Guidance for Pharmaceutical Industry – Adverse Drug Reaction Reporting Requirements

Drug Office
Department of Health
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1. INTRODUCTION

1.1 PURPOSE
This guidance sets out the requirements for reporting adverse drug reactions to the Department of Health Drug Office (“DH DO”) by pharmaceutical industry. It covers the types of adverse drug reactions which should be reported, and the timelines and other requirements for reporting adverse drug reactions of pharmaceutical products.

1.2 SCOPE
This guidance applies to the reporting of adverse drug reactions of all pharmaceutical products in Hong Kong by pharmaceutical industry.

Pharmaceutical industry in this guidance includes:
- Licensed Wholesale Dealers;
- Licensed Manufacturer;
- the holders of Certificate of Drug/Product Registration (“Registration Certificate Holders”); and
- the holders of Certificate for Clinical Trial/Medicinal Test (“Clinical Trial Certificate Holders”).

Pharmaceutical industry should comply with the requirements set out in this guidance.

2. WHAT IS ADVERSE DRUG REACTION?

2.1 ADVERSE DRUG REACTION
An adverse drug reaction is a response, which is noxious and unintended, to a pharmaceutical product.

2.2 SERIOUS ADVERSE DRUG REACTION
A serious adverse drug reaction is any untoward medical occurrence that at any dose:
- results in death;
- is life threatening;
- requires inpatient hospitalization or results in prolongation of existing hospitalization;
- results in persistent or significant disability/incapacity;
- is a congenital anomaly/birth defect; or
- is a medically important event or reaction.

2.3 UNEXPECTED ADVERSE DRUG REACTION
An unexpected adverse reaction is an adverse drug reaction whose nature, severity, specificity, or outcome is not consistent with the term or description used in the local product labelling.
3. WHAT REPORT FORMAT SHOULD BE USED?

Adverse drug reaction report can be made on the DH Adverse Drug Reaction Report Form or Council for International Organization of Medical Sciences (CIOMS) Form. A separate form should be used for each patient. Any follow-up information of an adverse drug reaction that has been reported to DH DO previously should be made on a new report form.

The DH Adverse Drug Reaction Report Form is available at the following link:
http://www.drugoffice.gov.hk/adr_industry.html

The CIOMS Form is available at the following link:
http://cioms.ch/index.php/cioms-form

4. WHAT SHOULD BE INCLUDED IN THE ADVERSE DRUG REACTION REPORT?

The form should be completed to the best of knowledge and information should be provided as much as possible.

The following items are considered essential for causality assessment and should be provided whenever possible:
- patient information (initials or reference number will be sufficient; **full name and other kinds of personal identifier of the patient**, such as identity card number and hospital admission number, should **NOT** be provided on the report form);
- adverse reaction description (including the date of onset of reaction and, if related to a vaccine, adverse reaction category);
- drug therapy or vaccine including product name (particularly biological product and vaccine; or manufacturer’s information) of the suspected and concomitant drug(s), batch number (particularly biological product and vaccine), dosage, route, dates of starting and stopping drug therapy, reason for use, etc.;
- the interacting agent(s) (i.e. drugs, herbs or food) if suspected drug interaction is involved;
- treatment of adverse drug reaction;
- outcome of the reaction;
- sequelae of the reaction;
- comments (e.g. allergies, relevant information - hepatic and renal functions, alcohol use, smoking);
- reporter details (contact information should be provided for necessary follow-up; please read the Statement of Purposes (APPENDIX II) in respect of the collection of personal data).

4.1 FOLLOW-UP REPORT

Any follow-up information of an adverse drug reaction that has been reported to DH DO previously should be made on a new report form. Please indicate that it is a follow-up report and quote the unique number of the previous adverse drug reaction report.
5. WHAT AND HOW TO REPORT?

5.1 LOCAL ADVERSE DRUG REACTION REPORTING

5.1.1 LOCAL SERIOUS ADVERSE DRUG REACTIONS

Pharmaceutical industry should report all serious adverse drug reactions occurring in Hong Kong to DH DO as soon as possible and no later than 15 calendar days of receipt of information. Follow-up reports should also be submitted as required.

For other reporting requirements as the conditions for registration approval, Registration Certificate Holders should refer to the conditions specified on the Certificate of Drug/Product Registration for details.

5.1.2 HOW TO REPORT

Local reports should be submitted to the Pharmacovigilance Unit of DH DO by:
- email to adr@dh.gov.hk; or

Electronic submission is always the preferred means. If electronic means are not feasible, please return the completed form by:
- fax to 2319 6319; or
- mail or delivery to the Pharmacovigilance Unit at Room 1856, Wu Chung House, 213 Queen’s Road East, Wanchai, Hong Kong.

If the adverse drug reactions are related to the pharmaceutical products used in clinical trial, please refer to sections 5.2 of this guidance. Pharmaceutical industry may refer to the table summarizing those scenarios at APPENDIX I of this guidance for easy reference.

5.2 PHARMACEUTICAL PRODUCTS USED IN CLINICAL TRIALS

5.2.1 ADVERSE DRUG REACTIONS

Clinical Trial Certificate Holders should report all local adverse drug reactions that are serious and unexpected as soon as possible to Drug Clinical Trials Unit of DH DO.

Fatal or life-threatening unexpected adverse drug reactions should be reported as soon as possible but no later than 7 calendar days after first knowledge by the sponsor that a case qualifies, followed by a report as complete as possible within 8 additional calendar days. This report must include an assessment of the importance and implication of the findings, including relevant previous experience with the same or similar pharmaceutical products.

Other serious, unexpected adverse drug reactions that are not fatal or life-threatening, it should be reported as soon as possible but no later than 15 calendar days after first knowledge by the sponsor that the case meets the minimum
criteria for expedited reporting.

For non-serious adverse drug reactions and serious adverse drug reactions that are expected, it should be reported in a brief summary at the conclusion of the trial.


5.2.2 HOW TO REPORT

Clinical Trial Certificate Holders should submit the reports to the Drug Clinical Trials Unit of DH DO by email to ct@dh.gov.hk.

Email is the preferred means. If email is not feasible, please return the completed form by:
- fax to 2803 4962; or
- mail or delivery to the Drug Clinical Trials Unit at 3/F, Public Health Laboratory Centre, 382 Nam Cheong Street, Kowloon.

6. CONTACT INFORMATION

Pharmacovigilance Unit
Drug Office, Department of Health
Room 1856, Wu Chung House,
213 Queen’s Road East, Wanchai
Hong Kong

Phone: 2319 2920
Fax: 2319 6319
Email: adr@dh.gov.hk

Drug Clinical Trials Unit
Drug Office, Department of Health
3/F, Public Health Laboratory Centre
382 Nam Cheong Street, Kowloon

Phone: 2319 8458
Fax: 2803 4962
Email: ct@dh.gov.hk
**APPENDIX I**  
**SUMMARY OF ADVERSE DRUG REACTION (ADR) REPORTING REQUIREMENTS**

<table>
<thead>
<tr>
<th>Type of Pharmaceutical Product</th>
<th>Type of ADR Report</th>
<th>Who to Report</th>
<th>Reporting Time-frame</th>
<th>Reporting Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>All pharmaceutical products, excluding those used in clinical trials</td>
<td>Local serious ADR*</td>
<td>Licensed Wholesale Dealers, Licensed Manufacturer, Registration Certificate Holders</td>
<td>As soon as possible and no later than 15 calendar days</td>
<td>Pharmacovigilance Unit, Drug Office, Department of Health</td>
</tr>
<tr>
<td>Pharmaceutical products used in clinical trials</td>
<td>Fatal or life-threatening unexpected ADR</td>
<td>Clinical Trial Certificate Holders</td>
<td>As soon as possible and no later than 7 calendar days, followed by a report as complete as possible within 8 additional calendar days</td>
<td>Drug Clinical Trials Unit, Drug Office, Department of Health</td>
</tr>
<tr>
<td></td>
<td>Other serious and unexpected ADR</td>
<td></td>
<td>As soon as possible and no later than 15 calendar days</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Non-serious ADR / Serious expected ADR</td>
<td></td>
<td>At the conclusion of the trial (reported in brief summary)</td>
<td></td>
</tr>
</tbody>
</table>

* Additional reporting requirements may be specified on the Certificate of Drug/Product Registration.
APPENDIX II. STATEMENT OF PURPOSES

Purpose of Collection

This personal data are provided by reporter for the purposes of reporting adverse drug reaction of the patient to the Department of Health (DH). The personal data provided will be used by DH for the following purposes:

(a) follow-up of the case report; and
(b) surveillance of drug-related events.

2. The provision of personal data is voluntary. If you do not provide sufficient information, we may not be able to assess the report properly.

Classes of Transferees

3. The personal data you provide are mainly for use within DH. Apart from this, the data may only be disclosed to parties where you have given consent to such disclosure or where such disclosure is allowed under the Personal Data (Privacy) Ordinance.

Access to Personal Data

4. You have a right of access and correction with respect to personal data as provided for in sections 18 and 22 and Principle 6 of Schedule 1 of the Personal Data (Privacy) Ordinance. Your right of access includes the right to obtain a copy of your personal data. A fee may be imposed for complying with a data access request.

Enquiries

5. Enquiries concerning the personal data provided, including the making access and corrections, should be addressed to:

Senior Pharmacist (PV&RM)1
Pharmacovigilance Unit
Pharmacovigilance and Risk Management Division
Drug Office
Department of Health
Room 1856, 18/F, Wu Chung House
213 Queen’s Road East, Wan Chai, Hong Kong
Tel: 2319 2920