

# Product safety Directorate, Ethiopian Food and Drug Authority

Pharmacovigilance Guidelines for Antiretroviral medicines EFDA/GDL/001 First edition

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#### Safety monitoring or Pharmacovigilance of medicines used to treat HIV/AIDS

I. Overview of safety, efficacy and quality assurance of medicine and medical device According to the National Consolidated Guidelines for comprehensive HIV prevention, care and treatment issued in 2018, in 2017, around 414,854 adults and 21,146 children under the age of 15 are taking ARV and ART service is being available in more than 1361 health facilities of which around 909 are health centers.

Continuous availability of needed anti-retroviral sand related medical supplies and devices of proven safety, efficacy/performance and quality and their appropriate use are indispensable for diagnosis, prevention, and treatment of HIV. The safety, efficacy /performance and quality of such products shall be assured throughout their life cycle starting from manufacturing until they are used by patients. Thus, assuring safety, efficacy and quality of such products is the responsibility of manufacturers, importers, distributers, retail out-lets, public health programs, health institutions, health professionals and patients. However, the responsibility of assuring of safety, efficacy/ performance and quality of such medicinal products and diagnostic devices is not left only to these stakeholders. Hence countries are required to establish national medicine regulatory authorities that are legally mandated for ensuring safety, efficacy and quality as well as appropriate use of such products assured by the above-mentioned stakeholders before and after they are made available in the market.

Accordingly, the Ethiopian Food and Drug Control Authority (EFDA), a national regulatory agency, is established and mandated as per the proclamation 1112/2019, to ensure the safety, quality and efficacy of medicines and medicine devices by undertaking the major regulatory functions including market authorization, quality testing/, regulatory inspection, pharmacovigilance, market surveillance and control and clinical trial monitoring. No medicine and medical devices, obtained either from locally manufacturers or foreign source, can be marketed and made available for use in the country without market authorization or permission from EFDA. EFDA authorizes marketing or availability for use of medicines and medical devices through dossier evaluation, Good Manufacturing Practice Inspection, and Laboratory Quality testing, as well as issuing pre-import approval and port clearance permit. EFDA also undertake and coordinate post-market or use surveillance: including undertaking regulatory inspection, marketing surveillance and control, and pharmacovigilance to ensure safety, efficacy and quality of medicine and medical device after are made available for use in the country.

#### II. National Pharmacovigilance system

EFDA, is mandated to establish and coordinate a pharmacovigilance system to make follow up of adverse drug events both from global and local evidences and then undertake appropriate regulatory measures. The country has a pharmacovigilance system since 2002,: organizational structure for Pharmacovigilance; national and sub-national Pharmacovigilance centers; national directive and guideline for Pharmacovigilance; Adverse Drug Reaction Reporting tools including pre-paid yellow paper, electronic and MEDSAFETY ADE /ADR reporting; a national Pharmacovigilance advisory committee, launched Active Pharmacovigilance on HIV and MDR TB medicines in collaboration with HIV/TB programs; has become the member of WHO UPSALLA drug monitoring center and is reporting ADR to the WHO drug monitoring center; undertake signal detection and risk – benefit management and had carried out regulator measures on such basis.

#### III. Rationale

It is evidenced that during the premarketing clinical trial evaluations the safety profiles of medicines is not fully identified and understood because of the limited size and profile of participants and the duration of the clinical trial. Hence it is necessary to undergo post marketing safety monitoring or Pharmacovigilance of medicines while they are in the market being used by the users. The rationale behind adding this Pharmacovigilance specific content on this HIV guideline is to enable the users of the guideline understand the importance of Pharmacovigilance, the types safety surveillance systems, the available reporting tools, what adverse events to report, to whom to report and what happens after reporting an adverse drug event encountered in the monitoring of safety of the specific medicines used to treat HIV/AIDS.

#### IV. Important terminologies in Pharmacovigilance

**Pharmacovigilance** means-a science and activity concerned with the detection, assessment understanding and prevention of adverse effects and other problems related to medicines. **Major aims of pharmacovigilance:** 

- J Early detection of hitherto unknown adverse reactions and interactions.
- Detection of increases in frequency of (known) adverse reactions.
- J Identification of risk factors and possible mechanisms underlying adverse reactions.
- Estimation of quantitative aspects of benefit/risk analysis and dissemination of information needed to improve drug prescribing and regulation.

#### The scope of pharmacovigilance:

- ) To improve patient care and safety in relation to the use of medicines, and all medical and paramedical interventions
- To improve public health and safety in relation to the use of medicines.

- f To detect problems related to the use of medicines and communicated the findings in timely manner.
- ) To contribute to the assessment of benefit, harm, effectiveness, and risk of medicine, encouraging their safe, rational and more effective use and
- ) To promote understanding, education, and clinical training in pharmacovigilance and its effective communication to health professionals and the public

Pharmacovigilance may also aid in identifying medication errors, substandard and falsified medicinal products, therapeutic failure and adverse drug reactions.

Adverse Drug Event(AE)—Any untoward medical occurrence that may be present during treatment with a medicine but does not necessarily have a causal relationship with this treatment that is, an adverse outcome that occurs while the patient is taking the medicine but is not, or not necessarily, attributable to it.

Adverse drug reaction (ADR)—any response to a drug which is noxious and unintended, and which occurs at doses normally used in man for prophylaxis, diagnosis or therapy of disease, or for the modification of physiological function.

An unexpected ADR – Any reaction, the nature or severity of which is not consistent with domestic labeling or market authorization or is unexpected from characteristics of the medicine.

**Serious Adverse Effect**—Any untoward medical occurrence that at any dose results in death, requires hospital admission or prolongation of existing hospital stay, results in persistent or significant disability or incapacity, or is life threatening.

**Medication error**—any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the healthcare professional, patient, or consumer. Such events may be related to professional practice, healthcare products, procedures, and systems, including prescribing, order communication, product labeling, packaging, nomenclature, compounding, dispensing, distribution, administration, education, monitoring and use."

a.	Medicine prescribed but not given	b.	Administration of a medicine not prescribed
с.	Medicine given to the wrong patient	d.	Wrong medicine/ IV fluid administered
e.	Wrong dose or strength given	f.	Wrong dosage form given
g.	Medicine given for wrong duration	h.	Wrong preparation of a dose (e.g., incorrect dilution)
i.	Incorrect administration technique	j.	Medicine given to a patient with known allergy
k.	Wrong route of administration used	١.	Wrong time/ frequency of administration

Medication errors include;

#### Market Authorization holder:

**Product quality defect-** is quality problem of products with suspected contamination, questionable stability, defective components, poor packaging and labeling and therapeutic failure.

**Passive surveillance**-is a system in which regulatory authorities and pharmaceutical companies wait for healthcare professionals, patients, or consumers to make the effort to contact the authority or company to spontaneously report an encountered adverse drug event. It is also called voluntary reporting.

Active surveillance- systems or situations in which adverse events are purposely sought in the post marketing setting by a health authority's request to all physicians to report an adverse drug event of a particular drug or class of drugs in the form of prompted reporting or stimulated reporting or observational studies to more closely follow, identify and investigate on a potential or weak signal

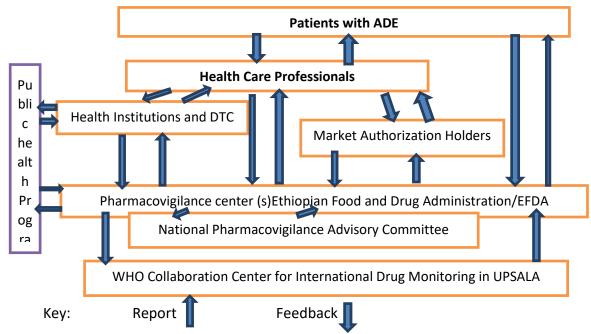
**Signal: Signal-** Reported information on a possible causal relationship between an adverse event and a medicine, the relationship being previously unknown or incompletely documented. Usually more than one signal report is required to generate a signal, depending on the seriousness of the event and the quality of the information. (1)

#### V. The type of ADEs of HIV/AIDS medicines to be reported (What to report)

The following varieties of ADEs, i.e. medicine-related injuries, with at least a reasonable possibility to be caused by medicines used to treat HIV/AIDS need to be reported to EFDA during the use of a spontaneous reporting or passive surveillance system. Peculiarities and reporting mechanisms may differ during the execution on an active surveillance system of a particular drug or disease.

- An individual's particular vulnerability
- Drug interactions
- Unexpected therapeutic ineffectiveness (e.g. resulting from drug interactions, product quality problems or antimicrobial resistance)
- All suspected reactions to the drugs
- Serious adverse drug reaction
- Unknown or unexpected reaction

In addition to the above, ADEs to be reported include medication errors, treatment failures and product quality defects independent of whether the action or medicine reached or injured the patient.



# VI. National Adverse Drug Reaction Reporting

Figure I: Schematic Presentation of the National ADR reporting system

## VII. Roles and responsibilities of stakeholders in pharmacovigilance

The following section describes the roles and responsibilities for the stakeholders involved in activities to minimize the risk of medicine-related injuries or Pharmacovigilance.

## 1. Patients and Consumers-

Patients who suspect they have been affected by an ADE should report to any health care professional including the one that had prescribed, dispensed or administered the drug that has caused the ADE .This will then enable the health professional to report the medicine-related problems to the University hospital based regional Pharmacovigilance centers at regions or the Pharmacovigilance center at EFDA.

## 2. Healthcare professionals-

All healthcare professionals in the nation have a very important role to highlight problems occurring when a marketed medicinal product is used. They need to alert the EFDA about suspected ADRs, medication errors and product quality problems in order for the authority to

take action in preventing or minimizing the occurrence of the medicine-related injury for other patients in the future.

The activities that healthcare professional need to perform when encountering an adverse drug event should include

#### a) Being vigilant and detecting adverse drug events-

Patients and healthcare professionals have the challenging task to monitor and be alert for possible medicine-related problems. It is important that clinicians are vigilant and perceptive towards any unexpected sign, symptom or complaint voiced by patients taking medicines, particularly in the early phases of treatment.

Distinguishing between the natural progression of a disease and an adverse effect by a medicine can be difficult. When an unexpected event, for which there is no obvious cause, occurs in a patient taking a medicine, the possibility that it is caused by the medicine or its use must always be considered.

Healthcare professionals should monitor for medication errors whilst prescribing, transcribing dispensing and administering medicines to patients.

Health professionals should make physical inspections of the medicinal product to be dispensed or administered. Pharmacy professionals have an important role in the work of detecting product quality defects. Color changes, separating components, powdering, crumbling, caking, molding, change of odor, incomplete pack, suspected contamination, poor packaging/poor labeling should be acknowledged.

#### b) Have knowledge of common adverse drug reactions of anti HIV medicines

The following medicines are listed in the Ethiopian National drug list for the treatment of HIV/AIDS under the section Anti retrovirals. Some of the known ADRs that are listed under these medicines are also listed in their summary of Product characteristics document when the product is marketed. Health care providers need to be vigilant and detect when the events occur and should be able to report whenever they are encountered (Annex I).

#### c) Assessing the patient –

When a medicine-related problem is suspected, the clinician should carry out a thorough physical examination with appropriate laboratory tests and consider:

- The patient's medical history, including history of a similar reaction or allergy
- The existence of any potential risk factors, such as hepatic or kidney insufficiency
- The existence of risk groups such as pediatric, elderly, pregnant and lactating patient.

#### d) Managing the encountered adverse event-

If an ADR is suspected, the health care professional should treat the patient and consider:

- to adjust the dose or
- To replace the medicine or

• To Withdraw the medicine.

The patient should be informed about the suspicion of the ADR and what actions are planned. Careful documentation of the ADR in the patient's medical records should take place. Documenting and informing the patient is important to avoid future problems.

If a medicine has caused an allergy, the EFDA "Allergy card" is recommended to be used (see attached below).

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The purpose of the Allergy card is to prevent patients from being prescribed again the medicines for which they are allergic in the first encounter. Patients should then carry the card with them and present it to any health facility at upcoming visits.

If the event is believed to be caused by a medication error, action should be taken according to the hospital or healthcare facility routines in order to avoid similar problems in the future. Accordingly the adverse drug reaction, medication error or product quality defects encountered should be reported to EFDA immediately as described below.

#### e) Reporting and adverse drug event (How to report)

Suspected ADEs (ADRs, detected medication errors or product quality defects) should be reported to the Pharmacovigilance center at EFDA. Reporting can be done using any of the four available tools and mechanisms described below:

- The yellow, prepaid report form available at the facility (Annex II)
- 8482 (toll free line) or Telephone 01115523142(direct) or 0115524122(via operator)
- Using online reporting system available from the website <u>www.fmhaca.gov.et-serivces-e-</u> <u>Reporting</u> ADR, creating an account using an email address and then entering the required information in the reporting page (See instructions on Annex III).
- Using a mobile app Medsafety that can be downloaded from Google play store for Android phones or and the APP store for IOS users, creating an account using an email address and then entering through the "new report" button and filling the information on the ADE that is going to be reported (See instructions on Annex IV).

All adverse ADEs ranging from minor reactions to disability or death should be reported. However there is a need to emphasize the reporting of suspected ADRs to new medicines, serious ADRs, unexpected reactions and drug interactions. If the event occurred in a university hospital Pharmacovigilance center it is very important to communicate with the pharmacovigilance focal person available to get the necessary support in the reporting process. These focal persons are also available in other health facilities and are designated by the facility to support Pharmacovigilance activities.

The reporter does not need to prove that there is a causal association between drug and adverse reaction. Therefore, uncertainty of the cause and effect relationship should not be a reason for not reporting. In addition, as stated in the National Pharmacovigilance Guideline of Ethiopia, it should be understood that reporting an ADR will not lead to any blame on the reporters and will not be used for any legal action.

#### *f) Timelines of reporting (When to report)*

Any suspected ADR; medication error or quality defect should be reported as soon as possible after all relevant information is compiled. Delay in reporting will make reports inaccurate and unreliable. Reporting while the patient is still in the health institution will give chance to the reporter to clear any ambiguity by re-questioning or examining the patient. When the reports have been received by EFDA, an acknowledgement letter will be sent to the reporter and follow-up questions might need to be answered.

Any follow-up information for an event that has already been reported can be sent on a new ADE report form to EFDA. Clearly indicate that the report concerns:

- Follow-up information
- The report case number, (available on the acknowledgement letter), so that this information can be matched with the original report.

It is very important that follow-up reports are identified and linked to the original report to avoid duplications of reports in the Pharmacovigilance database.

#### 3. Drug and Therapeutic Committee/DTC at healthcare facilities

The Drug and Therapeutic Committee is a technical working group established at healthcare facility with representative members from each department with the aim of managing medication use problems. Using the information on medicine safety, the DTC should revise the facility specific medicine list and promote rational use of medicines.

The DTC should also implement programs to track ADRs, medication errors and product quality defects and use the information to improve healthcare. Programs could involve review of ADEs, medication errors or near misses, patient chart review, or physical inspection of products. It needs the involvement of all health professionals as a team to identify problems with medicines, setting standards and monitoring practice. The facility should also assign a focal person to coordinate all ADE monitoring activities in the facility and serve as a link between the facility safety monitoring activities and the national Pharmacovigilance center.

#### 4. HIV/AID program

The monitoring of the safety of medicines of public health programs like HIV, Malaria, TB, Family Planning, Neglected Tropical Diseases, and Non Communicable Diseases is crucial for the

successful implementation of the programs. Hence HIV/AIDS program should collaboratively work with EFDA starting from the inception of the specific program and throughout the implementation period by encouraging the users of the medicines and healthcare professionals to report any ADEs encountered through the use of the available reporting mechanisms of the national Pharmacovigilance system.

Through the use of the passive and active surveillance systems, the EFDA Pharmacovigilance center has received adverse drug reports on the public health programs. The summary of these ADEs in the previous calendar year (2018/2019) indicates that out of the total number of reports received 56.9% were on antihelmenthics,7.5% on contraceptives,7.3% on anti-tuberculars, 4.2% on NCD's,0.6% on ARV's and 0.1% on anti-malaria's.

#### 5. Pharmacovigilance centers at Teaching University Hospitals

Currently there are five decentralized Pharmacovigilance centers in five specialized referral hospitals throughout the country\_; Hawassa university hospital (Hawassa), Ayder university hospital( Mekelle),Gondar university hospital( Gondar), Addis Ababa university Black lion hospital( Addis Ababa), Jimma university hospital (Jimma)

These centers are empowered to promote, and coordinate pharmacovigilance and provide training to healthcare providers in their catchment area to enable them report ADEs. Any ADE report on medicines of HIV/AIDS program could also be reported to these centers which will then analyze and send the report to EFDA.

#### 6. Branch EFDA, and regional regulators

The role of the six EFDA branches that are available in the country at Jimma, Komblocha, Bahirdar, Hawassa, Diredawa and Mekelle and the regulators that are available at each of the seven regional and 2 administrative city health bureaus in the monitoring of safety of medicines of public health programs is significant. Most importantly, as they are closer to the health facilities, their role in promoting of pharmacovigilance, inspection, investigation and sampling of medicines that have adverse events as well as enforce regulatory measures are vital.

#### 7. Pharmacovigilance Center / EFDA /what happens after a report are sent to EFDA?

As the primary role and mandate of EFDA is to ensure that marketed medicines are safe, effective and of quality, the experts at the Pharmacovigilance center perform the necessary data management activities after an ADE report is received.

These activities are-

#### a) Report entry

Pharmacovigilance experts at the center enter the incoming reports into the national Pharmacovigilance database which is vigiflow. Each report is classified as an ADR, medication error or a product quality problem. The recipient of the report will carefully review the report for the quality and completeness of the filled information obtained in the report form.

The center then provides an acknowledgment feedback to the reporter and might request information in case of missing pertinent data.

#### b) Causality assessment

Causality assessment is performed and the report is classified according to the WHO causality criteria. Causality assessment can also be performed at the regional Pharmacovigilance centers which who are sending reports to the national center. The assessment can then be verified and finalized to be sent to Uppsala monitoring center of WHO. The outcome of the report, together with any important or relevant information relating to the reaction will be communicated to the appropriate stakeholder.

#### c) Analyzing to detect signals.

The Pharmacovigilance experts at the EFDA review each incoming report (ADR, medication error, product quality defect) individually to detect any medicine-related problems that need immediate action.

The authority works towards detecting new potentially causal drug and event associations, or a new aspect of a known association, i.e. a signal which could be-

- Previously unknown ADRs
- Increases in frequency of known ADRs
- Risk groups, risk factors and possible mechanisms underlying ADRs.

A signal can initially be detected in a single incoming report. The literature, the WHO Signal document and the WHO Pharmaceutical Newsletter should be regularly screened to detect medicine-related problems relevant for the nation. Each year, a summary of the reports received during the past year is produced and evaluated.

In addition, post marketing surveillance to detect product quality defects is performed by the EFDA. Samples of any product in the market are collected from various premises in a determined frequency per year. The samples are tested in the EFDA laboratory. Regulatory inspection is also carried out by regional responsible offices to detect product quality defects.

#### d) Assessing for potential signals

Each detected potential signal will undergo further evaluation. The WHO database, published literature and information from the market Authorization Holder are reviewed for similar cases. The **National Pharmacovigilance safety Advisory Committee** is provided summary information for evaluation. The committee recommends what action needs to be taken, i.e. if it is a signal that needs to be acted upon, it is not signal, or if further monitoring is needed.

#### e) Taking regulatory measures

Based on the result of the different evaluations carried out and if necessary, using the quality control laboratory investigation results, and the recommendation obtained from the Pharmacovigilance advisory committee, regulatory measures will be taken on the specific medicine used in the public health program so that appropriate actions are taken. The

regulatory actions might range from warnings on the use of the specific medicine to the withdrawal or recall of the medicine and suspension from use by the program.

#### Annex I Common and known types of ADRs of anti HIV medicines

Abacavir Sulphate-fever; rash, nausea, vomiting, diarrhea, stomach pain, general ill feeling, extreme tiredness, loss of appetite, body aches, shortness of breath, cough, sore throat, swelling around midsection, dark urine, clay-colored stools, or jaundice (yellowing of the skin or eyes), chest pain or pressure, pain spreading the jaw or shoulder, lactic acidosis

**Abacavir Sulphate /Lamuvidine-fever**, rash, **nausea**, **vomiting**, **diarrhea**, stomach pain, general ill feeling, extreme tiredness, body aches, shortness of breath, cough, sore throat.

Atazanavir/ Ritonavir-headache, nausea, vomiting, diarrhea, stomach pain, fatigue ,fever, trouble sleeping, diarrhea, headache, muscle pain, depressed mood, sleep problems (insomnia);numbness, tingling or burning pain in the hands or feet, changes in the shape or location of body fat (especially in the arms, legs, face, neck, breasts, and waist).

**Darunavir**-diarrhea ,nausea ,vomiting, heartburn ,stomach pain ,weakness, headache, skin rash, or change in the shape or location of body fat (especially in the arms, legs, face, neck, breasts, and waist)

**Efavirenz**-nausea, vomiting, dizziness, drowsiness, trouble concentrating ,rash, headache, tired feeling ,sleep problems (insomnia), strange dreams or changes in the shape or location of body fat (especially in your arms, legs, face, neck, breasts, and waist).

**Efavirenz+Emtricitabine + Tenofovir** - dizziness, drowsiness, tired feeling ,nausea, diarrhea, headache Depressed mood, trouble concentrating, sleep problems (insomnia), strange dreams ,rash, changes in the shape or location of body fat (especially in the arms, legs, face, neck, breasts, and waist).

**Emtricitabine + Tenofovir** - nausea, vomiting, stomach pain, diarrhea, headache, dizziness, depression, joint pain, blisters under the skin, body aches or pain, chills, difficulty in breathing, ear and nasal congestion, fever, loss of voice, pain or tenderness around the eyes and cheekbones, rash and redness of the skin, runny nose, sore throat, unusual tiredness or weakness.

Lamivudine-cough, diarrhea, fatigue, headache, malaise (general discomfort), nasal symptoms, such as a runny nose, nausea.

Lamivudine+Zidovudine -headache ,nausea, diarrhea ,tiredness, general ill feeling ,cold symptoms such as stuffy nose, sneezing, sinus pain, cough, loss of body fat (especially in the arms, legs, face, and buttocks)

**Lopinavir** +**Ritonavir**-Diarrhea, headache, nausea, vomiting, stomach upset, drowsiness, dizziness, a bad taste in the mouth, and trouble sleeping

**Nevirapine-** rash, nausea, fatigue, headache, vomiting, diarrhea, abdominal pain, and muscle pain **Saquinavir-** diarrhea, stomach pain, nausea, vomiting, constipation, tiredness, back pain, dry lips or skin.

**Tenofovir-** stomach pain, nausea, vomiting, diarrhea; fever, pain, weakness, dizziness, headache, depressed mood, itching, rash, sleep problems (insomnia).

Zidovudine/Azidothymidine- nausea, vomiting, headache, dizziness, fatigue, weakness and muscle pain.

**Dolutegravir**-Diarrhea, nausea, vomiting, abdominal pain, flatulence, elevated lipase, headache, dizziness, liver enzyme elevations, hepatitis, hyperglycemia, increased fasted lipid values, insomnia, abnormal dreams, depression, suicidal ideation, elevated creatine kinase, arthralgia, myalgia, decreased total neutrophils, pruritus, rash, renal impairment, fatigue.

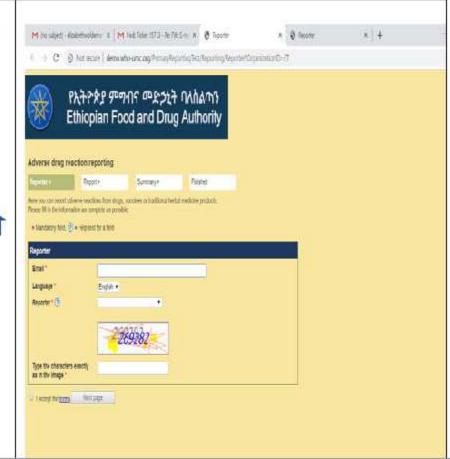
# Annex II. Prepaid Postage Yellow paper adverse drug event reporting form

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Annex III. Instructions on how to use the e-reporting system to report an adverse drug event

Healthcare professionals can report ADE by using e-reporting by following the procedures.

- Go to EFMHACA website www.fmhaca.gov.et
- click on service
- click on the link e-reporting of ADE then you will find the page page that is attached here
- ➢ fill the information required by moving from Reporter → and the rest information necessary for the report
- Submit the filled report to EFDA and protect the public from unnecessary drug related harms caused by Adverse Drug Event's



Annex IV. Instructions on how to use the mobile app of Medsafety to report an adverse event

# Healthcare professionals can report ADE by using their MOBILE PHONES by following these simple procedures.

- To access the Med safety app for IOS users go to the APP store for Android users go to google store search for Med safety app in the search bar (found as in the diagram above)
- Click on the Med safety icon app to select if
- 3. click install to install the app
- 4. Once the app has been successfully installed click open on your device
- 5. Create a user account.
- once the account has been created you come to the home page where the full page is provided

# 7. Then You can now report an ADE





Email

Password

LOGIN Forgotten password?

CREATE AN ACCOUNT CONTINUE AS A GUEST