



# SAFETY CONCERNS (SCs) V RMP A PSUR

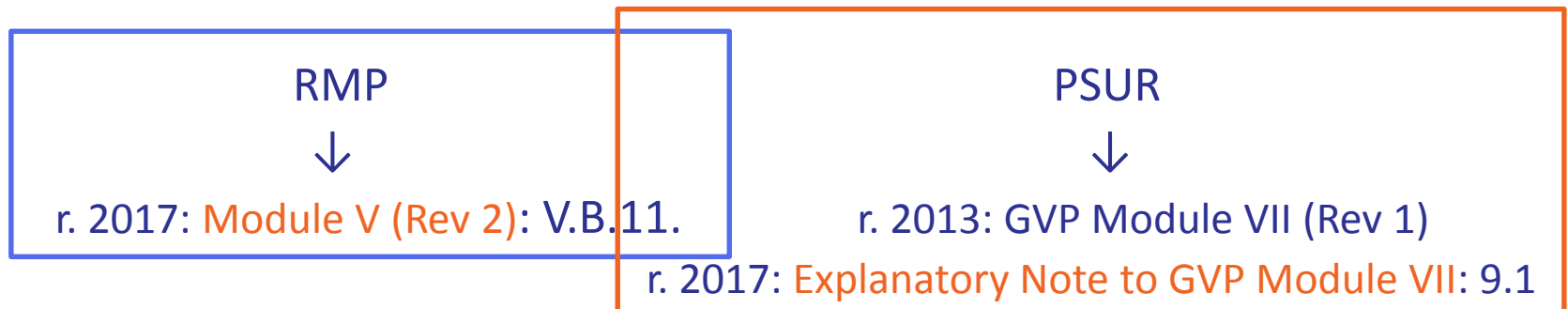
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## RMP vs. PSUR

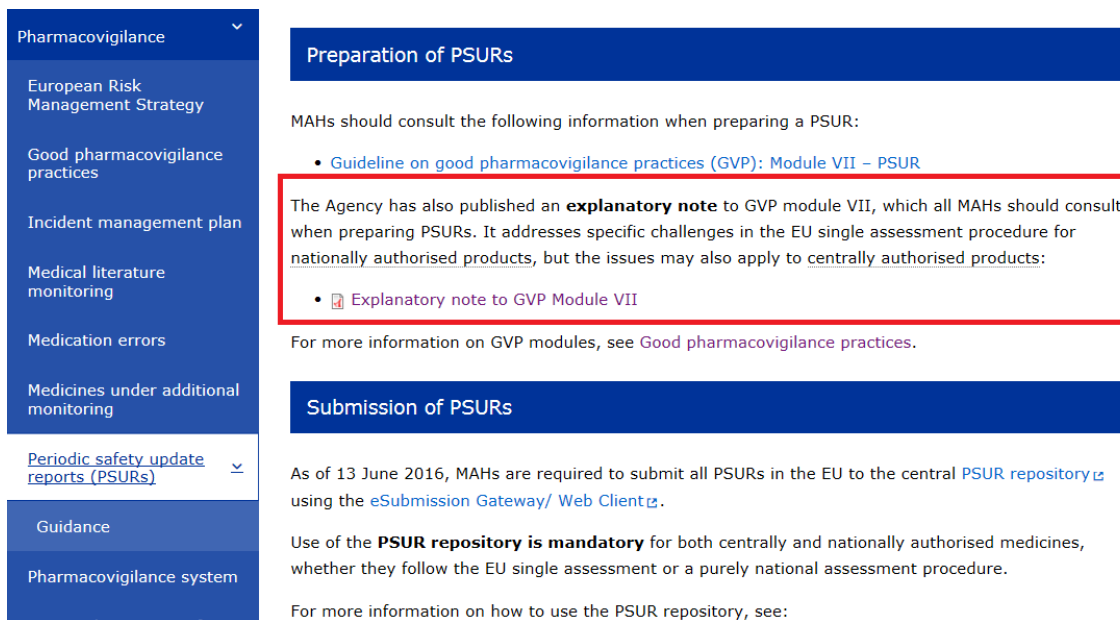
**RMP:** prospective, pre- and post-authorisation risk-benefit management and planning  
...další (tzv. additional) opatření k minimalizaci rizik či FV činnosti

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



SCs RMP ≠ SCs PSUR

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



The screenshot shows a navigation menu on the left with items: Pharmacovigilance, European Risk Management Strategy, Good pharmacovigilance practices, Incident management plan, Medical literature monitoring, Medication errors, Medicines under additional monitoring, Periodic safety update reports (PSURs), Guidance, and Pharmacovigilance system. The main content area has two blue headers: 'Preparation of PSURs' and 'Submission of PSURs'. Under 'Preparation of PSURs', it states MAHs should consult the following information when preparing a PSUR: a link to 'Guideline on good pharmacovigilance practices (GVP): Module VII – PSUR'. A red box highlights a paragraph: 'The Agency has also published an **explanatory note** to GVP module VII, which all MAHs should consult when preparing PSURs. It addresses specific challenges in the EU single assessment procedure for nationally authorised products, but the issues may also apply to centrally authorised products:'. Below this is a link to 'Explanatory note to GVP Module VII'. Under 'Submission of PSURs', it states that as of 13 June 2016, MAHs are required to submit all PSURs in the EU to the central PSUR repository using the eSubmission Gateway/ Web Client. It notes that use of the PSUR repository is mandatory for both centrally and nationally authorised medicines, whether they follow the EU single assessment or a purely national assessment procedure. It also provides a link for more information on how to use the PSUR repository.

[https://www.ema.europa.eu/en/documents/scientific-guideline/guideline-good-pharmacovigilance-practices-gvp-module-vii-periodic-safety-update-report-explanatory\\_en.pdf](https://www.ema.europa.eu/en/documents/scientific-guideline/guideline-good-pharmacovigilance-practices-gvp-module-vii-periodic-safety-update-report-explanatory_en.pdf)

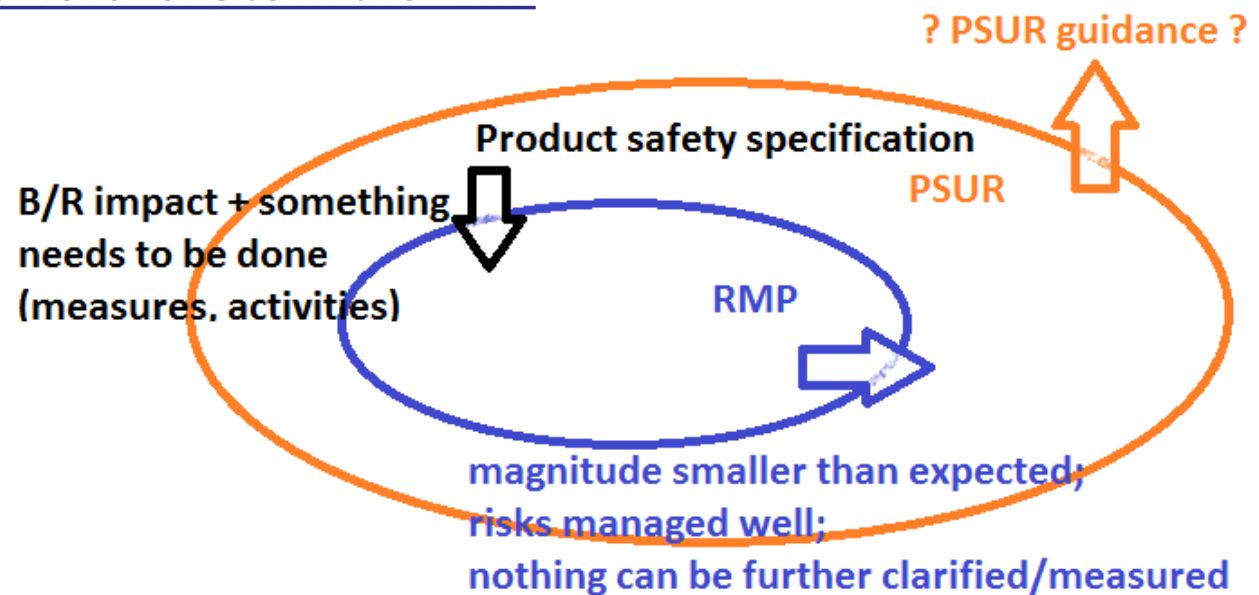
*...the PSUR is **not a tool for harmonisation** of the list of safety concerns across products with the same active substance(s) whether or not the product has an associated EU RMP.*

*...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) ?

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vs.

## RMP SCs

Summary of Safety Concerns (RMP Version 2.1)	
Important Identified Risks	Tumour lysis syndrome Neutropenia
Important Potential Risks	<ul style="list-style-type: none"> <li>Embryofetal toxicity</li> <li>Testicular toxicity</li> <li>Medication error</li> <li>Serious infection</li> <li>Richter's transformation</li> <li>DDI (CYP3A inducers, CYP3A inhibitors)</li> </ul>
Important Missing Information	<ul style="list-style-type: none"> <li>Carcinogenicity studies</li> <li>Safety in severe hepatic impairment</li> <li>Safety in severe renal impairment</li> <li>Safety in long-term exposure (&gt; 12 months)</li> </ul>

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

**Dříve:**

**Nyní:**

**Table II-SVIII-1: Summary of safety concerns**

<b>Important identified risks</b>	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
<b>Important potential risks</b>	Abnormal ejaculation, erectile dysfunction
	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	
<b>Important missing information</b>	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 $\geq$ 75 years



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

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



<b>Important identified risks</b>	None
<b>Important potential risks</b>	None
<b>Missing information</b>	None

<b>Important identified risks</b>	Risk of anticholinergic complications
	Anaphylaxis
<b>Important potential risks</b>	None
<b>Missing information</b>	Pregnancy and lactation



<b>Important identified risks</b>	None
<b>Important potential risks</b>	None
<b>Missing information</b>	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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