Content of the presentation

1. PASS: definition and objectives (a reminder)
2. Obligations and recommendations
3. The EU PAS Register
4. Guidance for PASS protocol submission
Post-authorisation safety study: definition

Any study relating to an authorised medicinal product conducted with the aim of identifying, characterising or quantifying a safety hazard, confirming the safety profile of the medicinal product, or of measuring the effectiveness of risk management measures.
Objectives of a PASS:

- to quantify potential or identified risks
- to evaluate risks of a medicinal product used in patient populations for which safety information is limited or missing (e.g., pregnant women, specific age groups, patients with renal or hepatic impairment)
- to provide evidence about the absence of a risk
- to assess patterns of drug utilisation that add knowledge on the safety of the medicinal product (e.g., indications, dosage, co-medication, medication errors)
- to measure the effectiveness of a risk minimisation activity.
1. Definition and objectives

- **PASS initiated, managed or financed by a MAH**
  - **Pursuant to an obligation imposed by a competent authority**
    - as a condition to the granting of the marketing authorisation, or after the granting of a marketing authorisation if there are concerns about the risks of the authorised medicinal product
    - as part of a marketing authorisation granted under exceptional circumstances.
  - **Voluntarily**
    - studies *required in the risk management plan* to investigate a safety concern or evaluate the effectiveness of risk minimisation activities
    - any other PASS
## 2. Obligations and requirements

- **legal obligation**
- **recommended in the GVP**
- **optional**

### Management of study

<table>
<thead>
<tr>
<th>Standard format of protocol and study report</th>
<th>PASS with MAH involvement</th>
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<tbody>
<tr>
<td>Imposed as an obligation</td>
<td>Conducted voluntarily</td>
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<tr>
<td>PRAC oversight</td>
<td>➠</td>
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<tr>
<td>Registration of study in EU PAS register</td>
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<tr>
<td>Study not to promote medicinal product</td>
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<td>Restricted payment to HCP</td>
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<td>Quality systems</td>
<td>➠</td>
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<tr>
<td>ENCePP methodological standards</td>
<td>✔</td>
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<tr>
<td>ENCePP checklist for study protocol</td>
<td>✔</td>
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<tr>
<td>ENCePP CoC</td>
<td>✔</td>
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<tr>
<td>ENCePP seal</td>
<td>★</td>
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</tbody>
</table>
2. Obligations and requirements

### Reporting of study information

<table>
<thead>
<tr>
<th>Pass with MAH involvement</th>
<th>Imposed as an obligation</th>
<th>Conducted voluntarily</th>
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</thead>
<tbody>
<tr>
<td>Protocol and progress reports to be submitted upon request to NCA of MS where study is conducted</td>
<td>[ ]</td>
<td>[ ]</td>
</tr>
<tr>
<td>Final report to be sent to the NCA of the MS where the study is conducted within 12 months of the end of data collection</td>
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<tr>
<td>Data generated in the study to be monitored</td>
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<tr>
<td>Any information which may influence the B/R balance to be reported to NCAs of MS where the product is authorised</td>
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<tr>
<td>Reporting of suspected adverse reactions in studies with primary data collection</td>
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<tr>
<td>Final manuscript of article to be transmitted to NCAs within 15 days after acceptance by journal editor</td>
<td>✓</td>
<td>✓</td>
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</table>
Objectives

• transparency, exchange of information, peer review
• supports EMA to fulfil its obligation to make public protocols and results of PASS imposed as an obligation
• supports MS to ensure that the public is given important information on pharmacovigilance concerns
• repository of all non-interventional PAS conducted in the EU, irrespective of the source of funding and status of investigators (MAH, academia, regulatory or public health authorities,...)

• NOT to replace regulatory submission for imposed studies
• Accepted by MS as means for submitting information on studies conducted voluntarily (Annex 1 of GVP Module VIII)
3. EU PAS Register

EU PAS Register to be developed as upgrade of ENCePP E-Register of studies and will include already registered studies, including ENCePP seal

Transitional period:

- ENCePP E-Register of studies to be used
- Guide for study registration amended
- for MAH-sponsored non-interventional PASS required by a regulatory authority:
  - acknowledgment email sent by EMA to MAH
  - all Member States informed by EMA of the registration with: title, name of sponsor, countries, link to registry
Impact on ENCePP

“ENCePP study registry” will no longer exist

• confusion between “ENCePP study” and “study registered in ENCePP” will be avoided

• “ENCePP” trademark will refer to best methodological and ethical standards in pharmacoepidemiology
  
  • ENCePP Guide for methodological standards in pharmacoepidemiology
  
  • ENCePP Checklist for study protocols
  
  • ENCePP Code of conduct
  
  • ENCePP study seal
Objectives

- consistency in presentation and format of PASS protocols submitted by marketing authorisation holders
- provision of essential administrative information
- coverage of all important scientific aspects of a protocol

Legal obligation for imposed non-interventional PASS from 10 January 2013

Recommended for all other non-interventional PASS


EMA → Regulatory → Human Medicines → Pharmacovigilance → Guidance
Questions ?