EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Update on implementation of Pharmacovigilance legislation

EU28: Science Medicines Health, a regulatory system fit for the future

06-07 May 2013, Dubrovnik, Croatia

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European Medicines Agency

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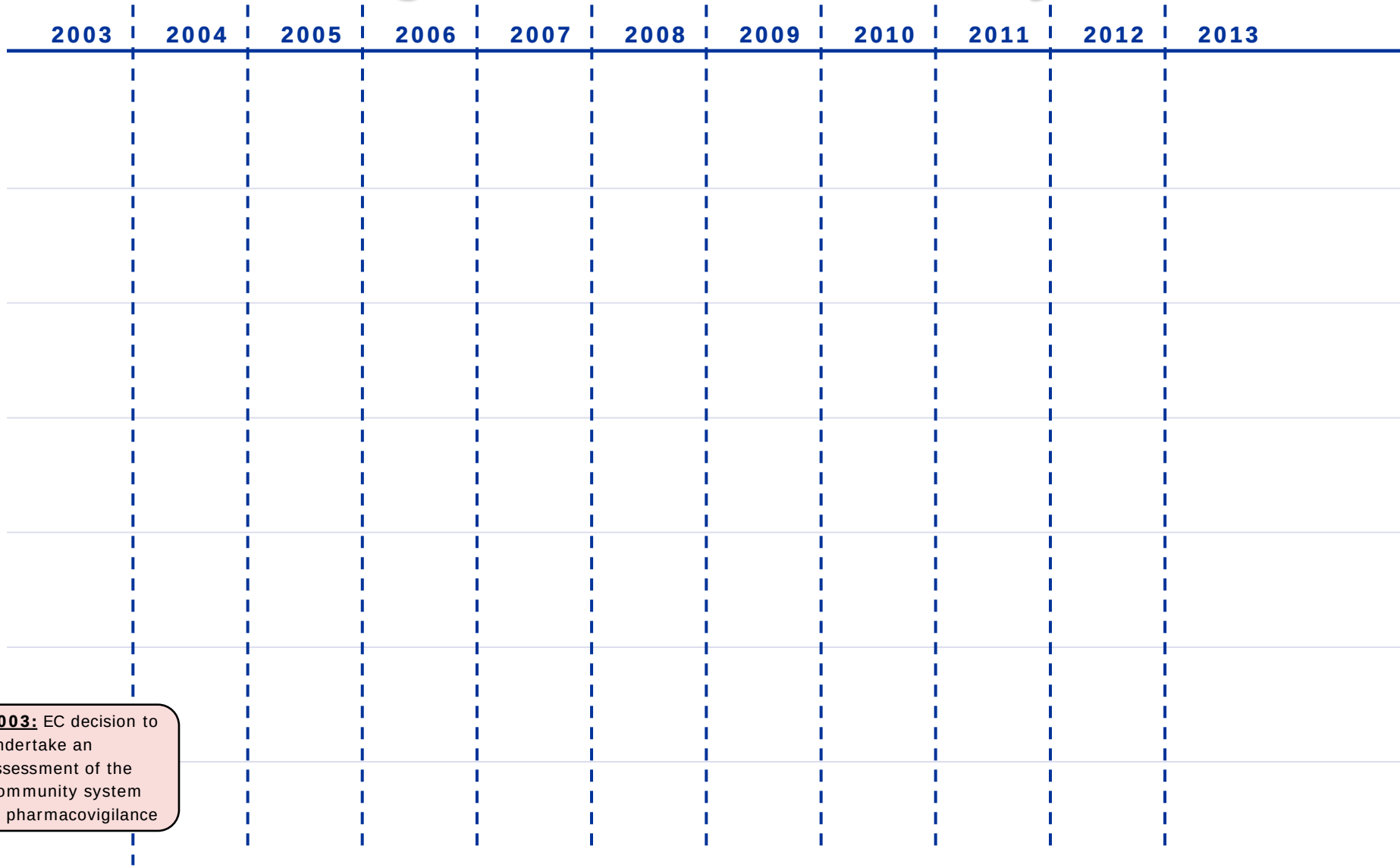
1. The making of the law and its objectives



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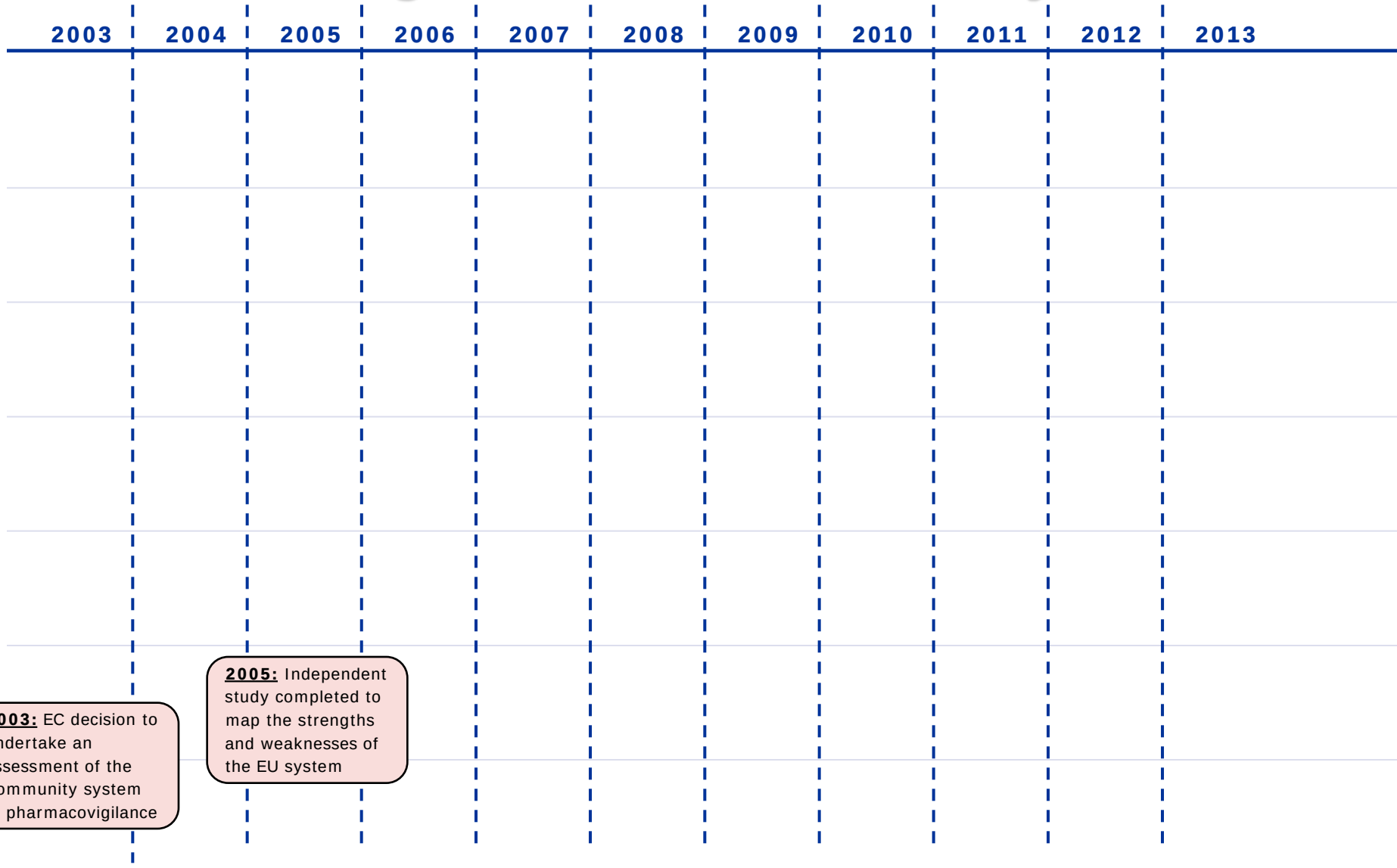

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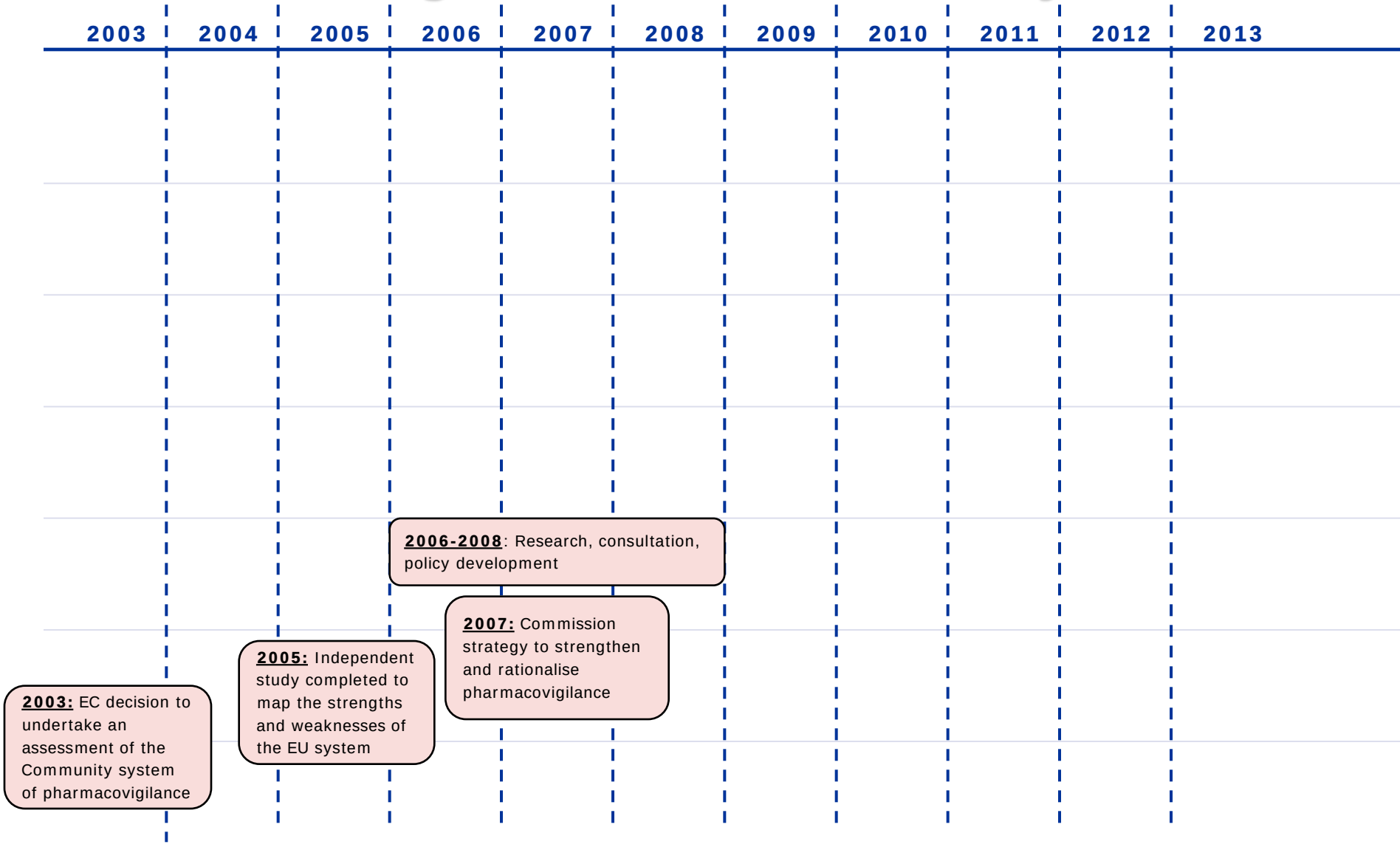

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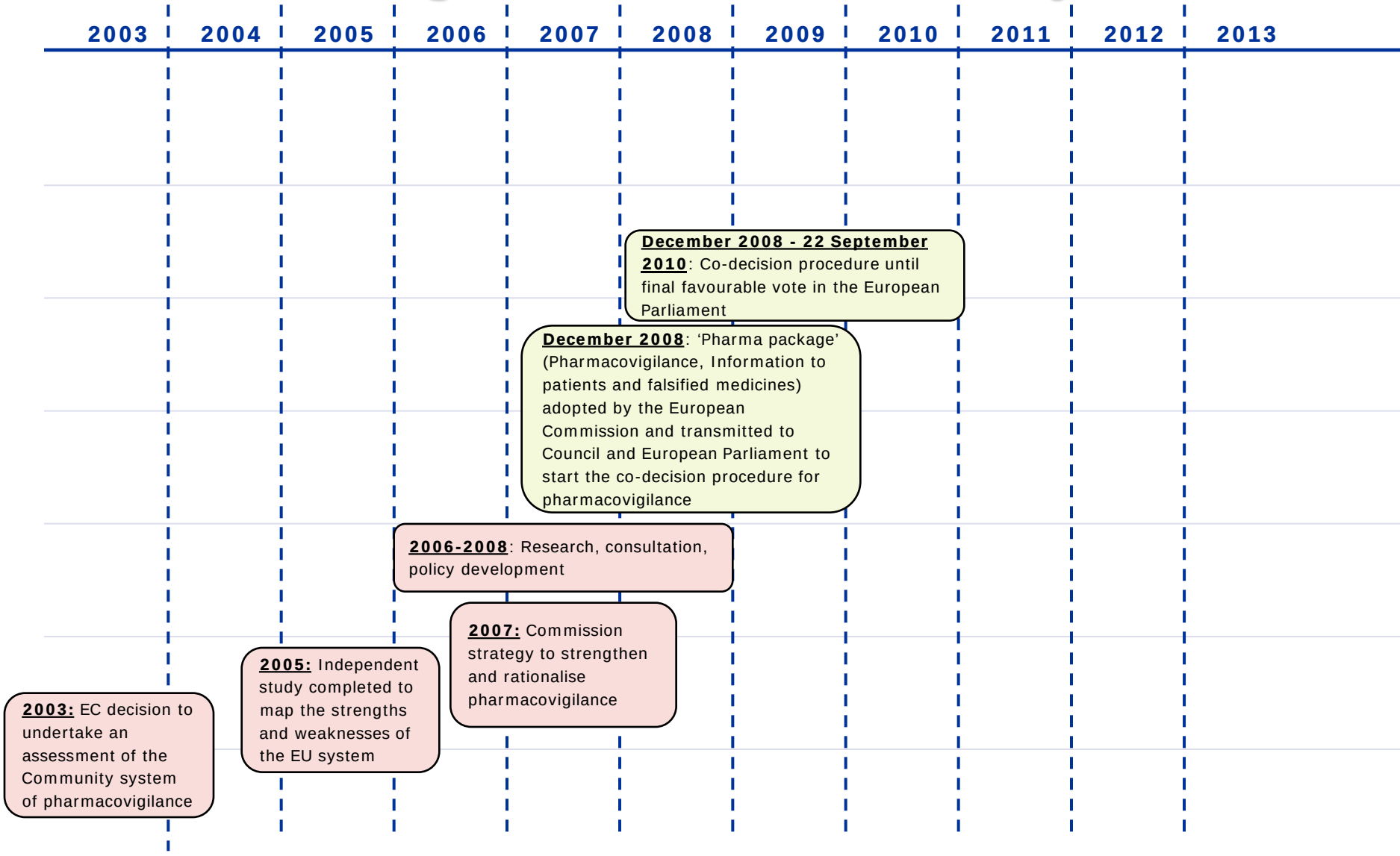

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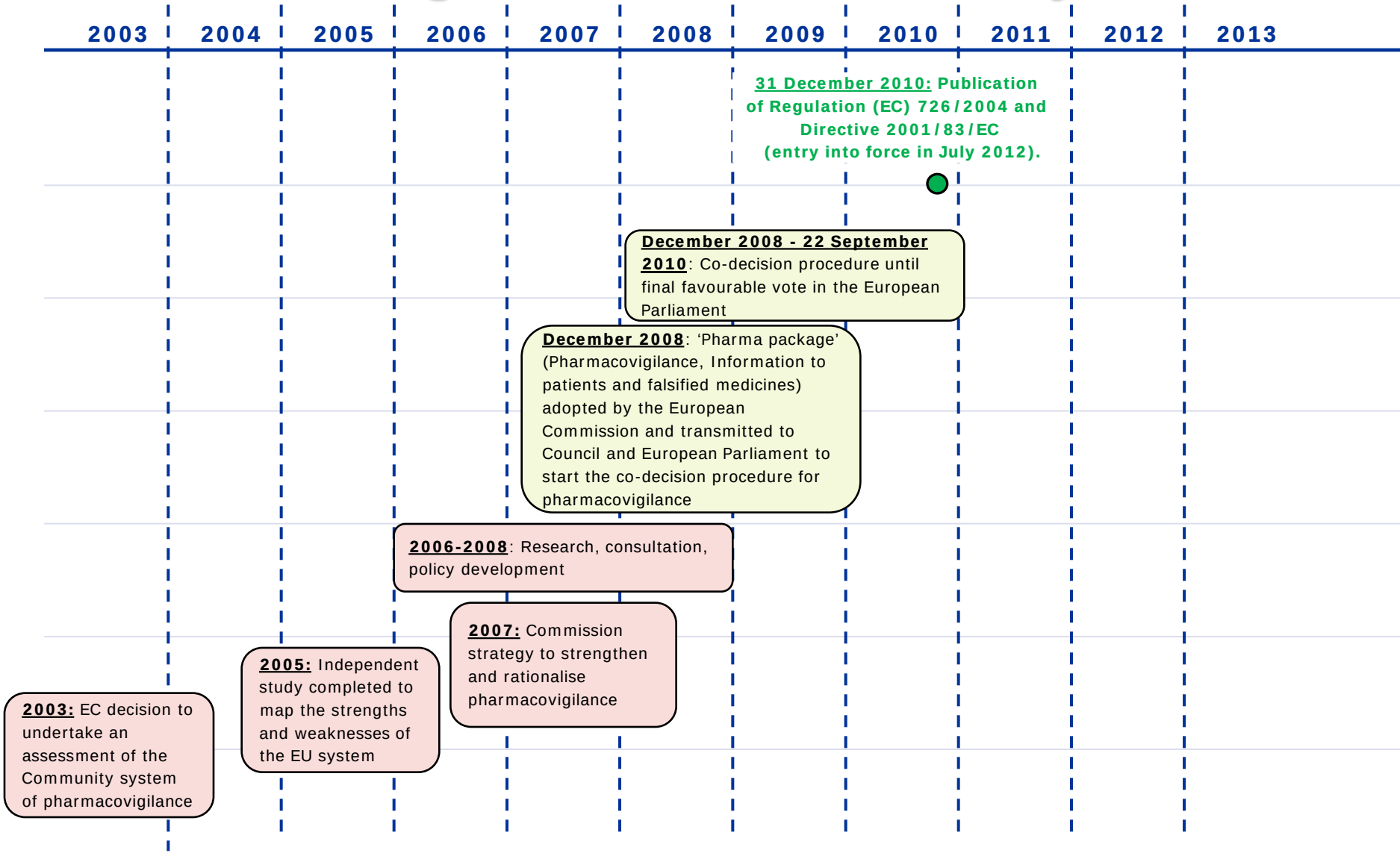

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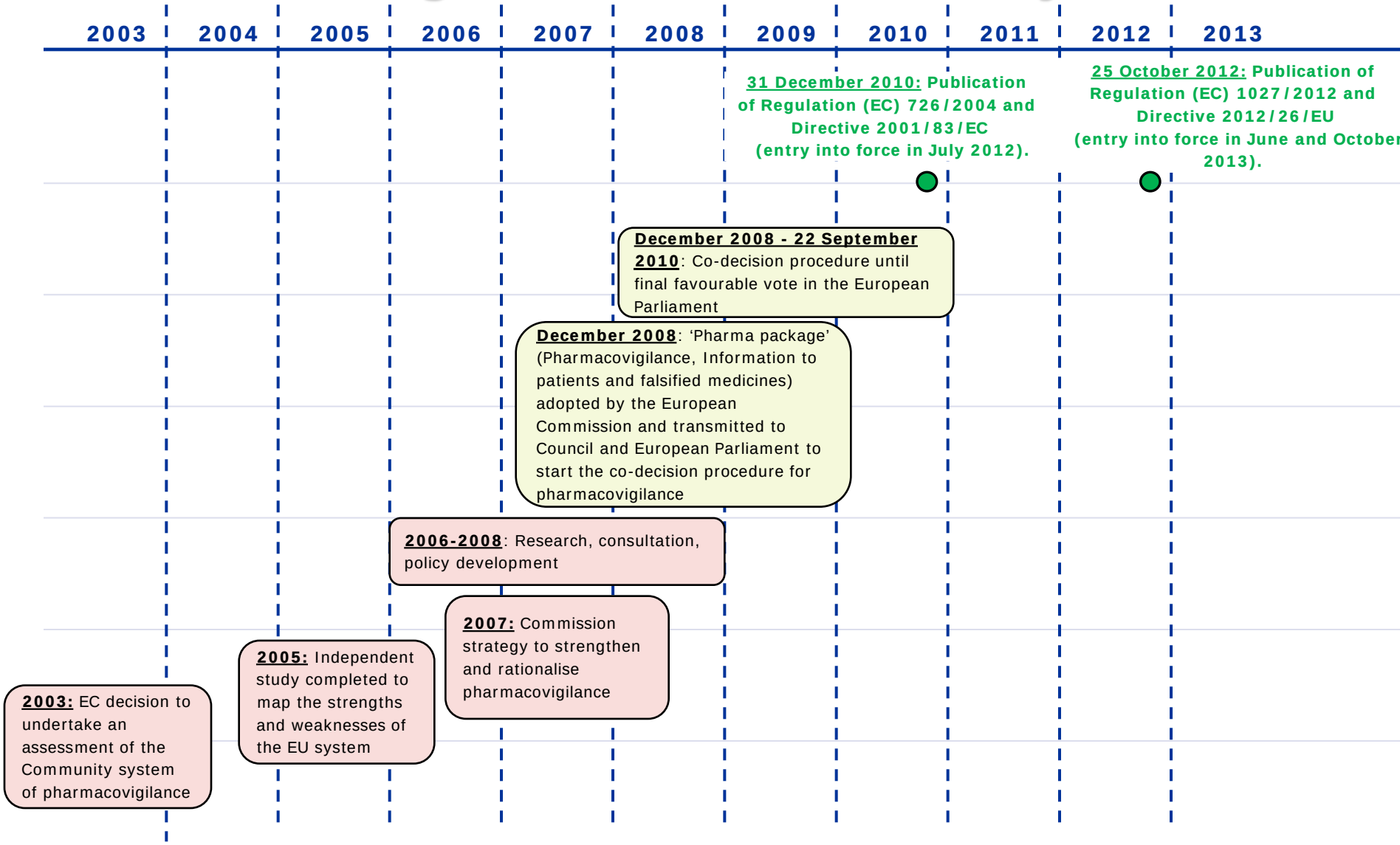


1. The making of the law and its objectives

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

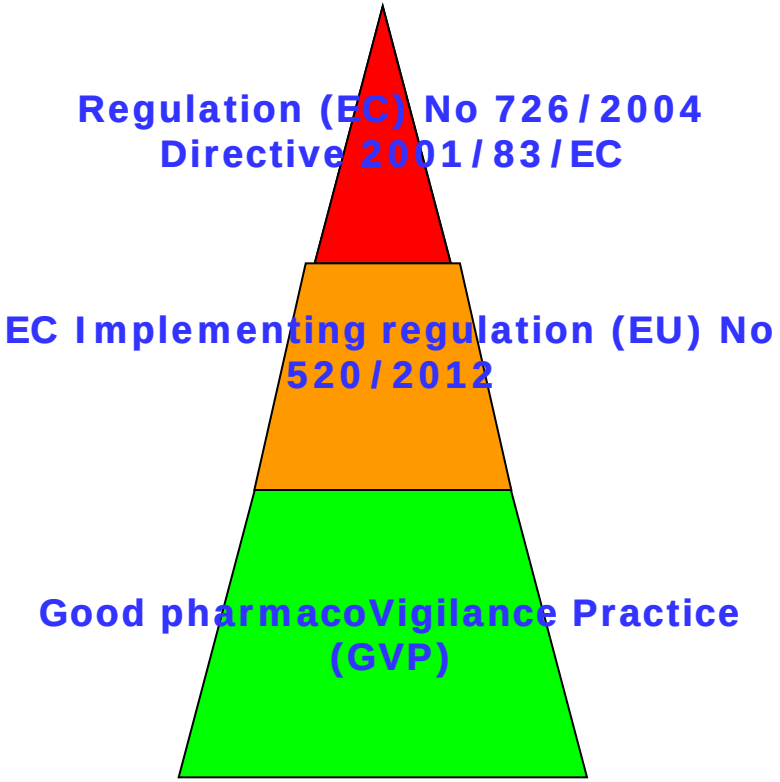
- Clear roles and responsibilities
- Science based
- Risk based/proportionate
- Increased proactivity/planning
- Reduced duplication/redundancy
- Integrate benefit and risk

1. The 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. Hierarchy of rules



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- Legally binding
- 9 Chapters

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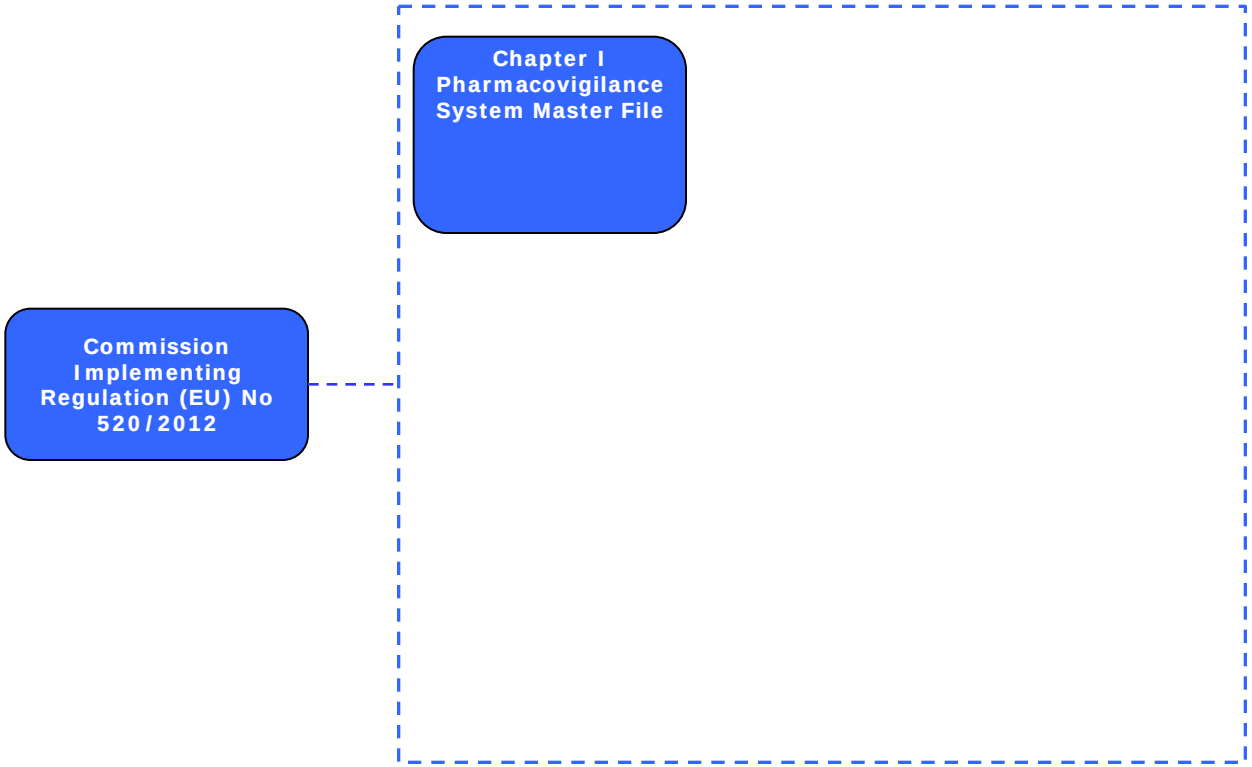

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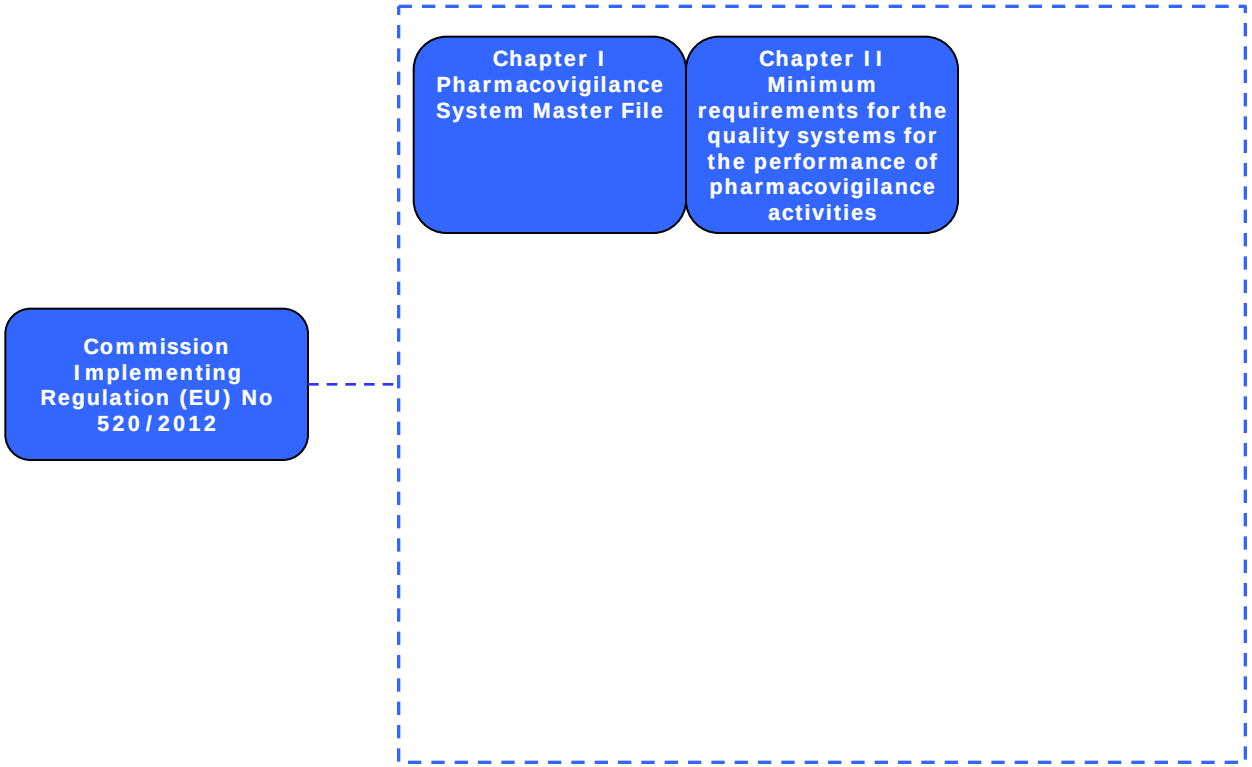

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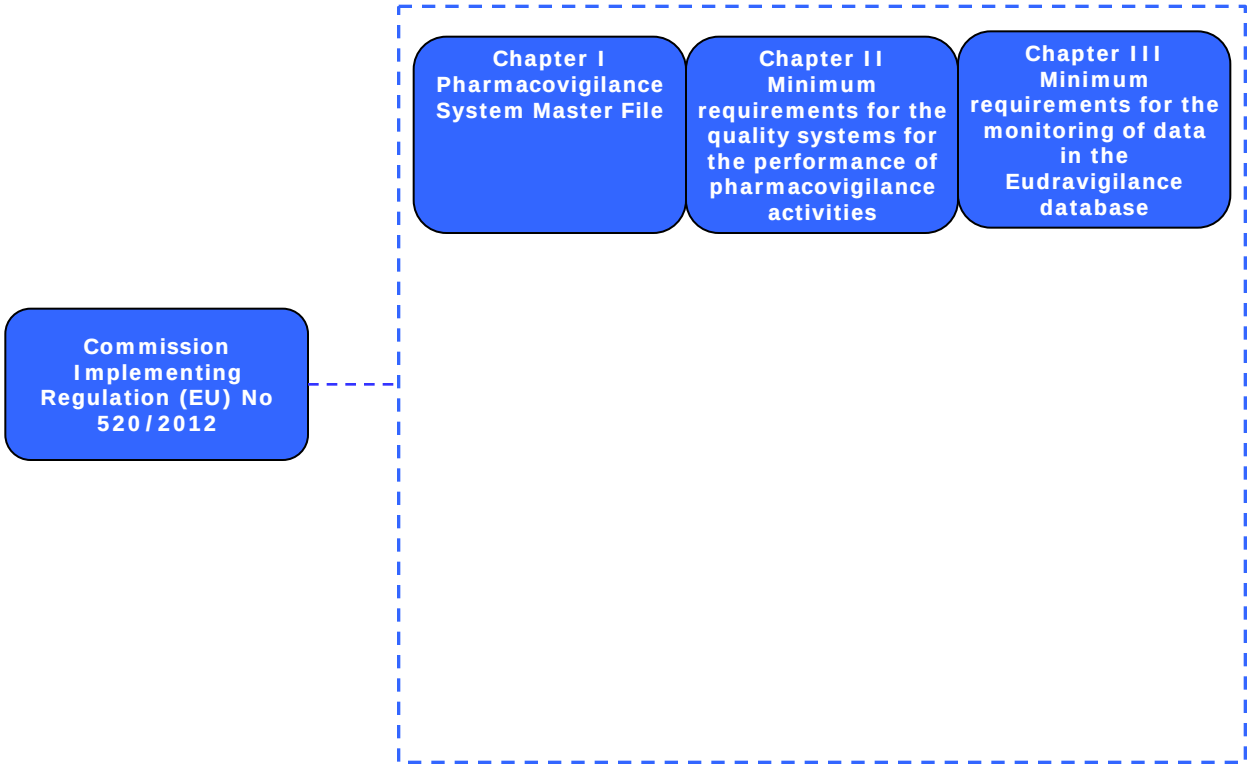

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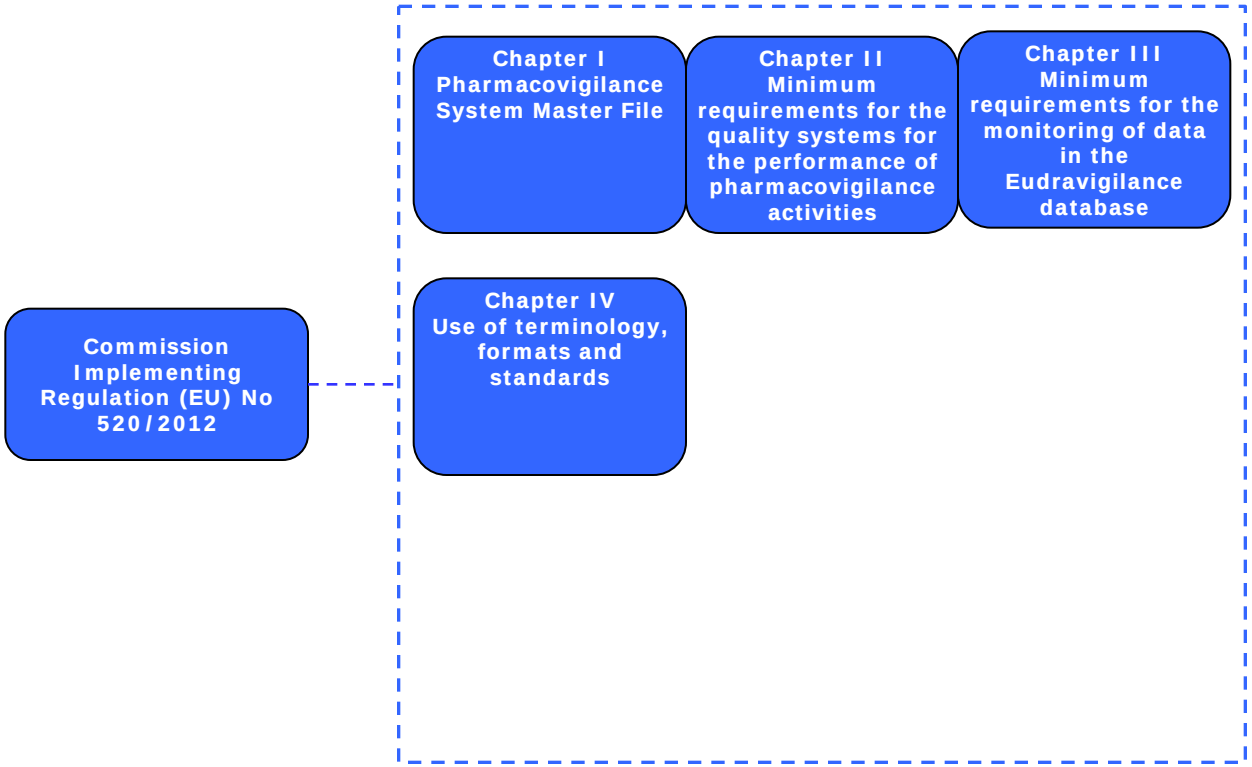

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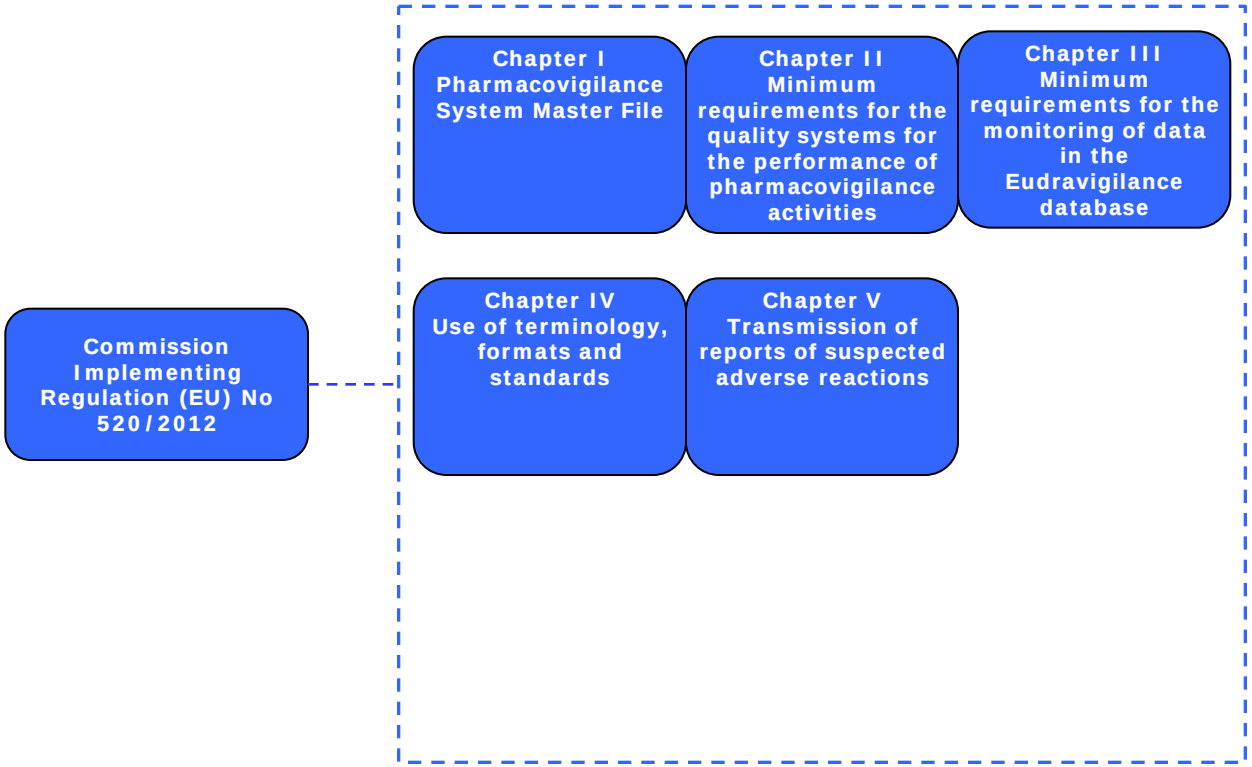

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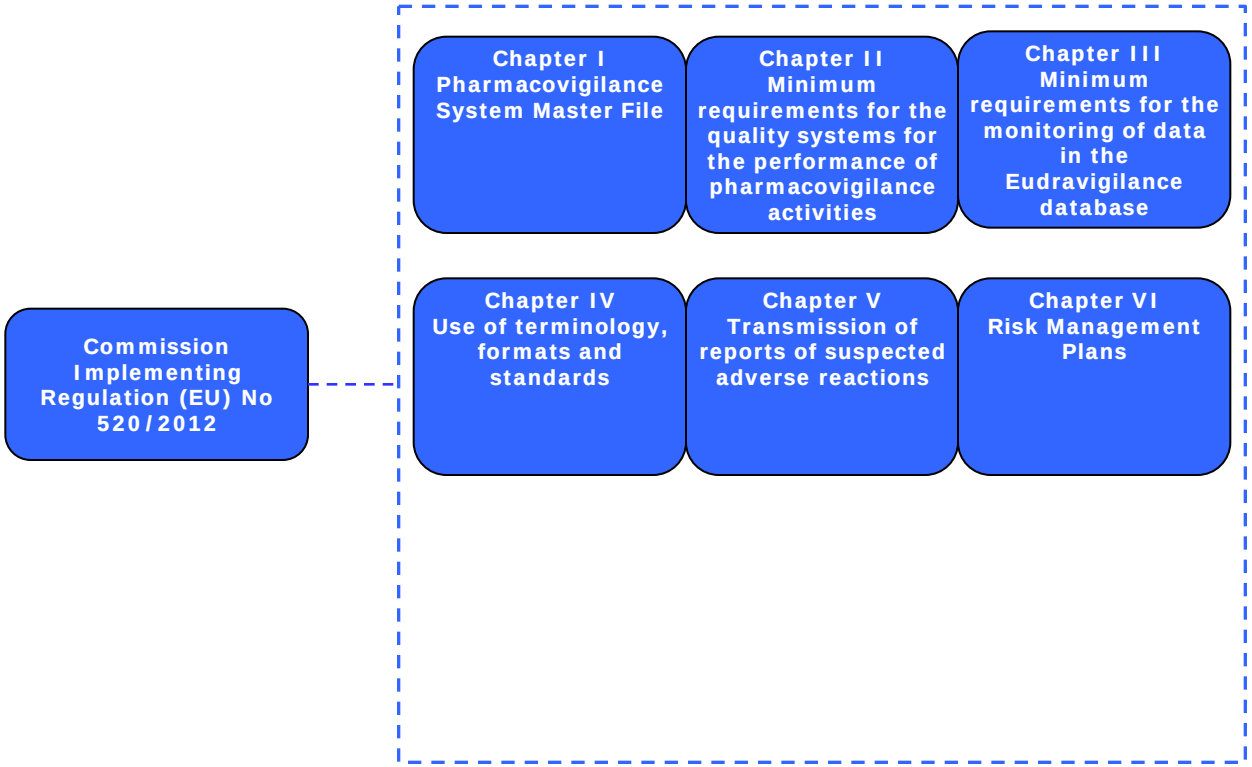

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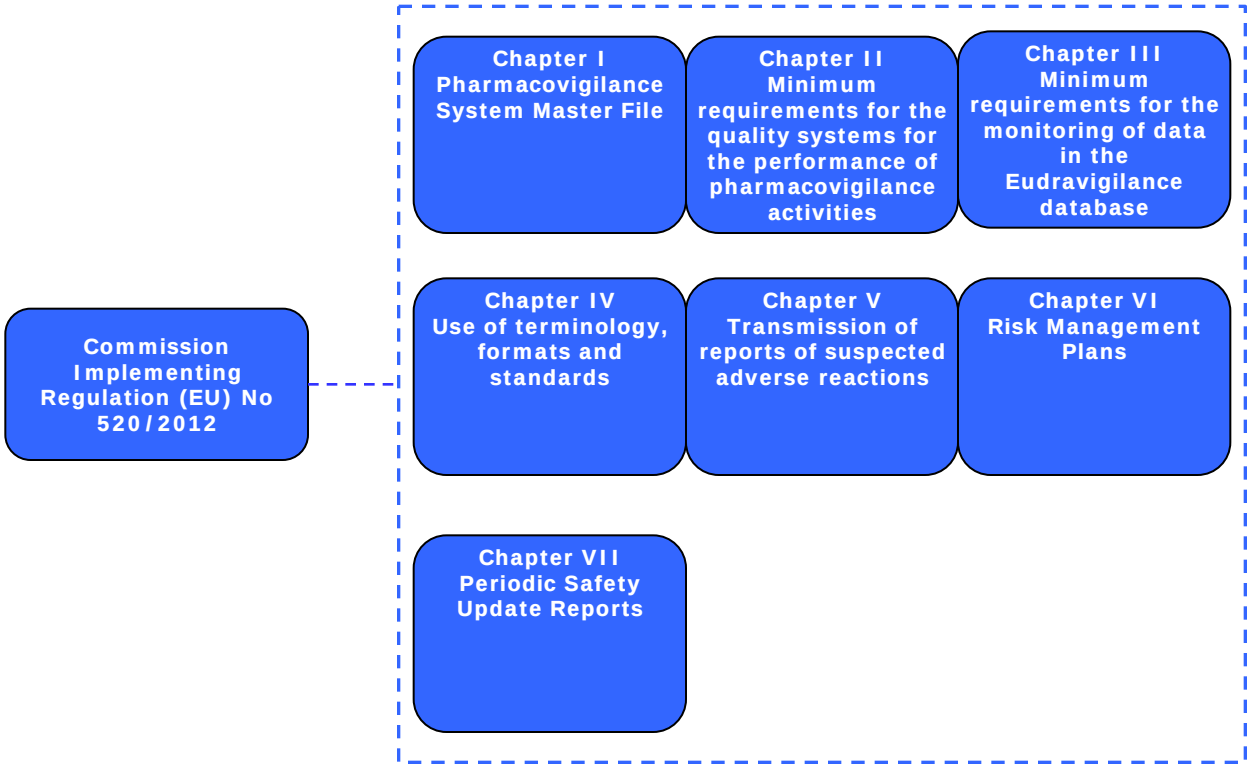

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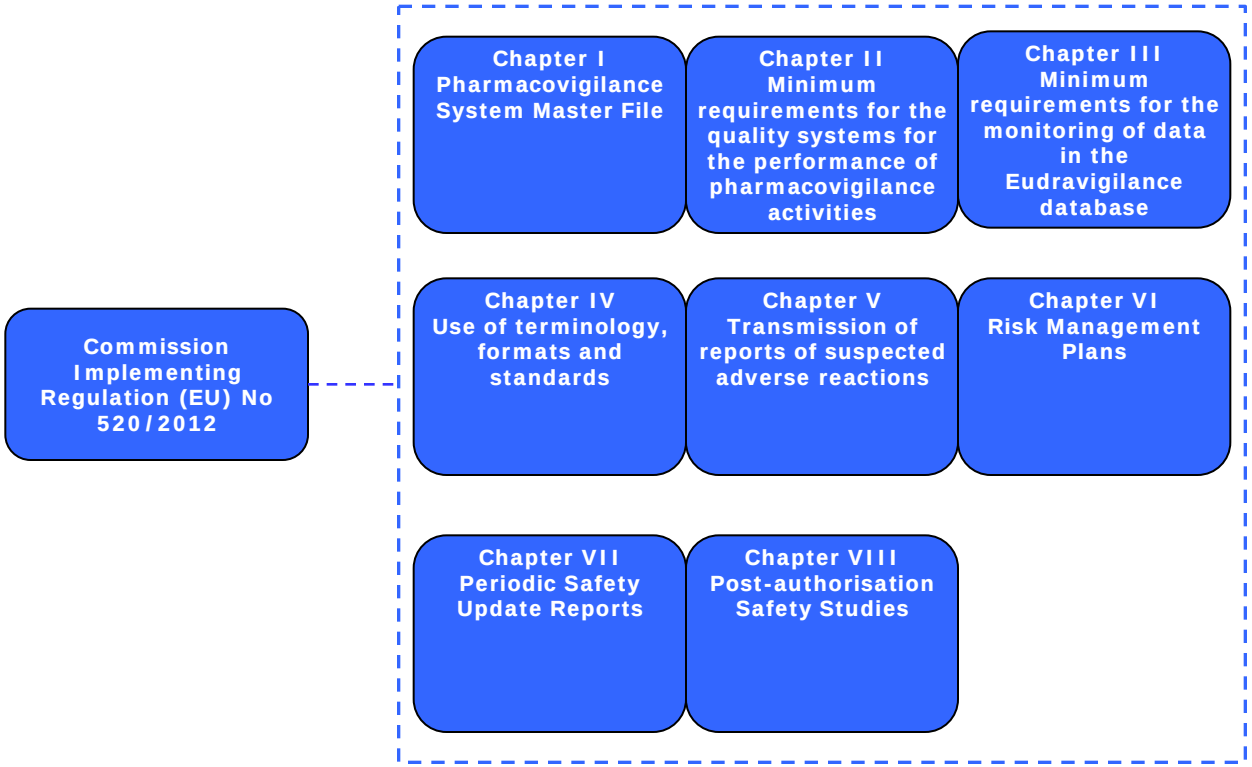

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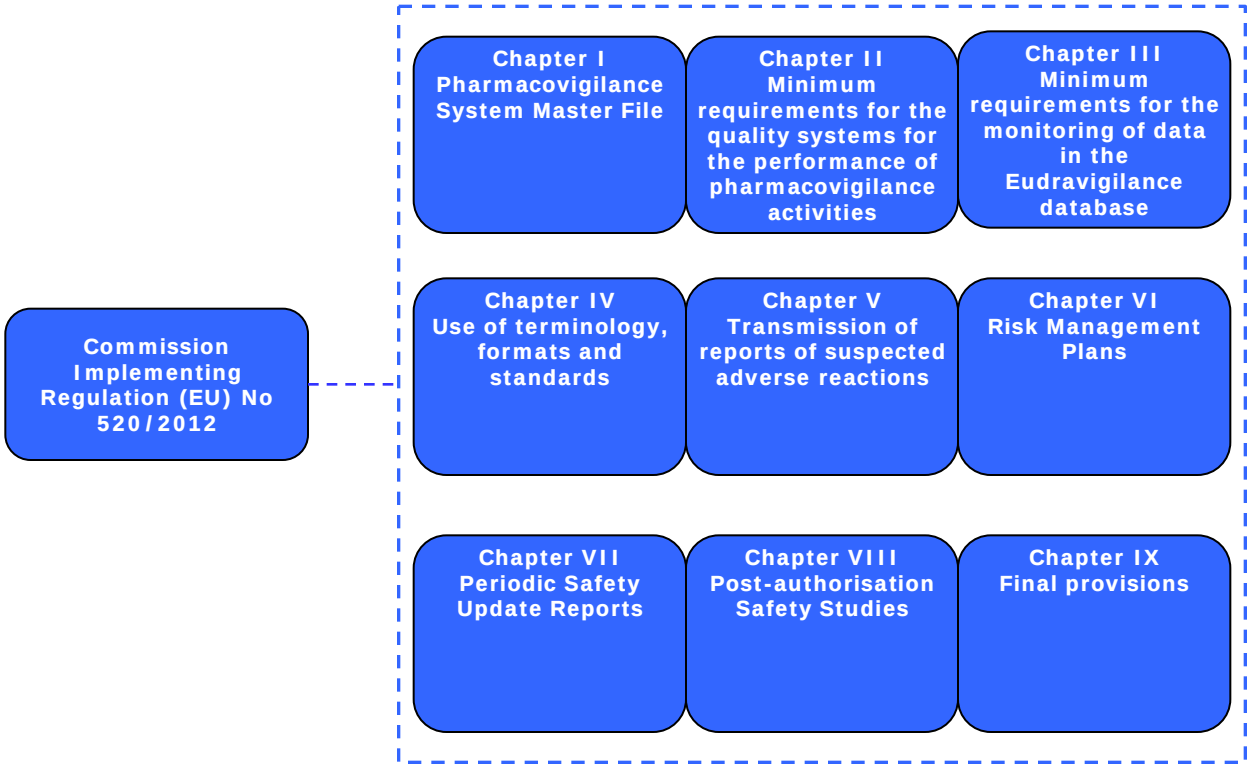

2. Hierarchy of rules - Good pharmacoVigilance Practice (GVP)

- Self-standing guidance on pharmacovigilance replacing Volume 9A
- Addressed to EU Marketing Authorisation Holders, Competent Authorities in Member States and Agency
- Developed within EU network
- 8 weeks public consultation
- 2 types of ‘Chapters’:
  - Modules for major processes
  - Product or populations specific (P)
- GVP structure:
  - A: Introduction
  - B: Structures and processes
  - C: Operation of the EU network

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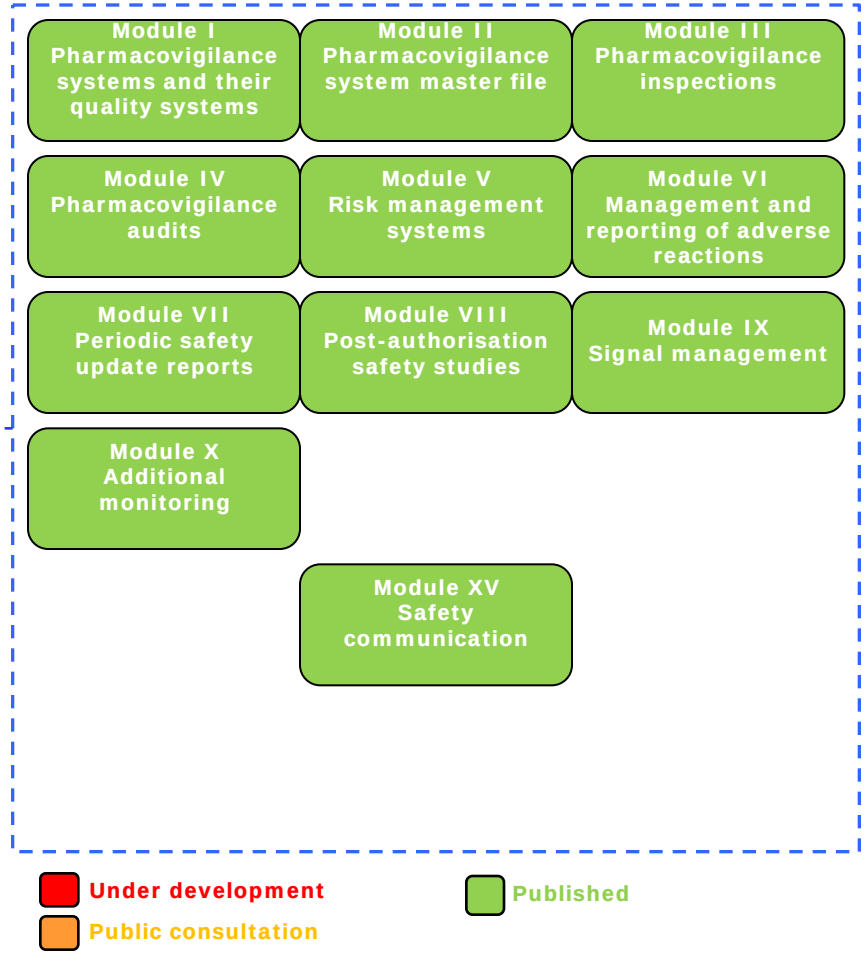

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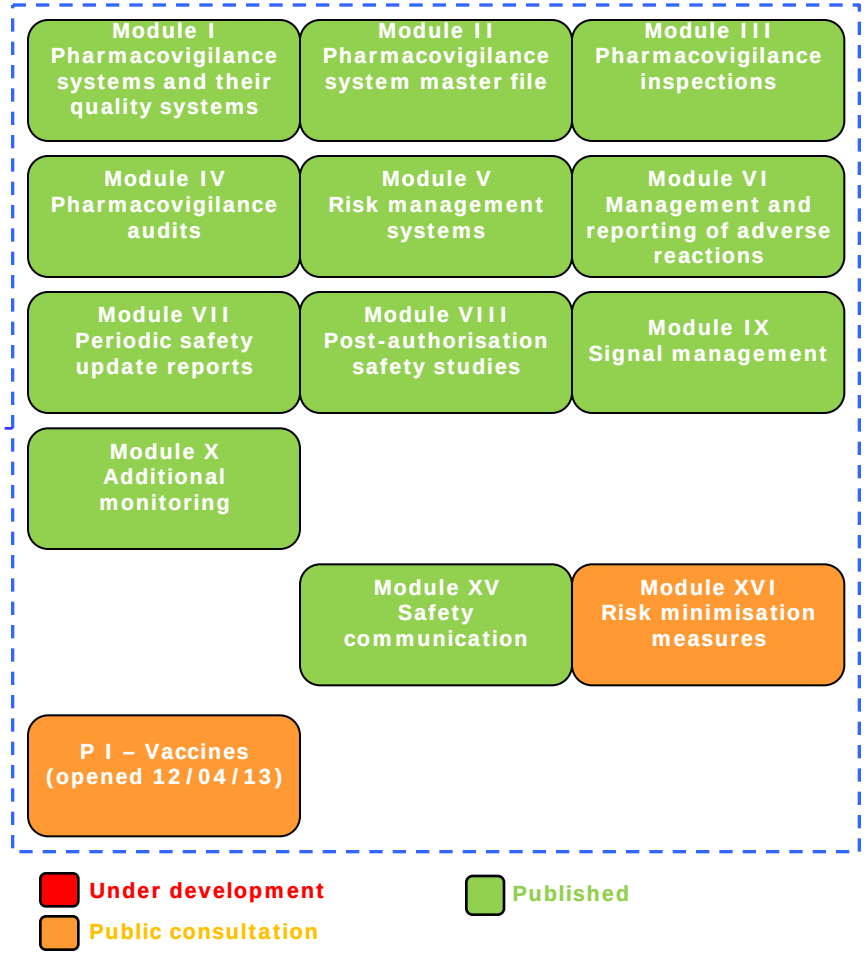

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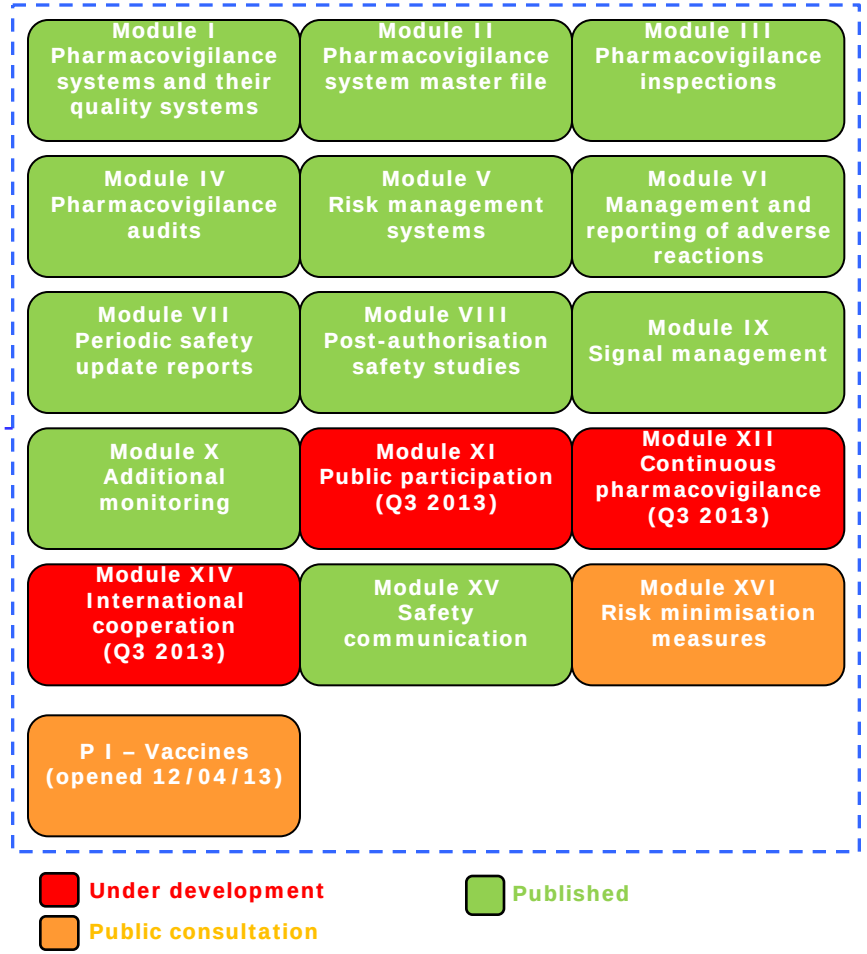
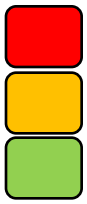


3. Prioritised implementation agreed by EMA Management Board in December 2011 and 2012

- **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)
Handling of PSURs for active substances contained in both CAPs and NAPs* in accordance with URD* list		NEW	- To start as of April 2013

3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Collection of key information on medicines (2/4)

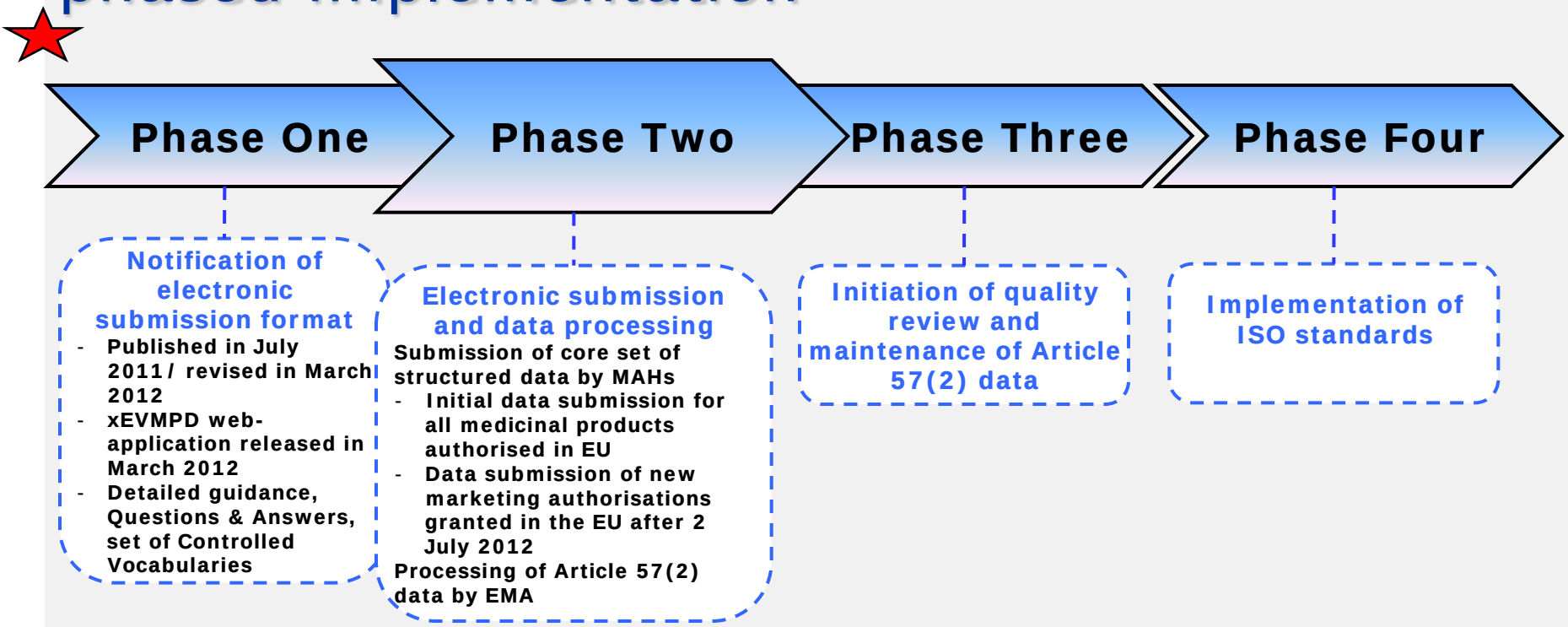
3. Post-Authorisation Safety and Efficacy Studies:	2012	2013	
Implementation of the PASS procedure for protocols approval and results management for CAPs			- Started July 2012
Public consultation on delegated act on PAES by the Commission			- From 28/11/2012 to 18/02/13
PASS: Operate the procedure for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

3. Prioritised implementation of the pharmacovigilance legislation by the EMA

Collection of key information on medicines (3/4)

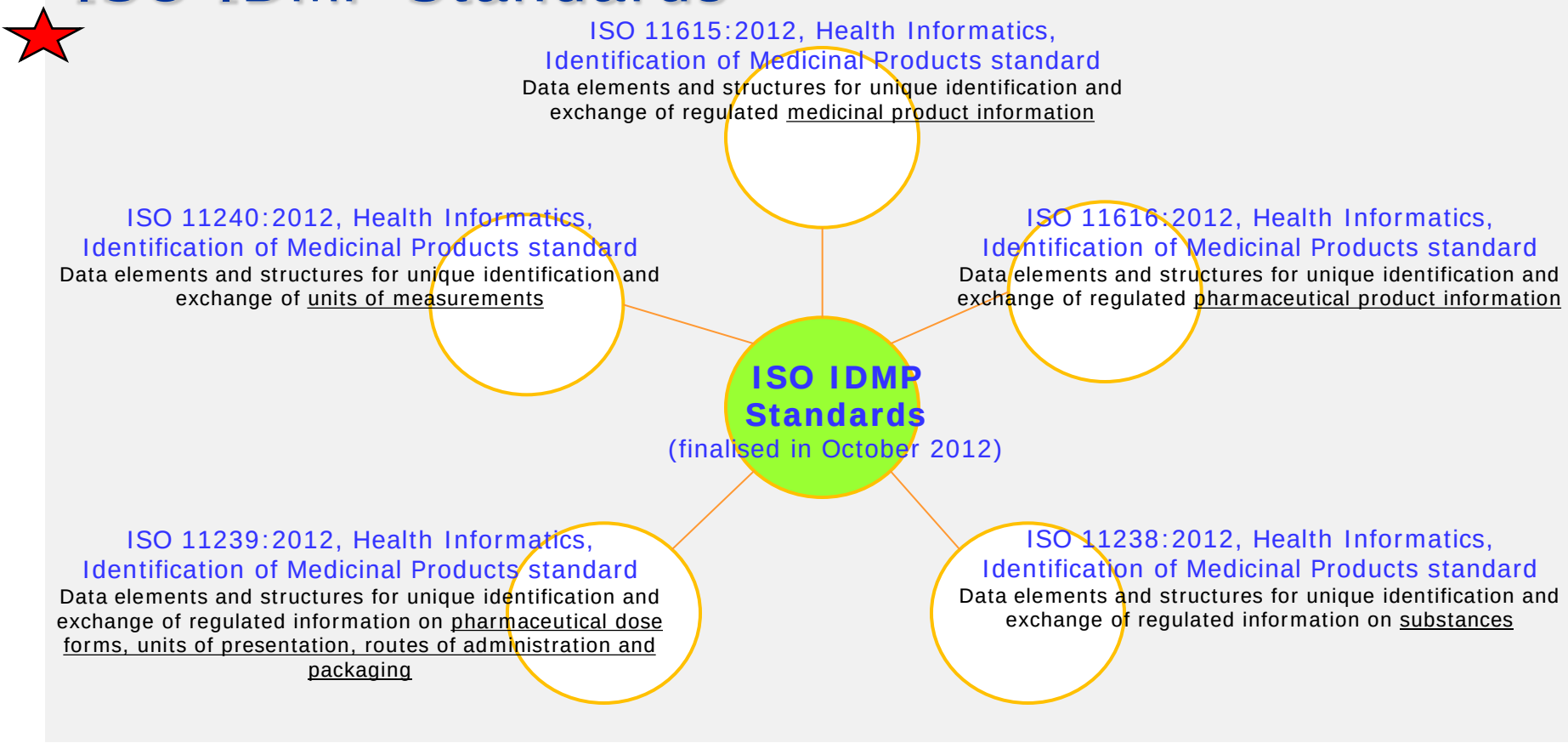
4. Electronic submission of core medicine information by MAHs ('Article 57'):	2012	2013	
Start validation of received information			
Initiate limited quality assurance of data being submitted on medicinal products authorised in EU		NEW	
Achieve an agreement with pharmaceutical industry on the submission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

Format for electronic submission of product information – phased implementation



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

Format for electronic submission of product information – ISO IDMP Standards



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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		NEW	

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)		NEW	

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		NEW	
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		NEW	- Following stakeholder workshop held on 28/02/13-01/03/13

'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

3. Prioritised implementation of the pharmacovigilance legislation by the EMA

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

2. Additional monitoring:	2012	2013	
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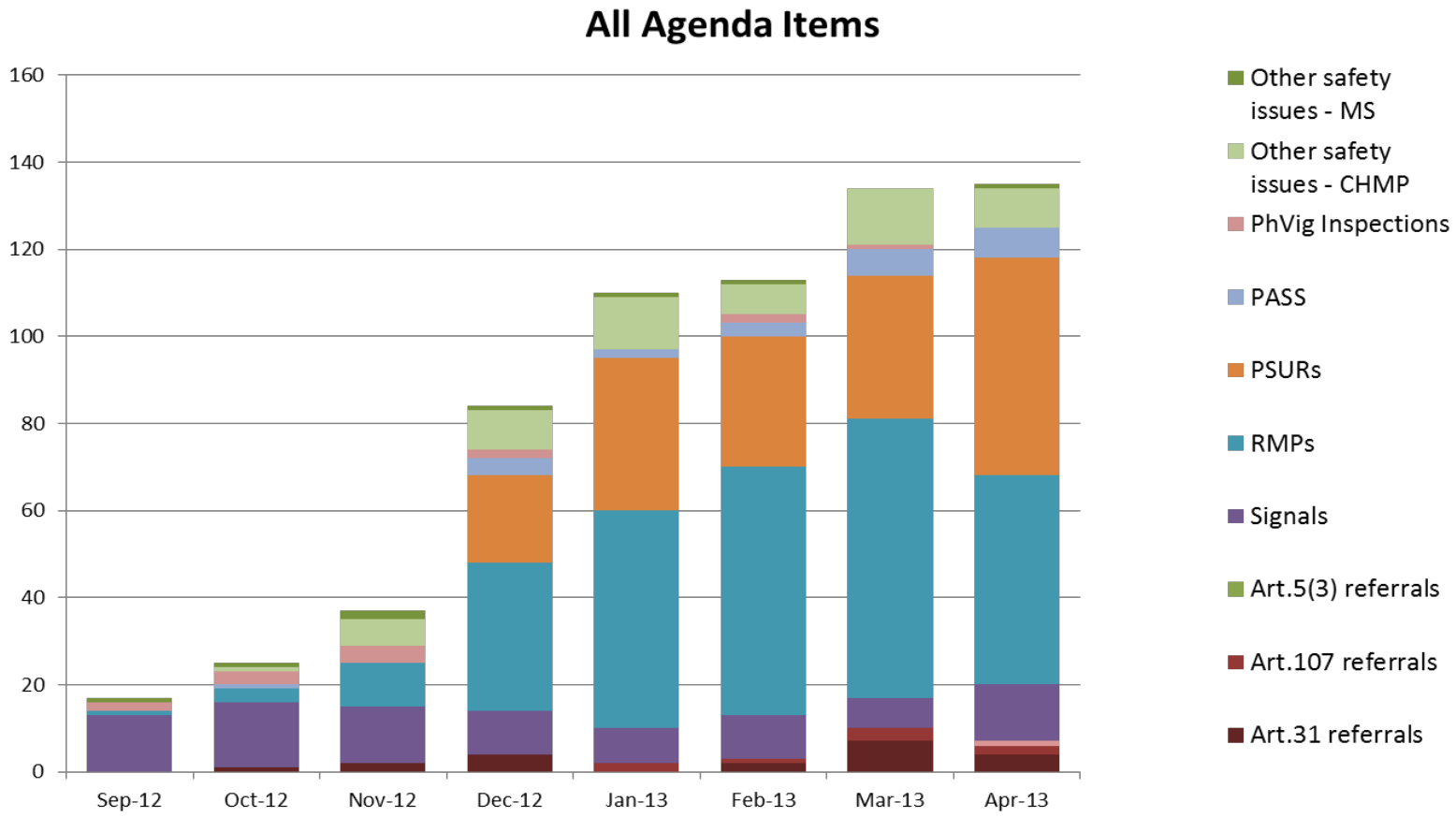
3. Prioritised implementation of the pharmacovigilance legislation by the EMA

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		NEW	
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		NEW	

PRAC workload



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
		NEW	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

Transparency of activities for Pharmacovigilance Risk Assessment Committee

Legal notice: EMA website serves as the EU Medicines Web-portal

- **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

3. Prioritised implementation of the pharmacovigilance legislation by the EMA

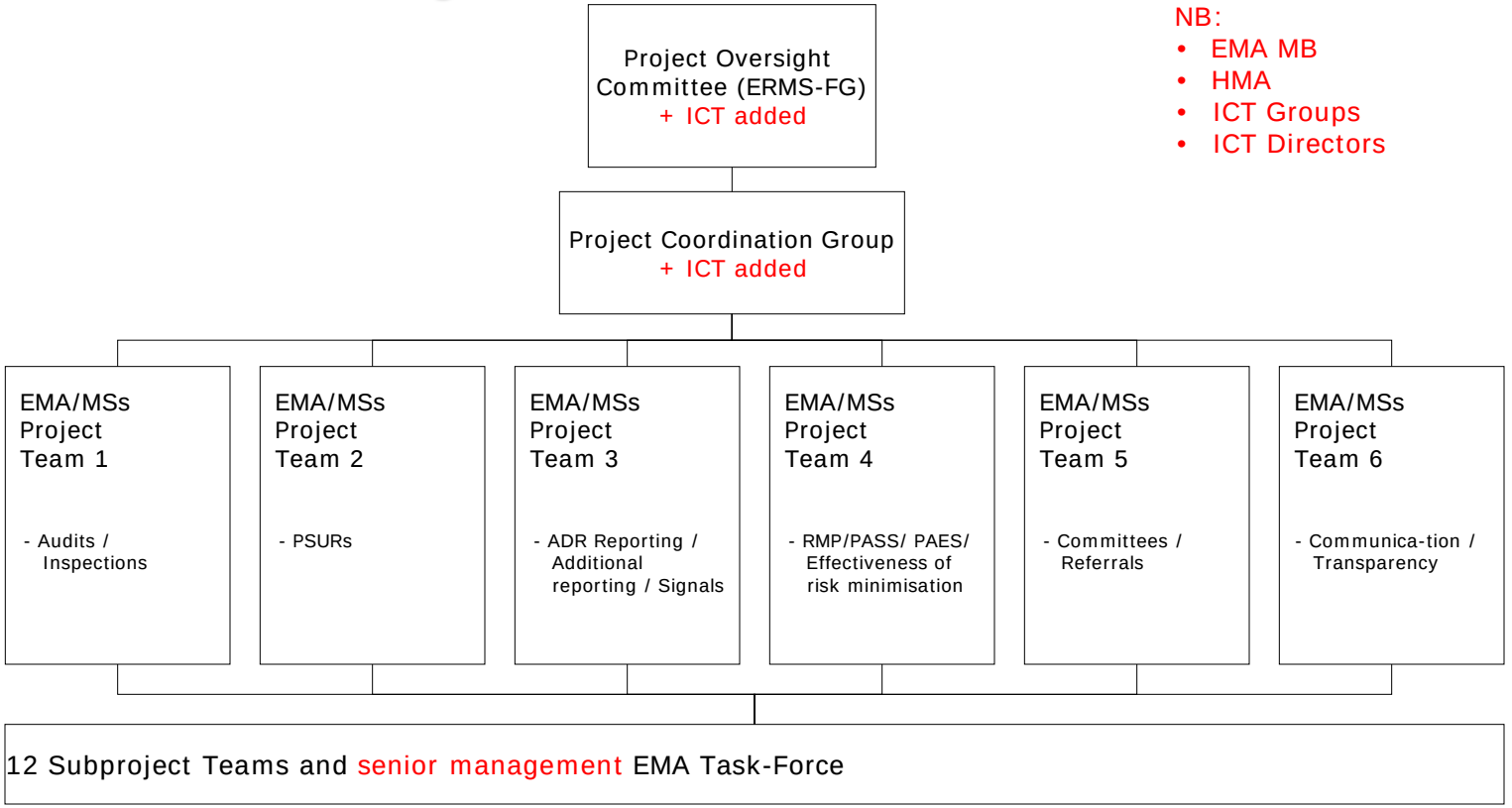
Communication with stakeholders (2/2)

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

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

Topics	Activities
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.

4. Project Governance structure - 2011/2012 Project Governance Structure



NB:
- EMA MB
- HMA
- ICT Groups
- ICT Directors

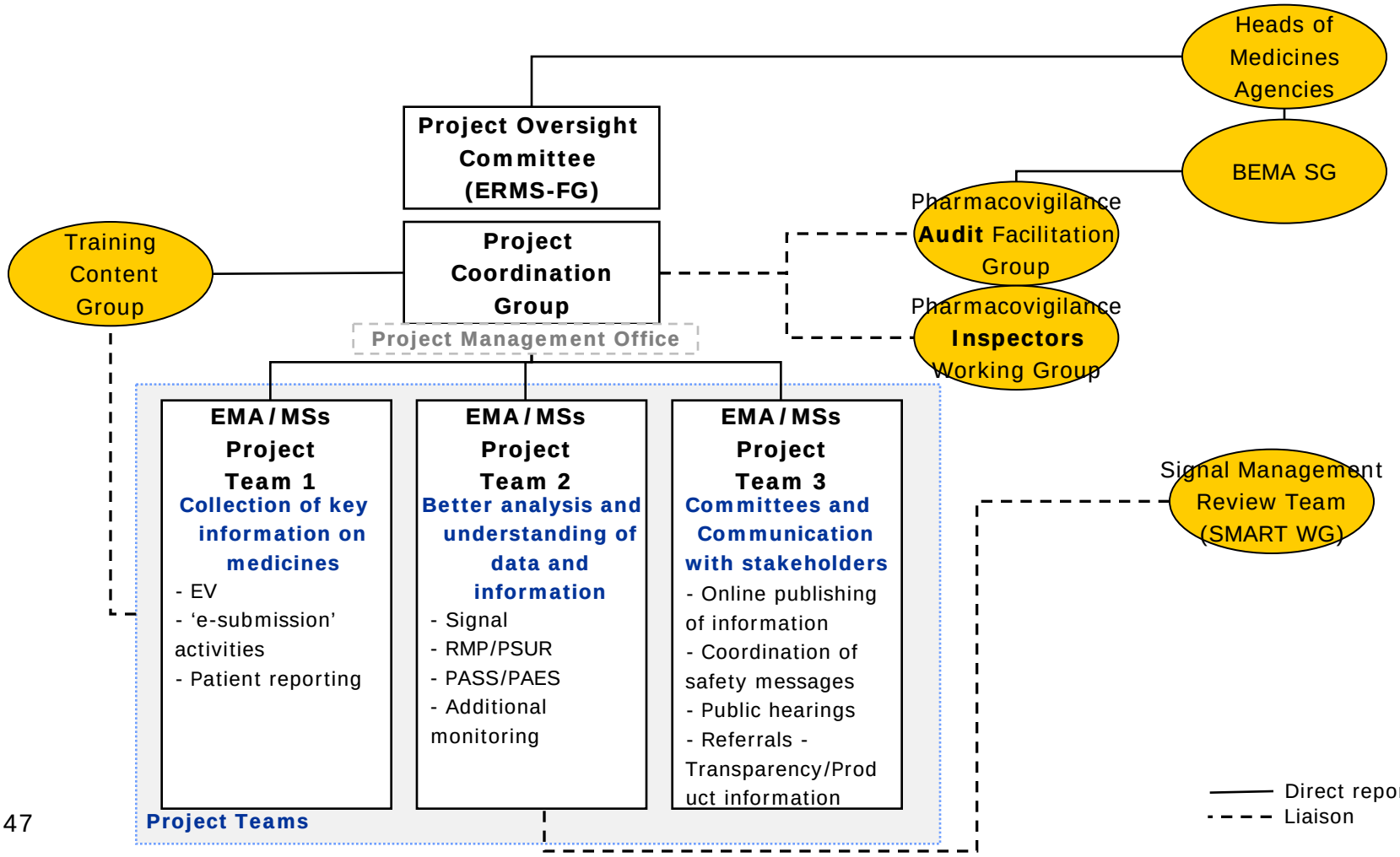
4. Project governance structure – revised Project Governance Structure

- Key drivers:
  - Complete development of remaining deliverables as per prioritised implementation agreed with EMA MB in Dec 2011 and 2012
  - Further integrated, streamlined and efficient implementation recognising the need for process efficiency and resource availability across the EU Network
  - Enhanced communication, information sharing and cross working across Project Teams as well as Stakeholders liaison management
  - Improved management and resolution of issues and gaps
  - Emphasis on NAPs-related issues
  - Reviewed Project groups membership, considering membership of ICT experts
  - Better integration and best use of available resources

4. Project governance structure – revised Project Governance Structure

- Environmental factors:
  - DG SANCO proposal for Joint Action on Pharmacovigilance to support Member States to find solutions for organising and running their pharmacovigilance system in the context of the new pharmacovigilance legislation in the EU (unlikely to have operational impact before Q4 2013)
  - Resources constraints across the EU Network
  - New changes to Pharmacovigilance legislation
  - On-going changes to variations and fees regulations

4. Project governance structure – revised Project Governance Structure



Thank you!

Any question?