



**EU Risk Management Plan for
Sovaldi® (Sofosbuvir)**

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RMP version to be assessed as part of this application:

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Rationale for submitting an updated RMP:

Updated the list of safety concerns to remove the important identified risks: “Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone” and “HBV reactivation in HBV/HCV coinfecting patients”, and to remove targeted follow-up questionnaire related to the important identified risk of cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone.

Summary of significant changes in this RMP:

Part	Module/Annex	Significant changes to RMP
Part I	Table Part I.1 : Product Overview	None
Part II Safety Specification	Section Part II: Module SI : Epidemiology of the indication and target populations(s)	None
	Section Part II: Module SII : Non-clinical part of the safety specification	None
	Section Part II: Module SIII : Clinical study exposure	None
	Section Part II: Module SIV : Populations not studied in clinical studies	None
	Section Part II: Module SV : Postauthorization experience	Information updated with Postmarketing exposure data
	Section Part II: Module SVI : Additional EU requirements for the safety specification	None
	Section Part II: Module SVII : Identified and potential risks	Updated to reflect the removal of the important identified risks “Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone” and “HBV reactivation in HBV/HCV coinfecting patients”.

Part	Module/Annex	Significant changes to RMP
	Section Part II: Module SVIII : Summary of the safety concerns	Updated to reflect the removal of the important identified risks “Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone” and “HBV reactivation in HBV/HCV coinfecting patients”.
Part III Pharmacovigilance Plan		Removal of targeted questionnaire collecting information on bradyarrhythmia.
Part IV Plan for post-authorization efficacy studies		None
Part V Risk Minimization Measures		Updated to reflect the removal of the important identified risks “Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone” and “HBV reactivation in HBV/HCV coinfecting patients”.
Part VI Summary of RMP		Updated to reflect the removal of the important identified risks “Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone” and “HBV reactivation in HBV/HCV coinfecting patients”.
Part VII Annexes		Updated Annex 4 to reflect the removal of the targeted questionnaire for bradyarrhythmia. Updated Annex 8 to reflect the changes in this RMP.

Other RMP versions under evaluation:

RMP Version number	Submitted on	Procedure number
None	Not applicable	Not applicable

Details of the currently approved RMP:

Version number:	Approved with procedure	Date of approval (opinion date)
12.0	EMA/H/C/002798/WS2356/0081	12 January 2023 (CHMP Opinion)

QPPV name:

Rainer Heissing

QPPV signature:

The RMP has been reviewed and approved by the QPPV and
the electronic signature is on file.

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GLOSSARY OF ABBREVIATIONS AND DEFINITION OF TERMS

ADR	Adverse drug reaction
AFP	Alpha-fetoprotein
AE	Adverse event
A-H	Atrial-to-His bundle
ALT	Alanine aminotransferase
ANRS	Agence Nationale de Recherche sur le Sida e les hépatitis (French National Agency for AIDS and Hepatitis Research)
AST	Aspartate aminotransferase
ATC	Anatomical Therapeutic Chemical classification system
AUC	Area under the curve
AUC_{τ}	Area under the curve from time 0 to the end of the dosing interval
AUC_{inf} or AUC_{0-inf}	Area under the curve from time 0 to infinity
BCRP	Breast cancer resistance protein
BSEP	Bile salt export pump
CDC	Centers for Disease Control
CHC	Chronic hepatitis C
CHMP	Committee for Medicinal Products for Human Use
C_{max}	Maximum concentration
C_{min}	Minimum concentration
CPT	Child-Pugh-Turcotte (score)
CYP	Cytochrome P450
DA	<i>N</i> -desethylamiodarone
DAA	Direct acting antiviral
DCV	Daclatasvir
DDI	Drug-drug interaction
DNA	Deoxyribonucleic acid
ECG	Electrocardiogram
eCTD	Electronic common technical document
EASL	European Association for the Study of the Liver
EC	European Commission
EEA	European Economic Area
EMA	European Medicines Agency
EPAR	European Public Assessment Report
EPC	Epclusa (sofosbuvir/velpatasvir)
ESRD	End-stage renal disease
EU	European Union
FDA	Food and Drug Administration
FDC	Fixed dose combination
GI	Gastrointestinal

GLE	Glecaprevir
GT	Genotype
GZR/EBR	Grazoprevir/elbasvir
HBcAg	Hepatitis B core antigen
HBsAg	Hepatitis B surface antigen
HBV	Hepatitis B virus
hCav	Human L-type calcium channel
HCC	Hepatocellular carcinoma
hHCN4	Human hyperpolarization-activated, cyclic nucleotide-gated channel 4
HCP	Healthcare professional
HCV	Hepatitis C virus
HIV	Human Immunodeficiency Virus
HVN	Harvoni (ledipasvir/sofosbuvir)
IDU	Injection drug use/Injection drug user
IFN	Interferon
IL28B	Interleukin 28B
INN	International nonproprietary name
IRB	Institutional Review Board
LDV	Ledipasvir (GS-5885)
MAA	Marketing Authorization Application
MAH	Marketing Authorization Holder
MATE	Multidrug and toxin extrusion protein
MoH	Ministry of Health
mtDNA	Mitochondrial deoxyribonucleic acid
NA	Not applicable
NASH	Nonalcoholic steatohepatitis
NDA	New drug application
NIAID	National Institute of Allergy and Infectious Diseases
NOAEL	No observed adverse effect level
NS3/4A	Nonstructural protein 3/4A
NS5A	Nonstructural protein 5A
NS5B	Nonstructural protein 5B
OAT	Organic anion transporter
OATP	Organic anion transporting polypeptide
OCT	Organic cation transporter
OMB/PTV/r	Ombitasvir/paritaprevir/ritonavir
OMB/PTV/r + DSV	Ombitasvir/paritaprevir/ritonavir + dasabuvir
PASS	Post-authorization safety study
PBRER	Periodic benefit risk evaluation report
PD	Pharmacodynamics

PEG	Pegylated interferon-alfa-2a/b
Pgp	P-glycoprotein
PI	Protease inhibitor
PIB	Pibrentasvir
PIL	Patient Information Leaflet
PK	Pharmacokinetics
PRAC	Pharmacovigilance Risk Assessment Committee
PSUR	Periodic Safety Update Report
PT	Preferred Term
Q1/Q2/Q3/Q4	Quarter 1/2/3/4
QPPV	Qualified Person for Pharmacovigilance
QT	Electrocardiographic interval between the beginning of the Q wave and termination of the T wave, representing the time for both ventricular depolarization and repolarization to occur
QTc	QT interval corrected for heart rate
RBV	Ribavirin
RMP	Risk Management Plan
RNA	Ribonucleic acid
SmPC	Summary of Product Characteristics
SMV	Simeprevir
SOF	Sofosbuvir
SVR	Sustained virologic response
UGT	Uridine diphosphate glucuronosyltransferase
UGT1A	UDP-glucuronosyltransferase 1 family, polypeptide A
UK	United Kingdom
US	United States
USA	United States of America
VEGF	Vascular endothelial growth factor
VEL	Velpatasvir, GS-5816
VSV	Vosevi (sofosbuvir/velpatasvir/voxilaprevir)
WHO	World Health Organization

PART I: PRODUCT OVERVIEW

Table Part I.1. Product Overview

Active substance(s) (INN or common name):	Sofosbuvir
Pharmaco-therapeutic group(s) (ATC Code):	Direct Acting Antivirals (J05AP08)
Marketing Authorization Holder	Gilead Sciences Ireland UC
Medicinal products to which this RMP refers:	1
Invented name(s) in the European Economic Area (EEA)	Sovaldi
Marketing authorization procedure	Centralized
Brief description of the product	<i>Chemical class</i> Sofosbuvir: Nonstructural protein 5B (NS5B) inhibitor
	<i>Summary of mode of action</i> Sofosbuvir is a nucleotide analogue that potently inhibits genotype 1 to 6 hepatitis C virus (HCV) ribonucleic acid (RNA) replicons in vitro and has demonstrated high sustained virological response (SVR) rates when administered with ribavirin (RBV) and with pegylated interferon (PEG) + RBV.
	<i>Important information about its composition</i> None
Hyperlink to the Product Information	Sovaldi Summary of Product Characteristics (SmPC)
Indication(s) in the EEA	Current: Sovaldi is indicated in combination with other medicinal products for the treatment of chronic hepatitis C (CHC) in adults and pediatric patients aged 3 years and above.
	Proposed: Not applicable

Dosage in the EEA	<p>Current: The recommended dose of Sovaldi in adults is one 400 mg tablet, taken orally, once daily with food. Sovaldi should be used in combination with other medicinal products.</p> <p>The recommended dose of Sovaldi in pediatric patients aged 3 years and above is based on weight (as detailed in Table 1). Sovaldi should be taken with food.</p> <p>Sovaldi oral granules are available for patients for the treatment of chronic HCV-infection in pediatric patients aged 3 years and above having difficulty in swallowing film-coated tablets.</p> <p>Table 1. <u>Dosing for pediatric patients aged 3 years and above using Sovaldi tablets or oral granules</u></p> <table><tr><th>Body Weight (kg)</th><th>Dosing of Sovaldi Tablets or Oral Granules</th><th>Sofosbuvir Daily Dose</th></tr><tr><td>≥ 35</td><td>one 400 mg tablet once daily or two 200 mg tablets once daily or two 200 mg sachets of granules once daily</td><td>400 mg /day</td></tr><tr><td>17 to < 35</td><td>one 200 mg tablet once daily or one 200 mg sachets of granules once daily</td><td>200 mg/day</td></tr><tr><td>< 17</td><td>one 150 mg sachets of granules once daily</td><td>150 mg/day</td></tr></table>	Body Weight (kg)	Dosing of Sovaldi Tablets or Oral Granules	Sofosbuvir Daily Dose	≥ 35	one 400 mg tablet once daily or two 200 mg tablets once daily or two 200 mg sachets of granules once daily	400 mg /day	17 to < 35	one 200 mg tablet once daily or one 200 mg sachets of granules once daily	200 mg/day	< 17	one 150 mg sachets of granules once daily	150 mg/day
Body Weight (kg)	Dosing of Sovaldi Tablets or Oral Granules	Sofosbuvir Daily Dose											
≥ 35	one 400 mg tablet once daily or two 200 mg tablets once daily or two 200 mg sachets of granules once daily	400 mg /day											
17 to < 35	one 200 mg tablet once daily or one 200 mg sachets of granules once daily	200 mg/day											
< 17	one 150 mg sachets of granules once daily	150 mg/day											
Pharmaceutical form(s) and strengths	<p>Proposed: Not applicable</p> <p>Current: Film-coated tablet/400mg Film-coated tablet/200 mg Granules sachet/200 mg Granules sachet/150 mg</p> <p>Proposed: Not applicable</p>												
Is/Will the product be subject to additional monitoring in the EU?	No												

PART II: SAFETY SPECIFICATION

PART II: MODULE SI - EPIDEMIOLOGY OF THE INDICATION(S) AND TARGET POPULATION(S)

SI.1. Hepatitis C

SI.1.1. Incidence

The rate of new hepatitis C virus (HCV) infections is difficult to determine due to the asymptomatic nature of acute infections. Worldwide, it is estimated that there were 1.75 million new HCV infections in 2015 {[The Polaris Observatory HCV Collaborators 2017](#), [World Health Organization \(WHO\) 2017](#)}. Unsafe healthcare procedures and injection drug use are the leading causes of new HCV infections globally {[World Health Organization \(WHO\) 2017](#)}.

The World Health Organization (WHO) reports that the Eastern Mediterranean Region and the European region have higher rates of infection compared to other world regions {[World Health Organization \(WHO\) 2017](#)} ([Table SI.1](#)). Variation in HCV incidence is largely determined by differences in practices, transmission risk factors, and access to care by region ([Table SI.1](#)).

Table SI.1. Incidence Estimates of HCV Infection by WHO Region {[World Health Organization \(WHO\) 2017](#)}

WHO region	Incidence rate per 100,000		Total number (000)	
	Best estimate	Uncertainty interval	Best estimate	Uncertainty interval
African region	31.0	22.5-54.4	309	222-544
Region of the Americas	6.4	5.9-7.0	63	59-69
Eastern Mediterranean Region	62.5	55.6-65.2	409	363-426
European Region	61.8	50.3-66.0	565	460-603
South-East Asia Region	14.8	12.5-26.9	287	243-524
Western Pacific Region	6.0	5.6-6.6	111	104-124
Global	23.7	21.3-28.7	1,751	1,572-2,120

SI.1.2. Prevalence

The prevalence of HCV infection worldwide is estimated to be 1% (approximately 71 million people) and varies considerably among different regions {[World Health Organization \(WHO\) 2017](#)}. Estimates of HCV viraemic prevalence through modelling found that, in 2015, the range of prevalence estimates by country spanned from 0.1% in the Netherlands to as high as 7.0% in Gabon {[The Polaris Observatory HCV Collaborators 2017](#)}.

The WHO estimates that HCV prevalence in Europe is approximately 1.5%, corresponding to 14 million people living with HCV {[World Health Organization \(WHO\) 2017](#)} ([Table SI.1](#)). The highest viraemic prevalence in 2015 was observed in Eastern Europe (3.3%, 95% Uncertainty Interval 2.1-3.4) and the lowest was observed in Western Europe (0.5%, 95% Uncertainty Interval 0.4-0.8) {[The Polaris Observatory HCV Collaborators 2017](#)}. In Central Europe, the viraemic prevalence was estimated to be 1.1% in 2015 (95% Uncertainty Interval 0.8-1.0).

The available data from Europe indicate a wide variation in viraemic prevalence between countries, ranging from 0.1% to 3.3% {[The Polaris Observatory HCV Collaborators 2017](#)}. The lowest HCV prevalence estimates (0.2% or lower) were observed in the Netherlands and Austria and the highest (2.0% or higher) were from Romania, Latvia and Russia.

The true prevalence is likely to be higher as general population studies may exclude high-risk subgroups like active injection drug users (IDUs), the homeless, the incarcerated, and veterans. The HCV infection rate is substantially higher in these subgroups as illustrated by a study that showed that HCV prevalence among prisoners in Spain was 22.7% {[Saiz de la Hoya 2011](#)}. Studies have shown that the overall prevalence is higher than national estimates when these subgroups are considered {[Chak 2011](#), [Gish 2005](#)}.

Injection drug use has become the main risk for HCV transmission in developed countries with well-established HCV screening programs of blood products and lower HCV prevalence. Among 71 million HCV-infected persons, 5.6 million (8%) currently inject drugs {[World Health Organization \(WHO\) 2017](#)}. For example, in Northern European countries such as Norway and Sweden, or in the United Kingdom (UK) or Canada, IDU is the main risk factor for HCV transmission, accounting for more than half of HCV-infected patients (ie, Norway 67%, Sweden 65%, Canada 58% and UK 90%). In some countries with increasing HCV prevalence, the increase may be explained by a dramatic increase in IDU {[Cornberg 2011](#)}.

Globally, HCV genotype 1 is the most prevalent, accounting for 44% of all infections, followed by genotype 3 (25% of all infections) and genotype 4 (15% of all infections) {[The Polaris Observatory HCV Collaborators 2017](#)}. Infection with HCV genotype 1 accounts for the majority (60%) of infections in high-income and upper-middle income countries; in contrast, genotype 3 is common in lower middle-income countries (36%) and genotype 4 is common in low-income countries (45%).

Table SI.2. Prevalence estimates of HCV infection by WHO region {[World Health Organization \(WHO\) 2017](#)}

WHO region	Estimates of the prevalence of HCV infection (%)			Estimated number of persons living with HCV (millions)		
	Best	Uncertainty interval		Best	Uncertainty interval	
		Lower	Higher		Lower	Higher
African region	1.0	0.7	1.6	11	7	16
Region of the Americas	0.7	0.6	0.8	7	6	8
Eastern Mediterranean Region	2.3	1.9	2.4	15	13	15
European Region	1.5	1.2	1.5	14	11	14
South-East Asia Region	0.5	0.4	0.9	10	8	18
Western Pacific Region	0.7	0.6	0.8	14	10	15
Global	1.0	0.8	1.1	71	62	79

SI.1.3. Demographics of the Population in the Authorized Indication

SI.1.3.1. HCV Infection by Gender

The rate of chronicity in HCV infection appears to be lower in women, particularly younger women. Being of the male sex has been associated with accelerated progression of hepatic fibrosis among those infected with HCV {[Shepard 2005](#)}.

SI.1.3.2. Hepatitis C Infection by Age

Worldwide, prevalence rates tend to increase with age and peak in ages 55-64 years {[Alter 2007](#), [Mohd Hanafiah 2013](#)}. In Turkey, Spain, Italy, Japan, and China, people over 50 years of age account for the highest prevalence of infections, indicating a cohort effect in which the risk for HCV infection was higher in the distant past (ie, 40-60 years previously). Young adults (ages 20 to 35 years) are at highest risk for acute infection, with an incidence 6 times higher than those over 40 years of age {[Armstrong 2000](#), [Kantar Health 2014](#), [Mohd Hanafiah 2013](#)}.

There are limited data on the prevalence of HCV infection among adolescents 12<18 years of age. It is estimated that approximately 2.1 to 3.5 million individuals 15 years of age or younger are chronically infected with HCV {[European Association for the Study of the Liver \(EASL\) 2018](#), [Nwaohiri 2018](#)}. The prevalence varies by geographic location. The estimated prevalence of HCV infection in children is up to 0.4% in Europe and the United States (US), and up to 6% in resource-limited countries {[El-Shabrawi 2013](#), [Khaderi 2014](#)}. The natural history of chronic HCV infection in children differs from that in adults since HCV infection in children is relatively benign. In general, the burden of disease is much lower in this age group than among older persons. A recent meta-analysis of primary national data sources and peer-reviewed papers used mathematical modeling to determine that the HCV antibody seroprevalence rate among subjects

10-19 years of age in 2005 was 1.2-1.3% in Western and Central Europe, 1.4-1.6% in Eastern Europe, and 0.6% in North America {[Mohd Hanafiah 2013](#)}. It must be noted that anti-HCV is a sign of previous and current infection that does not differentiate acute from chronic infections. Data from Europe and the United States show that the seroprevalence of anti-HCV among patients aged 10-19 has dropped in several countries since 2005 ([Table SI.3](#)) {[Kantar Health 2014](#)}. Whether these estimates have been influenced by changes in HCV surveillance and/or availability of highly effective DAA treatment is unclear.

Table SI.3. Estimated Number of Seroprevalent HCV Cases Among Patients Aged 10-19 in Different European Countries and United States

Country	Number of cases in 2005	Number of cases in 2015
United Kingdom	9,731	945
France	3,658	4,367
Germany	3,544	1,016
Italy	28,491	855
Spain	8,221	8,675
United States	134,554	6,573

SI.1.3.3. HCV Infection by Ethnicity

There are differences in the rate of chronic HCV infection, response to treatment, and development of complications among different racial and ethnic groups with HCV infection. In particular, African Americans appear to have a higher rate of chronic HCV infection than Caucasians and Hispanic whites, along with higher viral loads, lower clearance rates, and lower responses to anti-HCV therapy {[Pyrasopoulos 2005](#)}.

SI.1.3.4. Risk Factors for Hepatitis C

People at increased risk for hepatitis C infection include the following {[Centers for Disease Control and Prevention \(CDC\) 2015](#)}:

- Current injection drug users
- Past injection drug users, including those who injected only one time or many years ago
- Recipients of donated blood, blood products, and organs
- People who received a blood product for clotting problems made before 1987
- Hemodialysis patients or persons who spent many years on dialysis for kidney failure
- People who received body piercing, acupuncture, or tattoos done with non-sterile instruments

- People with known exposures to HCV virus, such as
 - Health care workers injured by needle sticks
 - Recipients of blood or organs from a donor who tested positive for HCV
- Human immunodeficiency virus (HIV)-infected persons
- Children born to mothers infected with HCV

Less common risks include:

- Having sexual contact with a person who is infected with HCV
- Sharing personal care items, such as razors or toothbrushes, that may have come in contact with the blood of an infected person

SI.1.4. Main Existing Treatment Options

Approved DAA-based treatment regimens are generally well tolerated and result in high sustained virologic response (SVR) at 12 weeks following completion of all treatment (SVR12) rates across most, but not all, patient populations.

The following approved HCV DAAs are recommended in the 2020 European Association for the Study of the Liver (EASL) guidelines {[European Association for the Study of the Liver 2020](#)}:

- SOF-containing products
 - Sovaldi (sofosbuvir, SOF)
 - Epclusa (sofosbuvir/velpatasvir, EPC)
 - Vosevi (sofosbuvir/velpatasvir/voxilaprevir, VSV)
- Glecaprevir/pibrentasvir (GLE/PIB)
- Grazoprevir/elbasvir (GZR/EBR)

According to the 2020 EASL guidelines {[European Association for the Study of the Liver 2020](#)}:

- SOF-containing regimens, EPC and VSV with or without RBV, are among the recommended treatment options for patients with genotypes 1-6 including treatment of adolescents (EPC), children aged 3-11 years who are treatment-naïve or -experienced, without cirrhosis or with compensated cirrhosis (Child-Pugh A) (EPC, pending approval of granule formulations), those with HIV/HCV coinfection (EPC and VSV), decompensated liver disease (EPC), post-transplant recurrence (EPC), and those who are DAA failures (VSV, or SOF + GLE/PIB).

For patients with decompensated cirrhosis, the SOF-containing regimen of EPC is the only currently approved HCV regimen that is recommended by the EASL guidelines. The currently available SOF-free regimens described in the EASL guidelines (GLE/PIB and GZR/EBR) are contraindicated in patients with decompensated cirrhosis (Child-Pugh C for GLE/PIB and Child-Pugh B and C for GZR/EBR).

SI.1.5. Natural History of the Indicated Condition including Mortality and Morbidity

The natural course of HCV infection and disease varies widely. Several factors have been associated with accelerated progression of hepatic fibrosis among those infected with HCV, or with increased incidence of HCV-related complications of chronic liver disease and hepatocellular carcinoma (HCC). These factors are HIV and hepatitis B virus (HBV) coinfections, inflammation, male sex, older age at acquisition of HCV infection, obesity, smoking, and excessive alcohol consumption {[Shepard 2005](#)}.

Although HCV-related liver disease is a leading cause of mortality in adults and is the primary reason for liver transplantation in many developed countries ({[Kim 2005](#), [Kim 2001](#), [World Health Organization \(WHO\) 2005](#)}), the vast majority of carriers die with, rather than from, this infection. In fact, many patients remain asymptomatic and unaware that they have been infected with the virus. Acute HCV infection usually occurs within the first six months of exposure to HCV and is typically asymptomatic; however, 20-30% of patients may experience malaise, fatigue, weakness, anorexia, or right upper quadrant pain, followed by jaundice.

Following the acute phase, 5-25% of HCV patients spontaneously resolve the infection within 2-12 weeks, while the rest develop chronic HCV disease. Patients with chronic HCV disease tend to be minimally symptomatic over the course of 20-40 years. A subset of patients (approximately 20%) develops nonspecific symptoms, including mild fatigue and malaise, nausea, and right upper quadrant pain. Patients with persistent viremia and years of chronic infection are at risk of fibrosis and cirrhosis, but the extent of liver damage and the time course of disease progression vary among individuals.

Approximately 15-35% of HCV patients will develop cirrhosis after 25-30 years of infection {[Thrft 2017](#)}. Although cirrhosis distorts the structure and degrades the function of the liver, it can remain asymptomatic for several years as healthy tissue compensates for diseased tissue. However, once cirrhosis is established, complications such as jaundice, ascites, variceal hemorrhage, and encephalopathy may ensue. The development of these complications defines decompensated cirrhosis, or end-stage liver disease. Decompensated liver disease was estimated to be present in 11.7% of HCV patients with cirrhosis in 2010, and this proportion is expected to rise at least through 2030 {[Davis 2010](#)}. In patients with decompensated cirrhosis, the five-year survival rate is 50% {[Fattovich 1997](#)}. In addition, approximately 10-25% of patients with cirrhosis may develop HCC ({[Hezode 2003](#), [Poynard 1997](#), [Seeff 1999](#)}).

Worldwide, more than 500,000 deaths occur from hepatitis C-related diseases, which include cirrhosis and liver cancer, every year. The mortality rate among HCV-infected persons was estimated to be 12 times higher than the mortality rate in the general population in a large US cohort study, suggesting that over 50,000 deaths in the US were related to HCV infection in 2010

{Mahajan 2014}. A Danish cohort study found that the higher risk of death among younger HCV-infected patients compared to an age- and sex-matched comparison cohort was due primarily to unnatural deaths (i.e. deaths related to mental and behavioral disorders, psychoactive substance use, and external causes), whereas excess mortality in older HCV-infected patients was due to liver-related deaths {Omland 2011}.

SI.1.6. Important Co-morbidities

Infection with HCV is associated with numerous extrahepatic clinical manifestations, including autoimmune and lymphoproliferative disorders in addition to diseases of the cardiovascular, renal, metabolic, and central nervous system {Cacoub 2016}. A number of comorbidities in HCV patients have also been associated with antiviral treatment with interferon and/or ribavirin. Below is a list of important conditions that have evidence of higher risk among HCV-infected patients {Cacoub 2016}:

SI.1.6.1. Cardiovascular Disease

Cardiovascular disease risk appears to be elevated among HCV-infected patients compared to the general population. As measured by the Framingham risk score, cardiovascular disease was found to be 2.4% higher in HCV patients from New York based clinics compared to the US general population (NHANES sample) ($p < 0.001$) {Kakinami 2013}. Studies have also shown higher risk of coronary artery disease among HCV-positive patients {Roed 2012}. Recent studies indicate that carotid atherosclerosis is quite common in patients with chronic HCV infection. The prevalence has been reported to range from 42 to 53% {Roed 2012}, and rises to 78% among those with hepatic steatosis {Roed 2012}.

Previous reports have identified significant positive associations between chronic HCV status and any of the following conditions: carotid-artery plaque, intima-media thickness, coronary flow reserve by transthoracic Doppler echocardiography, carotid plaque score, brachial artery endothelium-dependent dilatation, and pulse wave velocity {Roed 2012}.

Further, positive associations have been observed between chronic HCV infection and coronary artery disease (CAD) defined in other ways, including angiographic documentation ($> 50\%$ stenosis) and modified Reardon severity score system {Roed 2012}. A recent retrospective cohort study found a positive association with chronic HCV and coronary heart events, defined by CAD onset, chronic stable angina, unstable angina, or acute myocardial infarction {Paydak 2014}. Other studies show positive associations between HCV infection and cardiomyopathy (either dilated or hypertrophic) {Roed 2012}, as well as a study that found HCV positive subjects to have almost twice the risk of stroke compared to HCV negative subjects {Roed 2012}.

SI.1.6.2. Depression

Depressive symptoms are frequently recognized in both untreated and treated HCV patients. The previous standard of care for HCV, PEG plus RBV is associated with a high rate of depression (10 to 40% depending on the screening method used) and other mental and neuropsychiatric syndromes {Hauser 2002, Papafragkakis 2012, Raison 2005}. An estimated 24 to 70 percent of

people with chronic hepatitis C were found to be clinically depressed, as compared to 6 to 10% in the general population {Coughlan 2002, Schafer 2007}. In another study, a three-fold risk was observed in HCV seropositive patients when compared to the general US population {Basseri 2010}.

SI.1.6.3. Diabetes Mellitus Type 2

An increased prevalence of insulin resistance {Serfaty 2009} and, subsequently, diabetes mellitus has been observed within HCV patient populations {Allison 1994, Caronia 1999, Knobler 1998, Mason 1999, Simo 1996}. HCV infection has been identified as a risk factor for the development of insulin resistance in patients with visceral obesity {Eguchi 2009}, while diabetes also has been identified as a risk factor for rapid progression of fibrosis in HCV infection {Ortiz 2002}. A proposed mechanism for this relationship is hepatocyte dysfunction in severe HCV infection, which may lead to insufficient carbohydrate metabolism and glucose homeostasis {Petrides 1989}. Host cell adaptive mechanisms or viral proteins themselves (ie, in genotype 1 infection) may disrupt the insulin signaling pathway in hepatocytes and liver inflammation may induce cytokines, thus promoting insulin resistance.

Reports from North America, Europe, and the Middle East consistently found an increased prevalence of diabetes among patients with chronic HCV infection (24% to 62%) compared with people with alternate forms of liver disease and other control groups (3% to 13%) {Mehta 2000}. Moreover, HCV was associated with over 40% increased risk of type 2 diabetes compared with the general US population {Basseri 2010}.

SI.1.6.4. Hepatitis B

Due to overlapping routes of transmission, HBV and HCV coinfection is not uncommon among individuals in HBV endemic areas who also have a high risk of parenteral infections, such as injection drug users {Pallas 1999}, patients on hemodialysis {Reddy 2005}, patients undergoing organ transplantation {Aroldi 2005} and HIV-positive individuals {Zhou 2007}. The prevalence of HBV and HCV coinfection varies from 9% to 30% depending on the geographic region {Liaw 1995, Zarski 1998}. HCV coinfection with HBV also has exhibited higher rates of progression to cirrhosis from liver fibrosis {Chen 2006}.

Although liver disease activity and progression are generally more severe in the presence of HCV/HBV coinfection, an inverse relationship in the replicative levels of the 2 viruses exists, suggesting viral interference. Usually, HCV is the dominant virus, and HBV replication is suppressed in the presence of HCV coinfection, with resultant lower HBV deoxyribonucleic acid (DNA) levels and decreased hepatitis B surface antigen (HBsAg) and hepatitis B core antigen (HBcAg) levels in coinfecting patients compared to HBV mono-infected patients {Amin 2006, Biliotti 2008, Bini 2010, Chu 1998, Crockett 2005, Konstantinou 2015, Liaw 2004, Raimondo 2005, Saravanan 2009, Tyson 2013, Wiegand 2015}. The converse has also been observed, with some patients experiencing high HBV DNA levels while others present alternating phases of dominance of one virus over the other {Konstantinou 2015}.

HBV reactivation in HCV/HBV coinfecting patients has been observed following effective treatment of HCV, both with older regimens involving PEG+RBV and also with newly approved DAAs (interferon-free regimens):

- *HBV reactivation with PEG+RBV*: HBV reactivation following successful treatment of HCV with PEG+RBV has been reported in HCV/HBV coinfecting patients {[Hamzaoui 2013](#), [Liu 2012](#), [Potthoff 2009](#), [Yalcin 2003](#), [Yu 2013](#)}. HBV reactivation has been reported to occur in 14% to 38% of HCV/HBV coinfecting patients following PEG+RBV or interferon (IFN) + RBV treatment {[Liu 2012](#), [Vigano 2009](#), [Yu 2013](#)}, and the risk of viremia was increased in cases where the virologic response to HCV therapy was sustained (HBV reactivation occurred in 31% of patients who experienced HCV sustained virologic response [SVR] and 11% of patients without HCV SVR) {[Liu 2012](#)}.
- *HBV reactivation with approved DAAs*: Unlike PEG and RBV, the approved DAAs for HCV treatment do not have any inhibitory effect on HBV; these DAAs can be used without interferon. Literature articles have reported HBV reactivation in HCV/HBV coinfecting patients following treatment of HCV with DAAs {[Balagopal 2015](#), [Belperio 2017](#), [Chen 2017](#), [Collins 2015](#), [Ende 2015](#), [Hayashi 2016](#), [Kasahara 2017](#), [Londono 2017](#), [Ogawa 2017](#), [Ou 2017](#), [Takayama 2016](#), [Wang 2017](#)}. Many of the reported cases did not involve clinical flares and resolved either spontaneously or following addition of anti-HBV therapy. Severe cases of HBV reactivation are rare, but there have been reports where HBV reactivation has resulted in acute hepatic failure with the need for a liver transplant {[Ende 2015](#)} or a fatal outcome {[Benallai 2017](#), [Macera 2017](#)}. Class labeling has been issued for DAAs approved in the EU and other territories regarding the risk of HBV reactivation in HBV/HCV coinfecting patients. The labeling recommends HBV screening prior to initiation of HCV therapy, monitoring for HBV reactivation while on HCV treatment and appropriate management per current clinical guidelines should HBV reactivation occur.

SI.1.6.5. HIV

HIV coinfection may alter the natural history of HCV infection, and also contribute to the increasing burden of HCV infection, by accelerating liver fibrosis {[Eyster 1993](#), [Mohsen 2003](#), [Rockstroh 1996](#)}. Since the advent of highly-active antiretroviral therapy in the mid-90s, there has been a three-to nine-fold increase in HCV-associated mortality, and HCV infection is associated with up to half of all deaths in patients with HIV {[Basseri 2010](#), [Bica 2001](#), [Cacoub 2001](#), [Martin-Carbonero 2001](#), [Soriano 1999](#)}.

Globally, an estimated four to five million people are coinfecting with HCV and HIV {[Operskalski 2011](#)}. In the US and Western Europe, estimates of coinfection rates range from 15% to over 50% of the HIV-positive population {[Quaranta 1994](#), [Rockstroh 2003](#), [Rockstroh 2006](#), [Soriano 2002](#)}. The high prevalence of coinfection is attributed to the shared parenteral route of transmission. Consequently, coinfection with HCV and HIV is particularly common among hemophiliacs and injection drug users. Furthermore, individuals with chronic HIV and HCV coinfection have a greatly elevated risk of accelerated liver, kidney, and cardiovascular disease progression {[Operskalski 2011](#)}.

SI.1.6.6. Obesity/Hepatic Steatosis

Obesity is associated with non-alcoholic fatty liver disease and non-alcoholic steatohepatitis, diseases that could potentially lead to fibrosis and cirrhosis {[Angulo 1999](#)}, and has been identified as a risk factor for rapid fibrosis progression in HCV infection {[Ortiz 2002](#)}.

Furthermore, fibrosis stage has been associated with hepatic steatosis {[Negro 2009](#)} and the degree of necroinflammatory activity in obese patients with HCV {[Adinolfi 2001](#), [Clouston 2001](#)}. In addition, genotype 3 infection may induce steatosis and the degree of severity may correlate with viral load {[Serfaty 2009](#)}. Slightly increased prevalence rates of obesity within HCV patients in the US and Canada (24 and 29%, respectively) were found as compared with the general population {[Basseri 2010](#), [Chen 2008](#)}.

SI.1.6.7. Renal Insufficiency

Hepatitis C virus infection is a persistent public health concern among end stage renal disease patients who receive dialysis. Before testing of blood products for HCV and the availability of erythropoiesis-stimulating agents, patients on dialysis commonly acquired HCV through blood transfusions. Transmission still may occur because of contaminated medical equipment, patient-to-patient exposure, or other nosocomial routes {[Martin 2008](#)}. Differences in patient behavior and community exposures may contribute to persistence of HCV in hemodialysis units and also to variation in HCV prevalence and seroconversion among units {[Fissell 2004](#)}.

Prevalence rates of HCV infection are higher in dialysis patients compared to the general population worldwide {[Fabrizi 2002](#)}. HCV infection has been reported in 6 to 38% of dialysis patients in the US {[Basseri 2010](#), [Fissell 2004](#)}. The prevalence of anti-HCV seropositivity among patients undergoing regular dialysis in Western Europe ranges between 3% and 23% {[Fissell 2004](#)}. HCV infection was reported in nearly 15% of dialysis patients in Japan, {[Fissell 2004](#)}, and as high as 80% in countries with single center samples, such as Egypt and Morocco {[Martin 2008](#)}.

Glomerular disease and other kidney diseases are extrahepatic manifestations of HCV infection {[Fabrizi 2013](#), [Kamar 2013](#)}. Chronic HCV infection is associated with a higher risk of mixed cryoglobulinemia, membranoproliferative glomerulonephritis (MPGN), and other glomerulonephritis diseases {[Fabrizi 2013](#), [Kamar 2013](#)}. Renal failure is reported to occur in 11% to 49% of patients with decompensated cirrhosis, particularly in older patients and patients with more advanced liver disease {[Carvalho 2012](#)}.

PART II: MODULE SII - NON-CLINICAL PART OF THE SAFETY SPECIFICATION

Table SII.1. Table of Key Safety Findings from Non-Clinical Studies

Key Safety Findings (from non-clinical studies)	Relevance to human use
Toxicity	
<p><u>Single-dose toxicity</u> SOF (administered as GS-9851) has minimal toxicity after oral dosing to rats (no observed adverse effect level [NOAEL] at 1800 mg/kg; SA-PSI-7851-09-0001).</p>	<p>SOF is given in adult humans at 400 mg. The GS-331007 exposure at the NOAEL is approximately 26-fold higher when compared with the clinical exposure at 400 mg.</p>
<p><u>Repeat-dose toxicity</u> Exploratory and definitive repeat dose toxicity studies have been conducted in mice, rats, and dogs (0515-09260; SA-PSI-7851-08-001; SA-PSI-7851-08-002; SA-PSI-7851-09-0002; SA-PSI-7851-09-0003; SA-PSI-7977-09-0006; SA-PSI-7977-09-0007; SA-PSI-7977-09-0008; SA-PSI-7977-10-0003; SA-PSI-7977-10-0004; TX-334-2012). The target organs identified were gastrointestinal (GI) tract (dog), heart (rat and dog), and liver (dog). Slight (< 10%) hematological changes in red cell indices/erythropoiesis were also noted in the dogs. These target organs were identified at adverse (dog) or lethal (rat) doses/exposures of GS-9851 in the nonclinical species.</p>	<p>To date, manifestations of these target organ toxicities have not been observed in clinical studies with SOF.</p>
<p><u>Reproductive & Developmental Toxicity</u> SOF did not have any adverse effects in reproductive and developmental toxicity studies (SA-PSI-7977-10-0005; SA-PSI-7977-10-0008; SA-PSI-7977-11-0008; TX-334-2003). Animal data indicate that SOF has no effect on fertility, does not cause reproductive or fetal toxicity, and has no effects on behavior, reproduction, or development of offspring. The predominant circulating metabolite GS-331007 was a predominant component observed in the milk of lactating rats at a milk to plasma ratio of 0.1 at 1 hour post-dose (SA-PSI-7977-11-0008).</p>	<p>Animal data indicate that SOF does not cause reproductive or fetal toxicity. Because there are no clinical data with SOF in pregnant women, as a precaution, it is preferable to avoid use of SOF during pregnancy. The predominant circulating metabolite GS-331007 is excreted in rat milk. It is not known whether SOF and its metabolites are excreted in human breast milk. Mothers should be instructed not to breast-feed if they are taking SOF.</p>
<p><u>Nephrotoxicity</u> SOF and GS-331007 showed little potential for drug-drug interactions mediated by renal transporters. GS-331007, cleared renally, was not a substrate, and showed little or no inhibition of the renally expressed transporters such as organic anion transporter (OAT)1, OAT3, OCT2, and multidrug and toxin extrusion 1 (MATE1) transporter (AD-334-2005).</p>	<p>The nonclinical data indicate a low likelihood for nephrotoxicity in humans.</p>

Key Safety Findings (from non-clinical studies)	Relevance to human use
<p><u>Hepatotoxicity</u> SOF and GS-331007 showed little potential for drug-drug interactions mediated by hepatic transporters. Sofosbuvir is not a meaningful substrate, inhibitor, or inducer of CYP enzymes and does not inhibit uridine diphosphate glucuronosyltransferase (UGT)1A1 (AD-334-2013). Sofosbuvir and GS-331007 were not substrates or inhibitors of studied hepatic transporters (eg, OCT1, organic anion transporting polypeptide [OATP]1B1, OATP1B3, and bile salt export pump [BSEP]; AD-334-2004; AD-334-2005; PC-PSI-7977-11-0007).</p> <p>In dogs, dosing with GS-9851 at 1500 mg/kg/day for 7 days (SA-PSI-7851-08-002) resulted in alterations in serum chemistry that were suggestive of liver injury (increased mean serum alanine transaminase, aspartate transaminase [AST], and bilirubin levels in both sexes) with associated histopathologic findings (hepatocellular hypertrophy, glycogen depletion, microvesiculation, and apoptosis). The serum chemistry changes and histopathologic findings were not observed at the end of the 14-day recovery period. In all other studies with SOF or GS-9851, liver related serum chemistry and histopathologic findings were not observed after daily oral doses up to 500 mg/kg/day for 9 months.</p>	<p>It should be noted that the alterations in serum chemistry with the associated histopathologic findings were only observed at 1500 mg/kg/day; Day 7 GS-331007 exposure (AUC) at 1500 mg/kg/day (sexes combined) is 123-fold higher when compared with the mean clinical exposure at 400 mg. No alterations were found at lower doses up to 500 mg/kg/day for 9 months. Additionally, Phase 2 and 3 clinical safety data with SOF do not indicate a clinically relevant adverse effect on the liver.</p>
<p><u>Genotoxicity</u> SOF was negative for mutagenic potential in a bacterial reverse mutation test, negative in a chromosome aberration test using human peripheral blood lymphocytes, and negative in a mouse micronucleus assay (SA-PSI-7851-08-003; SA-PSI-7851-08-004; SA-PSI-7851-08-005).</p>	<p>SOF is considered nongenotoxic.</p>
<p><u>Carcinogenicity</u> Two-year oral gavage carcinogenicity studies with SOF were conducted in rats (TX-334-2001) and mice (TX-334-2002).</p> <p>In rats (TX-334-2001), SOF administered at 75, 250, and 750 mg/kg/day did not have any carcinogenic effect and did not affect the survivability of the animals.</p> <p>In mice (TX-334-2002), SOF administered at 20, 60, and 200 mg/kg/day for males and 60, 200, and 600 mg/kg/day for females did not affect the survivability or induce neoplastic/non-neoplastic changes at any dose level. No evidence of carcinogenic potential was observed in this study.</p>	<p>Carcinogenicity studies in rats and mice do not indicate any carcinogenicity potential for SOF administered at doses up to 600 mg/kg/day in mouse and 750 mg/kg/day in rat. Exposure to GS-331007 in these studies was at least 7 times (mouse) and 15 times (rat).</p>

Key Safety Findings (from non-clinical studies)	Relevance to human use
<p>Safety Pharmacology</p> <p><u>General Safety Pharmacology</u> In a battery of safety pharmacology studies, the effects of GS-9851 on the central nervous, cardiovascular, and respiratory systems were examined. There were no findings in the nonclinical safety pharmacology studies to suggest clinically relevant adverse neurological, cardiovascular, or respiratory effects (SA-PSI-7851-08-006; SA-PSI-7851-08-007; SA-PSI-7851-08-008; SA-PSI-7851-08-009; PC-PSI-7851-08-0023; PC-PSI-7851-08-0028; PC-PSI-7851-09-0001).</p>	<p>The nonclinical data indicate a low likelihood for neurological, cardiovascular, or respiratory effects in humans.</p>
<p><u>Cardiovascular</u> In a 7-day repeat dose dog study, an increase (19%) in QT/QTc interval was observed in male but not female dogs at the high dose of 1500 mg/kg/day (SA-PSI-7851-08-002). There were no other waveform changes or electrocardiogram (ECG) findings. The changes in the QT/QTc intervals may be related to the poor condition of the 1500 mg/kg/day high dose animals. There were no cardiovascular findings in the single dose study in telemetry monitored animals up to 1000 mg/kg, nor in dogs given daily oral doses of SOF up to 500 mg/kg/day for 9 months. In rats, high doses of GS-9851 at 2000 mg/kg/day caused multifocal cardiac myofiber degeneration that may have led to the death of several rats by Day 5 in the 7-day range-finding study (SA-PSI-7851-08-001). The myocardial findings were not associated with hematologic evidence of inflammation or higher serum AST concentration. Other biomarkers of myocardial damage (eg, troponins) were not evaluated in this initial toxicity study. Myocardial degeneration was also observed in a few rats at the same high dose 3 and 17 days after cessation of dosing, suggesting no or a slow resolution/recovery. In a 7-day rat toxicity study (Study TX-334-2012) using SOF alone, no early mortalities and no evidence of cardiac toxicity was observed at the high dose of 2000 mg/kg/day. GS-331007 exposure (AUC) at 2000 mg/kg/day SOF was also 29-fold (sexes combined) higher than the mean clinical exposure at 400 mg.</p>	<p>At the adverse dose of 1500 mg/kg/day in dogs in the 7 day study, systemic exposure (C_{max}) to the predominant metabolite GS-331007 was approximately 90-fold greater than the plasma concentration measured in HCV infected subjects at the SOF therapeutic dose of 400 mg once daily (human GS-331007 C_{max} of 0.582 µg/mL). While the 7-day repeat dose rat study with GS-9851 indicated a potential toxicity, subsequent 7-day rat study with SOF at the same doses and exposures was well tolerated. In the 4-week repeat dose rat study with GS-9851 (SA-PSI-7851-09-0003), these myocardial findings were not observed at the highest tested dose (500 mg/kg/day) and there were no changes in the levels of creatine kinase and troponin I when compared to controls. Longer duration studies (up to 26 weeks; SA-PSI-7977-09-0007; SA-PSI-7977-10-0004) with SOF in rats did not show evidence of cardiac toxicity suggesting the effect observed in the 7-day study in rats was related to the very high systemic exposure achieved at lethal dose level. At the lethal dose of 2000 mg/kg/day GS-9851 in the 7 day study, systemic exposures to the predominant metabolite GS-331007 was approximately 29-fold (sexes combined) greater than the exposure in HCV-infected subjects at the therapeutic dose of 400 mg. In the 26-week chronic study (SA-PSI-7977-10-0004), there were no cardiac changes at exposure margins up to 9-fold (sexes combined). Taken together, the data suggest that the observed mortalities and cardiac toxicity in Study SA-PSI-7851-08-001 were the result of GS-491241 and that SOF, at similar exposures, does not produce the same effect. Furthermore, the thorough QT study conducted in healthy subjects at the supratherapeutic dose of 1200 mg did not reveal any effect of SOF on the QTc interval, and there were no clinically significant changes in ECG or wave morphology (P7977-0613). Taken together, the potential for SOF and its metabolites to induce clinically meaningful QT prolongation is considered low.</p>

Key Safety Findings (from non-clinical studies)	Relevance to human use
<p><u>Cardiovascular Effects with Amiodarone</u></p> <p>Nonclinical studies (7 in vitro studies and 1 ex vivo study) have been conducted to evaluate a potential pharmacodynamic and/or pharmacokinetic mechanistic interaction between amiodarone and SOF in combination with another DAA. In the ex vivo guinea pig heart study, prolongation of the A-H interval was observed when amiodarone was combined with DCV, SMV or SOF compared to amiodarone alone. The triple combination of amiodarone, SOF and DCV resulted in the largest prolongation of the A-H interval, reflecting the observed clinical phenomenon (PC-334-2029 Addendum 1). Results from electrophysiology studies suggest that the human L-type calcium channel 3.2 (hCav3.2) and human hyperpolarization-activated, cyclic nucleotide-gated channel 4 (hHCN4) channels were not involved. Contradictory to the ex vivo guinea pig heart data, hCav1.2 channel may be indirectly inhibited by amiodarone with SOF or LDV (PC-334-2030, PC-334-2031, PC-334-2032).</p> <p>Data from in vitro studies show that amiodarone and its metabolite <i>N</i>-desethylamiodarone (DA) were neither inhibitors nor substrates of efflux transporters P-glycoprotein (Pgp) and BCRP, and hepatic uptake transporters OATP1B1 and OATP1B3 (AD-334-2028, AD-334-2029). Both amiodarone and DA appeared to be tightly bound (> 99%) to plasma and atrial tissue and all the tested anti-HCV agents including SOF and its nucleoside metabolite GS-331007 did not affect free fractions of both compounds (AD-334-2030, AD-334-2033).</p>	<p>The nonclinical data indicate that multiple pharmacodynamic and pharmacokinetic processes may contribute to the observed clinical phenomenon of symptomatic bradycardia in patients treated with amiodarone, SOF and another HCV DAA.</p> <p>The potential of amiodarone and DA to be victims or perpetrators of drug interactions mediated by these transporters is low. Amiodarone and the HCV DAAs are unlikely to cause drug-drug interactions through efflux and hepatic uptake transporters, and plasma or atrial tissue binding displacement.</p>
Other Toxicity-Related Information	
<p><u>Secondary Pharmacodynamics</u></p> <p>Sofosbuvir has shown a low potential for toxicity in in vitro studies, since no significant cytotoxicity was observed when a panel of cell lines was treated with SOF. Specifically, SOF shows a low potential for mitochondrial toxicity, since no significant effects were observed on mitochondrial deoxyribonucleic acid levels or mitochondrial biogenesis in SOF-treated cells (PC-334-2012; PC-334-2013; PC-334-2015; PC-PSI-7851-08-0009; PC-PSI-7977-09-0007). Furthermore, no measurable inhibition of human deoxyribonucleic acid (DNA), RNA, or mitochondrial polymerases was observed with the triphosphate form of SOF in vitro, indicating a low likelihood for off-target effects (PC-334-2013; PC-PSI-7851-08-0029; PC-PSI-7851-09-0015).</p>	<p>The nonclinical data indicate a low likelihood for cytotoxicity in humans.</p>

Key Safety Findings (from non-clinical studies)	Relevance to human use
Mechanisms for Drug Interactions	
<u>Transporter Drug Interactions</u> Nonclinical data show that SOF is a substrate for the intestinal efflux transporter Pgp and breast cancer resistance protein (BCRP) (8215026; PC PSI-7977-11-0006). Coadministration with inhibitors or inducers of these intestinal efflux transporters may affect the absorption of SOF from the GI tract (AD-334-2002).	Clinical data also show that SOF is a substrate for Pgp and that its intestinal absorption is limited by efflux transport by these transporters (P7977-1819). For example, the known Pgp and BCRP inhibitor, cyclosporine, was noted to increase A-B permeability through Caco-2 cells, corresponding to complete inhibition of efflux transport, and caused an increase in SOF levels in a clinical drug-drug interaction study. Therefore, administration with potent inducers of intestinal Pgp may decrease the absorption of SOF and lead to reduced delivery of the pharmacologically active triphosphate into the liver. However, coadministration with less potent inducers or those that do not markedly affect intestinal Pgp induction are unlikely to affect SOF levels.

PART II: MODULE SIII - CLINICAL STUDY EXPOSURE

SIII.1. Clinical Study Exposure

The tables in this section present exposure data to SOF in subjects with HCV infection from the following studies:

- GS-US-281-0101, GS-US-334-0101, GS-US-334-0107, GS-US-334-0108, GS-US-334-0109, GS-US-334-0110, GS-US-334-0111, GS-US-334-0114, GS-US-334-0115, GS-US-334-0116, GS-US-334-0118, GS-US-334-0119, GS-US-334-0123, GS-US-334-0124, GS-US-334-0125, GS-US-334-0126, GS-US-334-0131, GS-US-334-0133, GS-US-334-0138, GS-US-334-0139, GS-US-334-0146, GS-US-334-0148, GS-US-334-0151, GS-US-334-0153, GS-US-334-0154, GS-US-334-1111, GS-US-334-1112, GS-US-334-1113, GS-US-334-1114, GS-US-334-1274, GS-US-334-1344, GS-US-334-1379, GS-US-337-0101, GS-US-337-0122, GS-US-337-1903, GS-US-342-0102, GS-US-342-0104, GS-US-342-0109, GS-US-342-1139, GS-US-342-1140, P2938-0212, P2938-0515, P2938-0721, P7851-1101, P7851-1102, P7977-0111, P7977-0221, P7977-0312, P7977-0422, P7977-0523 (part 1-5), P7977-0613, P7977-0724, P7977-0814, P7977-0915, P7977-1231, P7977-1318, P7977-1819, P7977-1910 and P7977-2025.
- An additional 1371 subjects were exposed to SOF in the following expanded access, compassionate use, and collaborative studies: GS-US-334-0139 (n=114), EA-US-334-0132 (n = 1), GS-FR-334-0157 (n = 306), GS-US-334-0152 (n = 25), CU-US-334-0134 (n = 1), IN-US-334-0141 (n = 359), IN-US-334-0143 (n = 108), CO-US-334-0112 (n = 61), CO-US-334-0136 (n = 211), CO-US-334-0137 (n = 168) and CO-US-334-0150 (SWIFT-C, n = 17). These subjects are not included in the tables below.

Table SIII.1. Duration of Sofosbuvir Exposure in Subjects with HCV Infection

Duration Of Exposure	Patients	Patient-days
1 day	7524	-
1 week	6884	-
4 weeks	6715	-
8 weeks	6585	794,296
12 weeks	5875	745,298
16 weeks	2880	490,326
24 weeks	2181	396,275
Total patient-days		802,129

NOTE: Patient-days is the sum of days that patients were exposed to SOF.

Table SIII.2 Sofosbuvir Exposure by Age Group and Gender in Subjects with HCV Infection

Age Group	Patients		Patient-days	
	Male	Female	Male	Female
3-<6	3	10	414	1273
6-<12	11	30	1595	4217
12-<18	31	21	4530	3130
18-24	161	116	8288	7473
25-34	470	301	37,340	25,009
35-44	773	450	77,505	42,186
45-54	1535	841	186,913	94,094
55-64	1448	803	167,240	85,876
65-74	276	216	29,921	22,735
75-84	7	20	637	1668
≥85	1	0	85	0

Note: Patient-days is the sum of days that patients were exposed to SOF.

Table SIII.3 Sofosbuvir Exposure by Dose in Subjects with HCV Infection

Dose	Patients	Patient-days
12.5 mg	6	6
25 mg	16	39
50 mg	36	2638
100 mg	99	6745
200 mg	131	6231
400 mg	7259	786,227
800 mg	16	16
1200 mg	59	59

Note: Patient-days is the sum of days that patients were exposed to SOF.

Table SIII.4 Sofosbuvir Exposure by Racial Origin in Subjects with HCV Infection

Race	Number of Patients	Patient-days
Black or African American	560	43,184
White	5412	592,339
Asian	1345	144,927
American Indian or Alaska Native	47	4268
Native Hawaiian or Other Pacific Islander	40	3856
Other	102	11,267
Multiple	2	6
Not Permitted*	16	2282
Missing	0	0
Total	7524	802,129

* Not permitted' means either the site was not allowed to collect or the subject refused to provide race information.
Note: Patient-days is the sum of days that patients were exposed to SOF.

Table SIII.5 Sofosbuvir Exposure in Special Populations

Special Population		Number of Patients	Patient-days
Renal impairment	Normal	6	6
	Mild	6	6
	Moderate	6	6
	Severe	26	3129
	End-stage renal disease	6	12
Hepatic impairment	Moderate (Child-Pugh-Turcotte [CPT] Classification B)	54	11,177
	Severe (CPT Classification C)	8	56
Cirrhosis		1454	192,972
HIV/HCV coinfection		692	96,295
Pediatrics ^a		106	15,159
Bleeding disorder		16	1854

Note: Patient-days is the sum of days that patients were exposed to SOF.

a Pediatric includes subjects aged 3 < 18 years

PART II: MODULE SIV - POPULATIONS NOT STUDIED IN CLINICAL STUDIES

SIV.1. Exclusion Criteria in Pivotal Clinical Studies within the Development Program

Table SIV.1. Important Exclusion Criteria in Pivotal Studies in the Development Program

Criterion	Reason for Exclusion	Considered to be Missing Information
Pregnancy and lactation	Limited information on the use in this patient population	No Rationale: SOF has not been shown to be teratogenic in nonclinical studies. Safety in pregnancy is monitored on an ongoing basis through routine pharmacovigilance and data are presented periodically in periodic safety update reports/periodic benefit-risk evaluation reports (PSURs/PBRERs). No safety concerns regarding use of SOF in pregnancy have been identified.
History of clinically significant hemoglobinopathy	When SOF is used in combination with PEG+RBV or RBV, the contraindications applicable to PEG and/or RBV are also applicable to combination therapies of SOF with these agents.	No Rationale: Hemoglobinopathy is a contraindication for RBV.
History of significant cardiac disease	When SOF is used in combination with PEG+RBV or RBV, the contraindications applicable to PEG and/or RBV are also applicable to combination therapies of SOF with these agents.	No Rationale: A history of severe pre-existing cardiac disease, including unstable or uncontrolled cardiac disease in the previous 6 months, is a contraindication for both PEG and RBV.
Porphyria	When SOF is used in combination with PEG+RBV or RBV, the contraindications applicable to PEG and/or RBV are also applicable to combination therapies of SOF with these agents.	No Rationale: Porphyria is a contraindication for RBV.

SIV.2. Limitations to Detect Adverse Reactions in Clinical Study Development Programs

Table SIV.2. Ability of the Clinical Study Development Program to Detect Adverse Drug Reactions

Ability to Detect Adverse Reactions	Limitation of Study Program	Discussion of Implications for Target Population
Which are rare	Approximately 7524 subjects ^a have been exposed to SOF in the SOF clinical study program.	The clinical study population is large enough to detect at least uncommon adverse drug reactions (ADRs).
Due to prolonged exposure	There is no experience with prolonged exposure (ie, over 1 year) to SOF in the SOF clinical study program.	The proposed duration of SOF treatment is no more than 24 weeks or up to the time of liver transplantation; therefore, the target population should not be exposed to SOF for longer periods.
Due to cumulative effects	Safety data from clinical studies is available for the proposed duration of treatment.	No cumulative effects of SOF have been identified in the SOF clinical study program.
Which have a long latency	Safety data was collected for up to 30 days after the last dose was administered.	No ADRs to SOF with a long latency have been identified in the SOF clinical study program.

^a Includes subjects as of 05 December 2018

SIV.3. Limitations in Respect to Populations Typically Under-represented in Clinical Study Development Programs

While some of these populations were not included in the original SOF clinical studies, since then many of these populations have been studied in the LDV/SOF, SOF/VEL and SOF/VEL/VOX clinical program.

Table SIV.3. Exposure of Special Populations Included or not in Clinical Study Development Programs

Type of special population	Exposure	Considered to be Missing Information
Children (<3 years of age)	No subjects aged < 3 years of age have been exposed to SOF in clinical studies	No Rationale: SOF is not indicated in patients < 3 years old. No specific risks in pediatric patients are anticipated and ongoing review of pediatric data presented in PSURs/PBRERs has not identified any safety concerns regarding off-label pediatric use.
Pregnant women	Not included in the clinical development program	No Rationale: SOF has not been shown to be teratogenic in nonclinical studies. Safety in pregnancy is monitored on an ongoing basis through routine pharmacovigilance and data are presented periodically in PSURs/PBRERs. No safety concerns regarding use of SOF in pregnancy have been identified.
Breastfeeding women	Not included in the clinical development program	No Rationale: Safety in breastfeeding women is monitored on an ongoing basis through routine pharmacovigilance and data are presented periodically in PSURs/PBRERs. No safety concerns regarding use of SOF in breastfeeding have been identified.
Patients with end stage renal failure or severe renal insufficiency	Thirty-two (32) subjects with HCV and end stage renal failure or severe renal impairment were exposed to SOF in clinical studies. Twenty (20) subjects with HCV and severe renal impairment were exposed to SOF+RBV for 24 weeks (Cohorts 1 and 2) and 18 subjects with HCV and severe renal impairment were exposed to LDV/SOF for 12 weeks in Study GS-US-334-0154 (Cohort 3); 95 subjects with HCV on dialysis for ESRD were exposed to LDV/SOF for 8-24 weeks in Study GS-US-337-4063; 59 subjects with HCV on dialysis for ESRD were exposed to SOF/VEL for 12 weeks in Study GS-US-342-4062.	No Rationale: No safety signals or toxicities were identified in subjects with severe renal impairment or ESRD in studies GS-US-334-0154, GS-US-337-4063, and GS-US-342-4062. No dosage adjustment of SOF is required for patients with renal impairment, including ESRD requiring dialysis. Given that there are now clinical study data regarding the use of SOF+RBV, LDV/SOF, and SOF/VEL in subjects with HCV infection and severe renal impairment or ESRD which indicates that treatment with SOF or SOF-combination products is safe and well tolerated and there are no additional pharmacovigilance activities ongoing to provide further information on this safety concern, safety in patients with ESRD or severe renal insufficiency is not considered as a category of 'missing information' in this EU-RMP.

Type of special population	Exposure	Considered to be Missing Information
Patients with HBV coinfection relevant comorbidities	<p>Patients with HBV coinfection were excluded from the Phase 3 clinical studies for SOF submitted at the time of the original marketing authorization application.</p> <p>The safety of the SOF-containing regimen, LDV/SOF, has been assessed in 8 subjects with untreated chronic HBV infection in Study GS-US-337-0122 and in 103 subjects with isolated hepatitis B core antibody positivity in Study GS-US-337-0131. HBV reactivation was not observed in these patients. Safety in patients with HBV coinfection is also being investigated in Study GS-US-337-1655 (a Phase 3b study in Taiwan evaluating the safety and efficacy of LDV/SOF for 12 weeks in 100 subjects with HCV infection and untreated HBV coinfection).</p>	<p>No</p> <p>Rationale: Given that there are now clinical study data regarding the use of SOF-containing regimens in HBV coinfecting patients, and there is currently labeling for SOF-containing products regarding the risk of HBV reactivation in HBV/HCV coinfecting patients based on postmarketing data, the safety in patients with HBV coinfection is not considered as a category of 'missing information' in this EU-RMP.</p>
Population of different racial and/or ethnic origin	<p>In the Phase 3 study population, the percentages of subjects who were black/African American, Asian, or American/Indian/Alaska Native/Pacific Islander/other were 8.2%, 4.0%, and 2.8%, respectively; the remaining 85% were Caucasian.</p>	<p>No</p> <p>Rationale: SOF PK was not substantially altered in black patients when compared to nonblack patients, suggesting that no dose adjustment is required in these patients. Based on the data from the GS-US-334-0110 study with SOF+PEG+RBV and the National Institute of Allergy and Infectious Diseases (NIAID) sponsored 11-I-0258 study with SOF+RBV, there are adequate safety data in black subjects to conclude that the safety profile is similar between blacks and non-blacks.</p>
Patients with previous HCC	<p>Not included in the clinical development program</p>	<p>No</p> <p>A study has been conducted jointly between Gilead and other marketing authorization holders (MAHs) of DAAs, to assess the impact of DAA treatment on the incidence of HCC recurrence in patients with previous HCC. Following the completion of the study, the conclusion was that DAA treatment had no impact on the safety of patients with a previous HCC, and this topic was no longer considered an area of missing information.</p>

PART II: MODULE SV - POST-AUTHORIZATION EXPERIENCE

SV.1. Post-Authorization Exposure

SV.1.1. Method Used to Calculate Exposure

Patient exposure to marketed Sovaldi is estimated from sales (or prescription) data. It should be noted that the use of sales data for patient exposure calculations will generally overestimate patient exposure due to the accumulation of drug stocks at pharmacies/distributors and wastage.

Sales Data

The number of bottles sold cumulatively was multiplied by 28 to provide the number of tablets sold. As SOF is taken once daily, this figure was divided by 365.25 to provide patient-years of treatment. Given the various treatment durations for which Sovaldi can be administered (ie, 12 weeks, 24 weeks, or up to 48 weeks for patients awaiting liver transplantation), patient exposure has been standardized to patient-years.

Prescription Data

Estimates of the total treated patients and demographics of HCV infected patients exposed to SOF in the EU (in 5 EU countries: UK, France, Germany, Italy, and Spain) were obtained from prescription data from the following source:

- IMS/GERS by country converted to DoT (Days of Treatment)
- DoT consolidated to provide EU5 aggregate
- Using a patient calculation estimate regarding treatment duration DoT are converted to patient numbers by brand

Therapy Watch HCV EU5 is a quarterly tracking study of the hepatitis C market for Gilead. Data has been collected on a continuous basis, with sample launched in batches to ensure coverage across each month in the quarter. Per wave, 250 HCV treaters are surveyed across EU5 and HCV patient record forms (PRFs) from recently seen patients are completed online, including the following:

- 7 dynamic PRFs (treatment naïve/experienced who were initiated on treatment in last 12 weeks) each wave
- 7 total PRFs collected each wave (last 7 HCV patients seen, irrespective of treatment status)

SV.1.2. Exposure

SV.1.2.1. Exposure Based on Sales Data

Cumulative patient exposure to SOF since first marketing approval in the US on 06 December 2013 to 30 June 2025 is estimated to be 233,022 patient-years, including 35,542 patient-years in the EU and is presented in PSURs. In line with the trend for declining use of single agent SOF, sales in some territories are negative due to return of stock from wholesalers.

SV.1.2.2. Exposure Based on Prescription Data

Based on prescription data from UK, France, Germany, Italy and Spain, most patients exposed to SOF were Caucasian/White males and between the ages of 26-35 years.

PART II: MODULE SVI - ADDITIONAL EU REQUIREMENTS FOR THE SAFETY SPECIFICATION

SVI.1. Potential for Misuse for Illegal Purposes

There are no data to suggest that there is potential for SOF to be misused for illegal purposes.

PART II: MODULE SVII - IDENTIFIED AND POTENTIAL RISKS

SVII.1. Identification of Safety Concerns in the Initial RMP submission

Not applicable.

SVII.2. New Safety Concerns and Reclassification with a Submission of an updated RMP

No new important identified, important potential risks or missing information have been identified for SOF since the submission of the last RMP.

Risks previously classified as important removed from the list of safety concerns, along with the reasons for their removal, are presented [Table SVII.1](#).

Table SVII.1. Reason for Removing Important Risks and Missing Information from the List of Safety Concerns in the RMP

Safety Concern Removed	Reason for Removal From the List of Safety Concerns
Identified risk	
Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone	<p>Recommended by PRAC to remove the important identified risk of Cardiac arrhythmia (bradycardia) when SOF-containing regimens are used concomitantly with amiodarone from the list of safety concerns.</p> <p>There are no outstanding additional risk minimization measures or additional PV activities for this risk.</p> <p>Given that the management of this risk is fully integrated into standard clinical practice, the risk is considered fully characterized and appropriately managed.</p> <p>The risk will continue to be monitored through routine pharmacovigilance</p>
HBV reactivation in HBV/HCV coinfecting patients	<p>Recommended by PRAC to remove the important identified risk of HBV reactivation in HBV/HCV coinfecting patients from the list of safety concerns.</p> <p>There are no outstanding additional risk minimization measures or additional PV activities for this risk.</p> <p>Given that the management of this risk is fully integrated into standard clinical practice, the risk is considered fully characterized and appropriately managed.</p> <p>The risk will continue to be monitored through routine pharmacovigilance</p>

Following removal of these safety concerns by the MAH, there will be no safety concerns for Sovaldi in the EU-RMP.

SVII.3. Details of Important Identified Risks, Important Potential Risks, and Missing Information

SVII.3.1. Presentation of Important Identified Risks and Important Potential Risks

SVII.3.1.1. Important Identified Risks

There are no important identified risks for Sovaldi.

SVII.3.1.2. Important Potential Risks

There are no important potential risks for Sovaldi.

SVII.3.2. Presentation of the Missing Information

There is no missing information for Sovaldi.

PART II: MODULE SVIII - SUMMARY OF THE SAFETY CONCERNS

Table SVIII.1. Summary of Safety Concerns

Important Identified Risks	None
Important Potential Risks	None
Missing Information	None

PART III: PHARMACOVIGILANCE PLAN

III.1. Routine Pharmacovigilance Activities

Routine Pharmacovigilance Activities Beyond ADRs Reporting and Signal Detection:

Specific Adverse Reaction Follow-up Questionnaires

There are no specific adverse reaction follow-up questionnaires in [Annex 4](#).

Other Forms of Routine Pharmacovigilance Activities

There are no other forms of routine pharmacovigilance activities for any of the safety concerns.

III.2. Additional Pharmacovigilance activities

There are no ongoing or planned additional pharmacovigilance activities for any of the safety concerns.

Table Part III.1. Ongoing and Planned Additional Pharmacovigilance Activities

Study title	Rationale and Study Objectives	Study Design and Study Populations	Milestones	Due dates
Category 1 - Imposed mandatory additional pharmacovigilance activities which are conditions of the marketing authorization				
None				
Category 2 – Imposed mandatory additional pharmacovigilance activities which are Specific Obligations in the context of a conditional marketing authorization or a marketing authorization under exceptional circumstances				
None				
Category 3 - Required additional pharmacovigilance activities				
None				

III.3. Summary Table of additional Pharmacovigilance activities

Table Part III.2. Ongoing and Planned Additional Pharmacovigilance Activities

Study (Status)	Summary of Objectives	Safety Concerns Addressed	Milestones	Due dates
Category 1 - Imposed mandatory additional pharmacovigilance activities which are conditions of the marketing authorization				
None				
Category 2 – Imposed mandatory additional pharmacovigilance activities which are Specific Obligations in the context of a conditional marketing authorization or a marketing authorization under exceptional circumstances				
None				
Category 3 - Required additional pharmacovigilance activities				
None				

PART IV: PLANS FOR POST-AUTHORIZATION EFFICACY STUDIES

There are no planned or ongoing post-authorization efficacy studies.

PART V: RISK MINIMIZATION MEASURES (INCLUDING EVALUATION OF THE EFFECTIVENESS OF RISK MINIMIZATION ACTIVITIES)

V.1. Routine risk minimization measures

The routine risk minimization measures for Sovaldi in the EU comprise the SmPC, the package leaflet (PL), and the legal status of the product. Sovaldi is subject to restricted medical prescription, whereby therapy should be initiated by a physician experienced in the management of HCV infection (SmPC Section 4.2). There are no individual safety concerns for Sovaldi.

Table Part V.1. Description of Routine Risk Minimization Measures by Safety Concern

Safety concern	Routine risk minimization activities
Important Identified Risks	
None	
Important Potential Risks	
None	
Missing information	
None	

V.2. Additional Risk minimization measures

Routine risk minimization activities are described in Part V Section [V.1](#). No additional risk minimization measures are warranted as there are no safety concerns for the medicinal product.

V.3. Summary risk minimization measures

Table Part V.2. Summary Table of Pharmacovigilance and Risk Minimization Activities by Safety Concern

Safety Concern	Risk Minimization Measures	Pharmacovigilance Activities
Important identified risk(s)		
None		
Important potential risk(s)		
None		
Missing information		
None		

PART VI: SUMMARY OF THE RISK MANAGEMENT PLAN

I. Summary of risk management plan for SOVALDI (Sofosbuvir)

This is a summary of the risk management plan (RMP) for Sovaldi. The RMP details important risks of Sovaldi, how these risks can be minimized, and how more information will be obtained about Sovaldi's risks and uncertainties (missing information).

Sovaldi's summary of product characteristics (SmPC) and its package leaflet give essential information to healthcare professionals and patients on how Sovaldi should be used.

This summary of the RMP for Sovaldi should be read in the context of all this information including the assessment report of the evaluation and its plain-language summary, all which is part of the European Public Assessment Report (EPAR).

Important new concerns or changes to the current ones will be included in updates of Sovaldi's RMP.

II. The Medicine and What is it Used for

Sovaldi is authorized for treatment of chronic hepatitis C (CHC) in adults and pediatric patients aged 3 years and above (see SmPCs for the full indication). It contains sofosbuvir (SOF) as the active substance and it is given orally.

Further information about the evaluation of Sovaldi's benefits can be found in Sovaldi's EPAR, including in its plain-language summary, available on the EMA website, under the medicine's webpage: <https://www.ema.europa.eu/en/medicines/human/EPAR/sovaldi>.

III. Risks Associated with the Medicine and Activities to Minimize or Further Characterize the Risks

Important risks of Sovaldi, together with measures to minimize such risks and the proposed studies for learning more about Sovaldi's risks, are outlined below.

Measures to minimize the risks identified for medicinal products can be:

- Specific Information, such as warnings, precautions, and advice on correct use, in the package leaflet and SmPC addressed to patients and healthcare professionals;
- Important advice on the medicine's packaging;
- The authorized pack size — the amount of medicine in a pack is chosen so to ensure that the medicine is used correctly;
- The medicine's legal status — the way a medicine is supplied to the public (e.g. with or without prescription) can help to minimize its risks.

Together, these measures constitute routine risk minimization measures.

In addition to these measures, information about adverse reactions is collected continuously and regularly analyzed including periodic safety update report (PSUR) assessment so that immediate action can be taken as necessary. These measures constitute routine pharmacovigilance activities.

If important information that may affect the safe use of Sovaldi is not yet available, it is listed under ‘missing information’ below.

III.A. List of Important Risks and Missing Information

Important risks of Sovaldi are risks that need special risk management activities to further investigate or minimize the risk, so that the medicinal product can be safely administered. Important risks can be regarded as identified or potential. Identified risks are concerns for which there is sufficient proof of a link with the use of Sovaldi. Potential risks are concerns for which an association with the use of this medicine is possible based on available data, but this association has not been established yet and needs further evaluation. Missing information refers to information on the safety of the medicinal product that is currently missing and needs to be collected (e.g. on the long-term use of the medicine).

Table Part VI.1. List of Important Risks and Missing Information

Important Identified Risks	None
Important Potential Risks	None
Missing Information	None

III.B. Summary of Important Risks

Sovaldi has been assigned the legal status of a medicine subject to medical prescription in the European Union (EU), whereby Sovaldi therapy should be initiated by a doctor experienced in the management of HCV infection (as described in section 4.2 of the SmPC).

There are no important risks or missing information for Sovaldi.

III.C. Post-authorization Development Plan

III.C.1. Studies which are Conditions of the Marketing Authorization

There are no studies which are conditions of the marketing authorization or a specific obligation of Sovaldi.

III.C.2. Other Studies in Post-Authorization Development Plan

There are no studies required for Sovaldi.

PART VII: ANNEXES

Table of Contents

Annex 1. EudraVigilance Interface

This XML file is submitted electronically and can be provided on request.

Annex 2. Tabulation Summary of Planned, Ongoing, and Completed Pharmacovigilance Study Program

Annex 3. Protocols for Proposed, Ongoing and Completed Studies in the Pharmacovigilance Plan

Annex 4. Specific Adverse Drug Reaction Follow-up Forms

None

Annex 5. Protocols for Proposed and Ongoing Studies in RMP Part IV

None

Annex 6. Details of Proposed Additional Risk Minimization Measures (if applicable)

Not applicable

Annex 7. Other Supporting Data (Including Referenced Material)

The following information is included in this annex:

- Referenced material (Refer to [REFERENCES](#))

Annex 8. Summary of Changes to the Risk Management Plan over Time

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