Advances in Pharmacoepidemiology & Drug Safety

Srba, Adv Pharmacoepidemiol Drug Saf 2014, 3:2
DOI: 10.4172/2167-1052.1000154

Short Communication Open Access

The Missing Voice of Non-Serious Adverse Drug Reactions from Marketing Authorisation Holders

Jindrich Srba*

Department of Social and Clinical Pharmacy, Faculty of Pharmacy, Charles University, Hradec Kralove, Czech Republic

New pharmacovigilance legislation (Regulation (EU) No. 1235/2010 and Directive 2010/84/EU) was adopted by the European Parliament in December 2010. The European Medicines Agency (EMA) is responsible for implementing much of the new legislation, which has been effective since July 2012. One of the impacts concerned to marketing authorisation holders (MAH) is to submit adverse drug reaction (ADR) reports only into EudraVigilance, a safety database superintended by EMA.

An interim period was established, until EMA will ensure the full functionality of the Eudravigilance database. For this period, there should be applied requirements for valid Individual Case Safety Reports reported by MAHs. In accordance with the transitional provisions set out in Article 2(4) of Directive 2010/84/EU, MAHs shall report all serious suspected ADRs to regulatory authorities. Non-serious suspected ADRs may be required by competent authorities of a Member State in accordance transitional provisions set out in Article 2 (5) of the same Directive [1]. In practice, non-serious suspected ADRs are required only by seven Member States; therefore MAHs should not report non-serious ADRs to national regulatory authorities in the most of the Member States [2].

The amount of non-serious ADRs submitted by MAHs is not negligible. For example, out of 14,203 ADR reports processed by the Netherlands Pharmacovigilance Centre in 2012, were 6,770 (48%) ADR reports from MAHs [3]. Also position of the non-serious ADRs is roughly comparable in quantity, with serious ADRs as there were investigated trends in spontaneous reporting of serious and non-serious ADR reports to the French national PharmacoVigilance Network during the 2000s' [4].

Why this transitional approach is applied to MAHs (and not to other sources of non-serious ADRs)? Non-serious ADRs collected by MAHs should be always used in so-called periodic safety update reports [5]. Therefore contribution of non-serious ADR reports to benefit-risk profile of drugs should be ensured even if there is the interim period.

Unfortunately, elaboration and submission of periodic safety update reports by MAHs was reduced in terms of quantity and frequency due to the list of EU reference dates and frequency of submission of periodic safety update reports known as the 'EURD list' published by EMA in October 2013 [6]. Based on the EURD list, there is no need to submit safety reports to the most of generic drugs and the frequency of periodical submission was mostly prolonged to more than three years.

Regulatory authorities should continuously monitor the data available in the EudraVigilance database to determine whether there are new risks or whether risks have changed and whether those risks have an impact on the benefit-risk balance [7]. However, during the interim period, the majority of non-serious ADR reports are probably not being submitted and used for the signal detection process.

We should also not ignore the fact of misclassification, when some ADRs may be misclassified as non-serious by MAHs. These misclassified ADRs are subsequently not reported during the interim period.

From this point of view, absence of submission non-serious ADRs results in weakening of continuous surveillance drug safety profiles due to decrease of frequency of submitted ADRs. Additionally, quantitative comparisons of submitted ADR reports performed by research articles could be affected by the missing obligation to submit non-serious ADR reports by MAHs. These repercussions should be always considered, until the EudraVigilance database will not be fully functional.

References

1. Directive 2010/84/EU of the European Parliament and of the council of 15 December 2010 amending, as regards pharmacovigilance, Directive 2001/83/EC on the Community code relating to medicinal products for human use.
2. European Medicines Agency: Introductory cover note to the List of European Union reference dates and frequency of submission of Periodic Safety Update Reports, EMA/321386/2012 Rev. 8, 17 October 2013.
3. Medicines Evaluation Board (2012) Annual report 2012. The Netherlands.
4. Moulis G, Sommet A, Durrieu G, Bagheri H, Lapeyre-Mestre M, et al. (2012) Trends of reporting of 'serious'vs. 'non-serious' adverse drug reactions over time: a study in the French PharmacoVigilance Database. Br J Clin Pharmacol 74: 201-204.
5. Guideline on pharmacovigilance practice, Module VII – Periodic safety update report, 20 February 2012.
6. European Medicines Agency: Reporting requirements of Individual Case Safety Reports (ICSRs) applicable to marketing authorization holders during the interim period, EMA/606369/2012 Rev. 9, 31 October 2013.
7. Guideline on pharmacovigilance practice, Module IX – Signal management, European Medicine Agency, 22 June 2012.

***Corresponding author:** Jindrich Srba, Department of Social and Clinical Pharmacy, Faculty of Pharmacy, Charles University, Hradec Kralove, Czech Republic, Tel: +420 728 645 080; E-mail: jindrich.srba@gmail.com

Received March 21, 2014; **Accepted** May 16, 2014; **Published** May 18, 2014

Citation: Srba J (2014) The Missing Voice of Non-Serious Adverse Drug Reactions from Marketing Authorisation Holders. Adv Pharmacoepidemiol Drug Saf 3: 154. doi:10.4172/2167-1052.1000154

Copyright: © 2014 Srba J. This is an open-access article distributed under the terms of the Creative Commons Attribution License, which permits unrestricted use, distribution, and reproduction in any medium, provided the original author and source are credited.