EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Fourth Stakeholders forum on the implementation of the new Pharmacovigilance legislation

Module II - Pharmacovigilance system master file

Presented by: Joanna Harper
Inspections, Enforcement & Standards Division (MHRA)

GVP Module II - Registration and Maintenance of PSMF

Note:

although applicants for THMP registrations will not have to include a PV system summary in the application, article 104 still applies in that a PSMF will need to be made available and maintained.

PV system summary

- Location
- Registration
- Transfer from DDPS
- Variations
- Transfer of responsibilities for the PSMF

GVP Module II - Registration and Maintenance of PSMF

•PV System Summary

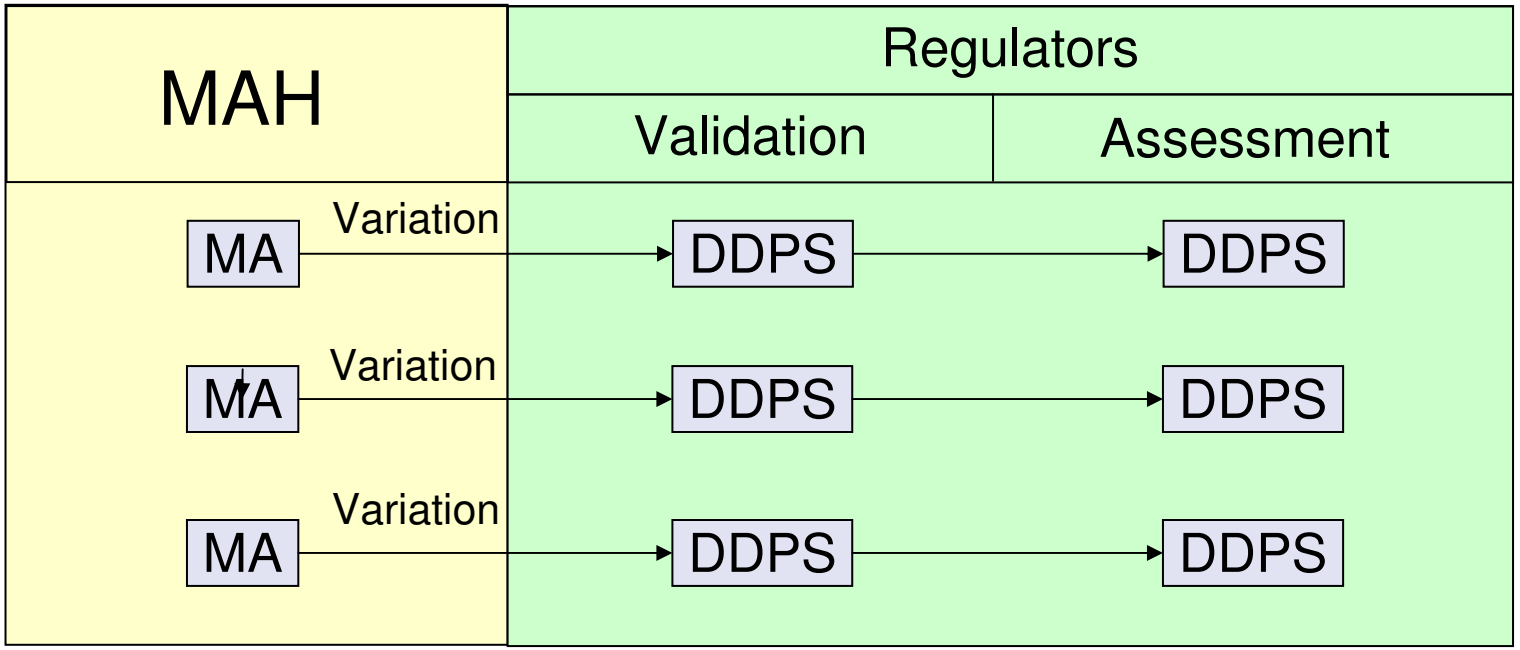
• **Location**

there is a change following consultation on the implementing measures, from QPPV site to either at the site where the main pharmacovigilance activities are performed or at the site where the QPPV operates.

This must also be a physical address for the MAH or contracted third party, within the Union. Therefore, the most relevant EU site should be selected, the default being the QPPV site in the absence of an appropriate site for selection.

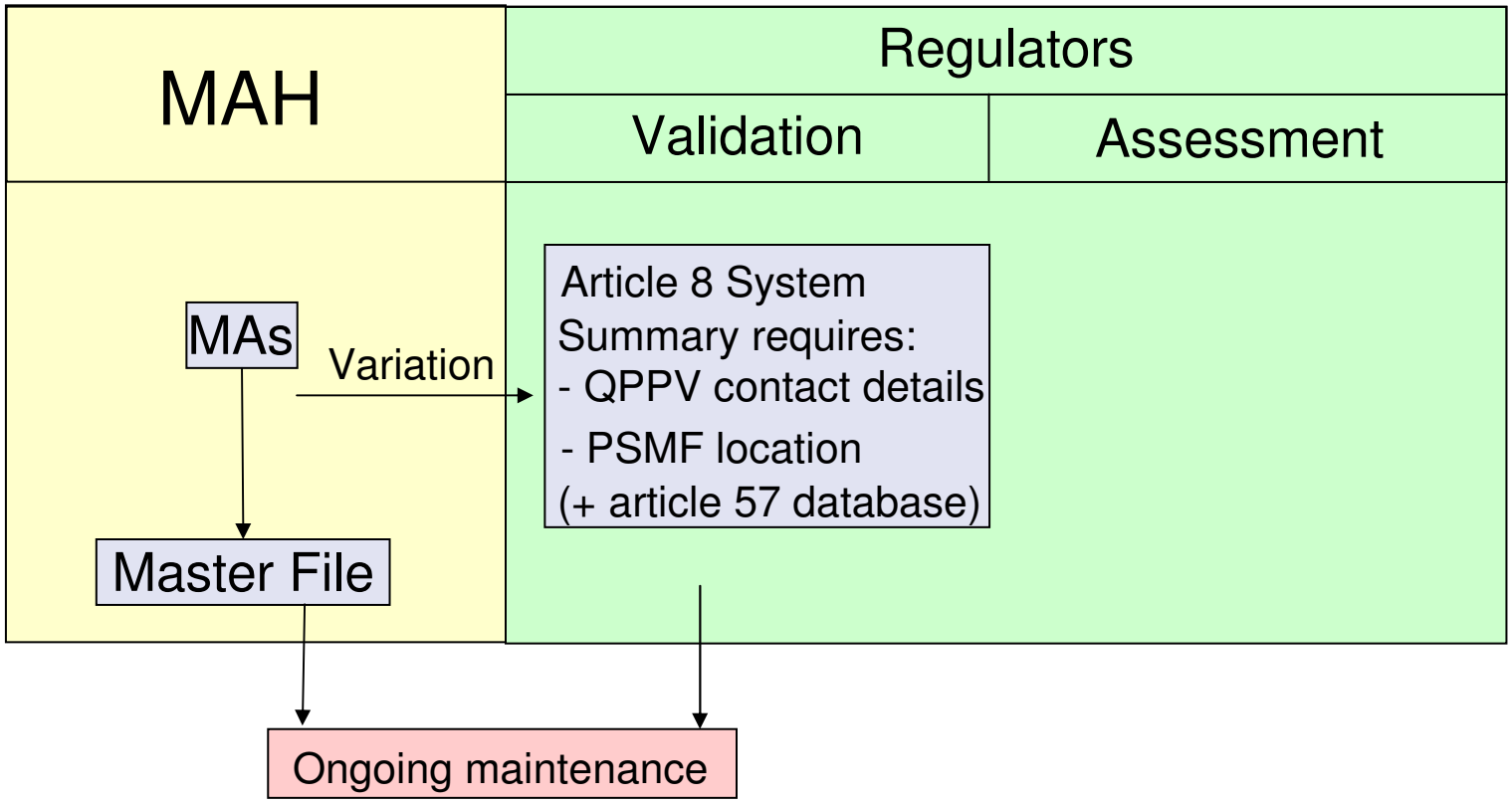
What considerations for guidance should be included for determination of 'main site' ?

Simplification – the concept (past)



Variations required for DDPS updates include: QPPV change, QPPV contact details change, back up of QPPV, change in the safety database, change in contractual arrangements, topics covered by written procedures, PV sites, (other) (*CI.9 of variations classification guideline)*

Simplification – the concept (future)



The PSMF will be kept up to date without variations. Variations will be required only for changes to the pharmacovigilance system summary (Article 8)

Module II – PSMF, Registration and Maintenance

Use of the article 57 database

– how can we optimize the use of the database ?

For example, it is proposed that once the article 57 database is in full use, PSMF location changes by variation may be limited to country changes only, with the database maintained for the full details.

Changes to the variations classification guideline: removing the need for variations relating to PV system change when a PSMF is in place

MAHs must still be prepared to submit PV system information and change information to allow NCAs and EMA to assess risk (included in the objectives, transfers of responsibilities and change control sections of the Module). This may be a full PSMF (including a pre-authorisation PSMF), the history of changes, or other relevant details)

Module II – PSMF, Registration and Maintenance

Early adoption of PSMF:

Where no renewal is due, it is possible for MAHs to include a PSMF location in the marketing authorisation by variation (and therefore be relieved of DDPS requirements where applicable).

This can occur before the end of the transition period (before July 2015).

- In the period up to 2015, ***what will be the voluntary uptake of PSMF?***

- Is it clear that, in the instance of no renewal between July 2012 and 2015, variations to update the marketing authorisation (PV system summary) will have to be ***submitted for all products (except THMP)****?*

What additional transitional guidance for the PSMF is required?

Module II – PSMF, Representation of PV systems

Arrangements for shared systems and delegated activities are described

- Single PSMF per system
- Single location per PSMF
- Possibilities of more than one system (and PSMF) per MAH
- Defining responsibilities (and QPPV) for shared systems in written agreements
- MAH able to provide information about the PV system (PSMFs) applicable to entire portfolio of MAs

What organisational arrangements and practical aspects do Industry want to see specifically covered in guidance?

Module II – PSMF, Information contained in the PSMF

QPPV details
Products
Organisational structure
Sources of safety data
Computerised systems and databases
Processes
PV system performance
Quality System
Annexes (lists)

The maintenance of the information is described in the section on change control. ***Is additional guidance needed for the content sections?***

The format is deliberately unspecified so that existing systems can be used to generate content, ***would Industry prefer a template approach?***

Module II – PSMF, Change control

- Informing QPPV and third parties/partners of **significant changes:**

- Safety database or associated databases, validation status (including data),
- Service provision for pharmacovigilance,
- Major contractual arrangements concerning PV,
- Mergers, acquisitions,
- PV sites, PSMF management.

Changes to be notified to the QPPV are also in the section 'transfer of responsibilities':

- Changes that must be submitted as variations,
- The addition of corrective and/or preventative actions and managed deviations,
- Changes that affect oversight of the PV system in terms of capacity, functioning and compliance,
- Changes in the arrangements for providing the PSMF to NCAs,
- The addition of new products to the PV system.

Module II – PSMF, Change control

- Maintaining, and making accessible, records of change control for lists and documents

- History of changes in a 'logbook' for re-versioning of PSMF or significant changes

Records of change for PSMF content will need to be maintained by the MAH, and may be requested by NCAs / Agency.

Do the types of changes to be recorded in the logbook require further definition ?

Simplification – operational

•A uniform information set describing the pharmacovigilance system is available to the QPPV and for the purposes of audit. Tool for QPPV to oversee and manage system.

• There is a reduced burden in terms of documentation submitted as part of the MAA, for MAHs and NCAs: version control, storage.

•Less routine assessment of the system description: a practical reference for inspection and audit

•There will be a harmonised and consistent PSMF for NCAs to use to plan inspections, MAHs will not necessarily need to manage ad hoc versions of pre-inspection documentation.

• Opportunity to use existing systems and to generate content for submission when requested

What can we do to maximise the guidance?

Crown copyright 2012