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Annual Report of the Pharmacovigilance Inspectors Working Group for 2011

Adopted by the PhV IWG on 22 March 2012

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1. Introduction

This document is the fourth Annual Report of the Pharmacovigilance Inspectors Working Group (PhV IWG). The PhV IWG[1] has been established by the EMA, within the scope of article 57(1)(i) of Regulation (EC) No. 726/2004. Following a report on the first year of operation, the PhV IWG Mandate was endorsed by the Heads of Medicines Agencies on 18-19 May 2009 and by the EMA Management Board on 1 October 2009, thereby formally establishing the PhV IWG.

The PhV IWG focuses on harmonisation and co-ordination of pharmacovigilance related activities at Community level. The group's role and activities are described in more detail in its Workplan. The group supports the co-ordination of the provision of pharmacovigilance inspection related advice and provides a link with other groups such as CHMP[2], CVMP[3], and PhV WP (H+V)[4].

This Annual Report is set out in line with the format and objectives of the 2011 Workplan.

2. Meetings

The plenary meetings, involving pharmacovigilance inspectors dealing with human medicinal products and pharmacovigilance inspectors dealing with veterinary medicinal products, were held on the following dates:

- 24 March 2011
- 16 June 2011
- 29-30 September 2011
- 08-09 December 2011

In June 2011, due to the implementation of the new human pharmacovigilance legislation, the group agreed to re-organise the meetings of September and December 2011 to accommodate a joint session and two separate sessions, one dedicated to human and one to veterinary medicinal products only.

In addition, approximately monthly meetings (remote access was provided to attendees) of the Audits/Inspections project team for the implementation of the new pharmacovigilance legislation, including PhV IWG and PhV WP delegates were organised to discuss draft documents and specific topics, in particular items to support the implementation of the new pharmacovigilance legislation (see section 6).

3. Inspections conducted in support of the centralised procedure

Development of pharmacovigilance inspections relating to centralised products

According to Volume 9A and the guideline on monitoring of compliance with pharmacovigilance regulatory obligations and pharmacovigilance inspections of veterinary medicinal products in Volume 9B, the CHMP and CVMP, respectively, in conjunction with the Competent Authority of the Member State (MS) in whose territory the MAH's QPPV is located and applicable Pharmacovigilance and Inspectors' Working Parties, will determine a programme for inspection in relation to centrally

[1] Pharmacovigilance Inspectors Working Group
[2] Committee for Medicinal Products for Human Use
[3] Committee for Medicinal Products for Veterinary Use
[4] Pharmacovigilance Working Party (Human + Veterinary)

authorised products (CAPs). These inspections will be prioritised based on the potential risk to public health, the nature of the products, extent of use, number of products that the MAH has on the EEA market and other risk factors.

The focus of these inspections is to determine whether the MAH has the personnel, systems and facilities in place to meet their regulatory pharmacovigilance obligations for CAPs in the EEA. These inspections will be requested as system inspections with one or more specific products selected as examples, for which specific information can be traced and verified through the various processes. This shall provide a practical evidence for the functioning of the MAH's pharmacovigilance system in the Community and their compliance with the regulatory requirements.

In general, it is anticipated that national inspection programmes will fulfil the need for the routine inspections of this programme and therefore it is expected that the inspection programme will be achieved mainly through the national programmes. However there will be situations where these inspections might be specifically requested by the CHMP or CVMP, as applicable, (e.g. global pharmacovigilance sites in third countries). Targeted inspections are also reflected in this programme as they may replace the need for a routine inspection.

The results presented in Table 1 and 2 show the number of inspections requested in relation to the Human and Veterinary 2011 pharmacovigilance inspection programmes, respectively, and split by the type of site inspected.

Table 1- Human pharmacovigilance inspections requested in 2011 in the context of the programme for pharmacovigilance inspection of companies with CAPs

	QPPV (MAH) site	Global PhV site	QPPV Subcontractor site	Subcontractor /Licensing partner site	Affiliate site	Total
CHMP Requested	4	1	0	0	0	5 **
National Inspection Programmes	22	0	2	4	0	28
Total	26	1	2	4	0	33 *

Table 2- Veterinary pharmacovigilance inspections requested in 2011 in the context of the programme for pharmacovigilance inspection of companies with CAPs

	QPPV (MAH) site	Global PhV site	QPPV Subcontractor site	Subcontractor /Licensing partner site	Affiliate site	Total
CVMP Requested	4	0	0	0	0	4
National Inspection Programmes	2	0	0	0	0	2
Total	6	0	0	0	0	6 *

*It should be noted that these totals are just a subset of the total number of pharmacovigilance inspections conducted in 2011 in EU/EEA, which is approximately 226 inspections for human medicinal products and 57 inspections for veterinary medicinal products.

** One of the QPPV site inspections was requested by the CHMP in 2011 but will be conducted in 2012.

4. Harmonisation topics

4.1. Implementation of the new human pharmacovigilance legislation

In relation to the implementation of the new human pharmacovigilance legislation the group contributed to the preparation of the technical contribution to the Commission's implementing measures and to the preparation of the following Good Vigilance Practice Guideline modules:

- GVP Module I - Pharmacovigilance Systems and their Quality Systems
- GVP Module II - Pharmacovigilance System Master File
- GVP Module III – Pharmacovigilance Inspections
- GVP Module IV - Pharmacovigilance System Audits

In addition, the group contributed to the preparation of specific guidance on the use of EMA databases and IT systems in relation to the pharmacovigilance system master file location, the contact details of the qualified person responsible for pharmacovigilance and inspection information sharing. The work on the implementation of the new pharmacovigilance legislation is ongoing.

4.2. Procedures and Guidance documents

The following documents, concerning human medicinal products, have been finalised in 2011:

- Triggers and risk factors for selection of sites/prioritisation for pharmacovigilance inspection: points to consider for assessors.

The following document concerning veterinary medicinal products have been finalised in 2011:

- Assessors' checklist in relation to the DDPS document assessment.
- Pre-submission instructions and template for the "Detailed description of the pharmacovigilance system" (DDPS) document for veterinary medicinal products.

The following documents, concerning only veterinary medicinal products, are under preparation and expected to be finalized in 2012:

- Guideline on Document Retention and Record Keeping for pharmacovigilance inspections.
- Recommendations on the training and experience of inspectors performing pharmacovigilance inspections.
- SOP on the follow-up of pharmacovigilance inspections by EMA for veterinary medicinal products.

4.3. Joint Inspections

The total of CHMP requested inspections in 2011 is five but one of those inspections will be conducted in 2012. From the pharmacovigilance inspections requested by the CHMP and conducted in 2011, three have been joint inspections involving more than one MS (see Table 1 in section 3). The pharmacovigilance inspection to be conducted in 2012 will also be a joint inspection involving more

than one MS. The four pharmacovigilance inspections requested by the CVMP (see Table 2 in section 3) were conducted as joint inspections.

4.4. Training and development

- The group worked on the preparation of a pharmacovigilance inspection training to take place in 2012.
- EudraVigilance (EV) and Data Analysis System (EVDAS) training of pharmacovigilance inspectors of human medicinal products took place on the 23 and 25 March 2011.
- During the PhV IWG meetings held in 2011, discussions on the following topics have taken place:
    - Development of peer review of case studies.
    - Sharing and discussion of inspection report findings.
    - EudraVigilance and Eudravigilance Data Analysis System demonstration of queries available to pharmacovigilance inspectors of veterinary medicinal products to facilitate the preparation of inspections.

5. Pharmacovigilance topics

A) In relation to medicinal products for human use

- The PhV IWG has prepared and is maintaining the 2011-2014 risk-based programme for routine pharmacovigilance inspections of MAHs connected with human centrally authorised products (CAPs).
- Pharmacovigilance inspectors have also provided recommendation to the PhV WP and PhV IWG in relation to pharmacovigilance inspections or related assessment issues.

B) In relation to medicinal products for veterinary use

- The PhV IWG has prepared and is maintaining the 2011-2013 risk-based programme for routine pharmacovigilance inspections of MAHs connected with veterinary centrally authorised products (CAPs).

These programmes are not publicly available as they contain confidential information.

6. Liaison with other groups

Interaction with the CHMP Pharmacovigilance Working Party

- A PhV IWG – Assessors Workshop was held on 9 December 2011 to discuss topics related to the implementation of the new human pharmacovigilance legislation. The following main topics were discussed:
    - GVP Module III on Pharmacovigilance Inspections.
    - Pre-authorisation inspections.
    - Marketing Authorisation conditions in relation to the existence of an adequate pharmacovigilance system.
    - Inspection programmes and operation of the EU Network.

- Communication and exchange of information with 3rd Country Regulators.
- Triggers and risk factors for prioritisation for pharmacovigilance inspections.
- Inspection follow up - Involvement and role of assessors and inspectors.
- Regulatory Actions and Sanctions at National and EU level for pharmacovigilance non-compliance related to the system or to the product.

- Approximately monthly meetings (remote access provided to attendees) of the Audits/Inspections project team for the implementation of the new pharmacovigilance legislation, including PhV IWG and PhV WP delegates were organised to discuss draft documents and specific topics, in particular items to support the implementation of the new pharmacovigilance legislation (see section 2 and section 4.1).

Interaction with the CVMP Pharmacovigilance Working Party

- The PhV IWG has had interaction with assessors on topics related to:
  - DDPS document,
  - Training of assessors and inspectors,
  - Preparation and maintenance of the risk-based programme for routine pharmacovigilance inspections of MAHs connected with veterinary centrally authorised products (CAPs).

Communication with the public and external bodies

- Delegates from the PhV IWG have participated and given presentations on behalf of the group in different European Conferences, covering different topics of public interest.
  - First (15/04/2011) and Third (20/10/2011) stakeholder forum on the implementation of the new pharmacovigilance legislation.

For the details of the activities of the PhV IWG see the Workplan for 2011.