

Information sheet Mandatory reporting of adverse reactions during a clinical trial with TrP/GT/GMO

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A. Reporting of deaths and suspected unexpected serious adverse reactions with a suspected link to a transplant product (TrP), a gene therapy medicinal product (GT) or with a medicinal product consisting of or containing genetically modified organisms (GMO) administered during a clinical trial with TrP/GT/GMO (in accordance with art. 41 Oclin.)

Reporting of all cases of deaths, SUSARs and SADR from Switzerland:

- In accordance with art. 41 para.4 of Oclin, all unexpected and serious adverse reactions with a suspected link to the TrP/GT/GMO administered, so-called **Suspected Unexpected Serious Adverse Reactions (SUSARs)** must be reported to Swissmedic.
- For the TrP/GT/GMO clinical trials, in accordance with art. 21 and 22 Oclin, the provisions concerning clinical trials of medicinal products apply analogously.
- Within the framework of a first pilot phase, the sponsor, in accordance with art. 41, para. 4 of Oclin, must also report all **Serious Adverse Events (SAEs)** that have a suspected link to the TrP/GT/GMO administered (so-called serious adverse drug reactions – SADR) to Swissmedic
- In addition, all cases of death that occur during the clinical trial in Switzerland must be reported to Swissmedic.

The report includes severe adverse drug reactions or events that could not only be linked to the TrP/GT/GMO itself but also to the following aspects:

- Serious events during the donation or during the preparation for the donation (including events that occur in connection with the administration of medicinal products that are given to a patient in view of an upcoming donation);
- Suspected viral, bacterial or other contamination from the TrP/GT/GMO;
- Serious events that could be linked to a quality defect in the TrP/GT/GMO or its components (preservatives, media, viral vectors, etc.) or in the medical device or matrices that are components of the product;
- Serious events during the administration of a TrP/GT/GMO (e.g. during surgery for which the application of a transplant product is necessary, or an injection);
- Release of the GMO into the environment, transmission to other persons or animals (for medicinal products that consist of genetically modified organisms (GMO) or contain GMO).

All reports must be submitted using the CIOMS form and / or the form for reporting a suspected unexpected adverse drug reaction to a transplant product that is already authorised or for reporting a serious adverse reaction (SUSAR or SADR) during a clinical trial with a transplant product. Additional information should be submitted as an accompanying letter. All documents have to be sent electronically to the email address biovigilance@swissmedic.ch.

The documents must contain at least the following information:

- Name of the TrP/GT/GMO with composition, trial code, Swissmedic reference number, trial number (and country if report is from abroad);
- Details of the trial product (information regarding dose, rate of administration, duration of administration and dates of administration);
- Patient details (age, sex, medical history);
- For reports on SUSARs, unblinded data should be provided;
- Source of report, precise description of the SUSAR or SADR and its progression (date of event, symptoms, most important clinical signs, details on the degree of severity, chronology, and possibly details of dechallenges / rechallenges and outcome);
- Details on co-medications (including beginning and end of treatment);
- Analysis of the causal link between the event and the TrP/GT/GMO.

Address to which the report should be sent:

biovigilance@swissmedic.ch

In exceptional cases:

Swissmedic
 Swiss Agency for Therapeutic Products
 Inspectorates and Authorisations, Transplant Unit
 Case Manager
 Hallerstrasse 7
 3012 Bern

Time limit for the reporting of all cases of death and SUSARs:

Within 7 days for SUSARs leading to death or that are life-threatening and within 15 days for other events for which reporting is mandatory (art. 41, para. 2 and 4, OClin).

Time limit for the reporting of SADRs:

Within 15 days.

B. Reporting of urgent safety measures from clinical trials (in accordance with art. 37, para. 1 and 3 OClin)

Swissmedic must be informed immediately (latest within 7 days) of current safety risks in order to guarantee the safety of the trial subjects.

Taking into account national and international data, the report must contain the following:

- Name of the TrP/GT/GMO with composition, trial code, Swissmedic reference number;

- All suspected new risks plus relevant new aspects of known adverse reactions that require measures relevant to safety;
- Source of report, precise description of the risks and of the measures taken.

The report must be submitted electronically and must include a critical, summarised assessment of the risk mitigation measures implemented.

Address to which the report should be sent:

biovigilance@swissmedic.ch

In exceptional cases:

Swissmedic
 Swiss Agency for Therapeutic Products
 Inspectorates and Authorisations, Transplant Unit
 Case Manager
 3012 Bern

The report must be separate from the annual safety report (ASR) and marked as urgent safety information.

Time limit for reporting Safety Signals:

The report must be submitted without delay once the circumstances that constitute a safety risk have occurred.

C. Submission of the annual safety report (ASR) (in accordance with art. 43 Oclin)

The annual safety report (ASR) or Development Safety Update Report (DSUR) is a summary of the current status of knowledge and handling of identified and potential risks in relation to TrP/GT/GMO in clinical trials. A confirmation of receipt of the report is sent to the sponsor.

The report must be submitted electronically (CD-ROM, DVD, e-mail). Formats similar to those for DSURs (Development Safety Update Reports) are accepted (see also ICH guideline E2F on development safety update report: https://www.ema.europa.eu/documents/scientific-guideline/international-conference-harmonisation-technical-requirements-registration-pharmaceuticals-human-use_en-26.pdf).

The safety report must include at least the following information:

- Name of the TrP/GT/GMO with composition, trial code, Swissmedic reference number;
- Time period covered by the report;
- Accompanying letter with summary, status of the clinical trial in Switzerland and abroad (number of centres, number of patients recruited/drop outs/completed, number of SAEs/SADRs/SUSARs/NSADR in Switzerland and abroad);
- Critical summary of the safety profile of the TrP/GT/GMO and new, relevant safety aspects and their effect on the clinical trial (including details regarding exposure);

- Table showing all serious adverse events (incl. SUSARs and quality defects) in Switzerland and abroad. The information presented should be as comprehensive as possible, and contain data on treatment groups and comparator groups. In the case of international multi-centre trials, the data on patients treated in Switzerland should also be presented separately;
- Additionally, for trials with healthy volunteers, tables showing **all** AE's occurring in Switzerland and abroad.

Address to which the report should be sent:

Swissmedic
Swiss Agency for Therapeutic Products
Inspectorates and Authorisations, Transplant Unit
Case Manager
Hallerstrasse 7
3012 Bern

or biovigilance@swissmedic.ch

Time limit for submitting an ASR:

The report must be submitted to Swissmedic once a year. Each report should cover 12 months of an ongoing clinical trial.

Change history

Version	Change	sig
5.0	Transfer ATM processes in the area of authorisations New ID number assigned Formal adjustments, new layout	dei