



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Implementation of the new pharmacovigilance legislation:

Overall update and activities in 2013

Workshop for micro, small and medium-sized enterprises (SMEs)

European Medicines Agency (EMA), London

26 April 2013

Franck Diafouka,
Project Manager,
Pharmacovigilance and Risk Management Sector, EMA

An agency of the European Union





Content

1. Making of the law and its objectives
2. Key achievements
3. Prioritised implementation for 2013
4. Conclusion



1. Making of the law and its objectives



1. Making of the law and its objectives

- 2003: EC decision to undertake an assessment of the Community system of pharmacovigilance
- 2005: Independent study completed to map the strengths and weaknesses of the EU system
- 2006-2008: Research, consultation, policy development (2007: Commission strategy to strengthen and rationalise pharmacovigilance)
- December 2008: “Pharma package” (Pharmacovigilance, Information to Patients and Falsified medicines) adopted by the European Commission and transmitted to Council and European Parliament for co decision procedure to start
- Co-decision work starts on revisions to Directive 2001/83/EC and revisions to Regulation (EC) 726/2004



1. Making of the law and its objectives

- 23 June 2010: Agreement on final text (first reading agreement)
- 22 September 2010: Final favourable vote in the European Parliament
- Both Regulation (EC) 726/2004 and Directive 2001/83/EC have been published on 31 December 2010 for an entry into force in July 2012.
- 2012 changes further to the 'Mediator stress test': Directive 2012/26/EU and Regulation (EC) 1027/2012 both adopted on 25th October 2012:
 - Regulation (EC) 1027/2012 applies from 5th June 2013
 - Directive 2012/26/EU applies from 28th October 2013



1. Making of the law and its objectives

Promote and protect public health by reducing burden of Adverse Drug Reactions and optimising the use of medicines:

- Clear roles and responsibilities
- Science based
- Risk based/proportionate
- Increased proactivity/planning
- Reduced duplication/redundancy
- Integrate benefit and risk



1. Making of the law and its objectives

Promote and protect public health by reducing burden of Adverse Drug Reactions and optimising the use of medicines:

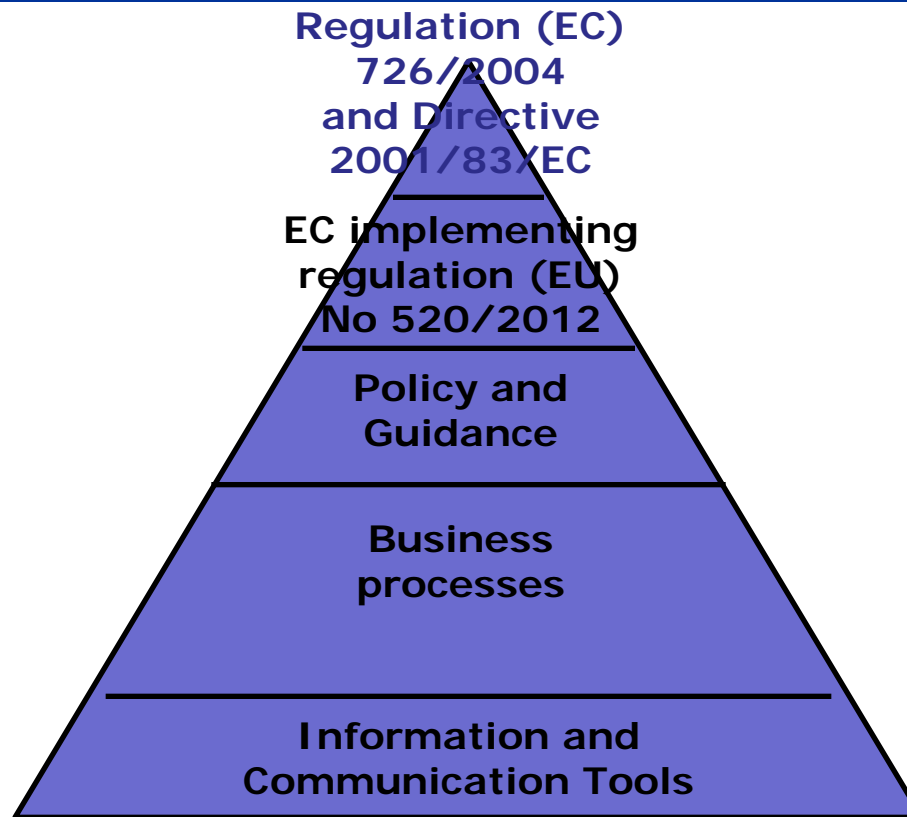
- Ensure robust and rapid EU decision-making
- Strengthen the EU Network
- Engage patients and healthcare professionals
- Increase transparency and accountability
- Provide better information on medicines



2. Key achievements

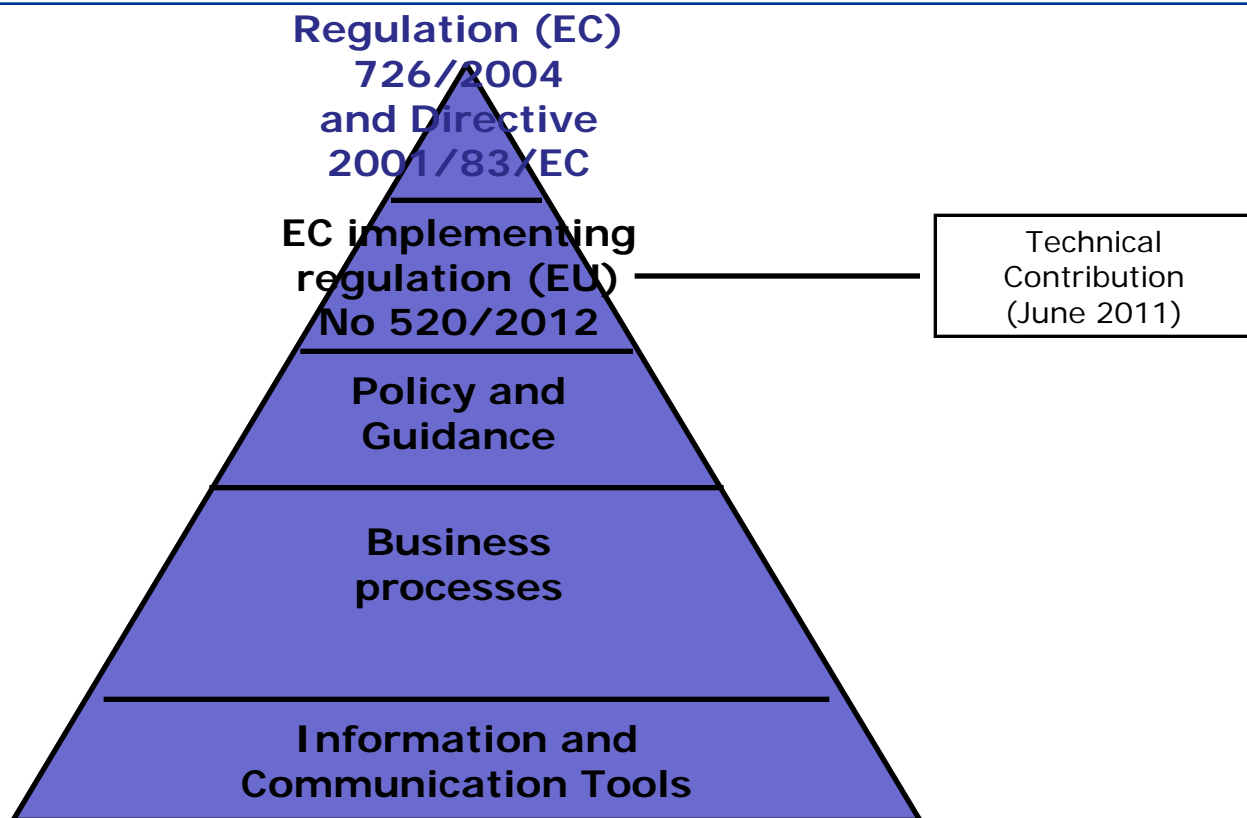


2. Key achievements – hierarchy of rules



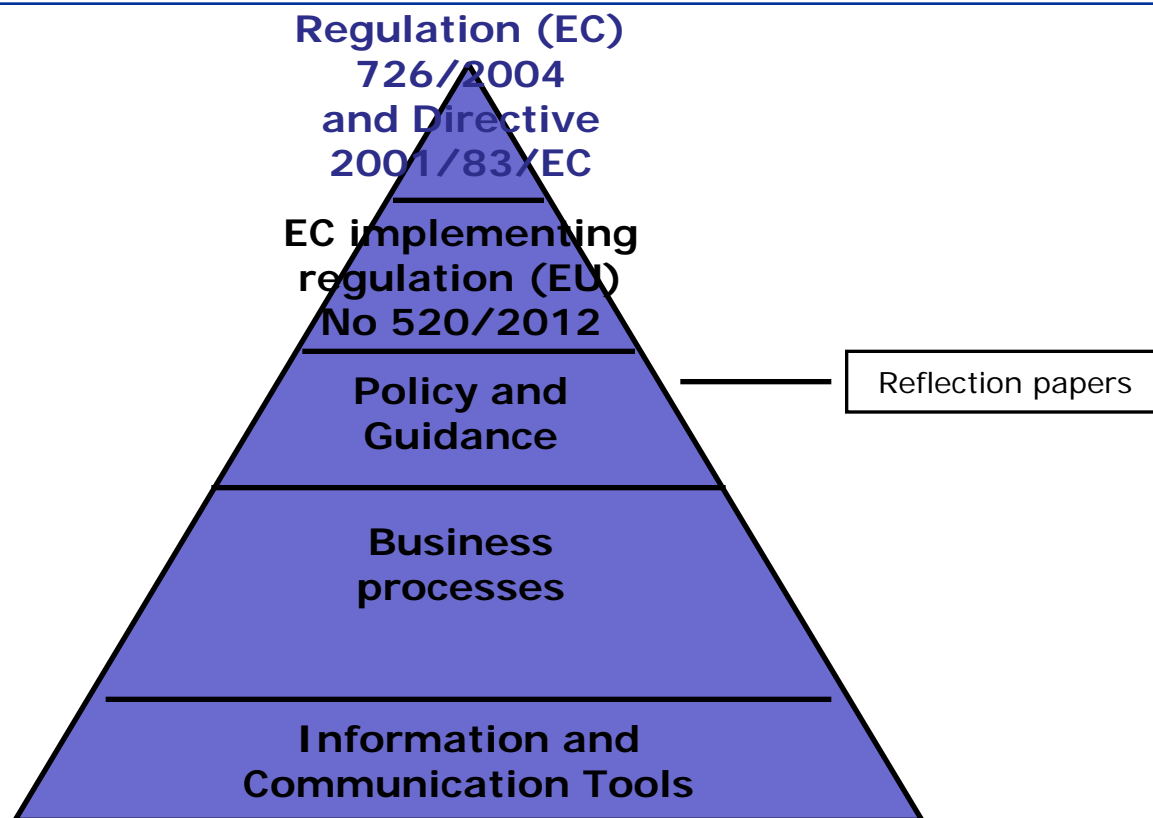


2. Key achievements



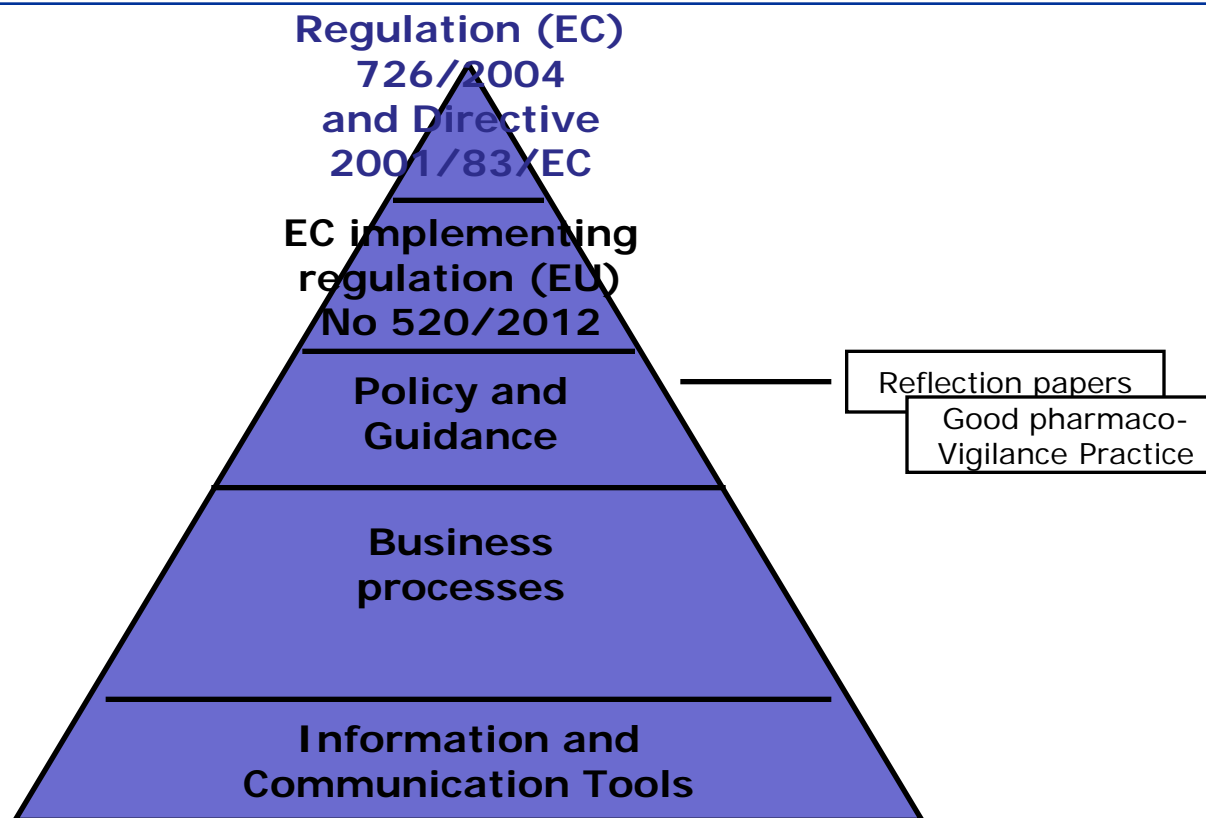


2. Key achievements



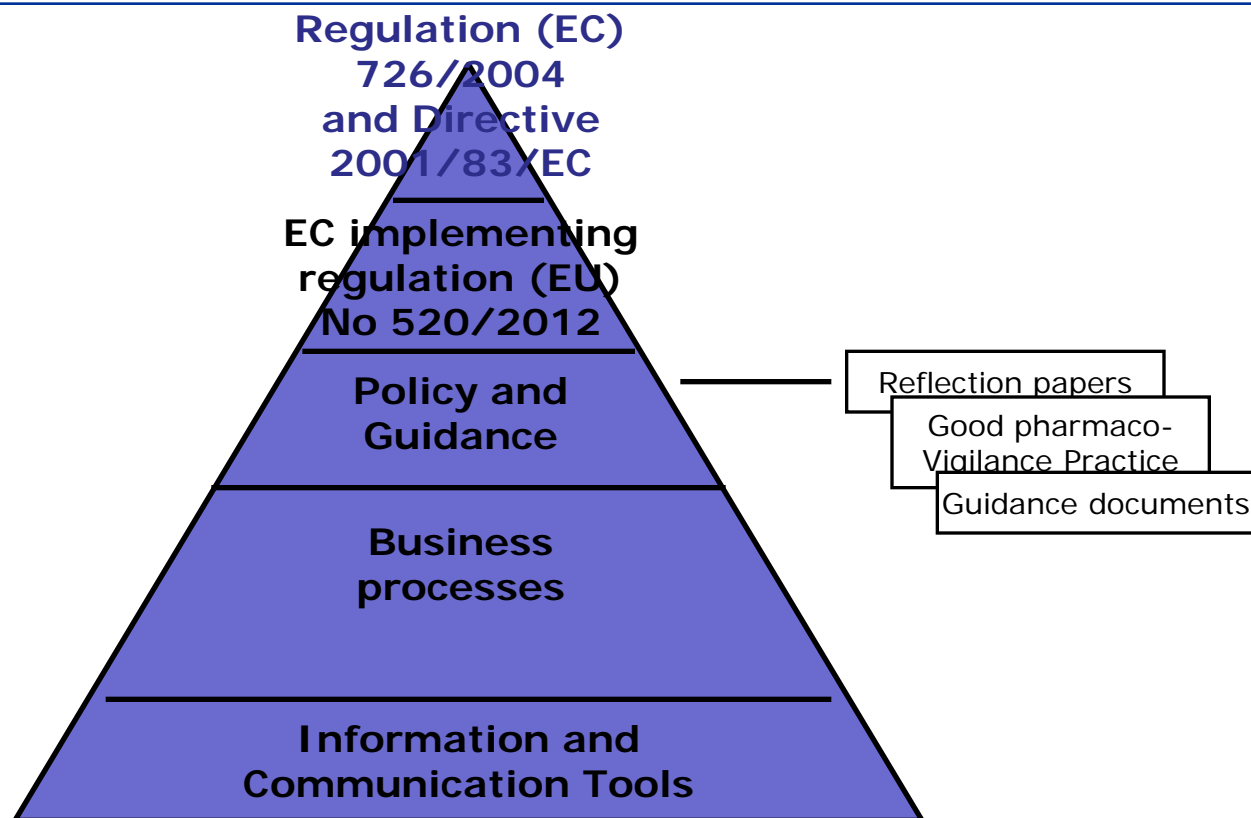


2. Key achievements



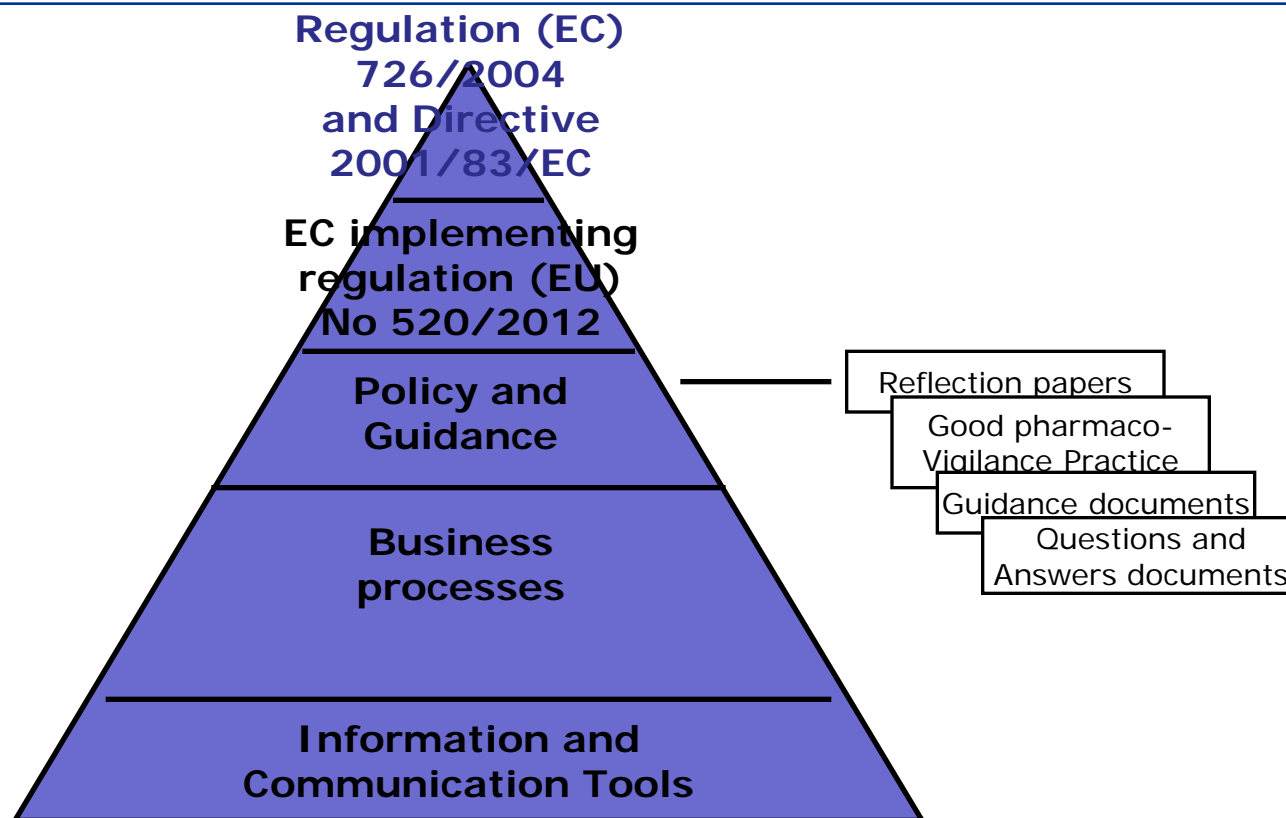


2. Key achievements



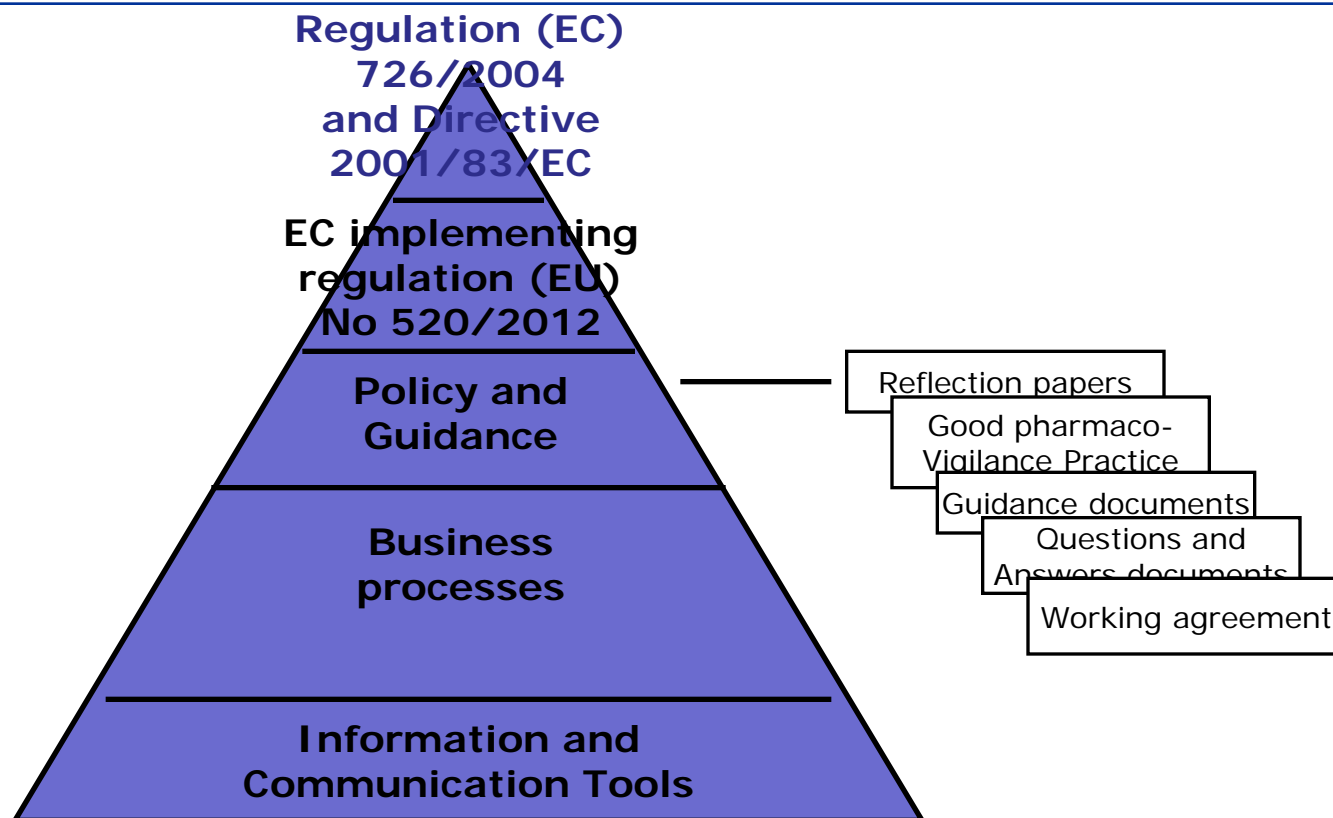


2. Key achievements





2. Key achievements





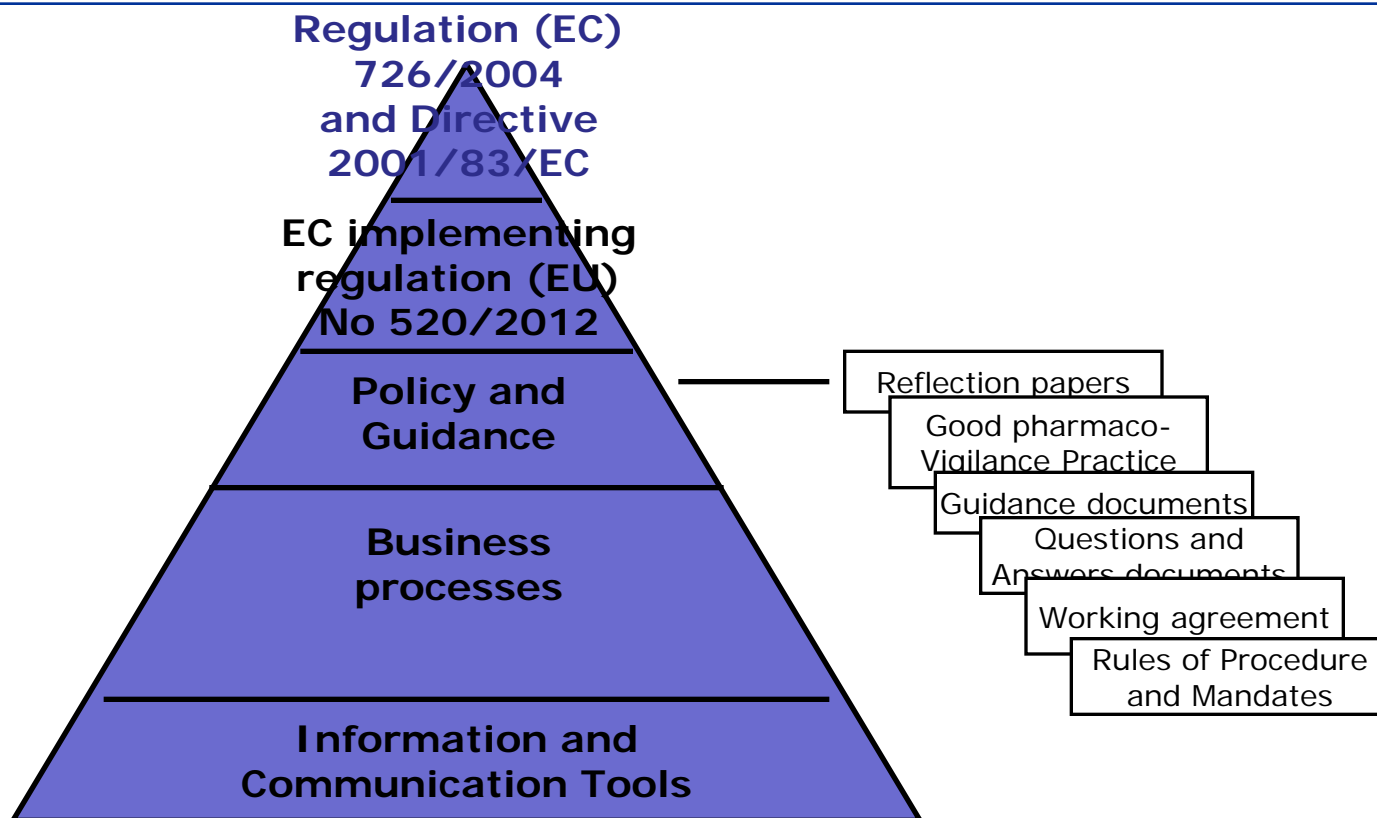
2. Key achievement: updated working agreement to enhance cooperation with EMCDDA*

- Article 28c(2): 'The Agency and the EMCDDA shall exchange information that they receive on the abuse of medicinal products including information related to illicit drugs'.
- Working arrangement (first signed in 2010) amended by EMA and EMCDDA Directors to strengthen information-exchange practices.
- More timely response to potential public health threats

*EMCDDA: European Monitoring Centre for Drugs and Drug Addiction

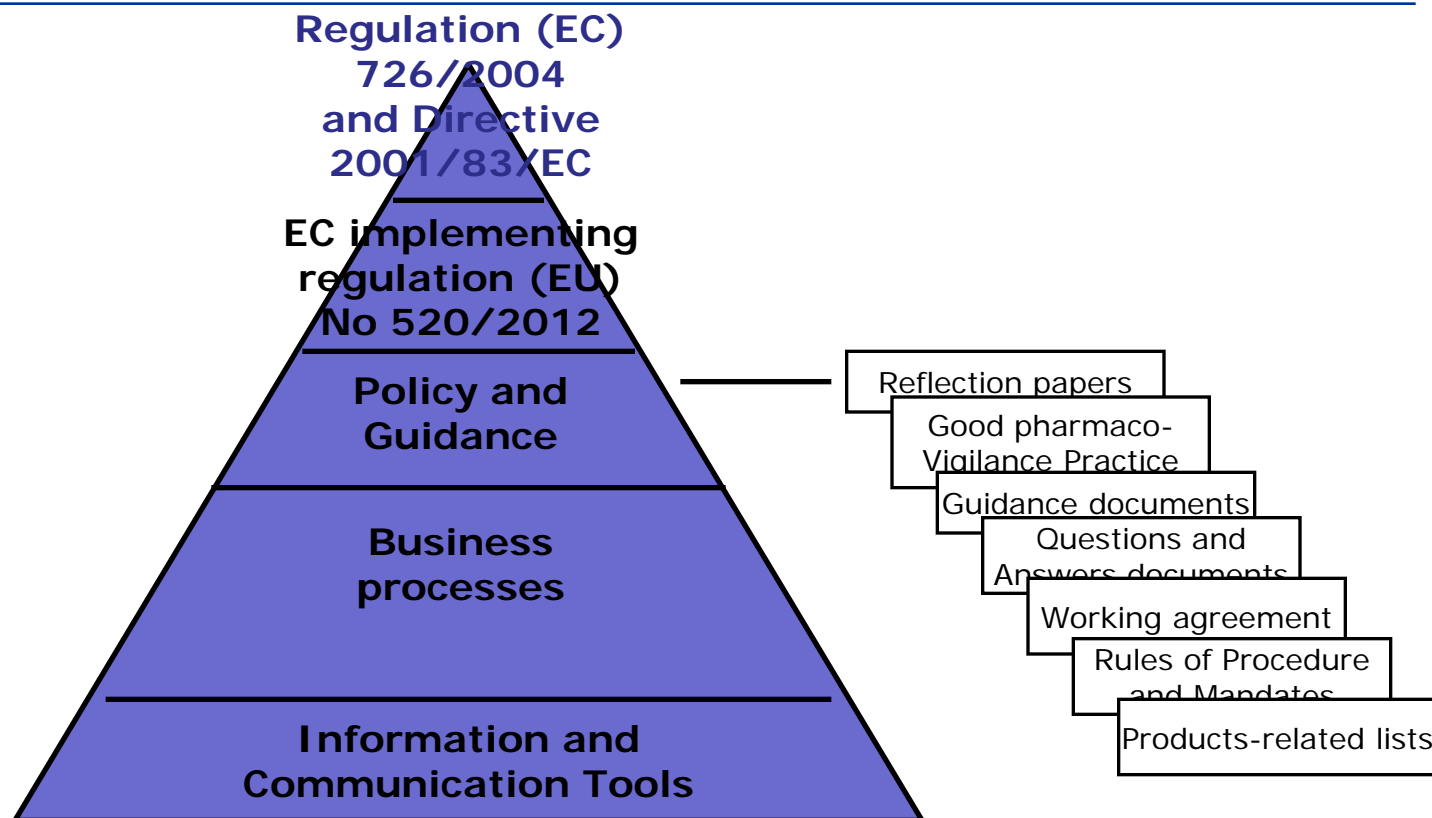


2. Key achievements



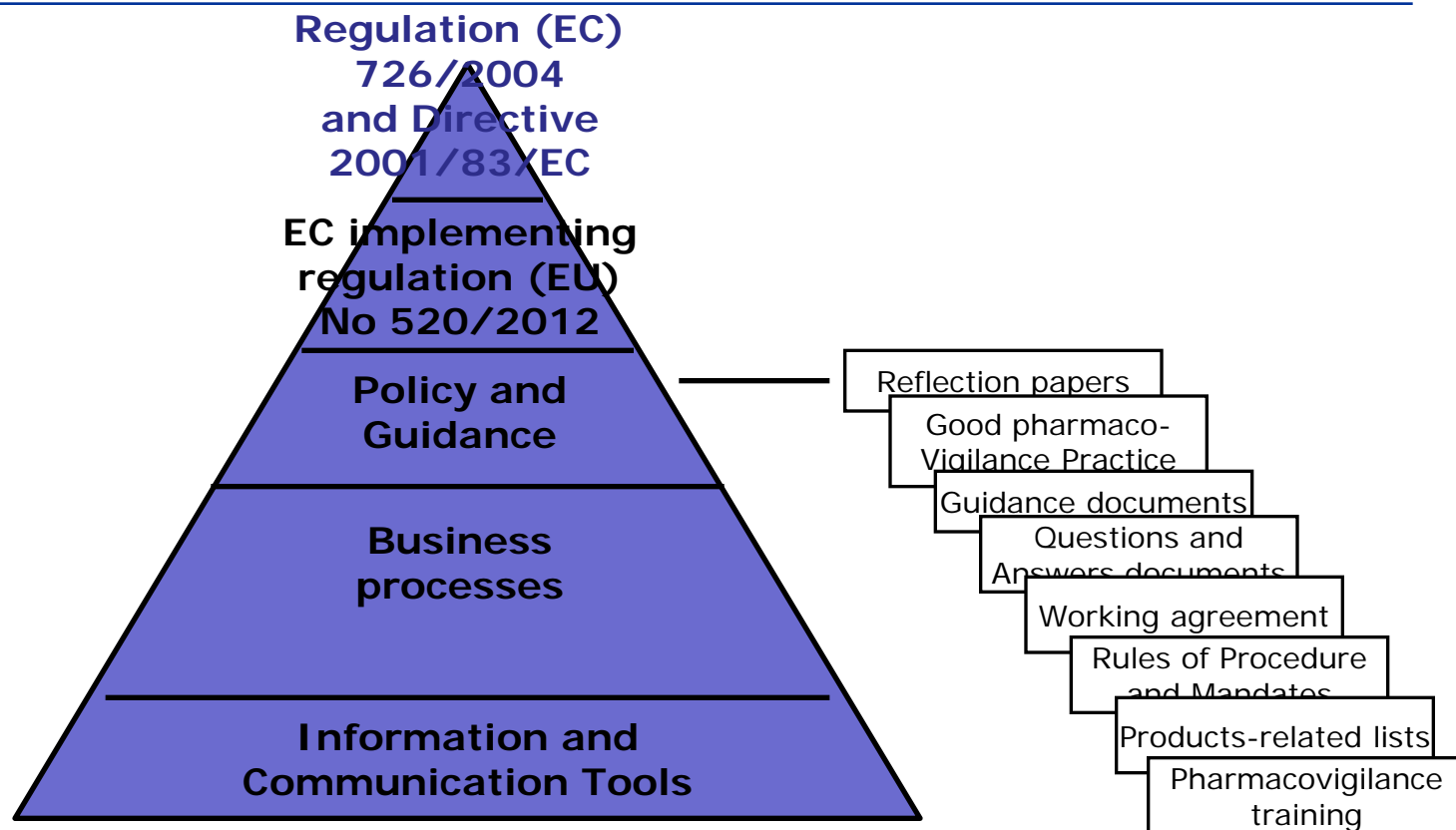


2. Key achievements



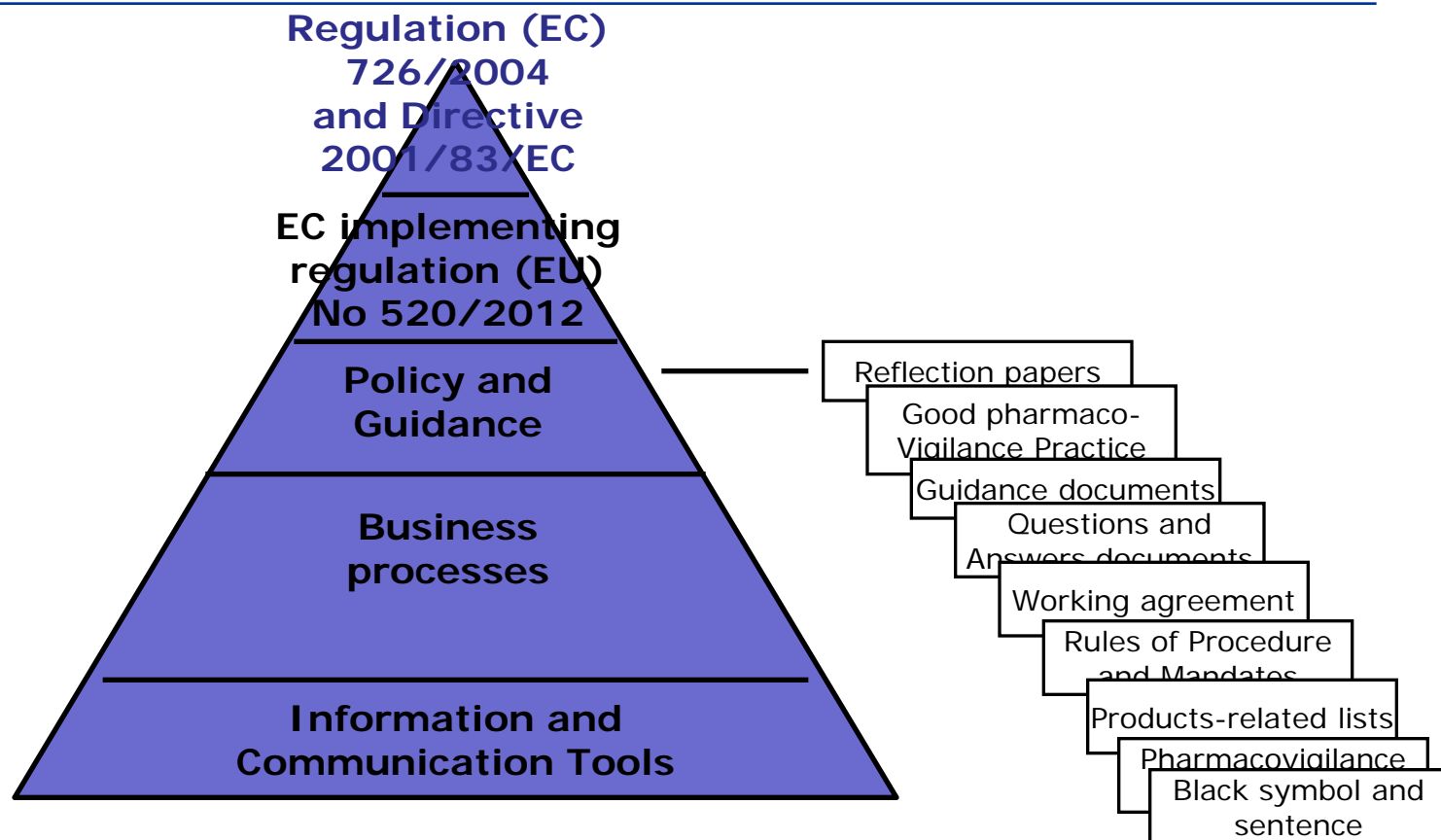


2. Key achievements






2. Key achievements



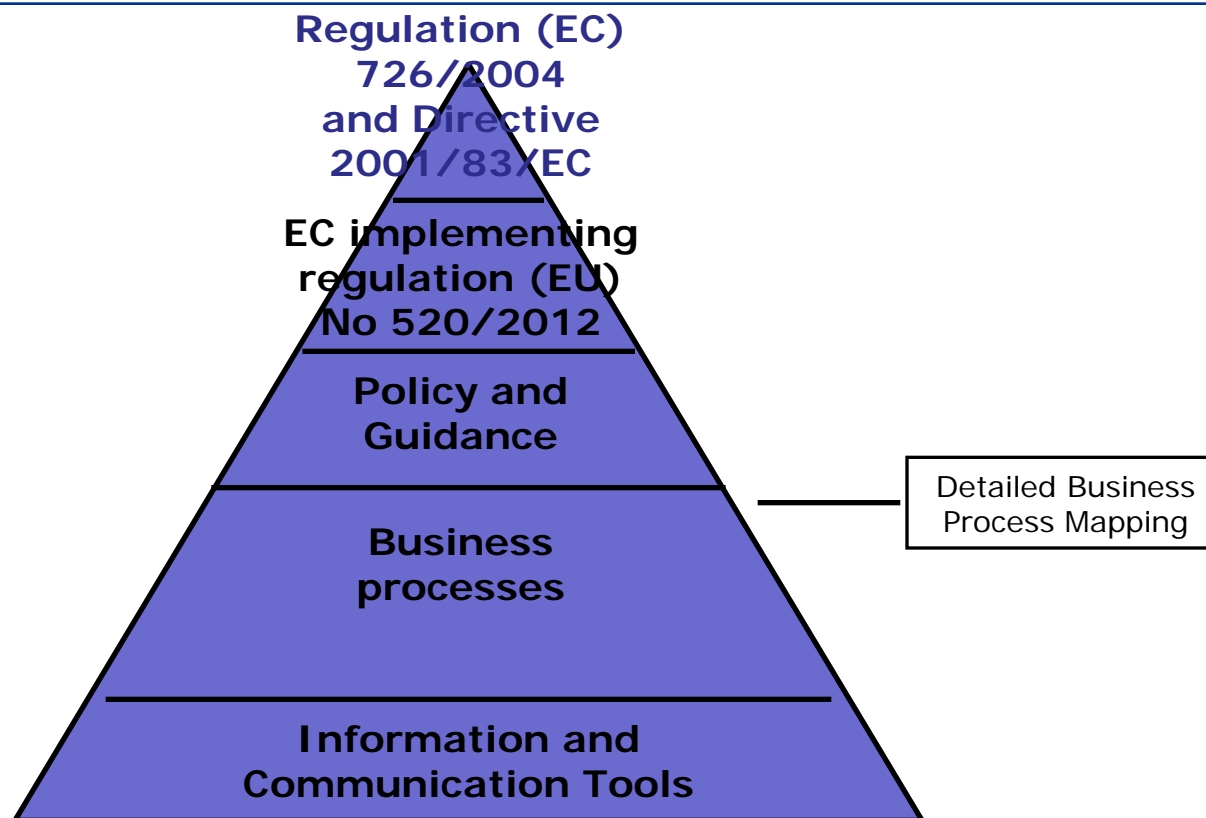


2. Key achievements: 'black symbol' for products under additional monitoring

- Black symbol:
 - Selected by the European Commission following a recommendation of the PRAC (after involving stakeholders) on 7 March 2013
 - Inverted equilateral black triangle 
- New text in Product Information
 - *SPC text: <{Black symbol}> This medicinal product is subject to additional monitoring. This is to allow any safety information to be identified rapidly. Healthcare professionals are encouraged to report any suspected adverse reactions. See section 4.8. >*
 - *PL text: <{Black symbol} This medicine is subject to additional monitoring. This will allow quick identification of new safety information. You can help by reporting any side effects you may get. See the end of section 4 for how to report side effects.*
- List of products under additional monitoring
 - Prepared by the EMA/PRAC: initial list published on 25th April 2013 and updated every month
- In April 2013, launch of wide public communication campaign coordinated by EMA

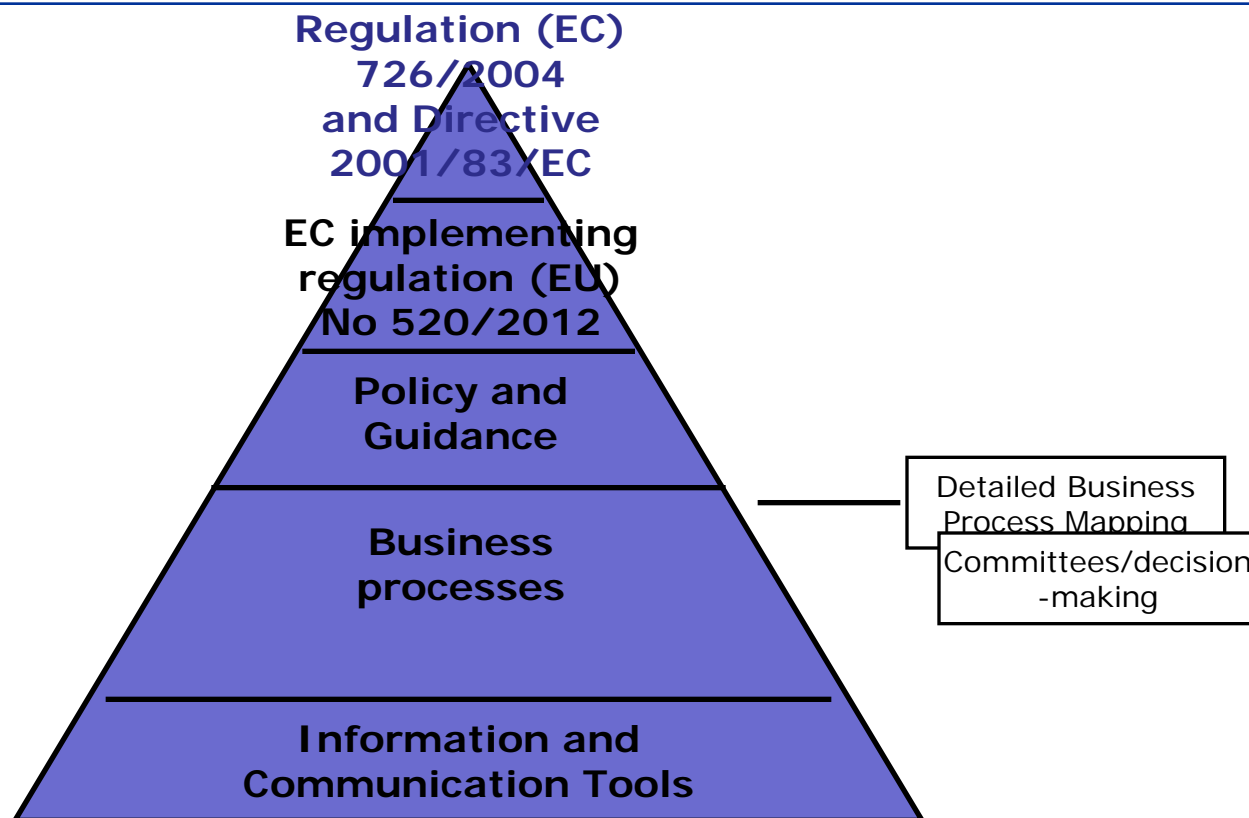


2. Key achievements



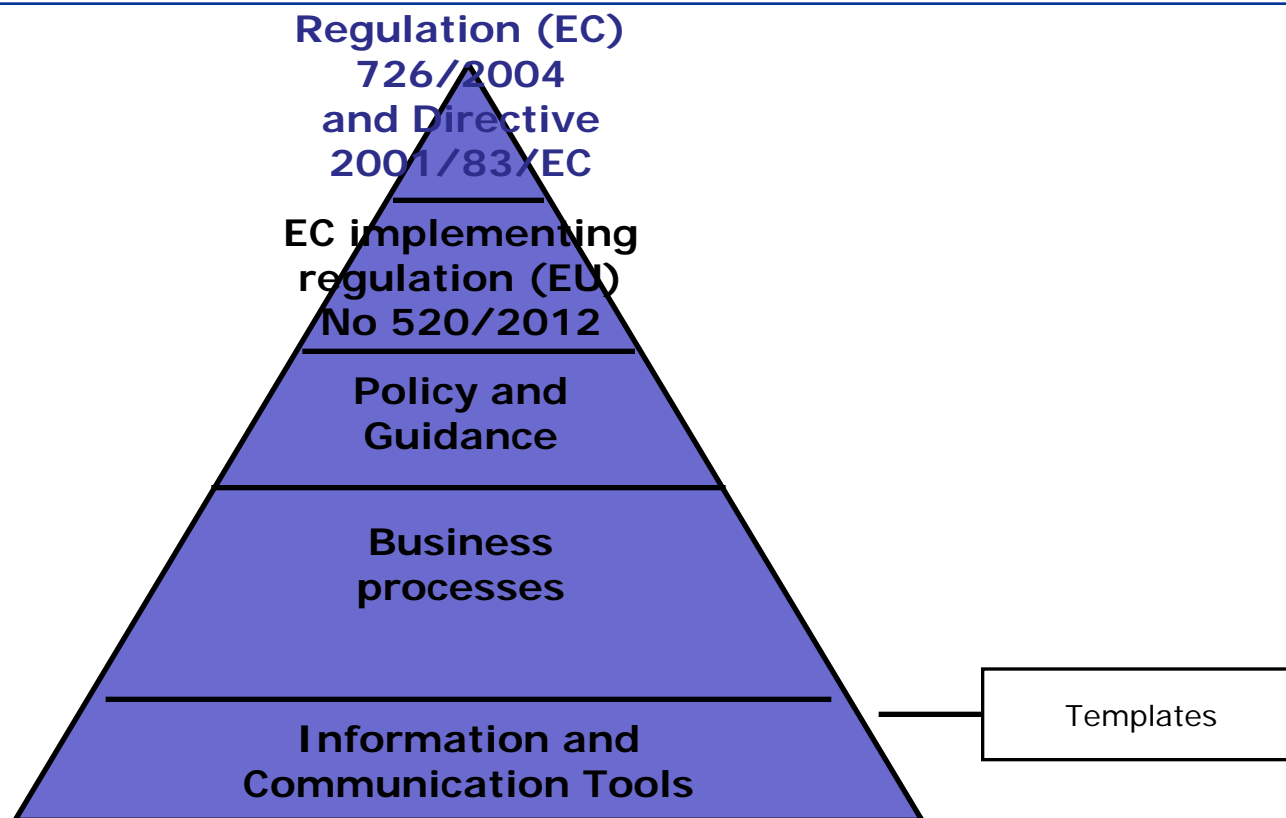


2. Key achievements



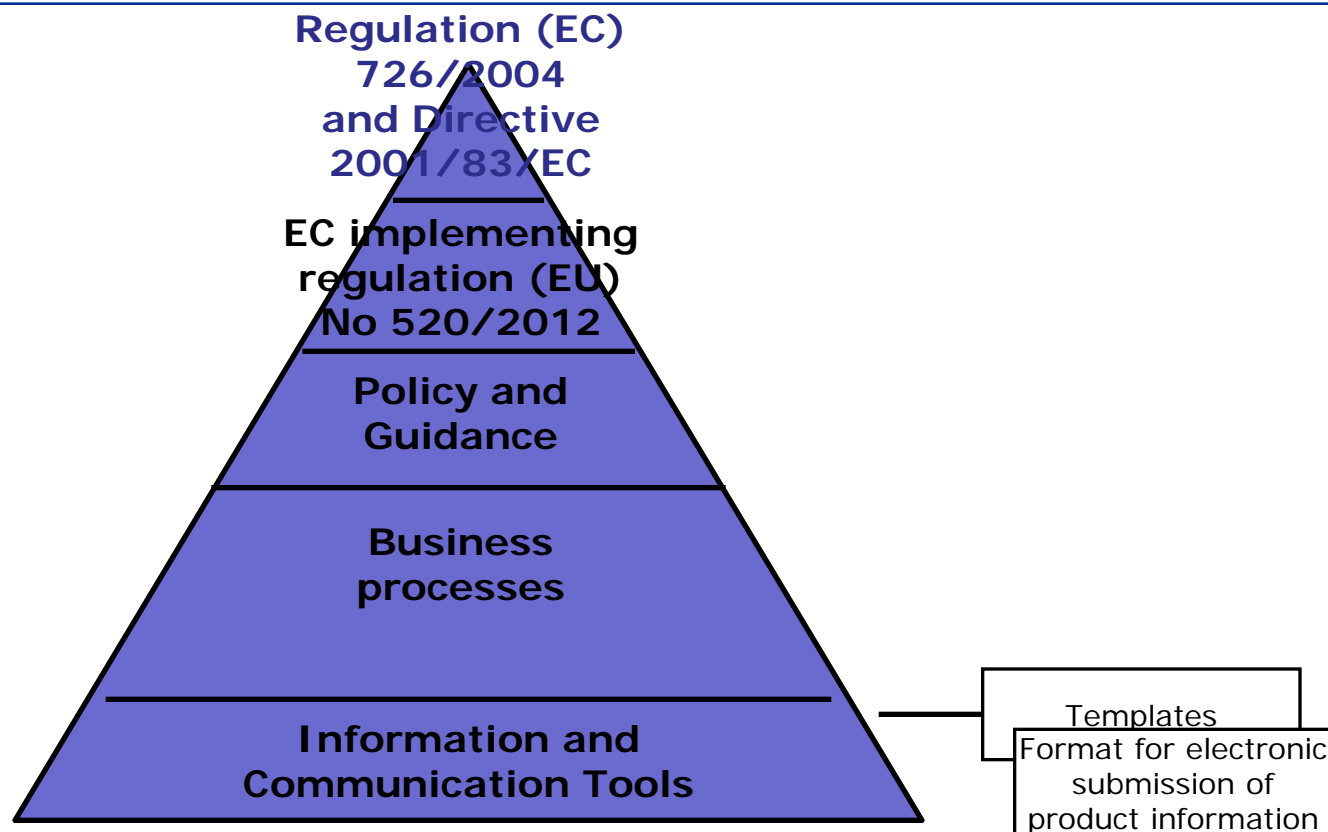


2. Key achievements



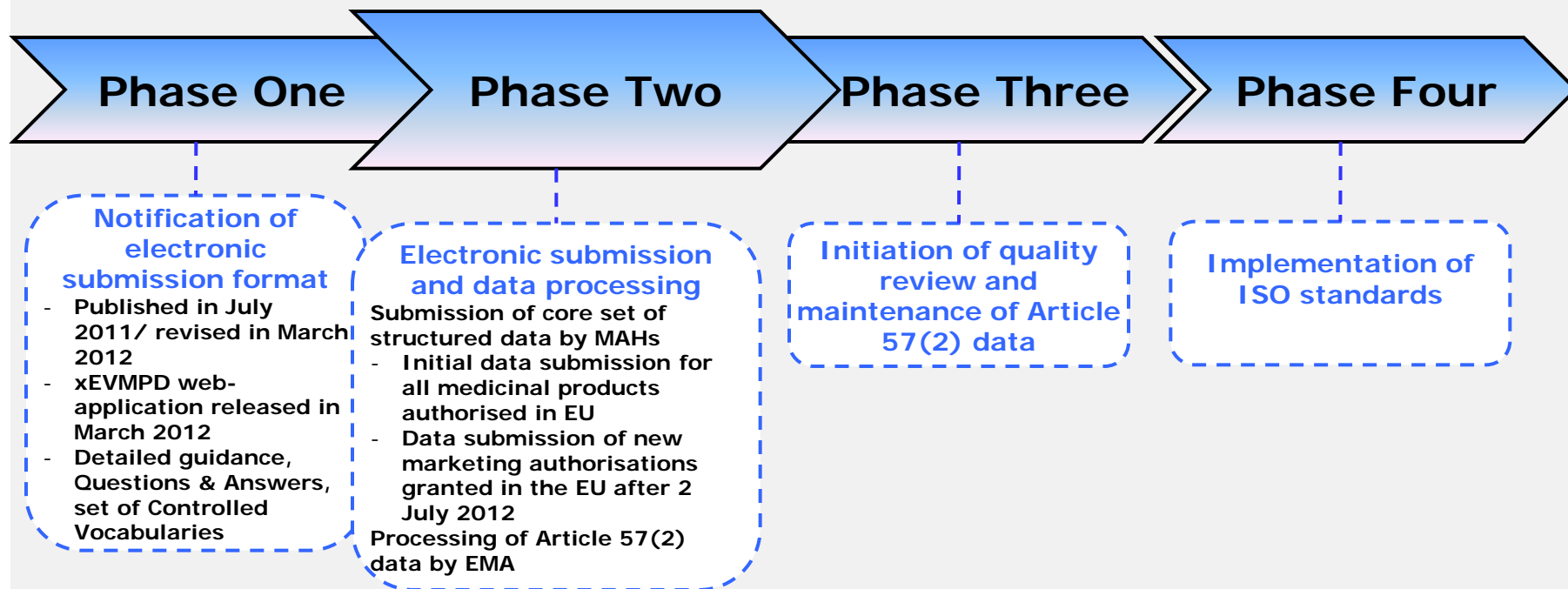


2. Key achievements





2. Key achievement: format for electronic submission of product information - phased implementation



NOTE: Dedicated helpdesks: art57@ema.europa.eu and eudravigilance@ema.europa.eu



2. Key achievement: format for electronic submission of product information –

ISO IDMP Standards

ISO 11615:2012, Health Informatics,
Identification of Medicinal Products standard
Data elements and structures for unique identification and
exchange of regulated medicinal product information

ISO 11240:2012, Health Informatics,
Identification of Medicinal Products standard
Data elements and structures for unique identification and
exchange of units of measurements

ISO 11616:2012, Health Informatics,
Identification of Medicinal Products standard
Data elements and structures for unique identification and
exchange of regulated pharmaceutical product information

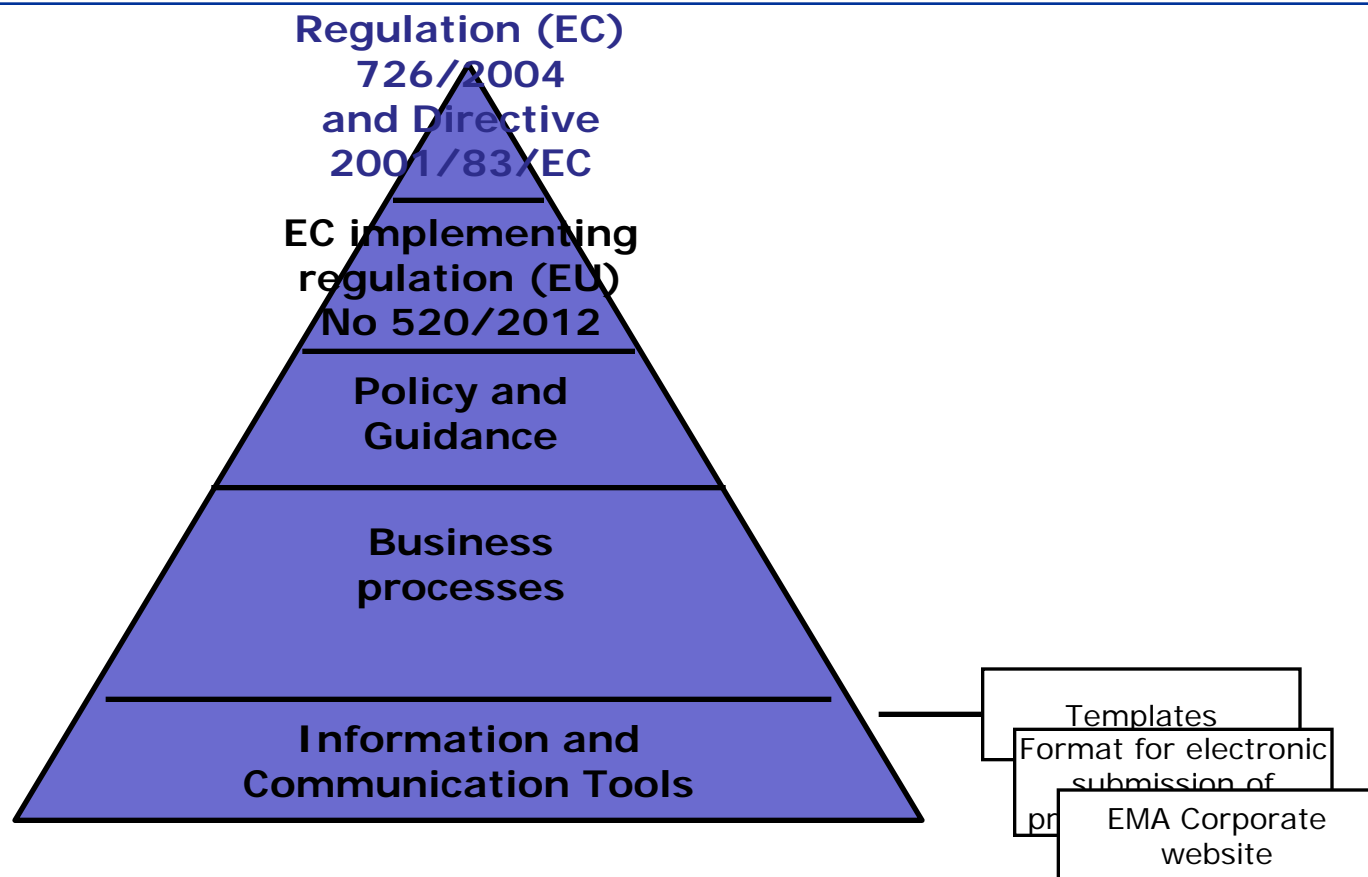
**ISO IDMP
Standards**
(finalised in October 2012)

ISO 11239:2012, Health Informatics,
Identification of Medicinal Products standard
Data elements and structures for unique identification and
exchange of regulated information on pharmaceutical dose
forms, units of presentation, routes of administration and
packaging

ISO 11238:2012, Health Informatics,
Identification of Medicinal Products standard
Data elements and structures for unique identification and
exchange of regulated information on substances



2. Key achievements





2. Key achievement: upgraded EMA Corporate website

- Legal notice: EMA website serves as the EU Medicines Web-portal
- Upgrade of EMA corporate website
 - New page for general public on pharmacovigilance implementation, including 'video'.
 - Updated template for safety referrals
 - New search function for all referrals,
 - New page for industry on pharmacovigilance implementation
 -

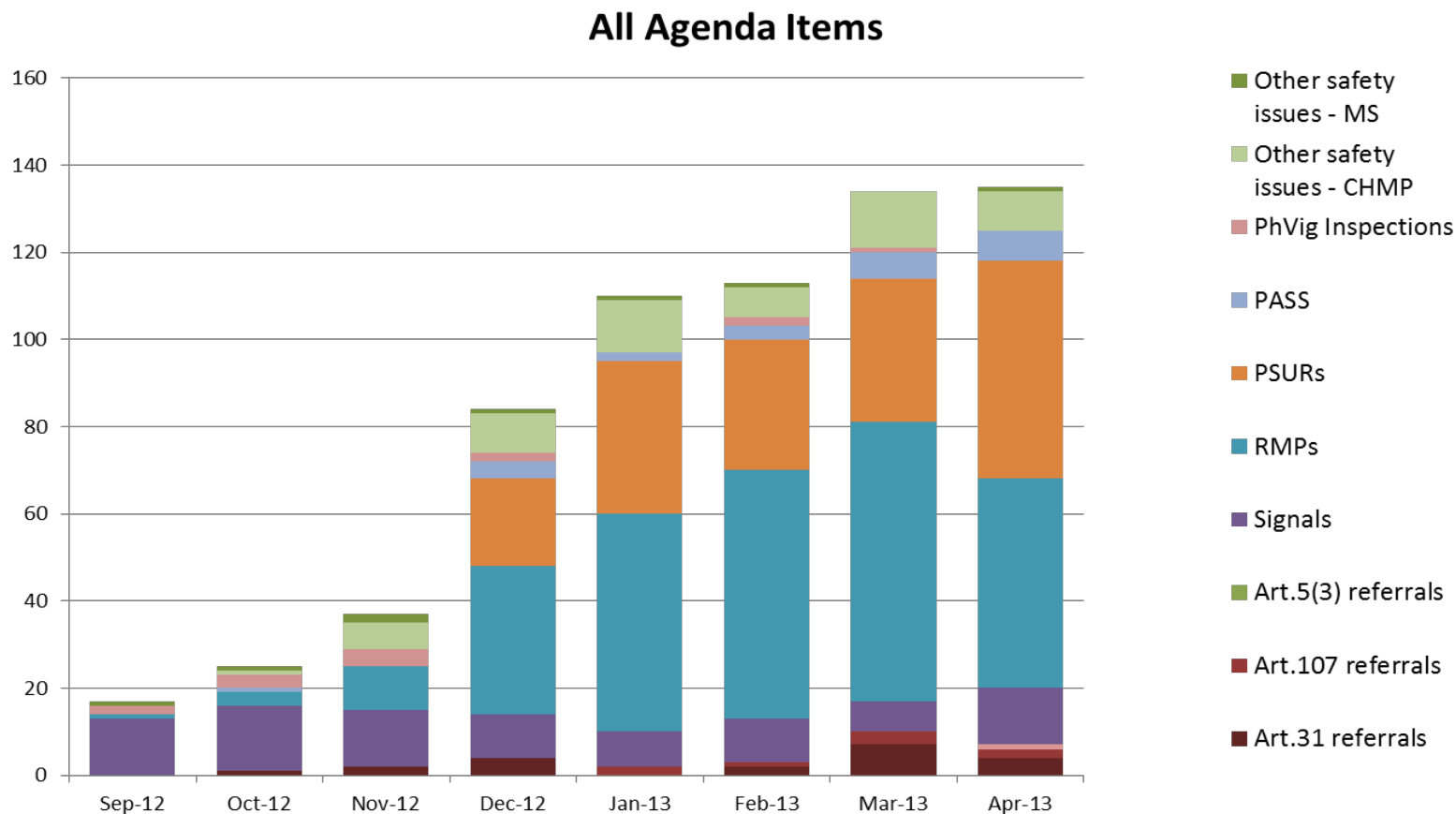


2. Key achievement: EMA Corporate website - Transparency of activities for Pharmacovigilance Risk Assessment Committee

- **Agenda** is published on Day 1 of PRAC by mid-day
- **Meeting highlights** are published on Friday of PRAC week
- **Safety referrals** are published on Friday of PRAC week
- **Minutes** are published on the following month after adoption



2. Key achievement: PRAC workload





3. Prioritised implementation agreed by EMA Management Board in December 2011 and December 2012



3. Prioritised implementation agreed by EMA Management Board in December 2011 and 2012

- **Criteria for prioritisation:**

- Firstly, public health activities
- Secondly, transparency and communication activities
- Thirdly, simplification activities (primarily for pharmaceutical industry)

- **Activities grouped into four main topic areas:**

- Collection of key information on medicines
- Better analysis and understanding of data and information
- Regulatory action to safeguard public health
- Communication with stakeholders

- **Traffic light:**



Not started



On-going implementation



Implemented



New activities



3. Prioritised implementation of the pharmacovigilance legislation by the EMA








Collection of key information on medicines (1/4)

1. Risk Management Plans:	2012	2013	
Establishment and operation of new procedure for requesting and assessing RMP			- Started July 2012 - Templates for industry (Oct) - Format compulsory (Jan 2013)
2. Periodic Safety Update Reports (PSUR):			
Operation of new procedures related to PSURs for CAPs*			- Started July 2012
Development, maintenance and publication of harmonised birthdates to support PSUR submission			- First list published in Oct 2012 (monthly update)
33 Handling of PSURs for active substances contained in both CAPs and NAPs* in accordance with URD* list			- To start as of April 2013



3. Prioritised implementation of the pharmacovigilance legislation by the EMA





Collection of key information on medicines (2/4)

3. Post-Authorisation Safety and Efficacy Studies:	2012	2013	
Implementation of the PASS procedure for protocols approval and results management for CAPs			- Started July 2012
Public consultation on delegated act on PAES by the Commission			- From 28/11/2012 to 18/02/13
PASS: Operate the procedure for initial protocol and protocol amendment endorsement and results management for NAPs			
PASS: Establish a procedure to encourage MAHs to collaborate on PASS affecting multiple medicinal products			
PAES: Deliver scientific guidance on methodological aspects (expert workshop)			



3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Collection of key information on medicines (3/4)

4. Electronic submission of core medicine information by MAHs ('Article 57'):	2012	2013	
Start validation of received information			
Initiate limited quality assurance of data being submitted on medicinal products authorised in EU			
Achieve an agreement with pharmaceutical industry on the submission of varied marketing authorisations in view of operating the process for submission of maintenance data at a later stage			



3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Collection of key information on medicines (4/4)

5. Reporting by patients:	2012	2013	
Cooperation with Member States to provide information to patients on direct reporting			- Core data fields agreed by Member States (June 2012)
Prepare guidance on patient reporting in cooperation with the Member States			
6. List of medicines withdrawn for safety reasons:			
Develop a business process for establishing, maintaining and publishing such list			Based on 2012 changes to pharmacovigilance legislation



3. Prioritised implementation of the pharmacovigilance legislation by the EMA







Better analysis/understanding of data and information (1/2)

1. EudraVigilance and signal detection	2012	2013	
Operation of revised signal detection process for CAPs			- Started July 2012
Support Member States to operate the new EU signal detection processes for NAPs			- Started July 2012 - Signal work-sharing list published (Oct 2012)
Start of signal management through the Pharmacovigilance and Risk Assessment Committee (PRAC)			- Started Sept 2012
Continuation of maintenance work for the current EV system including data quality			- As planned
Implementation of web-publishing of adverse reaction data (further to the EV Access Policy)			- Delivered in May 2012
Perform analyses of EV data for NAPs (in collaboration with MSs Competent Authorities through work-sharing)			



3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Better analysis/understanding of data and information (2/2)

2. Additional monitoring:	2012	2013	
Develop and publish the list of medicines with additional monitoring status			- Initial list published on 25 April 2013
Monitor that product information for relevant CAPs is updated to reflect this status			
3. IT systems to support processing and analysis of data:			
Finalisation of business requirements for enhanced IT systems			On-going in 2013
4. Medication errors:			
Establish guidance/best practice considerations on medication error prevention and reporting			- Following stakeholder workshop held on 28/02/13-01/03/13



3. Prioritised implementation of the pharmacovigilance legislation by the EMA


Regulatory action to safeguard public health (1/2)

1. Scientific committees and decision-making:	2012	2013	
Establishment and running of new committee (PRAC) and new responsibilities for CMD(h)			- Established July 2012
PRAC outputs: establish a strategy for supporting PRAC assessments and recommendations with best evidence, including aspects of effectiveness of risk minimisation/impact of regulatory action			
2. Strengthening referral procedures:			
Operation of new referral procedure (Urgent Union Procedure)			- First referral launched in Oct 2012
Redesign the 2012 implemented procedure and business process to include 2012 changes			



3. Prioritised implementation of the pharmacovigilance legislation by the EMA






Regulatory action to safeguard public health (2/2)

3. Pharmacovigilance Inspections:	2012	2013	
Develop and implement a revised process for the coordination of pharmacovigilance inspections			



3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Communication with stakeholders (1/2)

1. Online publishing of information:	2012	2013	
Publication (on EMA website) of agendas, minutes, assessments, approvals, recommendations, opinions and decisions of PRAC, CMD(h) and CHMP.			- Started July 2012 for PRAC agendas and minutes
			Publish agendas and minutes of CHMP meetings
2. Coordination of safety messages:			
Operation of the coordination of Member States' safety announcements for non-CAPs.			- Started July 2012
3. Public hearings:			
Develop concept of public hearings (incl. criteria and methodologies)			- Status in April 2013
Introduction of public hearings in the context of Urgent Union Procedure			- Status in April 2013



3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Communication with stakeholders (2/2)

4. Risk Management Plans summaries:	2012	2013	
Agree modalities to publish summary information for RMPs			
5. European Medicines web-portal:			
Initiate research and design work			

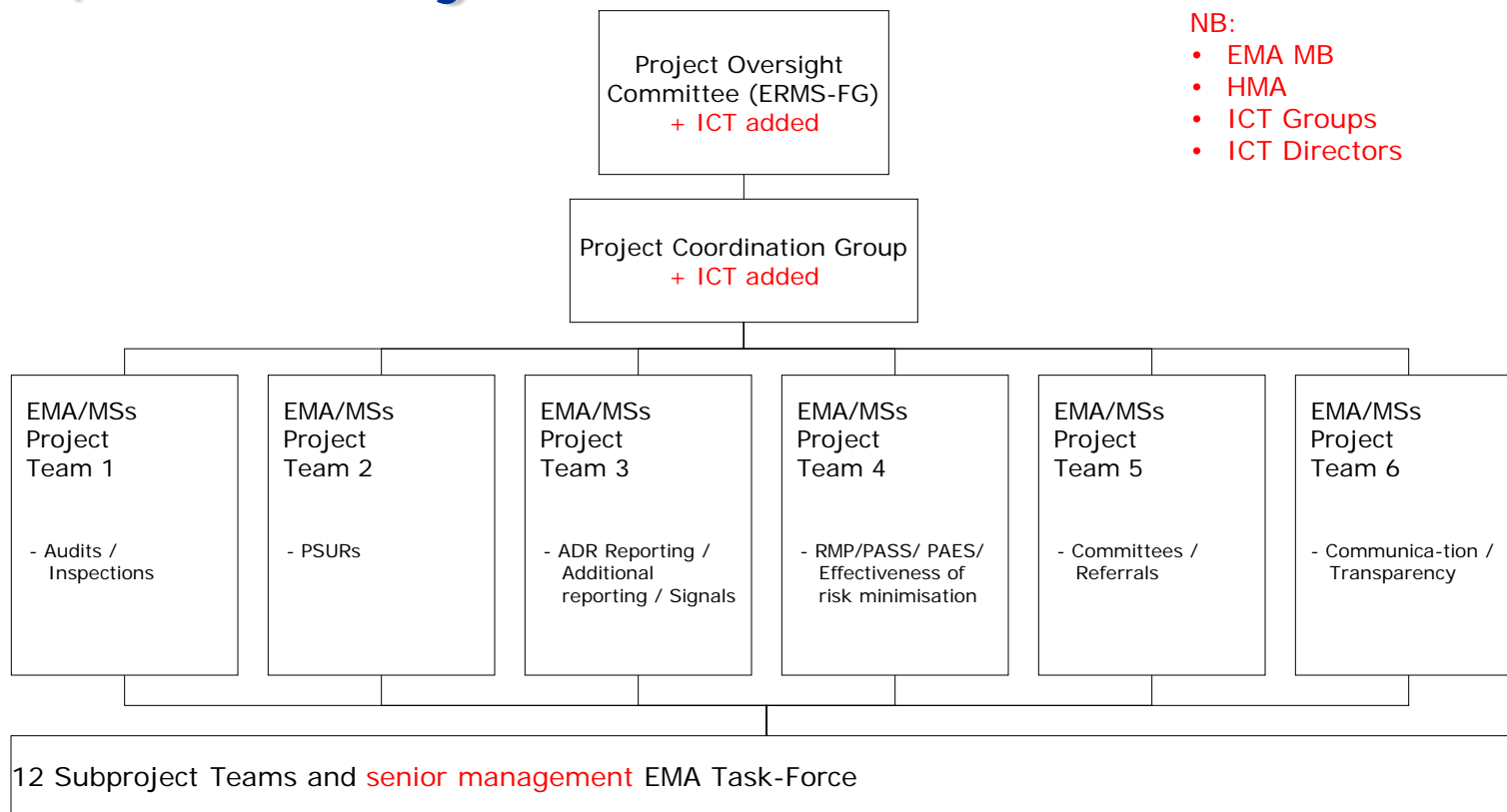


3. Prioritised implementation of the pharmacovigilance legislation by the EMA: beyond 2013...

- **Literature monitoring:** outsourcing and population of EudraVigilance with case reports.
- **EudraVigilance:** delivery of enhanced functionalities and IT system audit (Q4 2015 at least due to delayed development work).
- **Article 57(2) data submission and handling:** quality check and publication of controlled structured lists of medicinal products, substances and other key controlled terms.
- **Periodic Safety Update Reports:** delivery of PSUR repository and single PSUR assessment process for NAPs with input from analyses of ADR data.
- **Risk Management System:** define key indicators for measuring the effectiveness of risk minimisation and establish monitoring system
- **Transparency and communication:** delivery of EU Medicines web-portal and public hearings outside Urgent Union Procedure.

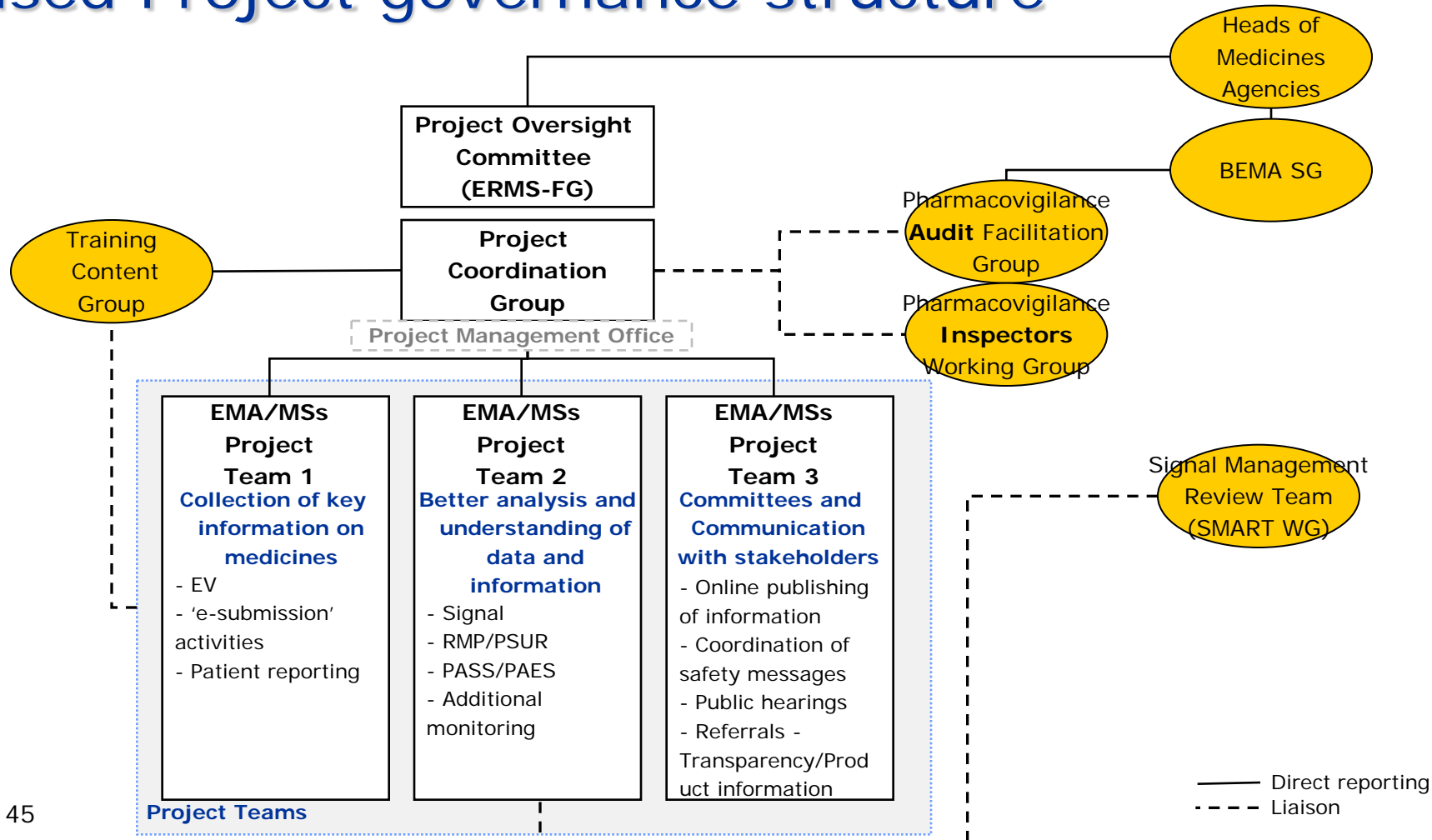


3. Prioritised implementation of the pharmacovigilance legislation - 2011/2012 Project Governance Structure





3. Prioritised implementation of the pharmacovigilance legislation - revised Project governance structure





Conclusion

- Prioritised implementation is on-going, taking account of budget restrictions, resources constraints and 2012 legislative amendments.
- Critical success factors rely on strong and continued collaboration, cooperation and Stakeholders dialogue.
- It is essential to keep focusing on promotion and protection of public health.



Thank you!

Any question?