Australian Government
Department of Health
Therapeutic Goods Administration

RMP requirements

When and why is an RMP required

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TGA/Industry RMP workshop
Canberra, 12 March 2015

TGA Health Safety Regulation

Guidelines about RMPs

- Risk Management Plan Question & Answers document (RMP Q&As)
- Mandatory requirements for an effective application

RMP format requirements

- TGA follows EMA RMP guidelines
- RMP submitted should be the most recent EU-RMP and Australian Specific Annex (ASA)
- Core RMP with ASA or Australian RMP **only** acceptable if no EU-RMP exists (has to be in the EU format)

Recent review of RMP guidelines

- RMP Q&As revised and updated following consultation with ARCS RMP EWG, Medicines Australia and GMiA
- Most recent RMP Q&As version March 2015
- No substantial changes to previous version June 2012

- Greater clarity
- Includes ASA template

- Requirement to submit RMP for “Change to strength, dosage form or route of administration” and “low risk changes to indication” reviewed on a case by case basis

Is a RMP required?

- Review of RMP Q&A document
- For generic applications: Review AusPAR to determine if innovator has additional risk-minimisation activities
- If uncertain regarding requirements contact RMP coordinator
- Provide all relevant information for such a request including
  a.) Trade name/generic name,
  b.) indication (for generics: identical to innovator?),
  c.) strength, dose form and route of administration (for generics: identical to innovator?)
- Request should be made well ahead of PPF lodgement

A RMP is always required for

- A New Chemical/Biological Entity
- Generic medicines where innovator product has additional risk-minimisation activities
- Higher risk (Class 3 and 4) biologicals
- Biosimilars
- Vaccines

A RMP is normally required (but case by case basis consideration)

- Change to indication
  (significantly more patients?, likely to include paediatric patients?, change of prescribers?)

- Change to strength, dosage form or route of administration
  (new route of administration has inherently higher risk e.g. oral tablets vs *iv* injection)

- Combination of active ingredients
  (history of combination use in clinical practice?)

→Requirement to submit a RMP will be reviewed at the PPF stage by the RMP team
- Decrease in RMPs and consequently PSURs to be submitted
- Routine pharmacovigilance activities maintained

A RMP may be required

- Request for an RMP by other sections of the TGA
- Request for an RMP by the Delegate

Examples

Is an RMP required?

Extension of indication

Example 1:

An anticoagulant is approved for treatment of DVT/PE.

The sponsor plans to submit an application to extend the indication to include prevention of DVT/PE.

Is an RMP required for such an application?

- RMP required

- Such an extension of indication would extend into a patient population with different characteristics to patient population previously approved
- Long term treatment vs short term treatment and different safety concerns associated with that
- Different prescribers will prescribe the product (e.g. emergency physicians vs. GPs)
- RMP will need to be adapted to new patient population

Extension of indication

Example 2:

Imaginitis is a rare disease and is caused by three distinct genotypes. Each genotype causes slightly different disease characteristics. Genotype A causes the most severe disease and occurs most frequently. Genotype B and C are very rare and the disease is less severe. All these patients are managed by the same specialised physician group. A product to treat Imaginitis caused by Genotype A has been on the market for some years and the safety profile of the drug is considered to be well characterised.

The sponsor seeks to extend the indication to treat patients with genotype B and C.

Is a RMP required for such an application?

- A RMP may not be required
- Such an extension of indication does extend into a different patient population but the patient populations are very similar and are managed by the same specialised physicians.
- Physicians are familiar with the safety profile of the product.

Change in strength

Example 3:

An innovator product is registered as a solution for *iv* injection at a concentration of 1mg/ml in three dose strengths of 1mg, 2mg and 3mg. The product is supplied in glass vials and needs to be drawn into a syringe for administration.

The sponsor proposes to register a solution with a dose strength of 2mg with a concentration of 2mg/ml.

Is a RMP required for such an application?

- RMP required

- RMP would be required as there is an increased possibility of medication error given the concentration is twice as potent as the already approved product.

Change in strength

Example 4:

An innovator product is registered as a solution for *iv* injection at a concentration of 2.5mg/ml in two dose strengths of 5mg and 10mg. The product is supplied in glass vials and needs to be drawn into a syringe for administration.

The sponsor proposes to register a lower dose of 2.5mg with the same concentration of 2.5mg/ml.

Is a RMP required for such an application?

- An RMP may not be required
- The concentration of the solution remains unchanged. Potential for medication error considered low.

Combination of active ingredients

Example 5:

Two active ingredients with a known and favourable safety profile have been registered for a number of years. Both products are frequently used together in clinical practice.

The sponsor seeks to register a combination of these two products.

Is an RMP required for such an application?

- A RMP may not be required
- Physicians are experienced in prescribing and monitoring the effects of this combination therapy
- Post-market safety data available for the combination use of these two products

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Hand out

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Extension of indication

Example 1:

An anticoagulant is approved for treatment of DVT/PE.

The sponsor plans to submit an application to extend the indication to include prevention of DVT/PE.

Is an RMP required for such an application?

Is an RMP required ◯ Yes ◯ No

Provide some rationale for your decision

Is an RMP required?

Extension of indication

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Example 2:

Imaginitis is a rare disease and is caused by three distinct genotypes. Each genotype causes slightly different disease characteristics. Genotype A causes the most severe disease and occurs most frequently. Genotype B and C are very rare and the disease is less severe. All these patients are managed by the same specialised physician group. A product to treat Imaginitis caused by Genotype A has been on the market for some years and the safety profile of the drug is considered to be well characterised.

The sponsor seeks to extend the indication to treat patients with genotype B and C.

Is a RMP required for such an application?

Is an RMP required ◯ Yes ◯ No

Provide some rationale for your decision

Is an RMP required?

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Change in strength

Example 3:

An innovator product is registered as a solution for *iv* injection at a concentration of 1mg/ml in three dose strengths of 1mg, 2mg and 3mg. The product is supplied in glass vials and needs to be drawn into a syringe for administration.

The sponsor proposes to register a solution with a dose strength of 2mg with a concentration of 2mg/ml.

Is a RMP required for such an application?

Is an RMP required ◯ Yes ◯ No

Provide some rationale for your decision

Is an RMP required?

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Change in strength

Example 4:

An innovator product is registered as a solution for *iv* injection at a concentration of 2.5mg/ml in two dose strengths of 5mg and 10mg. The product is supplied in glass vials and needs to be drawn into a syringe for administration.

The sponsor proposes to register a lower dose of 2.5mg with the same concentration of 2.5mg/ml.

Is a RMP required for such an application?

Is an RMP required ◯ Yes ◯ No

Provide some rationale for your decision

Is an RMP required?

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Combination of active ingredient

Example 5:

Two active ingredients with a known and favourable safety profile have been registered for a number of years. Both products are frequently used in combination in clinical practice.

The sponsor seeks to register a combination of these two products.

Is an RMP required for such an application?

Is an RMP required ◯ Yes ◯ No

Provide some rationale for your decision

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