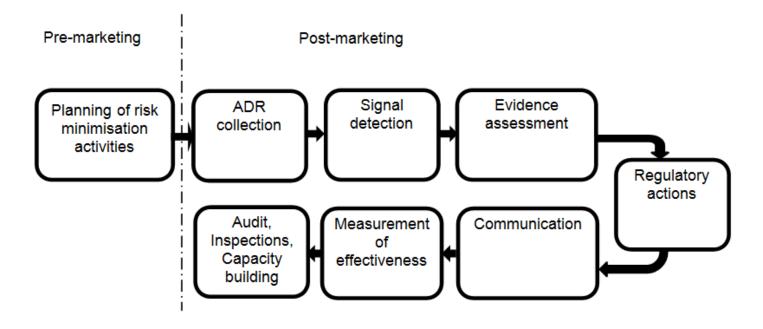


Health Protection

- Robust monitoring for new safety issues
- · Rapid decision making
- Effective action to minimise risk
- Demonstrating positive impact



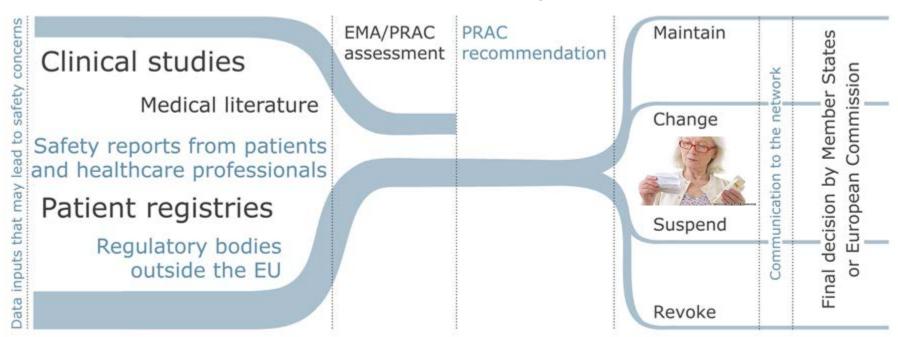
Continuum from pre- to post-marketing





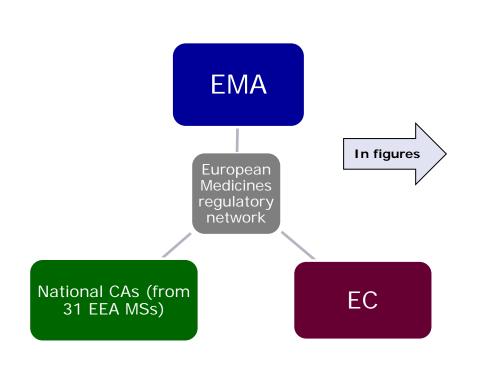
How do we monitor the safety of medicines

PRAC = Pharmacovigilance and Risk Assessment Committee





The European Medicines regulatory network

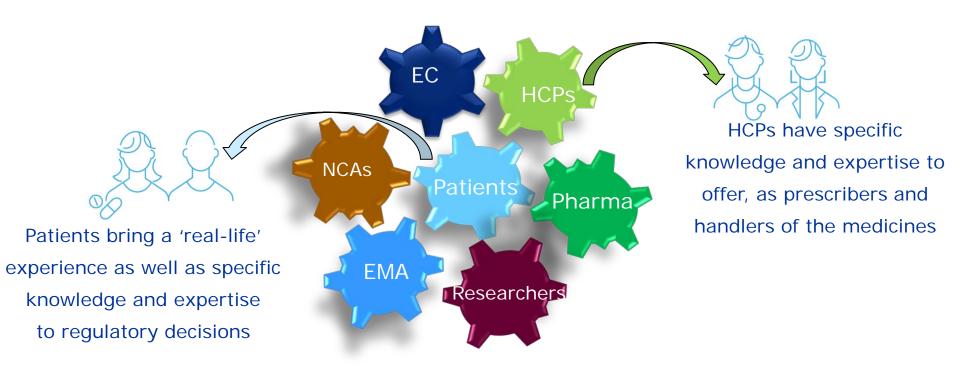


- 7 scientific committees (CHMP, CVMP, COMP, HMPC, PDCO, CAT, PRAC)
- 28 WPs
- ~ 4000 scientific experts across EU

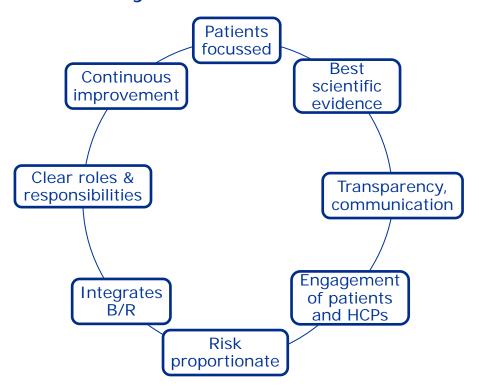




Pharmacovigilance stakeholders



Foundations of EU PhV system





Transparency, Communication, Engagement, Cooperation

Transparency

ADR portal

PRAC recommendations on signals

EPAR (incl. summary of RMP)

List of medicines (under evaluation, additionally monitored, withdrawn)

Committee agendas, minutes, press releases, highlights

Protocols/abstracts of final study reports of imposed PASS

EU Referral (start, list of medicines, LoQ, TT, etc.)

Communication -

Advance notification of signals on PRAC agenda

Preliminary AR on signals, PSURs etc. to MAHs

Coordination between NCAs of safety announcements: harmonised message to patients/HCPs across

Lines to take

Engagement

Participation of patients and HCPs in Scientific Committees

Patient and HCP WPs

Public hearings

Cooperation-

Sharing of info on drug safety issues (regular teleconferences with FDA [HC/PMDA observers])

Communication on any measure taken regarding CAPs that may have a bearing on public health protection in countries outside the EU (Confidentiality arrangement EMA/EC/WHO)

etc., etc.





Continuous improvement and capacity building

IMI PROTECT project Developed evidence based methodologies in PhV

EU Network Training Centre

Spread good scientific and regulatory practices across the EU network

SCOPE (EC Joint Action Strengthening Collaboration for Operating PV in EU)

Collected info on how regulators in MSs run their national PhV systems (ADR collection, signals management, risk communication, quality management systems etc.); promoted best practice approaches in the EU network; developed wide-range training material accessible to PhV staff in MSs (via the European Union Network Training Centre)

ENCePP (EU network) of Centres in PE and PhV)

Brings together expertise and resources in PE/PV and provides platform for collaboration; facilitates the conduct of multicentre, independent studies focussing on safety and on B/R balance of medicines



Some useful readings







Modules

- I: Quality systems
- II: PSMF
- III Inspections
- IV Audits
- V RMS
- VI ADRs

- VII PSURs
- VIII PASS
- IX SM
- X Additional monitoring
- XV Safety communication
- XVI RMM (tools, indicators)

Drug Saf DOI 10.1007/s40264-017-0572-8



LEADING ARTICLE

Promoting and Protecting Public Health: How the European Union Pharmacovigilance System Works

Aniello Santoro¹: Georgy Genov¹ · Almath Spooner^{2,3} · June Raine^{3,4} ·

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Abstract This article provides an overview of the European Union pharmacovigilance system resulting from the rationalisation and strengthening delivered through the implementation of the revised pharmacovigilance legislation. It outlines the system aims, underlying principles, components and drivers for future change. At its core, the Pharmacovigilance Risk Assessment Committee is responsible for assessing all aspects of the risk management of medicinal products, thus ensuring that medicines approved for the European Union market are optimally used by maximising their benefits and minimising risks. The main objectives of the system are to promote and protect public health by supporting the availability of medicines including those that fulfil previously unmet medical needs, and reducing the burden of adverse drug reactions. These are achieved through a proactive, risk proportionate and patient-centred approach, with high levels of transparency and engagement of civil society. In the European Union, pharmacovigilance is now fully integrated into the life cycle of medicinal products, with the planning of pharmacovigilance activities commencing before a medicine is placed on the market, and companies

Published online: 22 July 2017

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- ³ EMA Pharmacovigilance and Risk Assessment Committee, London, UK
- Medicines and Healthcare Products Regulatory Agency, London, UK

encouraged to start planning very early in development for high-innovation products. After authorisation, information on the safety of medicines continues to be obtained through a variety of sources, including spontaneous reports of adverse drug reactions or monitoring real-world data. Finally, the measurement of the impact of pharmacovigilance activities, auditing and inspections, as well as capacity building ensure that the system undergoes continuous improvement and can always rely on the best methodologies to safeguard public health.

Key Points

The European Union (EU) pharmacovigilance system ensures the promotion and protection of public health through a proactive, transparent, risk proportionate and patient-centred approach.

The Pharmacovigilance Risk Assessment Committee is at the core of the operations of the EU pharmacovigilance system and is responsible for assessing and monitoring the safety of medicines in the EU.

Enhancing involvement of patients, increasing the EU capacity to use real-world data, developing new scientific methods, achieving better pharmacovigilance for medication errors and the simplification of processes are future drivers of the system.

Overview of the EU PhV system

Any questions?

Further information

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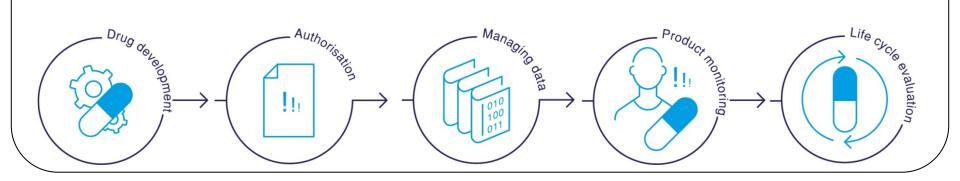
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Roles & Responsibilities through the product life cycle (I)





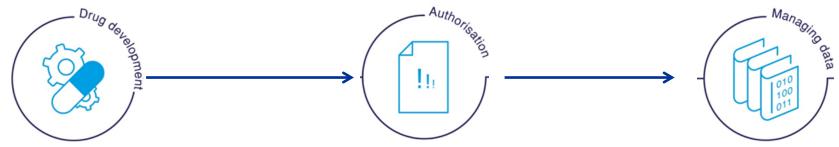
Assess & monitor safety of medicines
Coordinate the EU PV system
Develop standards & guidance



Santoro A, et al. Promoting and Protecting Public Health: How the European Union Pharmacovigilance System Works. Drug Saf. 2017 Jul 22.

Roles & Responsibilities through the product life cycle (II) 👻





Pharma

Discovers & develops medicines
Conducts studies to generate evidence

EMA/PRAC

Advise on evidence generation (studies)

EMA/CHMP

Assess EU-wide MAA

EMA/PRAC

Plan for optimal risk management (EU-RMP)

EC

Authorises medicines (CAP)

NCAs

Assess/authorise medicines (NAPs)

EMA

Maintains EV, PSUR repository and Art. 57 database of medicinal products

ΑII

Support access to and analysis of real world data

Roles & Responsibilities through the product life cycle (III)



european medicines agency



EMA/PRAC

SD (CAPs)

NCAs

Promote & operate ADR reporting nationally SD (NAPs)
Report ADRs to EV
Oversee national implem. of risk minimisation
Coordinate national safe & effective use of medicines

Industry

Monitors its medicines

Patients and HCPs

Use medicines Use the product information Report suspected ADRs

HCPs

Enact risk minimisation measures

EMA/PRAC

Assess PSURs, referrals, signals & study results Coordinate safety announcements in EU Coordinate inspections & monitor industry compliance

EMA/CHMP

Recommends to EC changes to MA, suspensions, withdrawals Assess modifications/ extensions to MA

NCAs

Carry out PV inspections
Assess safety issues
(NAPs)
Provide expertise to PRAC

Patients and HCPs

Participate in studies Provide input in the assessment

Academia

Conduct studies

International regulators

Exchange information on safety issues

Abbreviations



ADR: Adverse Drug Reaction

B/R: Benefit/Risk

CA: Competent Authority

CAP: Centrally Authorised Product

CAT: Committee on Advanced Therapies

CHMP: Committee for Medicinal Products for Human Use

CVMP: Committee for Medicinal Products for Veterinary Use

COMP: Committee for Orphan Medicinal Products

EC: European Commission

EEA: European Economic Area

EMA: European Medicines Agency

EPAR: European Public Assessment Report

EU: European Union **EV**: EudraVigilance

FDA: Food and Drug Administration

HC: Health Canada

HCP: Health Care Professional

LoQ: List of questions

MA: Marketing Authorisation

MAA: Marketing Authorisation Application

MAH: Marketing Authorisation Holder

MS: Member State

NAP: Nationally Authorised Product

NCA: National Competent Authority

PASS: Post Authorisation Safety Study

PDCO: Paediatric Committee

PE: Pharmacoepidemiology

PhV: Pharmacovigilance

PMDA: Pharmaceutical and Medical Devices Agency

PRAC: Pharmacovigilance Risk Assessment Committee

PROTECT: Pharmacoepidemiological Research on Outcomes of Therapeutics

PSMF: Pharmacovigilance System Master File

PSUR: Periodic Safety Update Report

RMM: Risk minimisation Measure

RMP: Risk Management Plan

RMS: Risk Minimisation System

SD: Signal detection

SM: Signal Management

TT: Timetable

WHO: World Health Organisation

WP: Working Party



EU Risk Management Plan

Module 10 - Patient safety and Pharmacovigilance

2nd International Awareness Session - The EU medicines regulatory system and the European Medicines Agency

Presented by Claire Espinasse on 9 march 2018 Scientific and Regulatory Management Department



Authorising medicines: What we know...



At the time of authorisation:

- Dossier of evidence submitted by the companies on quality, safety and efficacy
- Full assessment by the regulators
- Benefits must outweigh risks based on evidence from clinical trial program

What we know:

- Usually good evidence from clinical trials demonstrating efficacy in the specific indication and populations studied
- Good evidence from clinical trials on the most common adverse reactions

and what we don't know



- Effectiveness of the product in <u>normal clinical practice</u>: compliance, resistance, populations not included in trials
- Full safety profile including adverse drug reactions which are:
 - Rare
 - Delayed
 - From long-term exposure
 - Due to medication errors resulting in harm
 - Different in off-label use
 - Associated with abuse/misuse

Table 1 — Chance that a very rare side-effect (0.01%) will not be observed	
Number of patients treated	Chance of missing (%)
500	95.1
1000	90.5
2500	77.9
5000	60.7
7500	47.2
10000	36.8
15000	22.3
20000	13.5
25000	8.2
30000	5.0

Amery K Pharmacoepidemiology and Drug Safety, 8: 61±64 (1999)

 Associated with populations not yet studied in trials, where a different safety profile is suspected (e.g. in children, very elderly, pregnancy, lactation, co-morbidity)

Risk Management Definition



Risk management system: a set of pharmacovigilance activities and interventions designed to identify, characterise, prevent or minimise risks relating to a medicinal product, including the assessment of the effectiveness of those interventions.

Risk management plan: a detailed description of the risk management system

Obligation is fulfilled by submitting a Risk Management Plan (RMP), in the format of the **EU-RMP** template, and maintaining it;

Key documents when preparing your EU-RMP:

GVP module V rev.2

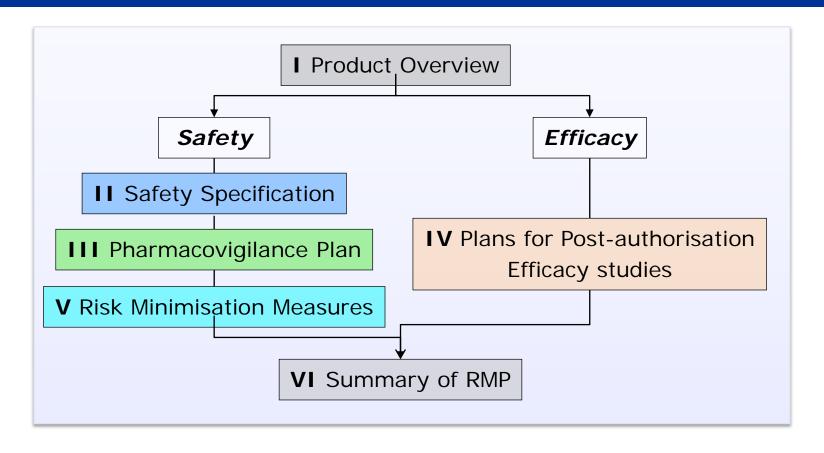
RMP template rev.2

both available on EMA website



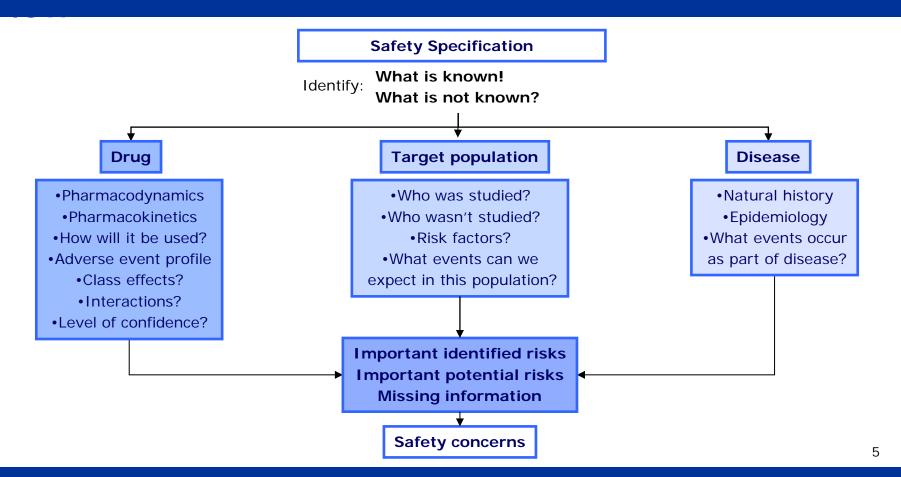
Information Flow in the RMP





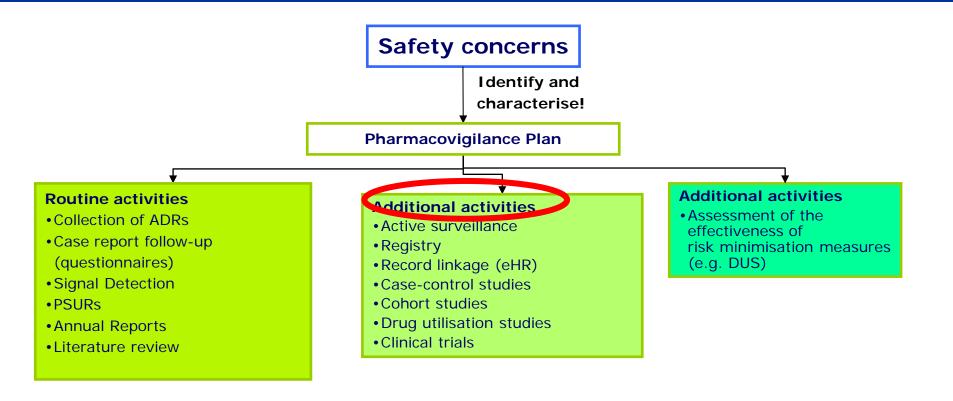
Part II Safety Specification Information





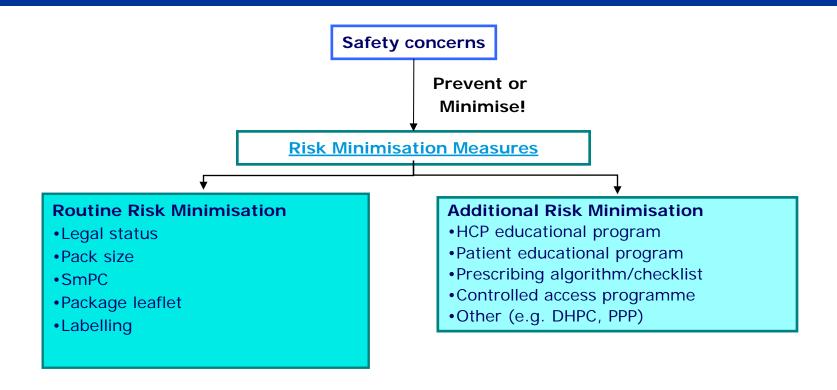
Part III Pharmacovigilance Plan





Part V Risk Minimisation Measures





Part V Routine Risk Minimisation Measures



Summary of Product Characteristics (SmPC)

- **Product information** (PIL)

- Pack size (controlling the number of dosage units)
 - Limited validity/size of prescription
- Legal status of medicine (defined in Annex II.B as conditions or restrictions for supply or use of medicinal product)
 - Restricted medical prescription (e.g. administration in hospital only)
 - Special medical prescription (e.g. for narcotic or psychotropic substances; potential for addiction, abuse or use for illegal purposes)

Part V Additional Risk Minimisation Measures



Health Care Professional Educational Programme

- Dear Health Care Professional Letter
- Physician's guide to prescribing
- Pharmacist's guide to dispensing
- Algorithm/checklist before prescribing/dispensing
- Specific training programme

Patient Educational Programme

- Patient Alert Card
- Patient Reminder Card
- Patient Information Brochure/Booklet

Controlled access programme

• Other (e.g. pregnancy prevention programme)

Reflected in
Conditions or
restrictions for
the safe and
effective use of
the medicinal
product (Annex II
of the PI)
RMP Part V +
Annex 6

Part V Effectiveness of Risk Minimisation



Effectiveness of risk minimisation activities should be measured

- Legislation requires active monitoring of the outcome of risk minimisation measures
- Crucial aspect of continuous pharmacovigilance
- Criteria to assess the effectiveness of each (additional) risk minimisation activity should be outcome measures that indicate the success or failure of the process implemented based on agreed standards
- Measurement of effectiveness is an additional pharmacovigilance activity of the RMP with defined milestones at regular intervals
- Consider burden on patients/prescribers and performance in healthcare system
 - → Further guidance provided in GVP Module XVI



Thank you for your attention

Further information

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EU Signal Detection and Management Procedure

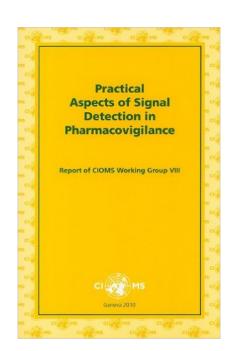
2nd International Awareness Session - The EU medicines regulatory system and the European Medicines Agency
 Presented by Rodrigo Postigo on 09 March 2018
 Pharmacovigilance and Epidemiology Department



What is a signal

"Information that arises from one or multiple sources (including observations and experiments), which suggests a new potentially causal association, or a new aspect of a known association, between an intervention and an event or set of related events, either adverse or beneficial, that is judged to be of sufficient likelihood to justify verificatory action".

- Council for International Organisations of Medical Sciences Working group VIII
 Practical Aspects of Signal Detection in Pharmacovigilance (CIOMS, Geneva 2010).
- In line with GVP Module IX and the Commission Implementing Regulation (520/2012) only signals related to an adverse reactions will be considered for the purpose of this presentation.



2010/2012 EU Legislation

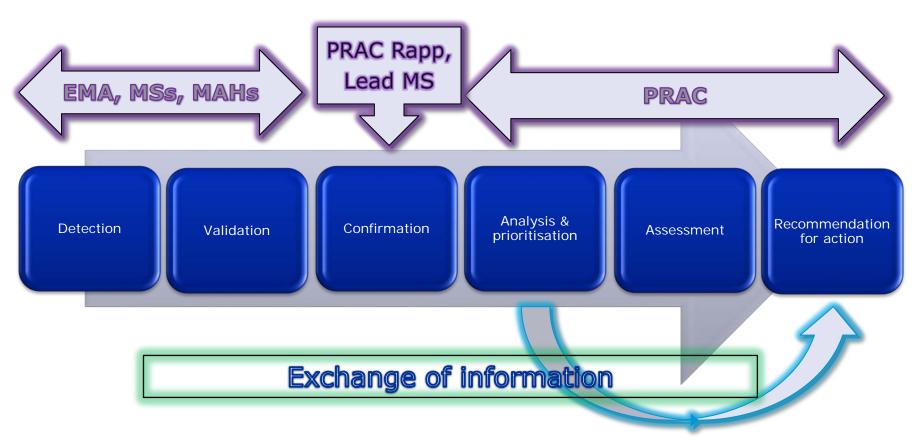


- ➤ Updated pharmacovigilance legislation published in 2010 and 2012 (amending Regulation 726/2004 and Directive 2001/83) and Commission Implementing Regulation (IR) 520/2012 established:
 - Principles for monitoring the data in the EudraVigilance database to determine whether there are new risks or whether risks have changed or whether those risks have an impact on the benefit risk balance of the medicinal product.
 - The PRAC shall perform initial analysis, prioritisation and assessment of signals and when necessary agree on any subsequent action concerning the marketing authorisation of the product.
 - The different steps in the Signal Management process.

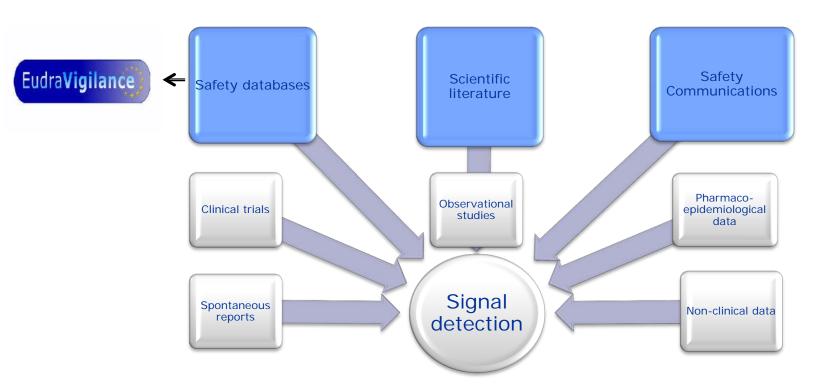
► EU Guideline: Good Vigilance Practice Module IX on Signal Management

EU signal management process at a glance











What is EudraVigilance?



- EudraVigilance (EV) is a common pharmacovigilance database accessible at a single point within the European Community
- EV contains information on suspected Adverse Drug Reactions (ADRs) from both pre- & post-authorisation phases, transmitted securely by:
 - National Competent Authorities (NCAs)
 - Marketing Authorisation Holders (MAHs)
 - Sponsors of Clinical Trials
- EV also contains medicinal product information in the extended EudraVigilance
 Medicinal Product Dictionary (xEVMPD)

What is the main purpose of EudraVigilance?

- To support the protection of public health by:
 - Collecting suspected ADRs in the pre- and post-authorisation phases
 - Supporting the monitoring and evaluation of potential safety issues by EU regulators during clinical trials and following their marketing authorisation
 - Monitoring the reporting compliance (EU expedited reporting requirements) and the quality of data submitted by MAHs and NCAs
 - Monitoring identified/potential safety issues as outlined in the EU Risk Management Plan
 - Supporting the decision making process at the level of the EMA Committees

EudraVigilance key dates

- Key dates
 - December 2001: Launched (post-authorisation only EVPM)
 - May 2004: Extended to cover Clinical Trials
 - November 2005: Mandatory electronic reporting of PM ICSRs in the EEA
 - July 2007: EudraVigilance Data Analysis System (EVDAS) available to NCAs
 - November 2017: EV became central repository for all EEA ADR data
 - ➤ All cases to be transmitted to EV & EMA to forward EEA cases to NCAs

EV access to the general public





EudraVigilance - European database of suspected adverse drug reaction reports



- bg Европейска база данни относно съобщенията за подозирани нежелани лекарствени реакции
- es Base de datos europea de informes de presuntas reacciones adversas
- cs Evropská databáze hlášení podezření na nežádoucí účinky léčivých přípravků
- da Europæisk database over indberetninger om formodede bivirkninger
- Europäische Datenbank gemeldeter Verdachtsfälle von Arzneimittelnebenwirkungen
- Ravimite võimalike kõrvaltoimete teatiste Euroopa andmebaas
- el Ευρωπαϊκή βάση δεδομένων αναφορών πιθο
- Evrópskur gagnagrunnur fyrir tilkynningar á n European database of suspected adverse dr
- fr Base de données européenne des rapports :
- ga Bunachar sonraí Eorpach na dtuarascálacha hr Europska baza podataka prijava sumnji na i
- it Banca dati europea delle segnalazioni di sos
- It Pranešimų apie įtariamą nepageidaujamą re
- hu Feltételezett mellékhatásokról szóló jelentés mt Database Ewropea ta' rapporti dwar reazzjo
- nl Europese database van rapporten over vern
- no Europeisk database over rapporter om anta
- pl Europejska baza danych zgłoszeń o podejrz
- Base de dados europeia de notificações de r
- Baza europeană de date privind rapoartele
- sk Európska databáza hlásení o podozreniach r sl Evropska podatkovna baza poročil o domne
- fi EU:n tietokanta lääkkeiden epäiltyjä haittav
- sv Europeiska databasen för rapporter om mis:

Number of individual cases by Age Group

Age Group	Cases	96
Not Specified	230	17.0%
0-1 Month	10	0.7%
2 Months - 2 Years	8	0.6%
3-11 Years	45	3.3%
12-17 Years	54	4.0%
18-64 Years	545	40.3%
65-85 Years	395	29.2%
More than 85 Years	66	4.9%
Total	1,353	100.0%

Number of individual cases by Sex

Sex	Cases	9/6
Female	676	50.0%
Male	592	43.8%
Not Specified	85	6.3%
Total	1,353	100.0%

EVPM ICSR(s) Individual Case Safety Report Form EudraVigilance General Information EU-EC-10000733311 EudraVigilance Local Report Number Sender Type Pharmaceutical company Sender's Organisation NOVO NORDISK A/S Type of Report Spontaneous Primary source country European Economic Area Reporter's qualification Healthcare Professional

Case serious?

Patient		
Age	Age Group	Sex
61 Years	Adult	Male

Reaction / Event									
MedDRA LLT	Duration	Outcome	Serlousness ¹						
Drug effect diminished		Unknown	life threat.						
Product lot specific issue		Unknown	life threat.						
Blood glucose increased		Not Recovered/Not Resolved	life threat.						

Drug Information											
Role ²	Drug	Duration	Dose	Units in Interval	Action taken						
s	ACTRAPID PENFILL - INSULIN HUMAN, INSULIN HUMAN (RDNA)				Drug withdrawn						
С	- CLINDAMYCIN, CLINDAMYCIN HYDROCHLORIDE, CLINDAMYCIN PHOSPHATE										

Drug Information (cont.)										
Info ³	Info ³ Drug Indication Pharm. Form Route of A									
	ACTRAPID PENFILL - INSULIN HUMAN, INSULIN HUMAN (RDNA)	Diabetes	Solution for injection	Subcutaneous						
	- CLINDAMYCIN, CLINDAMYCIN HYDROCHLORIDE, CLINDAMYCIN PHOSPHATE	Inflammation		Unknown						



Signal validation is the process of evaluating the current data available for the detected signal to verify that further analysis is needed (e.g analysis of individual cases)

Signal detection and validation in EudraVigilance

Agency

takes the lead for monitoring EV, signal detection and validation for Centrally Authorised Products (CAP)

NCAs

take the lead for monitoring EV, signal detection and validation for Nationally Authorised Products

commendation for action

The electronic Reaction Monitoring Report (eRMR) provides aggregated data, incorporates statistical analysis

Active Substances	SOCs	SMQ Narrow	SMQ Narrow PIS		New EV	Tot EV	New Fatal	Tot Fatal	New Sponta neous	Tot Sponta neous	PRR (-) •	Priority	Changes •	SDR	Signal Status
active subtance	Nerv	Convulsions	Petit Mal Epilepsy	Ime	0	19	0	0	0	16	0.26				
active subtance	Nerv	Convulsions	Grand Mal Convulsion	Ime / Dme	1	85	0	0	0	73	0.20	Pr 1	Increased		PSUR
active sublance	Nerv	Convulsions	Postictal Paralysis	Ime	0	3	0	0	0	3	0.75				
active subtance	Nerv	Convulsions	Complex Partial Seizures	Ime	0	5	0	0	0	2	0.03				
active subtance	Nerv	Convulsions	Psychomotor Seizures	Ime	0	1	0	0	0	0					
active subtance	Nerv	Convulsions	Temporal Lobe Epilepsy	Ime	0	1	0	0	0	1	0.05				
active subtance	Nerv	Convulsions	Simple Partial Seizures	Ime	0	1	0	0	0	0					
active subtance	Nerv	Convulsions	Clonic Convulsion	Ime	U	1	0	0	0	1	0.01				
active subtance	Nerv	Convulsions	Convulsion	Ime / Dme	5	750	0	12	5	609	0.42	Pr 1	Increased		Linked
active subtance	Nerv	Drug Abuse, Dependence &	Drug Withdrawal Convulsions	Ime	0	1	0	0	0	1	0.02				
active subtance	Nerv	Convulsions	Epilepsy	Ime / Dme	3	117	0	2	3	112	0.52	Pr 1	Increased		Closed
active subtance	Nerv	Convulsions	Partial Seizures	Ime	0	3	0	0	0	3	0.03				

- Number of cases (interval and cumulatively)
- Disproportionality (Reporting Odds Ratio)
- Clinical relevance
- > Biological plausibility
- > Temporal association
- Dechallenge / rechallenge (+/-)
- Confounders, alternative explanations
- Drug interactions
- Previous awareness (SPC, PSUR, RMP...)
- > Other sources (literature, CTs...)

Detection



EUROPEAN MEDICINES AGENCY

➤ Where it is considered that a validated signal requires further analysis, it shall be confirmed no later than 30 days by the PRAC Rapporteur or the Lead Member State.

- The initial analysis and prioritisation by PRAC is follow-up by a recommendation
- 3 main categories of PRAC recommendations:
 - No specific action
 - Need to additional information
 - Need for regulatory action



Evaluation of all evidence gathered following initial analysis and prioritisation:

Analysis and

- MAH responses
- Additional analyses performed by regulators or other stakeholders, in EV or other sources
- Led by Rapporteur appointed by the PRAC
- According to an agreed timetable
- Leads to a further PRAC recommendation

	Standard timetable for the assessment of additional data from MAHs for signals										
Day Action											
Day 1 Start of procedure											
Day 30	Preliminary PRAC Rapporteur AR										
Day 45	Comments from PRAC members										
Day 50	Updated PRAC Rapporteur AR										
Day 60	Adoption of PRAC recommendation										

Communications and transparency



Advanced notification of signals on the PRAC agenda

PRAC agenda

PRAC Recommendations

Translations of the product information

Assessment reports

PRAC minutes

EU - Signal management process



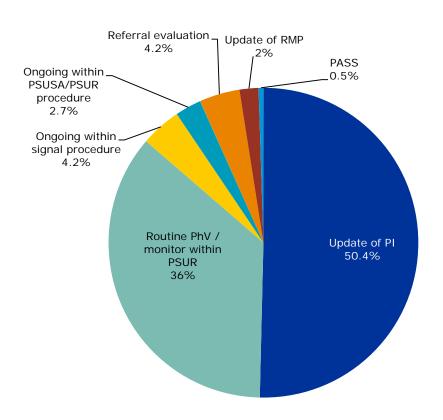
In 2017 the EMA signal management team reviewed in detail a total of 2,062 potential signals (Drug-event pairs from screening of the EudraVigilance database, medical literature, information received from other regulatory authorities).

81.8% of the signals originated from EudraVigilance

43 prioritised and assessed by PRAC

Sep 2012 to Dec 2017: PRAC evaluated 403 signals

Signal outcomes (Sep 2012 to Dec 2017)



EudraVigilance monitoring by MAHs



- From November 2017 MAHs have access to EudraVigilance to comply with their pharmacovigilance obligations.
- MAHs shall ensure the continuous monitoring of EudraVigilance
- Where a MAHs detects a new signal when monitoring the EV database, it shall validate it and shall forthwith inform the Agency and NCAs

Signals validated by MAHs



The EU Signal Management process is implemented since 2012

Further strengthened the link between scientific assessments and regularity actions delivering public health

New access to EudraVigilance: Safety monitoring of the database will be reinforced with the access by MAHs EMA and medicines regulatory agencies have progressed significantly in the transparency and communication aspects

Support, guidance and training



Signal Management webpage:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general_content_000587.jsp&mid=WC0b01ac05807 27d1b

GVP general page:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000345.jsp&mid=WC0b0 1ac058058f32c

Guideline: "Screening for adverse reactions in EudraVigilance":

http://www.ema.europa.eu/docs/en_GB/document_library/Other/2016/12/WC500218606.pdf

• Questions & answers on signal management:

http://www.ema.europa.eu/docs/en_GB/document_library/Other/2013/09/WC500150743.pdf

EudraVigilance Access Policy Revision 3:

http://www.ema.europa.eu/docs/en_GB/document_library/Other/2016/12/WC500218300.pdf

EudraVigilance Training Program:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000162.jsp&mid=WC0b01ac0580a_1a1fb_



Thank you for your attention

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Periodic Safety Update Report (PSUR)

2nd International Awareness Session - The EU medicines regulatory system and the European Medicines Agency

Presented by Gaelle Bec on 9 March 2018 Procedure Management Department





What is a PSUR (=Periodic Benefit-Risk Evaluation Report (PBRER))?



A report prepared by the Marketing Authorisation Holder (MAH) describing the worldwide safety experience with a medicine at a defined time after its authorisation.

Part of the lifecycle benefit-risk management of a medicine.



The legal requirements are established in the Regulation (EC) No 726/2004 and the Directive 2001/83/EC.

PSUR format

- Commission implementing Regulation (EU) No 520/2012
- Guideline on good pharmacovigilance practices (GVP) Module VII – Periodic Safety Update Report
- ICH-E2C(R2) guideline (see Annex IV ICH-E2C(R2))

- 1. Introduction
- Worldwide marketing approval status
- 3. Actions taken in the reporting interval for safety reasons
- 4. Changes to reference safety information

- 5. Estimated exposure and use patterns
- 6. Data in summary tabulations
- 7. Summaries of significant findings from clinical trials during the reporting interval
- 8. Findings from non-interventional studies

- 9. Information from other clinical trials and sources
- 10. Non-clinical data
- 11. Literature
- 12. Other periodic reports

- 13. Lack of efficacy in controlled clinical trials
- 14. Late-breaking information
- 15. Overview on signals: New, ongoing or closed
- 16. Signal and risk evaluation

- 17. Benefit evaluation
- 18. Integrated benefit-risk analysis for authorised indications
- 19. Conclusions and actions
- 20. Appendices to the PSUR



PSUR cycle and submission

- PSURs are submitted after approval of a medicine
- Submission requirements are set out in the list of Union reference dates (EURD list) (published on the EMA web-portal)

General principle:

- 1st PSUR should cover 6-month period from date of marketing authorisation in EU
- Subsequent PSURs submissions frequency as set in EURD list (e.g. 6-monthly, yearly, 3-yearly)





EURD list

List of active substances (AS) and combinations of AS authorised in EU for which a PSUR shall be submitted (does not include Art 58 products)



Active substances and combinations of active substances	European Union reference date (EURD)		DLP	Submission date	Next DLP	Next Submission date	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	Notes	Procedure number of the PSUR single assessment (DLP)	Procedure number of the PSUR single assessment procedure (Next DLP)	PRAC representative of the PSUR single. assessment procedure	of the PSUR single assessment procedure	CAP	NAP
(18) fludeonyglucose	14/11/1994	Зуныя	30/11/2017	28/02/2018			No	3907/2015	PRAC Rapporteur name visa amended on 28/01/2016 PRAC Rapporteur name updated on 07/04/2016 PRAC Rapporteur name updated on 04/02/2016 Lead MS vias added on 22/12/2014	PSUSA/000014371 201711		Claire Férard	France		NAP
1,3-butanediol/cinchocaine hydrochloride / devamethasone	23/09/1983	13 years	15/05/2025	13/08/2025			No	01/10/2012		PSUSA/00000753/ 202505					NAP
125i-human serum albumin	15/12/1989	13 years	15/12/2025	15/03/2026			No	01/10/2012		PSUSA/00000003/ 202512					NAP
131-6-iado-norcholesteral	21/06/1990	13 years	21/06/2025	19/09/2025			No	01/10/2012		PSUSA/00000004/ 202506					NAP
*C-urea	14/08/1997	Syews	15/01/2018	15/04/2018			No	07/10/2012	PRAC Rapporteur name updated on 12/05/2015	PSUSA/00000006/ 201001		Jan Neuhauser	Austria	CAP	
1-propanol / 2-propanol / 2- biphenylol	23/10/1980	Syears	23/10/2019	21/01/2020			No	27/11/2015	Nev substance added on 27/11/2015	PSUSA/00010406/ 201910					NAP
1-propand / 2-propand / factic acid	07/09/1981	Syears	07109(2019	06/12/2019			No	27/11/2015	Procedure number was corrected on 18/11/2016 New substance added on 27/11/2015	PSUSA00010414/2 01909					NAP

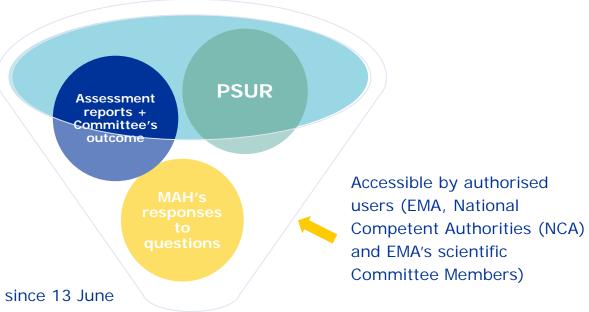
- Contain the EURD, PSUR submission frequency, DLP, submission date...
- The frequency of PSURs submission for the same AS and combination of AS is harmonised
- The management and assessment of PSURs within the EU is optimised
- The predictability of PSURs submission is increased
- The list is updated monthly

Patient safety and Pharmacovigilance: Periodic Safety Update Report (PSUR)



PSUR repository

(Common storage)



The use of the repository is mandatory since 13 June 2016 for both centrally and nationally authorised medicines.

PSUR single assessment (PSUSA) process



Single evaluation of PSURs of medicines containing the same AS or same combination of AS



Assessment by PRAC Rapporteur (CAP or CAP/NAP) or Lead Member State (NAP only)





Adoption of outcome:
Maintenance, variation,
suspension, revocation of
marketing authorisation(s)

Timelines: 120 days (PRAC assessment) (+ 14 days CHMP/CMDh + 67 days of EC decision making process)



Scope of the PSUSA

Evaluation of new or emerging information on the risks

Evaluation of any new efficacy/effectiveness information

Gain **cumulative knowledge** on the product while retaining a **focus on new information**

Conduct an **integrated benefit-risk evaluation** for approved indications





Outcomes of PSUSA are published on:

<u>European Public Assessment Report (EPAR)</u> (centrally authorised medicinal products)

Community Register (for centrally and nationally authorised products)

EMA web page under '<u>Home/Find medicine/Human medicines/Periodic safety</u> update report single assessments' (for nationally authorised products)



Continued improvement of PSUR single assessment

PSUR Road map activities:

- Identifying key issues encountered by Industry and Regulators in the preparation of PSURS, sharing Best Practice on ways to address these key issues to achieve a common understanding of the quality standards needed to facilitate the EU PSUR single assessment
- Explanatory note to GVP module VII
- PSUR Q&A for assessors



Useful links

Guideline on good pharmacovigilance practices Module VII – Periodic safety update report http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline/2013/04/WC500142468.pdf

Periodic safety update reports – EMA webpage

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_0003 61.jsp&mid=WC0b01ac058066f910

Periodic safety update reports: questions and answers

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000041.jsp&mid=WC0b01ac0580023e7d

EURD list - Introductory cover note

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



Thank you, any questions?

Further information

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Abbreviations

AS: Active substance

CAP: Centrally Authorised Product

CHMP: Committee for Medicinal Products for

Human Use

DLP: Data Lock Point

EC: European Commission

EMA: European Medicines Agency

EPAR: European Public Assessment Report

EU: European Union

EURD: European Union Reference Date

GVP: Good Pharmacovigilance Practices

MA: Marketing Authorisation

MAH: Marketing Authorisation Holder

MS: Member State

NAP: Nationally Authorised Product

NCA: National Competent Authority

PSUR: Periodic Safety Update Report

PSUSA: PSUR single assessment