



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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Quality and Safety of Medicines Department

Work plan for the Pharmacovigilance Inspectors Working Group for 2020

Due to the COVID-19 pandemic and the recent relocation of the Agency, the activities outlined in the work plan for 2020 may be subject to further review and reprioritisation in accordance with the business continuity plans of the Agency and the Member States.

1. Introduction

The Pharmacovigilance Inspectors Working Group (PhV IWG) was established by the European Medicines Agency (EMA) within the scope of Article 57(1)(i) of Regulation (EC) No. 726/2004 and its mandate was endorsed by the Heads of Medicines Agencies and the EMA Management Board in 2009, thereby formally establishing the PhV IWG. It is a joint meeting made up of pharmacovigilance inspectors dealing with human medicinal products and pharmacovigilance inspectors dealing with veterinary medicinal products.

The PhV IWG focuses on harmonisation and co-ordination of pharmacovigilance related activities at community level. The group activities for 2020 are outlined in this document and the priorities of the group will mainly focus on the following areas:

- continue with the implementation of the human pharmacovigilance legislation, including the implementation of pre-authorisation inspections, revision of existing guidance based on the latest developments in the area of pharmacovigilance and the experience gained to date, and input into the development of other guidance documents and processes (human);
- continue the work on the preparation for the implementation of the new legislation for veterinary medicines (veterinary);
- continue the work on the risk-based inspection planning and follow-up processes (veterinary);
- continue with the inspectors and assessors collaboration and training;
- periodic engagement with stakeholders on topics of common interest.

2. Meetings

The following virtual/face to face PhV IWG meetings will take place:

- 19 March 2020



- 25-26 June 2020
- 24-25 September 2020
- 03-04 December 2020

Meetings include a joint session and two separate sessions, one dedicated to human and one to veterinary medicinal products only.

The following virtual meetings will take place in 2020, using teleconference or equivalent:

- human medicinal products:
 - ad-hoc participation in PRAC meetings (remote access available) to discuss the outcome and follow up of specific pharmacovigilance inspections, as necessary,
 - ad hoc teleconference/meetings of the PhV IWG and Pharmacovigilance Risk Assessment Committee (PRAC) assessors subgroup to support the development and updates of guidance documents of common interest and to discuss topics referred to the subgroup for recommendation and advice, as required,
 - ad hoc teleconference/meetings of the PhV Inspectors' Article 57 subgroup on the development of new Article 57 reports for human medicinal products pharmacovigilance inspectors;
- veterinary medicinal products:
 - a number of subgroup teleconferences/meetings (e.g. PhV IWG - Pharmacovigilance Working Party (PhV WP)) to discuss topics of interest and draft documents will be organised in the margins of the plenary meetings, when necessary,
 - in accordance with Article 77(6) of Regulation (EU) 2019/6, the European Commission shall adopt an implementing act to establish measures on good pharmacovigilance practice for veterinary medicinal products and on the format and content of the pharmacovigilance system master file (PSMF) and its summary. An expert working group between PhV veterinary inspectors and assessors, has been established in 2019 to provide scientific advice to the European Commission on measures on good pharmacovigilance practice, with regard to inspections of pharmacovigilance systems for veterinary medicinal products and on the format and content of the PSMF and its summary. Virtual/face to face meetings of the expert working group will take place, as necessary;
- human and veterinary medicinal products:
 - ad hoc teleconference/meetings of the PhV IWG to discuss selected topics as necessary,
 - a PhV IWG Brexit subgroup was formed in 2018 to identify Brexit-related operational questions and potential issues that need to be addressed to ensure continuity of pharmacovigilance systems supervision in the EU/EEA and fulfilment of the risk-based programme for routine pharmacovigilance inspections of MAHs for CAPs. Virtual meetings of the PhV IWG Brexit subgroup will take place, as necessary.

3. Sharing of information and coordination of pharmacovigilance inspections

- Implementation of the 2020 risk-based programme for routine pharmacovigilance inspections of marketing authorisation holders connected with human and veterinary centrally authorised products (CAPs).
- For cause inspections at the request of the scientific committees for human and/or veterinary medicinal products (PRAC, CHMP and CVMP).
- Continue with the implementation of the Agency's managing meeting documents system (MMD) to improve the process for sharing of pharmacovigilance inspections information (planned and conducted inspections, third country inspections and inspection outcome) between the Agency, the Member States (inspectors and assessors) and the European Commission. Sharing of pharmacovigilance inspections information via MMD will be established for inspection of MAHs of veterinary medicinal products in 2020.

4. Harmonisation topics

4.1. *Procedures and guidance documents*

- Concerning human medicinal products, the group will focus on the preparation and/or completion of the following documents in 2020 based on the agreed priorities:
 - in relation to the work on the implementation of the pharmacovigilance legislation, progress revision of GVP and Union pharmacovigilance inspection procedures as listed below:
 - Union guidance on pre-authorisation pharmacovigilance inspections,
 - revision of the guidance on Distant/virtual pharmacovigilance inspections of MAHs during a crisis situation- Points to consider,
 - revision of the Union procedures on pharmacovigilance inspections, as necessary,
 - revision of GVP Module I on Pharmacovigilance systems and their quality systems, as necessary,
 - revision of GVP Module II on pharmacovigilance system master file, as necessary,
 - contribution to the development of question and answers (Q&A);
- Concerning veterinary medicinal products, the group will focus on the following topics and documents based on the agreed priorities:
 - Triggers and risk factors for selection of sites and prioritisation of pharmacovigilance inspection in preparation of the implementation of risk-based controls as described in article 123 (3) of Regulation (EU) 2019/6,
 - further harmonisation of pharmacovigilance inspections between Member States,
 - revision of existing inspection procedures and guidance for pharmacovigilance inspections for medicinal products for veterinary use conducted in the context of the centralised procedure to include the latest developments, as applicable,

- The group, in relation to human and veterinary medicinal products, will develop and monitor opportunities for joint inspections of sites involving inspectorates from more than one national competent authority.

4.2. *Training and development*

- Conduct EudraVigilance (EV) and EudraVigilance data analysis system (EVDAS)/data warehouse training for pharmacovigilance inspectors (human and veterinary).
- Conduct data analysis workshop(s) (pharmacovigilance data in Excel®) for pharmacovigilance inspectors (human and veterinary), as necessary.
- Familiarise the Pharmacovigilance Risk Assessment Committee (PRAC) members with the implementation of the Union procedures on pharmacovigilance inspections and specifically for the topic of pharmacovigilance inspection follow up.
- Conduct training on the extended EudraVigilance medicinal product dictionary (XEVMPD) and the generation and use of Article 57/XEVMPD reports for human medicinal products pharmacovigilance inspectors.
- Continue with the conduct of pharmacovigilance inspectors training in good vigilance practice and new processes, within the scheduled PhV IWG meetings for 2020, as necessary.
- Peer review of case studies, sharing and discussion of inspection reports, including grading of anonymised findings.
- Develop opportunities for lectures/workshops at the time of PhV IWG meetings, on special topics, by members of the group and by invited guests, including interaction with industry on topics of common interest.
- Follow up on the proposals for training within the Pharmaceutical Inspection Convention and Pharmaceutical Inspection Co-operation Scheme (jointly referred to as PIC/S) Working Group(s) (WGs) on good clinical practice & pharmacovigilance (GVP) in accordance with the agreed mandate.
- Initiate the development of an online PhV inspections basic training course.
- Develop capacity building opportunities for inspectors from countries outside the EU/EEA¹.

5. Pharmacovigilance topics

- Human medicinal products: continue the work in relation to the implementation of the human pharmacovigilance legislation:
 - contribution and feedback during the finalisation or revision of good vigilance practice guideline modules, as applicable,
 - contribution to the development of questions and answers (Q&A) and other guidance documents in relation to the ongoing implementation of the pharmacovigilance legislation,
 - contribution to the preparation of specific guidance on the use of EMA databases and IT systems in relation to:

¹ The European Economic Area

- the pharmacovigilance system master file location (PSMF and PSMFL EV code), the contact details of the qualified person responsible for pharmacovigilance (QPPV), the medicinal products linked to the PSMFL EV code (*entry and maintenance of information within the Article 57 /eXtended EudraVigilance Medicinal Product Dictionary (XEVMPD)*),
- pharmacovigilance inspection information sharing;
- contribution to the preparation of specific guidance, as applicable, in relation to:
 - Contract Service providers pharmacovigilance inspections,
 - non-interventional post authorisation safety studies (PASS) and pharmacovigilance inspections,
 - patient support programmes and market research programmes reporting requirements,
 - off-label use requirements,
 - management of deviations and implementation of the associated corrective and preventive actions listed in the Pharmacovigilance System Master File (PSMF),
- follow up on pharmacovigilance inspection topics discussed with stakeholders;
- Veterinary medicinal products:
 - inspections procedures and pharmacovigilance systems,
 - contribution to the update of *aide memoire* for pharmacovigilance inspections for medicinal products for veterinary use conducted in the context of the centralised procedure,
 - contribution to the preparation of specific guidance on the use of EMA databases and IT systems in relation to pharmacovigilance inspection information sharing,
 - contribution to the development of guidance documents in relation to the ongoing implementation of the new legislation for veterinary medicines.

6. Collaboration with the European Commission

- Human medicinal products:
 - Continue with the work in relation to the ongoing implementation of the pharmacovigilance legislation (please refer to sections 4 and 5 for further information).
- Veterinary medicinal products:
 - Contribute to the implementation of the revised legislation for veterinary medicinal products, in relation to pharmacovigilance inspections and pharmacovigilance system master file, as necessary.

7. Liaison with other groups

- The PhV IWG will liaise, as appropriate, with the following groups on pharmacovigilance areas identified of common interest as indicated in its [mandate](#):
 - Good Clinical Practice (GCP) and Good Manufacturing Practice/Good Distribution Practice Inspectors Working Group (GMDP IWG);

- Committee for Medicinal Products for Veterinary Use (CVMP) and its Pharmacovigilance Working Party (PhV WP);
- Committee for Medicinal Products for Human Use (CHMP);
- Pharmacovigilance Risk Assessment Committee (PRAC);
- Heads of Medicines Agencies (HMA);
- other regulatory agencies;
- Co-ordination Group for Mutual Recognition and Decentralised Procedures – human and veterinary (CMDh and CMDv);
- Eudravigilance Working Group (EV-EWG);
- external bodies, as appropriate.

8. International cooperation

- Development of contacts between EU and non-EU/EEA agencies on pharmacovigilance matters.
- Enforce the existing links with the PIC/S, facilitate joint visits when possible and work towards the development of guidance and harmonisation of standards in the field of pharmacovigilance inspections.