SAFETY CONCERNS (SCs) V RMP A PSUR

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RMP vs. PSUR

RMP: prospective, pre- and post-authorisation risk-benefit management and planning
…další (tzv. additional) opatření k minimalizaci rizik či FV činnosti

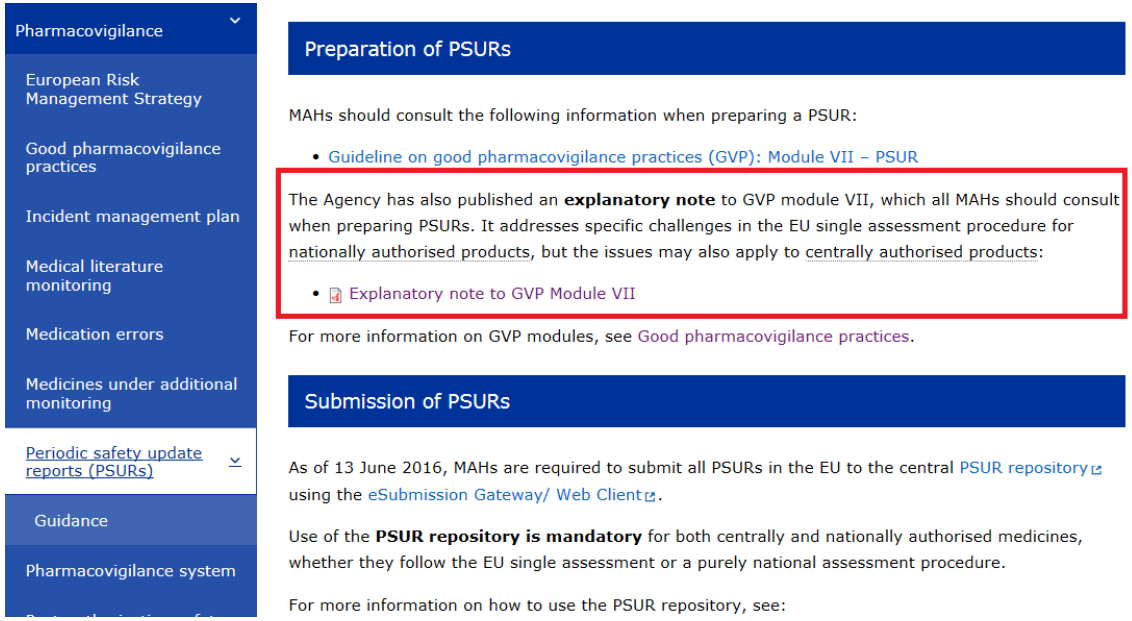
PSUR: retrospective, integrated, post-authorisation risk-benefit assessment
…celkový bezpečnostní profil (benefit-risk)

RMP
↓
r. 2017: Module V (Rev 2): V.B.11.

PSUR
↓
r. 2013: GVP Module VII (Rev 1)
r. 2017: Explanatory Note to GVP Module VII: 9.1

SCs RMP ≠ SCs PSUR

Explanatory Note to GVP Module VII *(31 October 2017)*



https://www.ema.europa.eu/en/documents/scientific-guideline/guideline-good-pharmacovigilance-practices-gvp-module-vii-periodic-safety-update-report-explanatory_en.pdf

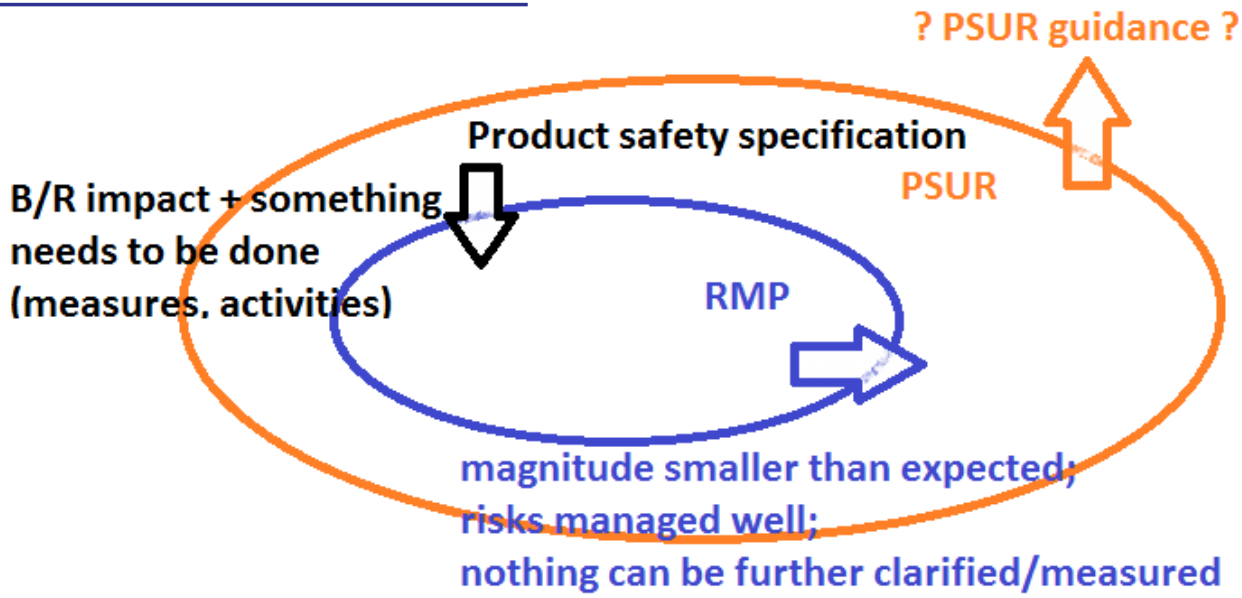
…the PSUR is not a tool for harmonisation of the list of safety concerns across products with the same active substance(s) whether or not the product has an associated EU RMP.

…should the PSUR assessment identify a new important potential or a new important identified risk, or missing information, it can be recommended that all MAHs include the particular risk in the safety specification of RMPs…

…the justification to remove a risk from the list of safety concerns in the RMP may not be applicable for reclassifying a risk in the PSUR…being removed from the RMP….may still be warranted to follow up on it, and thereby not remove it from the list in the PSUR.

RMP and PSUR safety specifications

Identification and removal of SCs in the RMP



1. **identifikace** SCs pro účely RMP…2. **odstranění** SCs z RMP

→ dále sledovány v rámci PSUR (?)

? (revize GVP Module VII v budoucnu) ?

Příklad

PSUR SCs

vs.

RMP SCs

Summary of Safety Concerns (RMP Version 2.1)	
Important Identified Risks	Tumour lysis syndrome Neutropenia
Important Potential Risks	• Embryofoetal toxicity • Testicular toxicity • Medication error • Serious infection • Richter's transformation • DDI (CYP3A inducers, CYP3A inhibitors)
Important Missing Information	• Carcinogenicity studies • Safety in severe hepatic impairment • Safety in severe renal impairment • Safety in long-term exposure (> 12 months)

Nový přístup k identifikaci SCs (*GVP Module V (Rev 2)*)

Dříve:

Table II-SVIII-1: Summary of safety concerns

Important identified risks	IFIS
	Orthostatic hypotension/hypotension
	Syncope/loss of consciousness
	Hypersensitivity (including allergic type reactions, such as facial edema, pharyngeal edema and swollen tongue)
	Abnormal Liver Function Tests (LFTs)
	Tachycardia
	Palpitations
	Abnormal ejaculation, erectile dysfunction
Important potential risks	Use in moderate/severe renal impairment
	Misdiagnosis of prostate cancer
	Photosensitivity reactions
	Genital discomfort/burning
	Gynaecomastia, breast enlargement, breast tenderness
	Use in patients with pre-existing cardiovascular disease
	Concomitant treatment with strong CYP 3A4 inhibitors
	Concomitant use with other alpha-blockers
	Concomitant treatment with phosphodiesterase type 5 inhibitors
	Concomitant use with antihypertensive medicines
Important missing information	Use in severe hepatic impairment
	Use in patients with a serum creatinine >2.0 mg/dL
	Concomitant use of 5-alpha-reductase inhibitors
	Patients aged ≥ 75 years

Nyní:

Important identified risks	IFIS (Intraoperative Floppy Iris Syndrome)
Important potential risks	Misdiagnosis of prostate cancer
Missing information	None

Important identified risks	Secondary exposure
Important potential risks	Prostate cancer
	Cardiovascular risks
	Oedema with or without congestive cardiac failure in patients suffering from severe cardiac, hepatic or renal insufficiency
Missing information	Safety in elderly males ≥ 65 years of age

Important identified risks	None
Important potential risks	None
Missing information	None

Important identified risks	Risk of anticholinergic complications
	Anaphylaxis
Important potential risks	None
Missing information	Pregnancy and lactation

Important identified risks	None
Important potential risks	None
Missing information	None

Přístup k SCs u generik

→ dle originálního (referenčního) LP (přestože není v souladu s GVP Module V (Rev 2) √

→ dle nového přístupu v souladu s GVP Module V (Rev 2) √

√ = současný postoj agentury EMA

Děkuji za pozornost.

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