EUROPEAN COMMISSION

STRATEGY TO BETTER PROTECT PUBLIC HEALTH BY STRENGTHENING AND RATIONALISING EU PHARMACOVIGILANCE:

Comments by ZENTIVA, a.s. to Public Consultation on legislative proposals

1. Comments to reporting of non-serious ICSRs from non-interventional PASS

Proposed text of the new directive:

Article 101e

...

2. Marketing authorisation holders shall submit electronically to Eudravigilance, no later than 15 -days following the receipt of the report, all adverse reactions that occur in the Community and all serious adverse reactions that occur outside the Community .

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Article 101h

...

h) The submission of final study reports and the reporting of adverse reactions from the studies shall be specified in the study protocol.

…

Existing applicable guidance:

Vol.9A (March 2007) text:

Periodic ICSRs (initial and follow-up) should be transmitted at regular intervals by the Marketing Authorisation Holder but at the latest at the time of submission of the PSUR in line with the time frames defined in the EU legislation.

Zentiva comment:

Non-serious adverse drug reaction reports from non-interventional studies are usually received after the finish of the study and hence represent high volume of safety data delivered to a company at a given time point. It might not be practically possible to process and to report all such cases within 15 days after the receipt. In addition, vast majority of these reports are non-serious expected reactions and their value is mainly in the evaluation of their frequency in the final study report.

There is a disagreement between Article 101e and 101h, because in our opinion it should not be possible to propose less strict timelines for non-serious ICSRs in the

study protocol. Unless stricter timelines, e.g. for certain critical laboratory parameters were considered.

Zentiva proposal:

- to extend the timelines for non-serious adverse reactions from non-interventional post-authorisation safety studies to **60 days** after the receipt
- to modify the text in article 101 h in this sense:

h) The submission of final study reports ~~and the reporting of adverse reactions~~ from the studies shall be specified in the study protocol.

2. Comments to ICSR reporting from phase IV trials

Proposed text of the new directive:

Article 101e

...

2. Marketing authorisation holders shall submit electronically to Eudravigilance, no later than 15-days following the receipt of the report, all adverse reactions that occur in the Community and all serious adverse reactions that occur outside the Community .

Existing applicable guidance:

Vol.9A (March 2007) text:

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The obligations concerned with the monitoring of adverse reactions occurring in clinical trials do not fall within the scope of pharmacovigilance activities, as described in these Guidelines.

Zentiva comment:

The requirements on ICSR reporting are very different in pre-authorisation clinical trials and after the authorisation. However, if a phase IV clinical trial is concerned, which requirements are applicable to the reporting of ICSR, where the suspect product is the MAH's own authorised product?

Zentiva proposal:

- practical guidance on reporting from phase IV clinical trials should be included in the next edition of Volume 9A. In our opinion, standard post-authorisation reporting requirements should be applied.