HPRA
An tÚdarás Rialála Táirgí Sláinte
Health Products Regulatory Authority

Pharmacovigilance - changes arising from the implementation of Regulation (EU) No 2019/6

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What is the basis for changes to the pharmacovigilance of veterinary medicinal products?

(58) In the light of experience, it has become clear that it is necessary to take measures to improve the operation of the pharmacovigilance system. That system should integrate and monitor data at Union level. It is in the interest of the Union to ensure that the veterinary pharmacovigilance systems for all authorised veterinary medicinal products are consistent. At the same time, it is necessary to take account of changes arising as a result of international harmonisation of definitions, terminology and technological developments in the field of pharmacovigilance.

(62) A pharmacovigilance database at Union level should be established to record and integrate information of suspected adverse events for all veterinary medicinal products authorised in the Union. That database should improve detection of suspected adverse events and should allow and facilitate the pharmacovigilance surveillance and work-sharing between the competent authorities. That database should include mechanisms for exchanging data with the existing national pharmacovigilance databases.

What is the basis for changes to the pharmacovigilance of veterinary medicinal products?

(63) The procedures that competent authorities and the Agency will adopt in order to evaluate the information on suspected adverse events that they receive should comply with the measures on good pharmacovigilance practice which should be adopted by the Commission and, as appropriate, be based on a common standard derived from the current Commission guidelines on pharmacovigilance for veterinary medicinal products. The evaluation performed by the competent authority or the Agency in that way may be one of the means by which it is determined whether there is any change to the benefit-risk balance of those veterinary medicinal products. It is, however, emphasised that the signal management process is the 'gold standard' for that purpose and proper attention should be given to it. That signal management process consists of tasks of signal detection, validation, confirmation, analysis and prioritisation, assessment and recommendation for action.

What parts of the new Regulation concern the pharmacovigilance of veterinary medicinal products?

Section 5 (Articles 73 – 81) of Regulation (EU) 2019/6.

- Art 73 – Union Pharmacovigilance system.
- Art 74 – Union Pharmacovigilance database.
- Art 75 – Access to the pharmacovigilance database.
- Art 76 – Reporting and recording of suspected adverse events.
- Art 77 – Pharmacovigilance responsibilities of the marketing authorisation holder.
- Art 78 – Qualified person responsible for pharmacovigilance.
- Art 79 – Pharmacovigilance responsibilities of the competent authorities and the Agency.
- Art 80 – Delegation of tasks by competent authority.
- Art 81 – Signal management process.

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- Art 73 – Union Pharmacovigilance system.
- Art 74 – Union Pharmacovigilance database.
- Art 75 – Access to the pharmacovigilance database.
- Art 76 – Reporting and recording of suspected adverse events.
- **Art 77 – Pharmacovigilance responsibilities of the marketing authorisation holder.** New
- **Art 78 – Qualified person responsible for pharmacovigilance.**
- Art 79 – Pharmacovigilance responsibilities of the competent authorities and the Agency.
- Art 80 – Delegation of tasks by competent authority.
- **Art 81 – Signal management process.** New

What stage are we currently at?

Good pharmacovigilance practice

European Commission request	Request for recommendations on implementing measures on veterinary medicinal products regarding good pharmacovigilance practice
Date of request	6 February 2019
Summary of EMA recommendation	Report on veterinary medicinal products regarding good pharmacovigilance practice
Summary of recommendation	The recommendations for good veterinary pharmacovigilance practice set out in this advice: • update the requirements for adverse event recording and reporting; • establish data provisions for calculation of the incidence of reported adverse events; • establish requirements for signal management based on the signal detection as the principle pharmacovigilance pillar; • introduces requirements for pharmacovigilance communication; and • updates the requirements for pharmacovigilance inspections; with the aim of reducing administrative burden while guaranteeing a high level of protection to public and animal health and the environment. The Agency will provide further guidance to complement the recommendations which will require revision and development of new scientific guidelines.
Date of recommendation sent to the European Commission	29 May 2020

Format and content of the pharmacovigilance system master file and its summary

European Commission request	Request for scientific recommendations on the format and content of the pharmacovigilance system master file and its summary
Date of request	6 February 2019
EMA recommendation	Report on veterinary medicinal products regarding the pharmacovigilance system master file
Summary of recommendation	The pharmacovigilance system master file is introduced in the veterinary sector for the first time. It is intended to be a detailed description of the pharmacovigilance system of the marketing authorisation holder with respect to one or more of its authorised veterinary medicinal products. The recommendations cover: • General requirements for the pharmacovigilance system master file; • Content of the main part of the pharmacovigilance system master file; • Content of the annexes to the pharmacovigilance system master file; • Format and maintenance of the pharmacovigilance system master file; • The location and availability of the pharmacovigilance system master file; • Content of the summary of the pharmacovigilance system master file to be submitted as part of the marketing authorisation application; EMA may need to provide further guidance on specific topics to complement the recommendation. This may result in the revision of existing or development of new scientific guidelines.
Date of recommendation sent to the European Commission	29 May 2020

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- Working Group on Veterinary Medicinal Products under the Standing Committee on VMPs.
- Meetings held Nov 2020, Feb 2021 & March 2021.
- Written comments from members due early April 2021.
- Once finalised, will go for a period of public consultation.
- Commission will then commence internal procedures with a view to adoption by the Standing Committee on VMPs. A single Implementing Regulation for GPP & the PSMF is foreseen.

Pharmacovigilance System Master File (PSMF)

- Pharmacovigilance obligations will apply as of 28 January 2022 (According to Art 153(1), no transition period foreseen).
- Detailed Description of the Pharmacovigilance System (DDPS) being replaced with a Pharmacovigilance System Master File (PSMF).
- New **From 28 January 2022, a Pharmacovigilance System Master File (PSMF) must be in place for all VMPs.**
- However, the PSMF is not included in the dossier but instead only a **summary** of the PSMF needs to be included in the dossier (for new applications).
- HPRA understands that existing products do not require updates to replace the DDPS with a summary of the PSMF (TBC).

Pharmacovigilance System Master File (PSMF)

- HPRA understands that the PSMF is to be **located** in the Union at the site where the main pharmacovigilance activities of the MAH are performed or at the site where the QPPV operates. Physical **address** to be given as this has relevance for inspections.
- The MAH can have one or more PSMFs but only one for a given product.
- Summary of the PSMF – expected to follow the recommendations from the EMA:
  - signed statement by MAH and QPPV that the QPPV has the necessary means to fulfil their task/responsibilities,
  - name, contact details and place of operation of the QPPV,
  - PSMF reference number and location.
- Change(s) to the summary of the PSMF will require a variation (Art 61 – **VNRA** – Commission Implementing Regulation (EU) 2021/17 – C.1, C.5 & C.6).

Good Pharmacovigilance Practice

New

- The MAH shall comply with 'good pharmacovigilance practice'.
- EMA currently working in co-operation with stakeholders in developing GLs (series of modules) on veterinary good pharmacovigilance practice - public consultation in due course.

Qualified Person for Pharmacovigilance (QPPV)

New

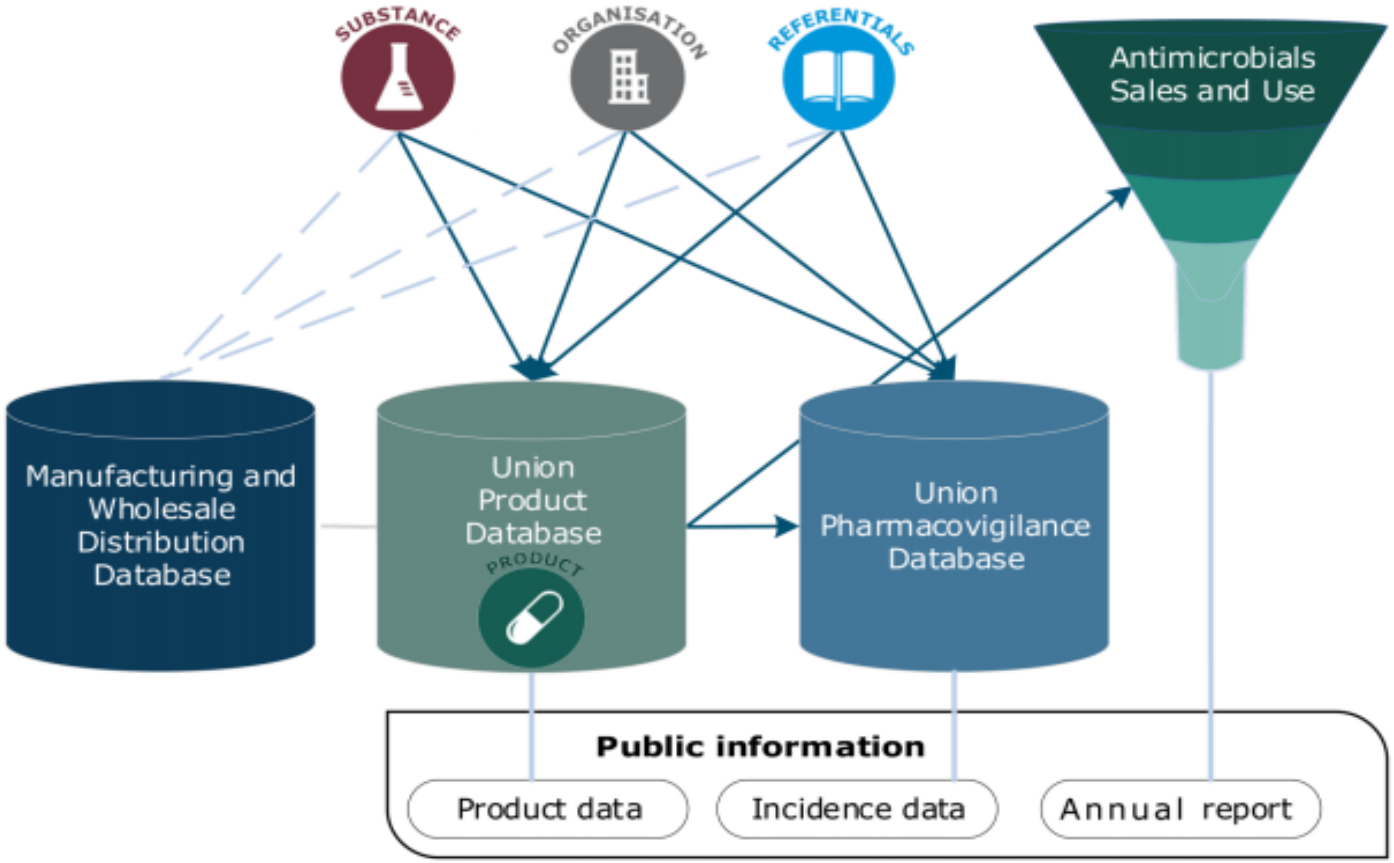
- QPPV responsible for elaborating and maintaining the PSMF.
- QPPV responsible for recording **all** suspected adverse events in the Union PhV database within **30** days of receipt.
- No requirement for causality assignments (ABON; serious/non-serious). Move to signal management using a Medically Important Event (MIE) list for signal prioritisation.
- QPPV responsible for applying the signal management process (Art 81).

Signal management process

New
- Periodic Safety Update Reports (PSURs) no longer required from 28th January 2022 – move to signal management.
- Signal management process to be elaborated further in the Implementing Regulation on GPP and in particular in EMA guidelines.
- HPRA understands that signal management will follow a risk-based approach and the MAH may choose to use **either** the Union PhV database **or** their own database to perform signal management.

New
- Record at least **annually** all results and outcomes of the signal management process in the Union PhV database.

Union Pharmacovigilance Database



Union Pharmacovigilance Database

- According to Art 74(1), the Union pharmacovigilance database shall include:
  - Suspected adverse events *(reactions in animal, lack of efficacy, environmental incidents, reactions in humans, residues >MRL after WP observed, transmission of an infectious agent, reactions in animals to a human medicinal product)*.
  - Information on the QPPV.
  - Reference number(s) of the PSMF(s).
  - Results of pharmacovigilance inspections.
  - Results and outcomes of the signal management process, including a conclusion on the benefit/risk balance.

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Thank you

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