European Medicines Agency
Risk Management Systems

26 June 2007

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EMEA Resource

- www.emea.europa.eu/pdfs/human/euleg/9626805en.pdf

- Guideline on Risk Management Systems for Medicinal Products for Human Use

DEFINITIONS

- ***Risk Management System*** – a set of pharmacovigilance activities and interventions designed to identify, characterise, prevent, or minimise risks relating to medicinal products, including the assessment of the effectiveness of those interventions

DEFINITIONS

- ***EU – Risk Management Plan*** – EU legislation requires a description of the risk management system be submitted "when appropriate". This requirement can be met by the submission of an EU-RMP as per sections 4.3 and 4.13 of their guidance.

EU – RISK MANAGEMENT PLAN

- 2 parts
  - Part 1
    - A safety specification
    - A pharmacovigilance plan
  - Part 2
    - An evaluation of the need for a risk miniminisation activities,
    - If there is a need for additional (“non-routine”) risk minimisation activities, the a risk minimisation plan must be submitted

When EU-RMP Required

- Pre- and post-authorisation
- Any product containing a new active substance
- Any biosimilar product
- Any generic where a safety concern requires additional risk minimisation activities
- New dosage form, new route of administration, significant change in indication
- On request from the EMEA or national authority

SAFETY SPECIFICATION

- ***PURPOSE***: help industry and EMEA identify any need for specific data collection and to facilitate the construction of the Pharmacovigilance Plan

- Summary of the important risks of a medicinal product
- Important potential risks and limitations of clinical and preclinical database
- Important missing information
- Populations potentially at risk
- Outstanding safety issues that warrant further investigation
- Epidemiology of the authorised indication(s)
- Potential Class effects
- Potential for overdose, transmission of infectious agents, misuse for illegal purposes, off-label use, and off-label paediatric use

PHARMACOVIGILANCE PLAN

- PURPOSE: Propose actions to address safety concerns identified in the Safety Specification

- Routine Pharmacovigilance
- Non-routine Pharmacovigilance (Annex A)
  - Active, Sentinel sites, Intensive monitoring schemes, prescription event monitoring, registers, comparative observational studies, cross-sectional survey studies, cohort studies, case-control studies, other novel designs, clinical trials, large simple trials, drug utilisation studies, etc

EVALUATION for Risk Minimisation Activities

- Must do for each risk identified in Safety Specification
- For some, pharmacovigilance plan adequate
- For others, more intensive risk minimisation may be required

RISK MINIMISATION ACTIVITES

- Routine Warnings in product information, labeling and packaging, patient information leaflet

- Potential for medication errors

RISK MINIMISATION PLAN

- Should include both routine and additional risk minimisation activities

- Annex B
  - Provision of information, additional educational materials, legal status of a medicine (restricted distribution and use), control at pharmacy level, control of packaging size or validity, informed consent, patient registries,

RISK MINIMISATION PLAN

- Assessment of effectiveness
  - » Metrics pre-defined and validated
  - » Timing of assessments
  - » Potential responses depending on results of assessment

STATISTICS

- Report of EMEA in Atlanta last week

- Since 2005, 75 authorisations centrally
  - » 67 Risk Management Plans submitted
  - » 8 had additional Risk Minimisation Plans

SUMMARY

- There is a legislative mandate for Risk Management Plans as defined by their guidance
- The underlying premise is that not having one is the exception