18 November 2021
EMA/367990/2021
Veterinary Medicines Division

Overview of comments received on 'Guideline on veterinary good pharmacovigilance practices (VGVP)' (EMA/257136/2021)

Module: Pharmacovigilance systems, their quality management systems and pharmacovigilance system master files

Interested parties (organisations or individuals) that commented on the draft document as released for consultation.

Stakeholder no.	Name of organisation or individual
1	AnimalhealthEurope
2	EGGVP– European Group for Generic Veterinary Products

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1. General comments – overview

[Add tables with general overview as received from interested party.]

Stakeholder no. *(See cover page)*	General comment (if any)	Outcome (if applicable)
1	AnimalhealthEurope would like to thank the Agency for this important document and is grateful for the opportunity to comment. Please find a few comments attached. Should you have further questions, AnimalhealthEurope is happy to provide any clarification needed. It is suggested to consistently use the wording 'veterinary medicinal products' throughout the document for clarity, instead of using 'product' or 'medicinal product' in some phrases.	 Accepted to be replaced.

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2	It is of concern that the summary of the pharmacovigilance system master file is part of the application, as it will have consequences i.e. administrative and financial burden (both for the industry and competent authorities) every time a pharmacovigilance system master file will be updated. Also the reference numbers will ask for a variation, if the pharmacovigilance system master file is updated. It is therefore very important for MAHs that, in case a variation is required (for instance change of QPPV), this can this be done by one single variation of the PSMF summary. More precise terminology and definition would be welcome along the text, in particular: • The guideline refers to "local representative" but there is a lack of clarity and disharmonised criteria in the EU Member States about this term. A definition at EU level is necessary to allow implementing the requirements of this guideline with clarity and in a harmonised manner. • The use of the terms "contracted" and "subcontracted" is inconsistent along the document. It needs to be clarified	There will not be a need of variation every time a PSMF is updated because the PSMF is not part of the dossier. Variation will be required only for elements included in the summary of the PSMF that is part of the dossier. The PSMF reference number should not change frequently and with no reason, as it aims to be a unique identifier for the phv system. It should change only if the phv system changes (for example in case of merge of MAHs systems with big changes of the system). In the latter case variation C6 will apply. According the Implementing Regulation EUR-Lex - 32021R0017 - EN - EUR-Lex (europa.eu), there are 3 categories (C1,5 and 6) that you could use to register the changes in the elements of the summary of PSMF. For instance if only QPPV changes only C1 variation is required and this will be enough to update the information in the summary of PSMF into the Database. In case you have changes of QPPV and PSMF location then indeed 2 variation categories (C1 and C5) will apply. The reference to local or regional representatives follows the Regulation (EU) 2019/6. We know that there is no harmonised approach at present and we will discuss with the MSs in order for the requirements to be harmonised as possible in the Union. However these information and guidance will have to be provided outside of VGVP. Accepted.

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	what is meant, or maybe for each situation should be added "contracted/subcontracted" instead of one of the two.	We will use both terms as this will apply on a case by case. It's better to use both terms as the Implementing Regulation (EU) 2021/1281 is using the term subcontracted.

2. Specific comments on text

[Add tables with specific comments as received from interested party.]

Line no.	Stakeholder no. *(To be completed by the Agency)*	Comment and rationale; proposed changes	Outcome *(To be completed by the Agency)*
57	1	Comment: What is meant by 'enabling them to fulfil all their pharmacovigilance'? The sentence seems to be incomplete. Proposed change: Please modify the sentence to read: "..enabling them to fulfil all their pharmacovigilance **obligations..**"	Comments accepted and rewording as follows: According to Article 77 of Regulation (EU) 2019/6, marketing authorisation holders shall establish and maintain a system for collecting, collating and evaluating information on the suspected adverse events concerning their authorised veterinary medicinal products ('pharmacovigilance system'), enabling them to fulfil all their pharmacovigilance obligations.
57	2	Comment: Typo – omitted word Proposal: *"enabling them to fulfil all their pharmacovigilance* ***responsibilities****"*	Accepted. Reworded as above.
79-84	2	Comment: This paragraph suggests that the marketing authorisation holder's risk management system (RMS) is linked to each product, although this is not stated in the regulation. If this would be confirmed, with a RMS described for each product in the PSMF, this would mean that the PSMF will be related with the products (not only the summary of the PSMF but the PSMF itself), with the huge amount	The RMS is not linked to each product, it should be part of the overall system as describe in the Implementing Regulation (EU) 2021/1281. We have added clarification that RMS documentation in the PSMF is only for the products for which specific safety monitoring requirements exist. Reworded as follows:

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		of maintenance work and burden (administrative and financial) it will involve for MAHs. It is also not clear if a RMS is required for each VMP, or if there could be certain products where the RMS may be omitted (which is the case for human medicines). The RMS should be linked to the MAH and not to the veterinary medicinal product. Proposal: Alternative statement – "Marketing authorisation holders shall ensure continuous assessment and document the risk management measures and the outcome of risk minimisation measures of the products for which specific safety monitoring requirements exist in the respective Annex of the pharmacovigilance system master file "	Marketing authorisation holders shall ensure continuous assessment and document the risk management measures and the outcome of risk minimisation measures in the pharmacovigilance system master file [IR 2021/XX, Article 16(3)] for the veterinary medicinal products for which specific safety monitoring requirements exist.
94-95	2	Comment: Typo – omitted word Proposal: *"good pharmacovigilance practice for veterinary medicinal* ***products"***	Accepted. The term *veterinary medicinal products* will be used in the document.
143	1	Comment: What does 'for the purpose of receiving reports of suspected adverse events' exactly mean?	The sentence comes from the Regulation (EU) 2019/6, Article 77(3)]. The sentence means that there should be a local or regional representative that understands and

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		Clarification is requested on what the requirements are for the local or regional representative.	communicates in the languages of the relevant Member States where the suspected adverse events are reported. This will facilitate the correct reporting and follow up of the reports. Depending on the official language spoken and the number of languages the selected representative speaks they could act at local or regional level. In addition he/she should have knowledge of pharmacovigilance obligations.
142-143	2	Comment: The term "local representative" needs definition to avoid disharmonised interpretation in the Member States – see also general comments.	See general comment above.
212, 264, 282	1	Comment: Please clarify and further define what is meant by follow-up audit.	With Follow-up audit we mean any further audit than the initial one that will always include at least the assessment of the CAPA put in place after the 1st audit.
265	1	Comment: The text may benefit from rephrasing, as the exact meaning is not clear now (… shall be sent to the QPPV and / management responsible for …). Clarification is sought.	The sentence has been rephrased slightly as follows: A report shall be drawn up on the results for each audit and any follow-up audits and these shall be sent to the QPPV and management responsible for the matters audited, as applicable, to ensure that management cooperates with the QPPV to address the findings.
279-280	1	Comment: Clarity is sought on what is meant with 'including monitoring and documenting the effectiveness of the corrective or preventive actions', or how this is expected to be correctly performed avoiding different biasing effects.	Accepted. The text is deleted from the change management part. If there are changes these will be already part of the corrective and preventive actions. Reworded as follows:

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			Marketing authorisation holders shall monitor the implementation and assess the effectiveness of corrective and preventive actions. If there are changes associated with the corrective and preventive actions, those changes shall be evaluated and be part of a controlled process of change (change management) and communicated to relevant stakeholders.
311	1	Comment: What is meant with 'activities (…) related to (…) terminologies? Please clarify.	Accepted to delete the word terminology. The sentence wants to highlight that staff members to whom no specific pharmacovigilance tasks and responsibilities have been assigned but whose activities may have an impact on the pharmacovigilance system or the conduct of pharmacovigilance. The sentence has been rephrased slightly as follows: Such activities include but are not limited to those related to clinical trials, technical product complaints, medical information, sales and marketing, regulatory affairs, legal affairs and audits.
312 -313	2	Comment: Paragraph is unclear, it is assumed it refers to ensuring business continuity in case of pharmacovigilance – related urgency. Proposal: *"Appropriate instructions on the processes to be used in case of* ***pharmacovigilance-related***	Proposal accepted.

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		urgency, including business continuity, shall be provided by the organisation to their personnel."	
328-329	2	Comment: Clarification would be welcome if the requirement "Evidence on validation status of the system(s)" is applicable to MAHs using their own databases only.	This applies for all systems used by the MAHs. All the systems used should be subject to appropriate checks, qualification and/or validation activities to prove their suitability for the intended purpose.
368	1	Information, how and where the PSMF reference number will be generated, is missing. Please clarify.	This is under discussion and there will be guidance added once it's agreed.
439	2	Comment: Table 1 – PSMF content overview: a section in which MAHs can mention the written procedures is missing. For instance, risk management system is a SOP. In which section of the PSMF should MAHs mention that there is a SOP available for this system? Proposal: Include a section for the written procedures.	The Table 1 provided the correspondence between the PSMF main part sections and Annexes. According to the Implementing Regulation (EU) 2021/1281, SOPs should be provided in annex IV. The PSMF content is already detailed in the Implementing Regulation