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1 Abbreviations

AIPS	Swissmedic product information publication platform
Art.	Article
eCTD	Electronic Common Technical Document (ICH)
EMA	European Medicines Agency
GVP Module V	Guideline on Good Pharmacovigilance Practices (GVP) Module V – Risk management systems (Rev 1)
ICH	International Conference of Harmonisation
ICH E2E Guideline	ICH Harmonised Tripartite Guideline on Pharmacovigilance Planning E2E
CD	Calendar days
Let.	Letter
Para.	Paragraph
PSUR	Periodic Safety Update Report
PBRER	Periodic Benefit-Risk Evaluation Report
PVP	Pharmacovigilance Plan
RMP	Risk Management Plan
Sec.	Section
TPA	Federal Act on Medicinal Products and Medical Devices (Therapeutic Products Act, SR 812.21)
TPO	Ordinance of 21 September 2018 on Therapeutic Products (Therapeutic Products Ordinance; SR 812.212.21)

2 Introduction

The Risk Management Plan (RMP) for a medicinal product, which presents the risk aspects of the product, the planned pharmacovigilance activities and risk minimisation measures, is part of the authorisation dossier (Module 1). The evaluation of the documentation is an integral part of the authorisation decision.
The purpose of the RMP is to describe known and suspected potential risk aspects at the time of authorisation, and to establish strategies on how these can be characterised in future and countered in a risk minimisation approach.

Swissmedic has published RMP summaries of authorised medicinal products since November 2015. Based on the publicly accessible RMP summaries, interested professionals and lay people can obtain

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information about the specific measures that have been arranged for the future characterisation and minimisation of risks for the corresponding medicinal product.
The RMP summaries supplement the publicly accessible information for healthcare professionals and patient information texts and are linked to the corresponding medicinal product via the Swissmedic product information platform (AIPS at www.swissmedicinfo.ch).

3 Objective

This Guidance document describes the requirements pertaining to the submission of RMPs, RMP Updates and RMP summaries, and explains the relevant formal and regulatory aspects for the benefit of the marketing authorisation holders.

4 Scope

Within the Safety of Medicines department, this Guidance document applies to the submission of RMPs, RMP Updates and RMP summaries.

5 Basic information on RMP/E2E description

The Guidelines of the International Council for Harmonisation (ICH) define the “current status of science and technology” in Switzerland, unless otherwise specified in laws or ordinances.
The basic document “ICH E2E Guideline - Pharmacovigilance Planning” describes two main aspects of the RMP: the specification of the risks of a medicinal product and the Pharmacovigilance Plan (PVP).
The European Medicines Agency (EMA) Guideline “Good pharmacovigilance practices (GVP): Module V – Risk management systems” is based on the ICH E2E Guideline and defines further substantive and formal requirements for the RMP.
In Switzerland, the basic obligation to submit an RMP is set forth in Art. 11 para. 2 let. a section. 5 TPA and Art. 4 of the Therapeutic Products Ordinance (TPO).
For a consistent understanding, the text refers to RMP; this term covers both the RMP format according to GVP Module V and the “Pharmacovigilance Planning” according to the ICH E2E Guideline.

6 RMP obligation in the context of authorisation applications

An RMP or RMP Update must be submitted for the following applications:

1. Initial marketing authorisation applications

- Applications for the authorisation of a human medicinal product containing at least one new active substance
- Applications for the authorisation of an orphan drug containing at least one new active substance
- Biotechnological medicinal products (including biosimilars)
- Human vaccines

2. Applications for an authorisation extension ("major variation" up to now) for a medicinal product which is already subject to an RMP.

- Paediatric indication / other significant variation to the indication
- New dosage recommendation
- New administration route/dosage form
- New manufacturing process (for biotechnology-derived substances)

For these applications a RMP/RMP Update should be submitted if the authorisation extension requires changes to the RMP concerning the following aspects:

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- Safety concerns
- Pharmacovigilance activities
- Risk minimisation measures

If an RMP submission is not necessary (no change in risk-related aspects, pharmacovigilance activities or risk-reducing measures), this should be briefly stated and explained in the cover letter accompanying the application.

In general, and if requested by Swissmedic, an RMP/RMP Update should be submitted at any point in the life cycle of a medicinal product if there are concerns about the benefit-risk profile.

7 RMP Updates

Basically, RMP Updates are required in the life cycle of the medicinal product when the state of knowledge about the described important drug risks changes or if new risks emerge.
If new findings about the benefit-risk profile of a medicinal product require changes to the RMP, particularly in relation to the risk aspects of the product ("safety concerns"), the pharmacovigilance activities or the risk minimisation measures, an RMP Update will need to be submitted.

The RMP Update is routinely submitted together with the Periodic Safety Update Report (PSUR) or Periodic Benefit-Risk Evaluation Report (PBRER), and the boxes on the accompanying form must be checked accordingly. The RMP Update is reviewed in connection with the PSUR/PBRER review.

8 Content and format of the RMP

The risk management system must be proportionate to the identified and potential risks of the medicinal product and the need for data about its safety after authorisation / registration.

The risk management of a medicinal product must be viewed as a global activity.
Differences may, however, still arise, particularly as a result of different indications, specific features of healthcare systems or target populations, for example. For this reason, different versions of the RMP for a medicinal product may be valid in certain regions.

The content and format of the RMP to be submitted to Swissmedic should be based on the ICH E2E Guideline "Pharmacovigilance Planning" and the EMA Guideline "Good pharmacovigilance practices (GVP): Module V – Risk management systems".
An RMP template can be found in the corresponding EMA guideline ("Guidance on format of the risk management plan (RMP) in the EU–integrated format").

If an RMP has been submitted to, or approved by, the EMA, this should be forwarded to Swissmedic.

Updates/changes to the RMP should be submitted both in "Track changes" mode and as a finalised version.

9 Pharmacovigilance activities and risk minimisation measures

All the pharmacovigilance activities described in the RMP or RMP Update (e.g. targeted questionnaires) and risk minimisation measures are considered to be binding in Switzerland as well, and must be implemented accordingly, once the authorisation application or an RMP Update has been approved.
Any discrepancies should be highlighted and a concise explanation provided. Checking the implementation of the activities specified in the RMP forms part of the pharmacovigilance inspections carried out by Swissmedic.

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9.1 Note on educational materials

If the marketing authorisation holder of a medicinal product undertakes to produce educational materials in connection with the RMP/RMP Update (e.g. for professionals and/or patients) or to produce other materials, these documents should be drafted in the official languages (German, French, Italian) in Switzerland.
They must not contain any promotional content or inconsistencies in relation to the product information (i.e. the material should be adapted to the approved product information).
The legal responsibility for the content of the materials rests solely with the marketing authorisation holder. The materials should be submitted to Swissmedic on request.

10 RMP Summary

An RMP Summary must be submitted for all authorisation applications as described in section6 under point 1 and point 2.

The submission of the RMP Summary is a requirement that is specified after the application has been approved.

The RMP Summary should be submitted, in English, to Swissmedic as a separate document (for format refer to “Guidance on format of the risk-management plan in the European Union part VI: Summary of activities in the risk-management plan by product”) with a cover letter (not a separate application) up to 60 calendar days (CD) after approval of the authorisation application (submission via Swissmedic portal delivery type “communication”, CD by post or via eCTD delivery type «variation/new application»).
A translation into the Swiss national languages is not envisaged. It is published in English, and the company is responsible for ensuring that the text is correct.
When drafting the summary, ensure that it is complete (list all risks and risk minimisation measures) and easily comprehensible.

The document intended for publication should be supplemented as follows:

Title page – stating the name of the medicinal product, active substance, version number of the current RMP, name of the marketing authorisation holder, date and the following disclaimer word for word:
The Risk Management Plan (RMP) is a comprehensive document submitted as part of the application dossier for market approval of a medicine. The RMP summary contains information on the medicine's safety profile and explains the measures that are taken in order to further investigate and follow the risks as well as to prevent or minimise them.
The RMP summary of “Präparatename” is a concise document and does not claim to be exhaustive. As the RMP is an international document, the summary might differ from the “Arzneimittelinformation / Information sur le médicament” approved and published in Switzerland, e.g. by mentioning risks occurring in populations or indications not included in the Swiss authorization.
Please note that the reference document which is valid and relevant for the effective and safe use of “Präparatename” in Switzerland is the “Arzneimittelinformation / Information sur le médicament” (see www.swissmedic.ch) approved and authorized by Swissmedic. “Name of the marketing authorisation holder” is fully responsible for the accuracy and correctness of the content of the published summary RMP of “Präparatename”.

The RMP Summary will be checked by Swissmedic and, provided there is no cause for complaint, published on the Swissmedic website with a link to AIPS. No separate correspondence is conducted with the marketing authorisation holder. In the event of a complaint, the marketing authorisation holder will be contacted.

Updates to RMP summaries:

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If RMP Updates are required during the life cycle of the medicinal product (see sections 6 and 7), the RMP Summary should also be updated. The above-mentioned requirements relating to form and content apply to these updates. The RMP Updates should be submitted together with the PSUR/PBRERs.

Enquiries

Please submit in writing to riskmanagement@swissmedic.ch

Change history

Version	Valid and binding as of	Description, comments	Author's initials
3.0	**15.07.2019**	**Specification of the delivery type for submissions via eCTD (Chapter 10)**	**dst**
2.0	**01.04.2019**	**Specification of the submission via Swissmedic portal: delivery type „communication" (Chapter 10)**	**dst**
1.0	**01.01.2019**	**Implementation of TPO4**	**dst**

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