ANNEX

to Decision of the
Eurasian Economic Commission's
Council
No. _____ dated _____ ___, 20___

Amendments
to Decision No. 83 of the Eurasian Economic Commission's Council
dated November 3, 2016

1. Paragraph 1 of Decision No. 83 of the Eurasian Economic Commission dated November 3, 2016 "On the Approval of Rules for Pharmaceutical Inspections" shall be amended as follows:

"1. To approve the following documents attached:

Rules for Pharmaceutical Manufacturing Inspections;

Requirements for the Rules and Procedure for Inspection of the Pharmacovigilance System of the Marketing Authorisation Holder."

2. To add "Manufacturing" to the name of the Rules for Pharmaceutical Inspections approved by the said Decision."

3. To supplement with the Requirements for the Rules and Procedure for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder as follows:

"APPROVED

by Decision No. _____ of the
Eurasian Economic Commission's
Council,
dated _____ ____, _____

REQUIREMENTS
for the Rules and Procedure for Inspection of the Pharmacovigilance System of the Marketing Authorisation Holder

1. General provisions

Any requirements for organizing and functioning of a pharmacovigilance system of marketing authorization holders shall be determined by Good Pharmacovigilance Practice of the Eurasian Economic Union, approved by Decision No. 87 of the Eurasian Economic Commission's Council dated November 3, 2016 (hereinafter referred to as Good Pharmacovigilance Practice).

In order to confirm compliance of marketing authorization holders with the pharmacovigilance requirements and obligations, the regulatory authorities competent for performance and performing the pharmacovigilance functions of the Member States (expert organizations) of the Eurasian Economic Union (hereinafter referred to as the regulatory authorities of the Member States) shall perform pharmacovigilance inspections of marketing authorization holders and other organizations engaged by the marketing authorization holders in performance of pharmacovigilance obligations. In accordance with the provisions of the Agreement on Common Principles and Rules for Circulation of Medicinal Products within the Eurasian Economic Union, dated May 29, 2014, the regulatory authorities of the Member States shall ensure that the holders of marketing authorizations for the medicines in circulation within the Member States of the Eurasian Economic Union (hereinafter referred to as the Member States, Union) fulfill their pharmacovigilance obligations in accordance with the requirements of Good Pharmacovigilance Practice. The rules of Good Pharmacovigilance Practice determine the obligations of a regulatory authority of the Member State,

related to pharmacovigilance inspections in order to confirm compliance of marketing authorization holders with their pharmacovigilance obligations. Rules of marketing authorization and expert assessment of medicinal products for human use approved by Decision No. 78 of the Eurasian Economic Commission's Council dated November 3, 2016, determine the requirements for conformity assessment of the pharmacovigilance system of a marketing authorization holder at the stage of examination of the marketing authorization application for a medicinal product and stipulate the conditions for the initiation of a pharmacovigilance system inspection at the pre-marketing stage. Chapter IV of Good Pharmacovigilance Practice determines the goals and types of pharmacovigilance system inspections, inspections planning procedure based on assessment of potential risks of non-fulfillment of pharmacovigilance obligations, pharmacovigilance system elements to be inspected, general requirements for the inspection process, actions and sanctions of regulatory authorities, requirements for the qualification and training of inspectors, procedure of cooperation of regulatory authorities of the Member States for exchange of information related to inspections of pharmacovigilance systems of marketing authorization holders.

This document, in addition to Chapter IV of Good Pharmacovigilance Practice, determines the requirements for the marketing authorization holder's pharmacovigilance system inspection procedure, including the requirements for inspection preparation and performance, for preparation of a pharmacovigilance system inspection report, and exchange of data on the pharmacovigilance system inspection results.

Inspectors assigned by the regulatory authorities of the Member State to the inspection of the marketing authorization holder's pharmacovigilance system shall be responsible for the proper pharmacovigilance system inspection and preparation of an inspection report.

2. Terms and definitions

The main terms in these Requirements shall have the meanings determined in the Agreement on Common Principles and Rules for Circulation of Medicinal Products within the Eurasian Economic Union dated December 23, 2014 and Good Pharmacovigilance Practice.

3. Marketing authorization holder's pharmacovigilance system inspection initiation procedure

3.1. Pharmacovigilance system inspection initiation procedure

The conditions and procedure for organization of scheduled and unscheduled pharmacovigilance system inspections for compliance with the requirements of Good Pharmacovigilance Practice are determined by Good Pharmacovigilance Practice, subject to the requirements of Section 3, Chapter IV of the mentioned Practice. The regulatory authorities of the Member States shall organize inspections of marketing authorization holders, ensuring interaction at the planning and inspection stages to minimize duplication of work performed and resource optimization in accordance with Section 11, Chapter IV of Good Pharmacovigilance Practice.

The inspection initiation procedure includes actions related to organization of a pharmacovigilance system inspection after determination of the marketing authorization holder or a third party with a pharmacovigilance system to be inspected. These actions are aimed at planning a future inspection and include but not limited to the following:

a) determination of the inspection team members;

b) announcement of the pharmacovigilance system inspection of the party under inspection;

c) taking the required logistics and organizational measures;

d) determination of the inspection scope, plan, time periods and sites.

These activities shall be performed by the regulatory authority of the Member State, responsible for the inspection, and, if required, include interaction with the party under inspection. In the case of an inspection at the request of a regulatory authority of another Member State, or an expert authority of the Member States, actions at this stage include, if required, interaction with the authority that initiated the inspection.

3.2. Determination of the inspection team members

Appointment and qualification of inspectors to conduct a pharmacovigilance system inspection are determined by the requirements established in Section 9, Chapter IV of Good Pharmacovigilance Practice and the inspection team formation procedures established in the Member States. Inspectors shall be specialists of a regulatory authority competent to perform pharmacovigilance functions or persons appointed in accordance with the legislation of the Member State. Inspection teams may include inspectors from two or more regulatory authorities of the Member States.

Upon formation of an inspection team, the competencies and the inspection period shall be aimed at ensuring achievement of the inspection goals related to assessment of compliance of the marketing authorization holder's pharmacovigilance system with the requirements of Good Pharmacovigilance Practice.

3.3. Announcement of the pharmacovigilance system inspection

The regulatory authority of the Member State is entitled to inspect marketing authorization holder's pharmacovigilance systems at any time in accordance with the inspection types and goals. In exceptional cases, the inspections can be conducted without preliminary notification. This approach

can be considered when it is required to inspect a pharmacovigilance system in case of revealing an initiating factor and when an immediate assessment of an important risk for public health and pharmacovigilance system functioning is needed, or when a notification may threaten achievement of the inspection goals.

The routine inspection procedure includes preliminary notification of the marketing authorization holder or a third party on the intention of the regulatory authority of the Member State to inspect the pharmacovigilance system. The period from the notification to the inspection start shall be sufficient for the organization under inspection to take all organizational and logistics measures and prepare relevant data; however, it shall not be unreasonably long. When initiating scheduled inspection, a recommended preliminary notification period is at least 45 calendar days before the scheduled inspection date. In case of initiation of an unscheduled inspection, the notification period can be reduced, subject to the initiating factor and risk related to improper fulfillment of pharmacovigilance obligations by the marketing authorization holder. The regulatory authorities of the Member States can use other approaches to determination of the time period from the notification date to the inspection date, if it necessary and reasonable.

A pharmacovigilance system inspection notification shall be prepared by a regulatory authority of the Member State using the form according to Annex 1 hereof. Information in the notification includes names of the inspectors, name of the marketing authorization holder, inspection goals and objects (for example, general assessment of the pharmacovigilance system or an assessment of specific pharmaceuticals, pre-authorization inspection, inspection in case of revealing an initiating factor), and a suggested inspection address. Additional information includes the number of the valid

version of a pharmacovigilance system master file and special conditions for authorization of medicinal products to be assessed.

A written notification shall be sent to a qualified person responsible for pharmacovigilance in accordance with the contact details provided by the marketing authorization holder, including via email. The notification includes a condition of mandatory confirmation of a possibility to conduct an inspection in the planned inspection site, within the scheduled period of time and provision of access to all required documents and databases. If the regulatory authority of the Member State sends a notification to the marketing authorization holder through a contact person, such contact person shall inform the relevant marketing authorization holder's qualified person responsible for pharmacovigilance. The organization under inspection shall send the regulatory authority a written consent to the inspection or a request to conduct the inspection within the period specified in the notification (if it is stipulated by the legislation of the Member State). If the organization under inspection cannot accept an inspection within the proposed period, the regulatory authority and the facility under inspection shall agree the acceptable inspection dates, subject to any factors based on which the inspection has been initiated, and risks associated with the change of the inspection dates.

At least 30 calendar days before the planned inspection date, the organization under inspection shall send a written request, including via email, to provide information required for the pharmacovigilance system inspection to the qualified person responsible for pharmacovigilance in accordance with the contact details provided by the marketing authorization holder. If the regulatory authority of the Member State sends the request to the marketing authorization holder through a contact person, such contact person shall inform the relevant marketing authorization holder's qualified

person responsible for pharmacovigilance. Any types of documentation required shall be determined by the type of inspection (general inspection of the pharmacovigilance system or inspection of individual medicinal products). Anyway, a valid version of the pharmacovigilance system master file is required. Additionally, documents confirming the functioning parameters and the results of the pharmacovigilance system assessment or characterizing specific aspects of the system operation, indicating the reporting periods may be requested. The request shall include a period of time within which the requested documents are to be submitted and the method of their submission.

If a pharmacovigilance system inspection is required on the territory of another Member State, the regulatory authority of the relevant Member State represented by its pharmacovigilance inspectorate shall be informed about the required inspection of the marketing authorization holder or a third party on its territory. In these cases, a joint inspection with the participation of inspectors of the regulatory authorities of two Member States, or an inspection by inspectors of the Member State on the territory of which the marketing authorization holder or a third party with the pharmacovigilance system to be inspected is located may be considered.

3.4. Preparation for the pharmacovigilance system inspection

3.4.1. When preparing for a pharmacovigilance system inspection, the inspectors of the regulatory authority assigned thereto shall familiarize themselves with any documents and data characterizing the pharmacovigilance system of the marketing authorization holder, submitted by the marketing authorization holder upon request or available to the regulatory authority, including:

data and documents submitted upon request by the inspected party in accordance with paragraph 3.3 of the Requirements;

a list of previously performed inspections of the marketing authorization holder's pharmacovigilance system, including inspections conducted within 3 years by regulatory authorities of other countries (if any), and information on critical and significant deficiencies (non-conformities) of the marketing authorization holder's pharmacovigilance system, identified during such inspections;

a list of other good practice inspections previously conducted, including inspections by the regulatory authorities of the Member States, indicating the inspection results in case of any critical non-conformities;

information on the performance indicators of the marketing authorization holder's pharmacovigilance system, available to the regulatory authority, such as timeliness of reporting adverse reactions and drug safety data, data quality assessment results, and fulfillment of pharmacovigilance obligations by the marketing authorization holder.

3.4.2. The inspection scope (pharmacovigilance system components to be inspected) is determined based on the inspection type and goals, results of a preliminary assessment of documents characterizing the pharmacovigilance system of the marketing authorization holder, and the requirements of Section 5, Chapter IV of Good Pharmacovigilance Practice. The inspection scope is documented by the regulatory authority in accordance with the procedural documents of the regulatory authority, and is presented in the inspection report.

When determining the inspection scope, the scope and results of previous pharmacovigilance system inspections by the regulatory authorities of the Member States shall be taken into account. When it seems reasonable, double inspection of pharmacovigilance system components previously

assessed during previous inspections is not required, provided that they comply with the requirements of Good Pharmacovigilance Practice. If a pharmacovigilance system component that was previously inspected by the regulatory authorities of the Member States is re-included in the inspection scope, a deeper inspection of one or more aspects of the system component is performed.

3.4.3 Preparation for the inspection includes the development of an inspection program for the marketing authorization holder's pharmacovigilance system for compliance with the requirements of Good Pharmacovigilance Practice (hereinafter referred to as the inspection program). The inspection program includes the following sections:

goals and scope of the pharmacovigilance system inspection;

allocation of functions and responsibilities among the inspectors of the inspection team;

date and place of the pharmacovigilance system inspection;

indication of the functional divisions to be inspected;

a list of documents, digital devices and tools to which access should be granted and which will be evaluated during the inspection;

planned inspection time for individual components of the system according to the inspection program;

final meeting agenda.

The relevant sections of the inspection program (for example, an indication of functional divisions to be inspected), and the list of documents that are included in the inspection assessment, shall be submitted in writing to the qualified person responsible for pharmacovigilance in accordance with the contact details provided by the marketing authorisation holder, including via e-mail, at least 10 business days before the start of the inspection, in order to ensure access to the required employees and documentation. If the

regulatory authority of the Member State sends a request through a contact person, the contact person shall inform the relevant qualified person responsible for pharmacovigilance of the marketing authorisation holder.

3.4.4. Other logistics and general organisational measures.

Ensure that the inspection site chosen is optimal for achieving the objectives of the pharmacovigilance system inspection. If it is necessary to change the planned inspection site or add an additional site to the inspection program, a corresponding new notification shall be prepared and sent to the inspected organisation in accordance with paragraph 3.3 of the Requirements at least 45 calendar days before the scheduled inspection date in another site.

If during the inspection a teleconference with experts and/or employees of the marketing authorisation holder outside the inspection site is planned, the inspected organisation shall be notified in advance.

If, by agreement with the regulatory authority that initiated the pharmacovigilance system inspection, it is decided to conduct an inspection using remote cooperation tools, the inspected organisation should be notified of the need to take appropriate organisational measures. The inspected organisation shall provide a description of the electronic communication systems in place to enable such an inspection. The electronic and technical means through which the interaction will be provided should be assessed and ensured, and, if necessary, they should be preliminary tested.

4. Inspection procedures of the marketing authorization holder's pharmacovigilance system

The pharmacovigilance system is inspected according to an inspection program. The inspection program may be supplemented during the inspection (for example, in order to ensure achievement of inspection goals). All changes to the inspection program shall be documented.

During the inspection, pharmacovigilance system data are obtained through:

assessment of relevant documentation;

assessment of computerized systems;

interviewing the employees;

assessment of internal and external correspondence (for example, registers, correspondence with regulatory authorities, etc.).

Refusal to provide records or retention of documentation that the inspector has the right to request for the assessment are documented in the inspection report. In future such non-compliance with the requirements to access to necessary data and documentation shall be discussed with a regulatory authority that initiated the inspection in order to determine further actions and solutions for the consequences.

When working with documents and information collected during the inspection, it is required to comply with any personal data protection and confidentiality regulations.

4.1. Inspection beginning

Before any inspection, an inspection opening meeting of the inspection team and representatives of the inspected organization shall be held. A lead inspector of the inspection team shall be the chairman of the meeting.

The inspection opening meeting goal is:

presentation of an inspection team;

clarification based on which paragraphs of the legislation, regulating the pharmacovigilance system inspection, the inspection has been initiated;

provision of information related to the inspection scope and tasks;

discussion of logistics aspects, time frames and other organizational issues included in the inspection program;

presentation of employees of the marketing authorization holder, participating in the inspection;

an opportunity to present a pharmacovigilance system review by the inspected party;

discussion with the representatives of the marketing authorization holder of supposed difficulties associated with the inspection, if any.

4.2. Assessment of documentation, processes, and systems

Documentation and processes to be assessed during inspection depend on the inspection type, scope and area. In case of an inspection after identification of an initiating factor, the inspection shall be conducted in relation to the system components of concern. When conducting an on-site inspection at the place of local pharmacovigilance activities, the inspection scope may differ from the inspection scope at the place of the main pharmacovigilance activities.

The list of components of the pharmacovigilance system to be assessed during an inspection is provided in Section B of Annex 2 to these Requirements. This list is not exhaustive and can be supplemented if needed to ensure the inspection scope required to achieve the goals of the pharmacovigilance system inspection.

4.3. Observations and inspection results

All observations and inspection results shall be documented. Documents or records containing or demonstrating non-conformities shall be copied, if required.

4. Inspection closing

After the end of the inspection, a final meeting with the inspected organization shall be held. A qualified person responsible for pharmacovigilance should participate in the final meeting. The final meeting is held to:

explain preliminary classification of identified non-conformities;

explain the procedure and the period of time to provide an inspection report and a written response of the marketing authorization holder, and to take subsequent measures;

present summarized information on the non-conformities identified, while ensuring unambiguous interpretation of the inspection results;

provide the inspected organization with an opportunity to correct misinterpretations or misunderstandings of the non-conformities identified.

Inspection includes a visit to one or more sites of the inspected activities. In these cases, if it is reasonable, an inspection closing meeting can be held in each pharmacovigilance activity site.

An inspection may be ended early under exceptional circumstances. In this case, any deviation from the inspection program and the reason for early completion shall be documented in the inspection report.

5. Report preparation procedure on the inspection results of marketing authorization holder's pharmacovigilance system.

5.1. Inspection report preparation procedure

It is required to prepare an inspection report for each inspection site. If, at the request of a regulatory authority of the Member State, several pharmacovigilance activity sites are inspected, the inspection report is supplemented with an inspection review containing only critical and significant deficiencies (non-conformities) at each pharmacovigilance activity inspection site with an assessment of deficiencies (non-conformities) impact on the pharmacovigilance system and recommendations on any measures to be taken. If, during an inspection and preparation of an inspection report, it is required to immediately consider critical deficiencies (non-conformities), inspectors are entitled to make a decision to inform the

regulatory authority before preparation and distribution of the inspection report.

In certain cases, it is allowed to prepare one inspection report for two or more inspected sites, including, if those are individual inspections. This approach is reasonable, for example, when results of two inspections should be combined in one report. In case of such a decision, the lead inspector shall inform the regulatory authority and record the decision in the inspection report.

An inspection report shall be prepared by inspection team members and, as a rule, coordinated by the lead inspector in accordance with Annex 2. This form may be amended, subject to the local preparation procedure for an inspection report of the regulatory authority of the Member State. An inspection report should be agreed upon and signed by all members of the inspection team.

An inspection report should be prepared within 30 business days after the end of an inspection. When preparing an inspection report based on the inspection results of several sites, the start date of the report preparation period is the last day of the last inspection. An inspectorate shall send an inspection report and a cover letter (in electronic form) to the marketing authorization holder before the final completion of the report with a request to provide comments (for example, on significant mistakes, different opinions, and corrective and preventive actions). The marketing authorization holder shall provide a corrective and preventive action plan within 30 business days after receipt of an inspection report. If a marketing authorization holder does not respond within the fixed time, the absence of the response shall be documented in the inspection report.

The inspectors shall consider a marketing authorization holder's response, including the assessment of the impact of the submitted comments on the inspection results, and the compliance of the proposed corrective and preventive actions. This assessment shall be included in the final inspection report version, which is prepared within 10 business days after obtaining a marketing authorization holder's response. The final version shall be signed by the lead inspector and inspection team members in accordance with the legislation of the Member State and standard operating procedures of the regulatory authority of the Member State. In case of failure to agree any corrective and preventive actions or their deadlines, subsequent additional procedures shall be determined and sent to the marketing authorization holder in writing.

If any proposed corrective and preventive actions of the marketing authorization holder can be agreed, the inspection can be completed.

An inspection report shall be submitted to the regulatory authority that initiated the pharmacovigilance system inspection of the marketing authorization holder. Template of a data exchange form for any pharmacovigilance system inspection results is provided in Annex 3 hereto.

5.2. Requirements to the inspection report contents

Template of an inspection report based on the pharmacovigilance system inspection results, is provided in Annex 1 hereto.

The classification of deficiencies (non-conformities) identified based on the pharmacovigilance system inspection results is provided in Annex 4 hereto. For each identified deficiency (non-conformity), the section of regulatory requirements in which this deficiency (non-conformity) has been identified shall be indicated.

An inspection report includes inspectors' comments (if it is reasonable).

An inspection report shall also include a general conclusion regarding compliance of the pharmacovigilance system as a whole, or in terms of the inspected pharmacovigilance system components, with the relevant regulatory pharmacovigilance system requirements of the Member States.

5.2.1. Language of the inspection report.

An inspection report shall be made in Russian.

5.2.2.Inspection report contents.

An inspection report shall contain an assessment of the significance of all identified non-conformities and a conclusion on critical and significant non-conformities. An inspection report shall also contain a conclusion regarding compliance of the pharmacovigilance system with the requirements of Good Pharmacovigilance Practice, requirements of the Member States for the pharmacovigilance system of marketing authorization holders and a risk assessment of any identified non-conformities (if any) for public health.

5.2.3.Assessment of an inspection report

An inspection report shall be assessed by the relevant department of the regulatory authority that initiated the inspection, within 5 calendar days and for compliance with:

requirements for pharmacovigilance procedures established by Good Pharmacovigilance Practice and the legislation of the Member States;

requirements of a pharmacovigilance system inspection of the marketing authorization holder;

the request of the regulatory authority to inspect the pharmacovigilance system of the marketing authorization holder;

the sections of the legislation referenced to when identifying deficiencies (non-conformities) of the pharmacovigilance system.

In case of non-compliance with these requirements, the lead inspector shall be notified in writing of the need to make appropriate corrections or

take other measures within a specific period to eliminate such non-compliance.

Within the established period, the lead inspector shall submit a correction of the inspection report or proposals for other measures, or, if it is not possible, an explanation of the reasons for the non-conformities in the inspection report or the inspection procedure. A decision on possible approval of any submitted report correction, other corrective actions, or the inspector's explanation of the reasons for any non-conformities, and the development of further actions to resolve the inspection report acceptance issue, shall be made by the regulatory authority that initiated the pharmacovigilance system inspection of the marketing authorization holder.

The marketing authorization holder shall be informed if an agreed corrective and preventive action plan is revised.

5.2.4. Inspection review.

The lead inspector shall prepare a review of non-conformities based on the results of the pharmacovigilance system inspection of the marketing authorization holder (hereinafter referred to as the inspection review), summarizing, if applicable, the inspection results of several pharmacovigilance activity sites, including a conclusion regarding the potential impact of all identified non-conformities on the pharmacovigilance system and recommendations on measures to be taken (for example, corrective and preventive action, re-inspection, monitoring of compliance, for instance, in terms of quality and (or) legal requirements for the work completion time, etc.) An inspection review shall be made in Russian and, if determined by the legislation of the Member State, can be additionally prepared in the language of the Member State. Individual inspection reports for certain pharmacovigilance activity sites shall be attached to the inspection review as

annexes. For an example of an inspection review refer to Annex 5 hereto. An inspection review shall be submitted to the regulatory authority within 80 business days after the completion of the last inspection included in the review.

Annex 1

to the Requirements for the Rules and Procedures for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder

Form of a
marketing authorization holder notification
of a pharmacovigilance system inspection

Regulatory authority of the Member State of the Eurasian Economic Union

_____

(name)

informs you about its decision to conduct a/an (pre-authorization, scheduled, unscheduled) inspection of the pharmacovigilance system of the marketing authorization holder

_____

(name)

for compliance with the Eurasian Economic Union's Good Pharmacovigilance Practice.

The pharmacovigilance system inspection is scheduled in accordance with paragraph _____ of the Eurasian Economic Union's Good Pharmacovigilance Practice.

The goal of the pharmacovigilance system inspection is

_____

_____

The following facilities shall be inspected for compliance with the Eurasian Economic Union's Good Pharmacovigilance Practice:

_____

_____

located at:

_____

Scheduled dates of the pharmacovigilance system inspection: _____

The inspection team includes inspectors of the regulatory authority (name)

_____ (Lead Inspector)

_____

_____

Confirmation of the pharmacovigilance system inspection dates shall be sent to the regulatory authority (name) at: _____

until _____

Annex 2

to the Requirements for the Rules and Procedures for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder

REPORT
on the pharmacovigilance system inspection of the marketing authorization holder

The cover page includes the following information:

Pharmacovigilance system name: Organization name:
Pharmacovigilance system master file:

Pharmacovigilance system inspection No.:

Report version No.:
Report date:

Section A. Administrative information.

Inspection type:	
Name and address of the pharmacovigilance activity site to be inspected:	
Contact person for inspection issues:	Unless the same as the qualified person responsible for pharmacovigilance
Inspection dates:	
Lead inspector:	
Inspector responsible for preparation of the report:	
Inspectors of the inspection team and experts:	
Previous inspections of the pharmacovigilance system of the marketing authorization holder: Dates and regulatory authorities	

Inspection goal:	
Names of medicinal products used as examples for pharmacovigilance system assessment:	
Full name and location of the qualified person responsible for pharmacovigilance: Full name and location of the qualified person responsible for pharmacovigilance on the territory of the Member States of the Eurasian Economic Union (if any):	
Date of initial submission of an inspection report to the marketing authorization holder:	
Period for submission of a response by the marketing authorization holder:	
Date of submission of a final inspection report version:	
The report was prepared by:	Full name: Position:

Section B. General information

1.Inspection basis and scope.

A basis for the pharmacovigilance system inspection in general or inspection of individual medicinal products, or inspection integrating both types of inspection shall be indicated. The inspection can be scheduled or unscheduled. In case of an unscheduled inspection (including a pre-authorization inspection of the pharmacovigilance system), indicate the basis or initiating factors for the inspection.

2. Legal and regulatory framework

Indicate legal and regulatory framework, based on which the pharmacovigilance system inspection of the marketing authorization holder was conducted. The pharmacovigilance system inspection is based on the requirements of the following regulatory requirements:

Good Manufacturing Practice of the Eurasian Economic Union;

Requirements for the Rules and Procedure for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder.

3. General information on the inspection

Short description of the inspection process related to organization of pharmacovigilance system and all significant changes and measures taken after the last inspection is provided.

It shall be indicated that the inspection is performed in accordance with an inspection program is provided; in case of any corrections in or amendments to the program, those shall be indicated as well.

Information regarding the date and place of the inspection closing meeting to discuss the inspection results, including deficiencies (non-conformities), if any, and persons who attended the meeting, shall be provided.

A short description of the pharmacovigilance system of the marketing authorization holder is provided, indicating any changes made within the period from the last inspection (if any).

Section C. Review of inspected pharmacovigilance system components

The inspected pharmacovigilance system components shall be listed.

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
1. Qualified person responsible for pharmacovigilance					
Qualification					

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
Official duties					
Pharmacovigilance system control					
Reserve processes and delegation of responsibilities					
Other					
2. Pharmacovigilance system master file					
Format					
Contents					
Maintenance and submission					
Other					
3. Standard procedures (standard operating procedures (SOPs), guidelines, etc.)					
Procedures					
Guidelines					
SOP training processes					
Other					
4.Contracts, agreements					
Contracts					
Agreements					
Other					
5. Periodic safety update report (PSUR)					
Planning of a PSUR					
Format and contents					
Quality control of a PSUR					

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
Timeliness of submission					
Remarks of the expert report on PSUR assessment					
Other					
6. Risk management system					
Format and contents of a risk management plan					
Additional pharmacovigilance actions					
Additional risk minimization measures					
Other					
7. Organization of work with adverse reaction reports					
Receiving individual case safety reports (ICSR) from all sources, maintaining common databases					
Assessment of severity, causal link, and foreseeability					
Medical assessment and MedDRA coding					
Quality control process					
ICSR submission process					
Process of receiving additional ICSR information					
Reporting adverse reactions (ARs) during non-interventional studies and other non-interventional programs					

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
Systematic medical literature review					
Other					
8. Computerized systems and databases used by the pharmacovigilance system					
Process to ensure operation of the computerized systems and databases					
Confirmation of compliance with goals					
Backup and recovery guarantee in case of damage					
Database transfer process					
Other					
9.Clinical trials					
Reporting suspected unexpected serious adverse reactions					
Consistency of the Investigator's Brochure and Summaries of Product Characteristics (SmPC) for authorized medicinal products					
Reconciliation of serious adverse events reported during clinical trials with a pharmacovigilance database					
Other					
10. Signal management					
Safety information sources included in the signal detection procedure (information from all					

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
relevant sources is included)					
Frequency of data review					
Aggregated data review					
Signal processing					
Timely updates of SmPCs and package leaflets					
Other					
11. Quality of medicinal products					
Review of quality deviations data and trend analysis					
Consistency of data on inadequate quality complaints and data from safety databases					
Other					
12. Pharmacovigilance system data archiving					
Records management					
Assessment of archiving tools					
Other					
13. Pharmacovigilance system quality management system					
Pharmacovigilance system quality system and management of compliance with legal and regulatory requirements of the Eurasian Economic Union					
Tools and equipment for					

Pharmacovigilance system component name	Component assessment degree* (yes)	Component assessment degree** (no)	Non-conformities (yes/no)		Remarks
			critical	significant	
pharmacovigilance activities					
Audit (internal and external) of the pharmacovigilance system and corrective and preventive action procedure					
Other					
14. Pharmacovigilance training					
Introductory and subsequent training					
Training assessment					
Keeping training records					
Other					
15.Regulatory issues and interaction with the regulatory authority					
Development and update of information on the medicinal product					
Responses to regulatory authority's requests					
Other					
16. Medical information					
Reconciliation of medical information requests and the safety database					
17. Additional components (if any)					

* (Yes) means assessment of this pharmacovigilance system component at a level, which, in the inspector's opinion, is sufficient for determination of compliance and identification of deficiencies (non-conformities);

** (No) means that this component was not assessed during the inspection due to the absence of necessity based on the inspection goals and scope or request, according to which the inspection was conducted.

Section D. Identified deficiencies (non-conformities)

D.1. Classification of deficiencies (non-conformities) of the pharmacovigilance system

A critical deficiency (non-conformity) of the pharmacovigilance system (CD) is a fundamental deficiency (non-conformity) in one or several processes or performed procedures of the pharmacovigilance system, which negatively affects the entire pharmacovigilance system and (or) the rights, safety, and well-being of patients, and (or) poses a potential threat to public health and (or) is a serious violation of the requirements of the legislation of the Member States of the Eurasian Economic Union (hereinafter referred to as the Member States, Union) and international treaties, and acts constituting the law of the Union.

A significant deficiency (non-conformity) of the pharmacovigilance system (SD) is an important deficiency (non-conformity) of one or several processes or performed procedures of the pharmacovigilance system, or a fundamental deficiency of any part of one or several processes or performed pharmacovigilance procedures, which adversely affects the entire process and (or) can potentially affect the rights, safety and well-being of patients, and (or) may pose a potential threat to public health and (or) is a violation of any legal requirements of the Member States, international treaties, and acts constituting the law of the Union, which, however, is not considered serious.

An insignificant deficiency (non-conformity) of the pharmacovigilance system (ID) is a deficiency (non-conformity) of any component of one or more processes or performed procedures of the pharmacovigilance system, which, as expected, cannot adversely affect the entire pharmacovigilance system or process and (or) the rights, safety, and well-being of patients.

Remarks: observations shall be accompanied with proposals for system quality improvement or deviation reduction.

Information in the inspection report shall be based on data and information actually obtained by inspectors during the inspection of the pharmacovigilance activity site. The inspection report shall not include any suggestions regarding satisfactory state of documentation, equipment, tools, employees and procedures that have not been assessed during the inspection.

D.2. Guidelines for responding to deficiencies (non-conformities) identified during the inspection

The response of the inspected party to any deficiencies (non-conformities) shall be short, meaningful and include proposed actions to manage the identified deficiencies (non-conformities) and establish the causes of the identified deficiencies (non-conformities).

Additionally, it is required to determine any measures to identify and prevent other potential similar deficiencies (non-conformities) of the pharmacovigilance system.

The response shall be added directly to the table in Section D.3.1 of the report without correcting the inspectorate's description of the identified deficiencies (non-conformities).

The response shall contain information on the sections below for each deficiency (non-conformity):

Determination of the deficiency (non-conformity) cause The indication of the cause of the identified deficiency (non-conformity), which, in case of taking appropriate measures for its elimination, will later facilitate prevention of the deviation. One deficiency (non-conformity) may have several causes.
Further assessment A deficiency (non-conformity) grade and its impact on the system and medicinal products shall be assessed. If applicable, further actions that were performed or additionally planned shall be indicated, for proper impact assessment of the deficiency (non-conformity) (for example, a retrospective

assessment of data may require identification of its impact scope).
Corrective actions A detailed description of taken or scheduled corrective actions aimed at elimination of the identified deficiency (non-conformity) shall be provided.
Preventive actions A detailed description of taken or scheduled preventive actions aimed at elimination of the deficiency (non-conformity) cause to prevent its occurrence in the future is provided. The actions shall also include actions to identify and prevent similar deficiencies (non-conformities).
Deliverables A detailed description of any deliverables of proposed or completed corrective and preventive actions shall be given. For example, making the relevant amendments to standard operating procedures or working instructions, making training records and changing software.
Action dates Scheduled dates or completion dates of any actions shall be given, indicating their completion, if applicable.

D.3. Deficiencies (non-conformities) identified based on the inspection results

D.3.1. Critical deficiencies (non-conformities)

Information on critical deficiencies (non-conformities) according to the relevant definition is provided.

Deficiency (non-conformity) CD 1 (critical deficiency (non-conformity) 1)	Use categories (and subcategories) according to Annex 3 with a short name of the deficiency (non-conformity)
Inspector adds a description of the deficiency (non-conformity) Basis for deficiency (non-conformity) definition according to the regulatory document	
Determination of the deficiency (non-conformity) cause	
To be filled by the marketing authorization holder	
Further assessment	
To be filled by the marketing authorization holder	
Corrective actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing	Completion date To be filled by the marketing

authorization holder	authorization holder
Preventive actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing authorization holder	Completion date To be filled by the marketing authorization holder

D.3.2. Significant deficiencies (non-conformities)

Information on significant deficiencies (non-conformities) according to the relevant definition is provided.

Deficiency (non-conformity) 1 (significant deficiency (non-conformity) 1)	Categories (and subcategories) according to Annex 3 with a short name of the deficiency (non-conformity) shall be used
Inspector adds a description of the deficiency (non-conformity) Basis for deficiency (non-conformity) definition according to the regulatory document	
Determination of the deficiency (non-conformity) cause	
To be filled by the marketing authorization holder	
Further assessment	
To be filled by the marketing authorization holder	
Corrective actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing authorization holder	Completion date To be filled by the marketing authorization holder
Preventive actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing authorization holder	Completion date To be filled by the marketing authorization holder

D.3.3. Insignificant deficiencies (non-conformities)

Information on insignificant deficiencies (non-conformities) according to the relevant definition is provided.

Deficiency (non-conformity)1 (insignificant deficiency (non-	Use categories (and subcategories) according to Annex 3 with a short name of the deficiency (non-conformity)

conformity) 1) (ID 1)	
Inspector adds a description of the deficiency (non-conformity) Basis for deficiency (non-conformity) definition according to the regulatory document	
Determination of the deficiency (non-conformity) cause	
To be filled by the marketing authorization holder	
Further assessment	
To be filled by the marketing authorization holder	
Corrective actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing authorization holder	Completion date To be filled by the marketing authorization holder
Preventive actions	
To be filled by the marketing authorization holder	
Deliverables To be filled by the marketing authorization holder	Completion date To be filled by the marketing authorization holder

D.3.4. Remarks

Issues that the inspectorate considers necessary to communicate to the inspected party, which are not deficiencies (non-conformities).

Section E.

E.1. Conclusions

E.2. Recommendations

E.3. Inspectors' assessment of the response of the inspected party

E.4. Final conclusions and recommendations

Section F. Dates and signatures of inspectors and experts (if applicable)

Annex 3

to the Requirements for the Rules and Procedures for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder

Template of a data exchange form for pharmacovigilance system inspection results

<table>
<tr><td colspan="3">Template of a data exchange form for pharmacovigilance system inspection results</td></tr>
<tr><td>Reference No.:</td><td>Number of pages:
Number of annexes:</td><td>Date: dd/mm/yyyy</td></tr>
<tr><td colspan="3">Country/Regulatory authority</td></tr>
<tr><td colspan="3">TO:
☐ Regulatory authorities of the Member States of the Eurasian Economic Union
_____
_____
☐ Other regulatory authorities:
☐ Other organizations:</td></tr>
<tr><td colspan="3">MEDICINAL PRODUCT/STUDY/MARKETING Authorization HOLDER
Brand name(s):
International non-proprietary name (INN):
Indications:
Authorization procedure (specify): mutual recognition procedure/decentralized procedure/authorization in accordance with the legislation of the Member State of the Eurasian Economic Union.
Study protocol name and No.
Post-marketing experience:
Other:</td></tr>
</table>

Marketing authorization holder(s): Study sponsor: Contract research organization/third parties: Other, specify:
RECOMMENDED MEASURES AND (OR) MEASURES TAKEN: ☐ For information and (or) discussion ☐ For the next inspection ☐ For initiation of an unscheduled inspection due to an initiating factor ☐ Other, specify:
INSPECTION SCOPE:
INSPECTION RESULT SUMMARY: *(remarks on main results and non-conformities)*

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
1. Qualified person responsible for pharmacovigilance			
Qualification			
Official duties			
Pharmacovigilance system control			
Reserve processes and delegation of responsibilities			
Other			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
2. Pharmacovigilance system master file			
Format			
Contents			
Maintenance and submission			
Other			
3. Standard procedures (standard operating procedures (SOPs), guidelines, etc.)			
Absence of any required procedures			
Procedure non-compliance			
Procedures are contrary to the legislation and pharmacovigilance guidelines			
Standard operating procedure training process			
Other			
4.Contracts, agreements			
Absence of legal contracts			
Contracts do not contain any required safety information exchange data			
Other			
5.Periodic safety			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
update report (PSUR)			
Planning of a PSUR			
The format and contents comply with Section 8 of the Practice			
Quality control of a PSUR			
Timeliness of submission			
Remarks of the expert report on PSUR assessment			
Other			
6. Risk management system			
Format and contents of a risk management plan			
Additional pharmacovigilance actions			
Additional risk minimization measures			
Other			
7.Organization of work with adverse reaction reports			
Receiving individual case safety reports (ICSR) from all sources, maintaining common databases			
Assessment of			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
severity, causal link, and foreseeability			
Medical assessment and MedDRA coding			
Quality control process			
ICSR submission process			
Process of receiving additional ICSR information			
Reporting adverse reactions (ARs) during non-interventional studies and other non-interventional programs			
Systematic medical literature review			
Other			
8.Computerized systems and databases used by the pharmacovigilance system			
Process to ensure operation of the computerized systems and databases			
Confirmation of compliance with goals			
Backup and recovery guarantee in case of damage			
Database transfer			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
process			
Other			
9.Clinical trials			
Reporting unexpected serious adverse reactions			
Consistency of the Investigator's Brochure and Summaries of Product Characteristics (SmPC) for authorized medicinal products			
Reconciliation of serious adverse events reported during clinical trials with a pharmacovigilance database			
Other			
10. Signal management			
Safety information sources included in the signal detection procedure (information from all relevant sources is included)			
Frequency of data review			
Aggregated data review			
Signal processing			
Timely updates of SmPCs and package			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
leaflets			
Other			
11. Quality of medicinal products			
Review of quality deviations data and trend analysis			
Consistency of data on inadequate quality complaints and data from safety databases			
Other			
12. Archiving pharmacovigilance data			
Records management			
Compliance of archiving tools			
Other			
13. Pharmacovigilance system quality management system			
Pharmacovigilance system's quality system and compliance management			
Tools and equipment for pharmacovigilance activities			
Pharmacovigilance system audit (internal and external) and corrective and preventive action			

Pharmacovigilance system component name	Non-conformities		Remarks (for example, a component was not inspected)
	critical	significant	
process			
Other			
14. Pharmacovigilance training			
Introductory and subsequent training			
Training assessment			
Keeping training records			
Other			
15.Regulatory issues and interaction with the regulatory authority			
Development and update of information on the medicinal product			
Responses to regulatory authority's requests			
Other			
16.Medical information			
Reconciliation of medical information requests and the safety database			
17. Additional components (if any)			

GROUNDS FOR SUBMISSION OF THIS INFORMATION: *(summarize the relevant grounds for assessment of non-conformities as significant, their impact*

on other areas of activities and importance for other regulatory authorities; if it is reasonable, a local inspection is recommended, indicating system components to be inspected during such local inspection)
INFORMATION SOURCE: (*specify*) ☐ Preclinical data ☐ Assessment during the authorization procedure/authorization confirmation ☐ Inspection results/inspection report ☐ Information submitted by the marketing authorization holder to the regulatory authority of the Member State/EEC ☐ Periodic safety update report(s)(PSUR) ☐ Post-marketing safety data/signal ☐ Regulatory authority, specify ☐ Other, specify
PERFORMANCE STATUS SUMMARY (for critical and significant non-conformities): (if applicable)
These issues affect interests of other Member States of the Eurasian Economic Union:☐YES ☐NO
REQUESTED INFORMATION: (if applicable)
FULL NAME AND CONTACT DETAILS OF THE LEAD INSPECTOR:

Annex 4

to the Requirements for the Rules and Procedures for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder

Classification of deficiencies (non-conformities) of the pharmacovigilance system

Critical deficiency (non-conformity) of the pharmacovigilance system. A fundamental deficiency (non-conformity) in one or several processes or performed procedures of the pharmacovigilance system, which negatively affects the entire pharmacovigilance system and (or) the rights, safety, and well-being of patients, and (or) poses a potential threat to public health and (or) is a serious violation of the requirements of the legislation of the Member States of the Eurasian Economic Union (hereinafter referred to as the Member States, Union) and international treaties, and acts constituting the law of the Union.

Significant deficiency (non-conformity) of the pharmacovigilance system. An important deficiency (non-conformity) in one or several processes or performed procedures of the pharmacovigilance system, or a fundamental deficiency of any part of one or several processes or performed pharmacovigilance procedures, which adversely affects the entire process and (or) can potentially affect rights, safety and well-being of patients, and (or) may pose a potential threat to public health and (or) is a violation of the requirements of the legislation of the Member States, international treaties, and acts constituting the law of the Union, which, however, is not considered serious.

Insignificant deficiency (non-conformity) of the pharmacovigilance system. A deficiency (non-conformity) of any component of one or more processes or performed procedures of the pharmacovigilance system, which, as expected, cannot adversely affect the entire pharmacovigilance system or process and (or) the rights, safety, and well-being of patients.

Remarks: observations in terms of any established deficiencies (non-conformities) may be accompanied by proposals related to pharmacovigilance system quality improvement or reduction of non-conformity occurrence probability.

Annex 5

to the Requirements for the Rules and Procedures for Inspection of the Pharmacovigilance System of the Marketing Authorization Holder

Non-conformity review
based on the results of the pharmacovigilance system inspection of the marketing authorization holder

Section A. Administrative information.

A.1. Names of medicinal products.

A.2. Authorization data.

Section B. Basis and general information.

B.1. Inspection scope according to the inspection request.

B.2. Legal and regulatory framework.

Section C. Description of non-conformities (critical and significant) identified during the inspection.

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
1. Qualified person responsible for pharmacovigilance			
Qualification			
Official duties			
Pharmacovigilance system control			
Reserve processes and delegation of responsibilities			
Other			
2. Pharmacovigilance system master file			

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
Format			
Contents			
Maintenance and submission			
Other			
3. Standard procedures (standard operating procedures (SOPs), guidelines, etc.)			
Procedures			
Guidelines			
SOP training processes			
Other			
4.Contracts, agreements			
Contracts			
Agreements			
Other			
5.Periodic safety update report (PSUR)			
Planning of a PSUR			
Format and contents			
Quality control of a PSUR			
Timeliness of submission			
Remarks of the expert report on PSUR assessment			
Other			
6. Risk management system			
Format and contents of a risk management plan			
Additional pharmacovigilance actions			
Additional risk minimization measures			
Other			
7.Organization of work with adverse reaction reports			

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
Receiving individual case safety reports (ICSR) from all sources, maintaining common databases			
Assessment of severity, causal link, and foreseeability			
Medical assessment and MedDRA coding			
Quality control process			
ICSR submission process			
Process of receiving additional ICSR information			
Reporting adverse reactions (ARs) during non-interventional studies and other non-interventional programs			
Systematic medical literature review			
Other			
8.Computerized systems and databases used by the pharmacovigilance system			
Process to ensure operation of the computerized systems and databases			
Confirmation of compliance with goals			
Backup and recovery guarantee in case of damage			
Database transfer process			

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
Other			
9.Clinical trials			
Reporting unexpected serious adverse reactions			
Consistency of the Investigator's Brochures and SmPCs for authorized medicinal products			
Reconciliation of serious adverse events reported during clinical trials with a pharmacovigilance database			
Other			
10. Signal management			
Safety information sources included in the signal detection procedure (information from all relevant sources is included)			
Frequency of data review			
Aggregated data review			
Signal processing			
Timely updates of SmPCs and package leaflets			
Other			
11. Quality of medicinal products			
Review of quality deviations data and trend analysis			
Consistency of data on inadequate quality			

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
complaints and data from safety databases			
Other			
12. Archiving pharmacovigilance data			
Records management			
Compliance of archiving tools			
Other			
13. Pharmacovigilance system quality management system			
Pharmacovigilance system's quality system and compliance management			
Tools and equipment for pharmacovigilance activities			
Pharmacovigilance system audit (internal and external) and corrective and preventive action process			
Other			
14. Pharmacovigilance training			
Introductory and subsequent training			
Training assessment			
Keeping training records			
Other			
15. Regulatory issues and interaction with the regulatory authority			
Development and update of			

Pharmacovigilance system component name	Non-conformities		Remarks
	critical	significant	
information on the medicinal product			
Responses to regulatory authority's requests			
Other			
16. Medical information			
Reconciliation of medical information requests and the safety database			
17. Additional components (if any)			

Section E. Summary of non-conformities, assessment and conclusion.

E.1. Non-conformity summary.

E.2. Conclusion.

E.3. Recommendations.

Section F. Signature and date.

Section G. Annexes.

G.1. Inspection report by the activity site (individual inspection report for each activity site).

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