Questions and answers on the risk management plan (RMP) summary

In March 2014 the European Medicines Agency (EMA) began publishing summaries of risk management plans for centrally authorised medicines.

What is a risk management plan?

A risk management plan (RMP) is a document submitted as part of the dossier that is evaluated by regulatory authorities before a medicine can be authorised and which is regularly updated as new information becomes available. RMPs include information on a medicine's safety profile and explain the measures that are taken in order to prevent or minimise the medicine's risks in patients.

All medicines have both benefits and risks; in order for a medicine to be authorised, the benefits have to outweigh the risks. At the time a medicine is first authorised, it is impossible to know everything about its safety as the medicine will only have been tested in a relatively small number of patients for a limited length of time. Some side effects are very rare, or only occur in patients with other conditions or particular genetic backgrounds. The RMP details the known safety concerns with the medicine and how they can be managed. The RMP will also include details of any additional studies that have been recommended at the time of licensing to provide more information on the medicine's safety profile. Medicines are then carefully monitored after marketing (pharmacovigilance), so that new side effects can be detected quickly, and regulatory authorities can ensure that the benefits outweigh the known risks at all times.

More information about RMPs can be found on the Agency's website: [ema.europa.eu/Human regulatory/Pharmacovigilance/Risk-management plans](https://ema.europa.eu/Human regulatory/Pharmacovigilance/Risk-management plans).

Why is the EMA publishing summaries of RMPs?

This type of publication is a further step towards increased transparency and public access to relevant information on medicines, which are among the requirements of the new European pharmacovigilance
legislation¹ and reflect key guiding principles of the Agency. The RMP summaries complement the public-friendly information already available in the Agency’s summaries of the European public assessment report (also known as EPAR summaries) and the package leaflet. They will allow stakeholders, including the general public, wider access to the information behind the decision-making process of European regulatory authorities when they review the safety of a medicine or active substance.

What information is found in the RMP summary?

The RMP summary for centrally authorised medicines is a document written in public-friendly language that summarises the information contained in the full RMP, which is a long and technical document. The RMP summary includes the following sections:

- a brief overview of the epidemiology of the disease, that is, information on its cause, how common it is and which parts of the population are affected by the disease;
- a summary of the benefits of treatment with the medicine, based on the main studies carried out for the marketing authorisation application;
- a description of the unknowns about treatment benefits (population groups in whom it has not been studied);
- a summary of the important risks of the medicine and how they are managed, in tabular form;
- a table explaining any information that is currently missing and needs to be collected (e.g. on the long-term use of the medicine);
- any additional measures to ensure safe use that are required as part of the licensing of the medicine;
- a list of planned studies to provide more information on the safety and benefits of the medicine;
- where appropriate, an explanation of any updates that have been made to the RMP.

Are there differences between the RMP summaries of similar medicines?

An RMP is drawn up to manage a medicine’s risks based on an evaluation of the information available for that particular medicine. While medicines with a similar active ingredient, or which belong to the same class and are used for the same condition, may have similar information in their RMPs (and therefore their summaries), there may also be important differences.

These differences may reflect differences in the information submitted by the company with its marketing authorisation application or in the overall balance of benefits and risks between different medicines. For example, studies performed by the companies may be designed differently and include different groups of patients (e.g. different age groups, ethnic population) or be of different duration. In addition, similar medicines may show different results in studies even if the studies have the same design. These differences in the actual data available are likely to lead to some differences in the medicines’ risk profile and therefore in the contents of their RMPs.

¹ Regulation (EU) No 1235/2010 and Directive 2010/84/EU.
Why doesn’t every medicine have an RMP summary?

All companies now applying to European regulators for marketing authorisation must include an RMP as part of the dossier supplied for evaluation. For medicines that do not yet have an RMP, it is likely that one will be required with any future significant change to the marketing authorisation.

The EMA will eventually publish RMP summaries for all centrally authorised medicines. The Agency began by piloting the publishing of RMP summaries for those medicines authorised centrally since February 2014. RMP summaries for medicines authorised before this date will be published once the process is fully established and when variations to their marketing authorisations result in significant changes to the RMP.

Who writes the RMP and the RMP summary?

The RMP is drafted by the company along with the other documents submitted with its application and it is then reviewed by the regulator. During the evaluation of the application for centrally authorised medicines, the content of the RMP must be reviewed by the EMA’s Pharmacovigilance Risk Management Committee (PRAC) and approved by the Committee for Human Medicinal Products (CHMP) before a positive opinion is issued in favour of marketing authorisation.

The RMP summary for each centrally authorised medicine is prepared by EMA staff based on information provided by the company in the approved RMP, which includes key elements for the public summary.

What is the difference between the package leaflet, an EPAR summary and the RMP summary?

The information a patient needs to use the medicine safely can be found in the package leaflet which comes with the medicine. The leaflet includes a list of all the side effects that have been seen with the medicine. Although many of these will be included in the RMP summary, some side effects may not be as significant as others, or may not need special measures to manage them, and so may not be included in the RMP summary.

The EPAR summaries focus more on explaining how the EMA assessed the benefits and risks of a medicine before recommending authorisation in the EU.

RMP summaries are published for readers who wish to know more about how the risks of a medicine are being managed. Their content is described under 'What information is found in the RMP summary?', above.

While all three documents serve different purposes, they complement each other and are important tools for keeping patients and the general public informed about their medicines.

When will RMP summaries be updated?

Over time, as the information on the safety profile of medicines increases, the RMP will be updated to reflect this new information. This may result in changes to the RMP summary. The Agency is initially piloting the publishing of RMP summaries only for newly centrally authorised medicines. Once the process is fully developed, it is anticipated that RMP summaries will be updated whenever there are significant changes to an RMP as part of a variation to the marketing authorisation of a medicine.