<20th July 2016>

Submission of comments on 'Reflection paper on collecting and reporting information on off-label use in pharmacovigilance' (EMA/293194/2016)

Comments from: Guild of Healthcare Pharmacists

Name of organisation or individual
Barry Corbett, Professional Secretary, Guild of Healthcare Pharmacists

Please note that these comments and the identity of the sender will be published unless a specific justified objection is received.

When completed, this form should be sent to the European Medicines Agency electronically, in Word format (not PDF).

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1. General comments

Stakeholder number *(To be completed by the Agency)*	General comment (if any)	Outcome (if applicable) *(To be completed by the Agency)*

We agree entirely with the concerns and questions raised by the European Federation of Pharmaceutical Industries and Associations and the concerns raised by the Pharmacovigilance Risk Assessment Committee in that there is a need to **clarify** the handling of cases of off-label use which are **not** associated with the occurrence of suspected adverse reactions i.e. the intent and proposal therefore seem legitimate in terms of clarifying reporting obligations, and the proposal is consistent with reporting obligations in other spheres. Although some Member States may already have put in place specific national guidance regarding the notification by Marketing Authorisation Holders (MAHs) of practices of off-label use of medicines at national level, there should be consistency across the MAHs in relation to their pharmacovigilance obligations. This could be facilitated through the introduction of a robust system that incorporates then following elements:

Reporting of individual cases of off-label use of medicines

1. Both the **risk** and the benefit of off-label use of medicinal products should be considered by MAHs (in compliance with Article 23(2) of Directive 2001/83/EC).
2. Following the above, the MAH should be required to continuously assess the benefits and risks of its products in the Periodic Safety Update Reports (PSURs) submitted to the competent authorities and address the clinical importance of any risk related to off-label use.

Risk Management Plan

1. Implementation of a risk management plan for the medicinal product concerned would ensure a planned and risk proportionate approach to enable the monitoring of the use of specific medicinal products in routine clinical settings. When off-label use has been identified for a product but a safety concern has been raised, the risk management plan should be used for collection and follow-up of cases of off-label use **including** cases not associated with suspected adverse reactions, and be used to determine additional structured investigations.
2. The monitoring of off-label use should focus on collection and assessment of information which might influence the evaluation of the benefits and risks of the concerned medicinal product.

Variation of the marketing authorisation

1. As the obligations under Article 23(2) of Directive 2001/83/EC are linked to data/information, a **variation** of the marketing authorisation would seem to be sensible way forward to achieve the above objectives.

2. Specific comments on text

Line number(s) of the relevant text *(e.g. Lines 20-23)*	Stakeholder number *(To be completed by the Agency)*	Comment and rationale; proposed changes *(If changes to the wording are suggested, they should be highlighted using 'track changes')*	Outcome *(To be completed by the Agency)*
233-234		Comment: Proposed change (if any): *This information should be collected and presented in periodic safety update reports for the interpretation of safety data or for the benefit risk evaluation of medicinal products."*	
243-244		Comment: Proposed change (if any): Instead, the obligation in Article 23(2) is linked to data/information, will entail a variation of the marketing authorisation.	
250-252		Comment: Proposed change (if any): Moreover, data on off-label use or on research in non-authorised indications should be used to allow the evaluation of the impact and gravity of individual signals if those signals arrive through individual case safety reports and relate to the use outside the terms of the marketing authorisation	

Please add more rows if needed.