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EMA/395730/2012 Rev 2* (superseded version)

Guideline on good pharmacovigilance practices (GVP)

Module VIII Addendum I – Requirements and recommendations for the submission of information on non-interventional post-authorisation safety studies (Rev 2)

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*Note: Revision 2 contains the following:

- Change of the title;

- Deletion of Tables XIII Add I.1. and XIII Add I.2. and simplification of presentation of submission requirements and recommendations based on legislation related to non-interventional post-authorisation safety studies;

- Update of submission requirements for study protocols and progress reports according to Art 107m(5) based on updated information provided by Member States;

- Addition of information regarding study registration in the EU PAS Register.

This version is not valid anymore, but kept on the Agency's website for the purpose of public access to historical documents. For the valid version, please refer to the Agency's GVP webpage for the latest revision of this GVP Module.

See websites for contact details

European Medicines Agency www.ema.europa.eu
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VIII.Add.I.1. Introduction

This Addendum provides additional information on legal requirements (identifiable by the modal verb "shall") and recommendations (identifiable by the modal verb "should") for the submission of study protocols, progress reports and final study reports of non-interventional post-authorisation safety studies (PASS) to national competent authorities and the Agency. It also provides additional information as regards the registration of non-interventional PASS in the EU PAS Register. It does not provide recommendations for the transmission of information to ethics committees, national review boards or other bodies in place according to national legislation.

VIII.Add.I.2. Study registration

According to IR Annex III.3 *(Format of the final study report),* the date of study registration in the electronic study register shall be included as a milestone in the final study report for non-interventional post-authorisation safety studies (PASS) imposed as an obligation. VIII.B.2. also states that marketing authorisation holders should register all non-interventional PASS conducted voluntarily in the EU or included in the risk management plan agreed in the EU. Non-interventional PASS should be registered before the study commences or at the earliest possible date, and the study protocol (and its updates), the progress reports and the study reports should be uploaded in the register.

The EU PAS Register is a register of post-authorisation studies publicly available through the EU PAS Register webpage[1] that serves as the electronic study register mentioned in IR Annex III. The information requested at the time of study registration in the EU PAS Register includes administrative details, targets of the study and methodological aspects. The study protocol, the study report and other documents can be uploaded. Administrative information includes whether the study has been requested by a regulatory authority, the RMP category if applicable, information about the percentage of funding from different sources and the country(-ies) where the study will be conducted. In case the record for a new registered study indicates that the study has been requested by a regulatory authority, is funded even partially by a pharmaceutical company and is conducted in at least one EU country, the Agency sends a notification message with the full study title, the name of the funder(s), the name of the country(-ies) where the study will be conducted and a link to the current study record to all national competent authorities of the EU Member States. This notification aims to systematically inform Member States of the public registration of a post-authorisation study requested by a regulatory authority, funded by a marketing authorisation holder and conducted on their territory.

Uploading of the study protocol, the progress report(s) and the final study report in the EU PAS Register is not a legal obligation. Therefore, registration of a non-interventional PASS in the EU PAS Register cannot be the only channel for the submission of these documents to national competent authorities and the Agency.

VIII.Add.I.3. Requirements and recommendations for non-interventional PASS conducted pursuant to an obligation imposed by an EU competent authority

These studies include non-interventional PASS of categories 1 and 2 of studies of GVP Module V.

The draft protocol, the updated study protocol following substantial amendment and the final study report shall be submitted according to the normal procedure to the Pharmacovigilance Risk Assessment Committee (PRAC) and the Agency, or to the national competent authority of the Member State that

[1] http://www.encepp.eu/encepp_studies/indexRegister.shtml

requested the study if the study is conducted in only one Member State [DIR Art 107n to 107p]. The final study report shall be submitted within 12 months after the end of data collection [DIR Art 107p(1)].

According to DIR Art 107m(5), the marketing authorisation holder may be required by the national competent authority to submit the progress reports to the competent authorities of the Member States in which the study is conducted. The national competent authority of all Member States in which the study is conducted, except Denmark, stated they require submission of the progress reports. The progress reports should also be submitted to the Agency for centrally-authorised products.

VIII.Add.I.4. Requirements and recommendations for non-interventional PASS conducted voluntarily

These studies include non-interventional PASS of category 3 of the GVP Module V and other non-interventional PASS voluntary conducted by marketing authorisation holders.

According to DIR Art 107m(6), the final study report shall be submitted according to national procedures to the competent authorities of the Member States where the study was conducted within 12 months of the end of data collection.

According to DIR Art 107m(5), the marketing authorisation holder may be required by the national competent authority to submit the study protocol and the progress reports to the competent authorities of the Member States in which the study is conducted. The national competent authority of the following Member States in which the study is conducted stated they require submission of the study protocol and progress reports through national procedures:

> Austria, Bulgaria, Croatia, Czech Republic, France, Germany, Italy, Lithuania, The Netherlands, Portugal, Romania, Slovakia, Slovenia, Spain.

For studies of category 3, progress reports should also be submitted to the Agency for centrally-authorised products.

For studies of category 3, the study protocol should also be submitted with the risk management plan according to the recommendations of GVP Module V.