15 June 2020
EMA/395730/2012 Rev 3*

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 3)

Date for coming into effect of first version	2 July 2012
Date for coming into effect of Revision 1	25 April 2013
Release for public consultation of Draft Revision 2	11 August 2015
End of consultation (deadline for comments)	9 October 2015
Revised draft Revision 2 finalised by the Agency in collaboration with Member States	14 April 2016
Revised draft Revision 2 agreed by European Risk Management Facilitation Group (ERMS FG)	15 July 2016
Revised draft Revision 2 adopted by Executive Director as final	4 August 2016
Date for coming into effect of Revision 2	9 August 2016
Draft Revision 3 finalised by the Agency in collaboration with Member States	13 May 2020
Draft Revision 3 agreed by the EU Network Pharmacovigilance Oversight Group (EU-POG)	29 May 2020
Revised draft Revision 3* adopted by Executive Director as final	15 June 2020
Date for coming into effect of Revision 3*	24 June 2020

*Note: Revision 3 contains the following:

- In section VIII.Add.I.2., deletion of a paragraph describing the notification procedure from EMA to Member States of the public registration of a post-authorisation study requested by a competent authority conducted on their territory and funded by a marketing authorisation holder (this notification procedure was previously performed on a monthly basis and has now been discontinued following the modification of the search function of the EU PAS Register allowing searches by country);
- In section VIII.Add.I.3., amendment of the list of national competent authorities not requiring progress reports for non-interventional PASS imposed as an obligation, i.e. addition of Finland and Norway;
- Editorial amendments.

See websites for contact details

European Medicines Agency www.ema.europa.eu
Heads of Medicines Agencies www.hma.eu

The European Medicines Agency is an agency of the European Union

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 Annex III.3 *(Format of the final study report)* of the Commission Implementing Regulation (EU) No 520/2012 (IR), the date of study registration in the electronic study register shall be included as a milestone in the final study report for non-interventional PASS imposed as an obligation. GVP Module VIII, in 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 (RMP) agreed in the EU. Non-interventional PASS should be registered in the EU PAS Register 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.

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

Non-interventional PASS conducted pursuant to an obligation imposed by an EU competent authority include non-interventional PASS of categories 1 and 2 (see GVP Module V).

The draft study protocol, the updated 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 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)].

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

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 [DIR Art 107m(5)]. The national competent authority of the following Member States in which the study is conducted stated that they require submission of the progress reports through national procedures:

All EU/EEA Member States except Denmark, Finland and Norway[2].

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

Non-interventional PASS conducted voluntarily include non-interventional PASS of category 3 (see GVP Module V) and other non-interventional PASS voluntary conducted by marketing authorisation holders.

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 [DIR Art 107m(6)].

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 [DIR Art 107m(5)]. The national competent authority of the following Member States in which the study is conducted stated that 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 RMP according to GVP Module V.

[2] See https://legemiddelverket.no/english/pharmacovigilance/questions-and-answers-about-the-introduction-of-the-new-pharmacovigilance-legislation#module-viii-post-authorisation-safety-studies-(pass)