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5 The VGVP draft modules are released for consultation and may change further, pending
6 the finalisation and publication of the Commission Implementing Regulation laying down
7 rules for the application of Regulation (EU) 2019/6 of the European Parliament and of
the Council as regards good pharmacovigilance practice and on the format, content and
summary of the pharmacovigilance system master file for veterinary medicinal products.

8
9 **Guideline on veterinary good pharmacovigilance practices**
10 **(VGVP)**

11 **Module: Signal Management**

12 **Draft**

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14 Comments should be provided using this [template](#). The completed comments form should be sent to Vet-Guidelines@ema.europa.eu

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46 **1. Introduction**

47 This module of the guidelines on veterinary good pharmacovigilance practices (VGVP) brings together
48 general guidance for marketing authorisation holders, national competent authorities and the European
49 Medicines Agency (the "Agency") regarding signal management for veterinary medicinal products
50 authorised in the European Union (EU).

51 Commission Implementing Regulation (EU) .../... of xxx, Article 17 (5) requires the Agency to publish
52 guidance on best practice for signal management.

53 Regulation (EU) 2019/6 and the measures laid down in the Commission Implementing Regulation on
54 veterinary good pharmacovigilance practice include provisions for signal management in the EU.

55 The objectives of this module are:

- 56 • to provide general guidance and requirements on scientific and quality aspects of signal
57 management for veterinary medicinal products;
- 58 • to describe the roles, responsibilities, and procedural aspects of the EU signal management process
59 for veterinary medicinal products.

60 This module is applicable to authorised veterinary medicinal products in the EU irrespective of the
61 authorisation procedure (centralised or national procedure, including mutual recognition and
62 decentralised), and including those used outside the terms of the marketing authorisation (i.e. off-
63 label) and homeopathic products.

64 Unless stated otherwise, the guidance provided in this module applies predominantly to marketing
65 authorisation holders but should also be considered by all organisations involved in the signal
66 management process; national competent authorities, the coordination group, the Agency and the
67 Commission.

68 The current guidance document on this module will be reviewed and updated in the future to reflect on
69 the experience gained on the signal management process from all stakeholders.

70 This module should be read in conjunction with Regulation (EU) 2019/6 of the European Parliament
71 and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive
72 2001/82/EC (the Regulation) and Commission Implementing Regulation (EU) .../... of XXX, laying down
73 rules for the application of Regulation (EU) 2019/6 of the European Parliament and of the Council as
74 regards good pharmacovigilance practice and on the format, content and summary of the
75 pharmacovigilance system master file for veterinary medicinal products (the Implementing
76 Regulation)< reference to the Commission Implementing Act to be completed when available>.

77 **2. Structures and processes**

78 ***2.1. Signal management activities by marketing authorisation holders***

79 Marketing authorisation holders should continuously monitor the safety of their veterinary medicinal
80 products, in order to promptly detect any new safety issues such as a change to the benefit-risk
81 balance, a new risk associated with the product or the active substance or a change to a known risk, so
82 that adequate regulatory actions and communication can be taken, in coordination with the competent
83 authorities, and the Agency.

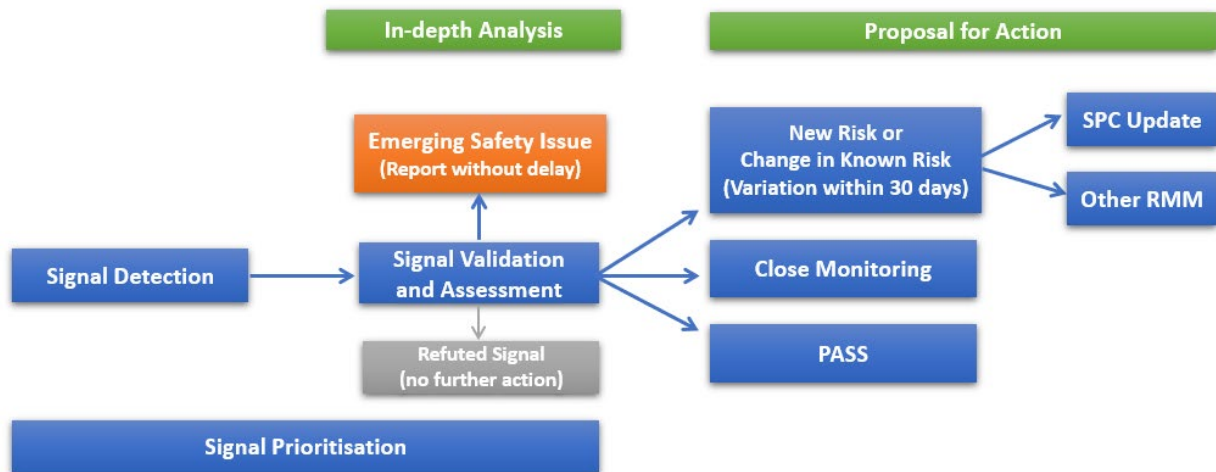
84 The identification of new risks associated with a veterinary medicinal product should be based on the
85 detection and analysis of signals, in accordance with the signal management process. Where the

86 outcome of the signal management process identifies a change to the benefit-risk balance, a new risk,
87 the marketing authorisation holder shall notify it without delay and no later than 30 calendar days, of
88 receipt of the suspected adverse event report, to competent authorities, and where necessary submit a
89 variation to the terms of the marketing authorisation in accordance with Articles 77(10) and 81(2) of
90 Regulation (EU) 2019/6.

91 In case of an impact on the benefit-risk balance of the veterinary medicinal product concerned, on
92 animal or public health, or on protection of the environment that is considered an emerging safety
93 issue, identified by the marketing authorisation holder according to Article 58(10) of the Regulation,
94 the marketing authorisation holder should notify it to the relevant competent authority(ies) without
95 delay and no later than 3 working days following the identification of an emerging safety issue by the
96 marketing authorisation holder (see section 2.3.1).

97 The signal management process should consist of, but not be limited to, the pharmacovigilance
98 activities of signal detection, prioritisation, validation, assessment, and recommendation for action.

99



100

101 **Figure 1. Overview of the signal management process for veterinary medicinal products**

102 **2.2. Data sources in signal management**

103 Signals can arise from several data sources, including all scientific information from the use of
104 veterinary medicinal products, i.e. quality, non-clinical, clinical data and post-marketing data.

105 The most common sources for detecting signals include spontaneous reporting systems, clinical
106 studies, and scientific literature. Marketing authorisation holders shall carry out signal management for
107 their veterinary medicinal products, taking into account all relevant pharmacovigilance data of which
108 they can reasonably be expected to be aware and which may be useful for that signal management
109 process, including sales data (see Article 81(1) of Regulation (EU) 2019/6). Please also refer to the
110 guidance on the collection and recording of suspected adverse events associated with veterinary
111 medicinal products in the relevant VGVP module.

112 **2.3. Signal prioritisation**

113 Signal management should follow a risk-based approach which takes into account the type of medicinal
114 product or active substance concerned and the nature and characteristics of the data, including but not
115 limited to, the length of time on the market and the stability of the pharmacovigilance profile.

116 In order to avoid delaying the detection and management of certain signals that might require urgent
117 attention, signal prioritisation should be performed throughout the whole signal management process,
118 from deciding the periodicity of signal detection to the point of signal assessment. Prioritisation
119 furthermore allows for identifying and focusing on those signals with a potential for significant impact
120 on the benefit-risk balance of the veterinary medicinal product or its active substance or those signals
121 with a high impact on animal or public health and thus require more urgent attention.

122 Appropriate measures should be considered at any stage if the information available suggests that
123 there could be a risk that requires prevention or risk minimisation in a timely manner. Clinical
124 judgement and flexibility should be applied throughout the process.

125 The following subsections should be read in order of importance, with emerging safety issues (see
126 section 2.3.1 of this document) and signals involving medically important terms (see section 2.3.2 of
127 this document), being the most important issues to identify and prioritise.

128 **2.3.1. Emerging Safety Issues**

129 Any new information which might influence the assessment of the benefits and the risks of the
130 veterinary medicinal product concerned according to Article 58(10) of Regulation (EU) 2019/6, and
131 which may require urgent regulatory action and communication should be identified as an emerging
132 safety issue. It should be reported to the relevant competent authority(ies), without delay and no later
133 than 3 calendar days after identification of an emerging safety issue. Examples include:

- 134 • major safety issues identified in the context of ongoing or newly completed studies, e.g. an
135 unexpectedly increased rate of fatal or life-threatening adverse events;
- 136 • major safety issues identified through spontaneous reporting or published in the scientific
137 literature, which may lead to considering a contraindication, a restriction of use of the veterinary
138 medicinal product or its withdrawal from the market;
- 139 • major safety-related regulatory actions outside the EU, e.g. a restriction of the use of the
140 veterinary medicinal product or its suspension.

141 In the context of Emerging Safety Issues, evidence of any serious¹ adverse events in human
142 potentially associated with a veterinary medicinal product should be considered. However, events that
143 include a veterinary medicinal product used as part of a suicidal attempt should not be considered an
144 Emerging Safety Issue.

145 When a marketing authorisation holder in the EU becomes aware of an emerging safety issue from any
146 source, they should notify the competent authority(ies) of the Member State(s) where the veterinary
147 medicinal product is authorised and to the Agency. This should be done as soon as possible and no
148 later than 3 calendar days after establishing that a validated signal or a safety issue from any source
149 meets the definition of an emerging safety issue.

150 When notifying an emerging safety issue, the marketing authorisation holder should describe the
151 safety issue, the source(s) of information, any planned or taken actions with timelines, and should
152 provide any relevant documentation available at the time of initial notification. Any further information
153 relevant to the issue should be provided to the Agency and relevant national competent authorities as
154 soon as it becomes available.

¹ Seriousness criteria used in human pharmacovigilance: An adverse reaction that results in death, is life-threatening, requires hospitalisation or prolongation of existing hospitalisation, results in persistent or significant disability or incapacity, or is a birth defect

155 Upon being notified of an emerging safety issue, the national competent authorities or the Agency as
156 appropriate will promptly assess the urgency and potential impact of the issue and agree on
157 appropriate next steps and the potential regulatory procedure to address the matter raised. This may
158 involve the consultation of the Incident review groups, if warranted (see Incident management plan for
159 medicines for veterinary use²).

160 The marketing authorisation holder should collaborate with the Agency and national competent
161 authorities in the assessment of emerging safety issues.

162 **2.3.2. Signals involving Medically Important (MI) terms in VeDDRA**

163 A list of Medically Important (MI) terms has been developed (Appendix 1) in VeDDRA. This list contains
164 serious medical concepts at the level of VeDDRA preferred terms. It is intended to be used by
165 marketing authorisation holders, the Agency and national competent authorities for signal
166 prioritisation.

167 Reports involving MI terms should be always prioritised regardless of the absence of any statistical
168 disproportionality measure (e.g. ROR³) or the number of cases reported (unless they are considered
169 adequately reflected in the current product information). However, this does not mean that any report
170 involving a MI term would concern a safety signal. As with any signals, usually more than a single
171 report is required, although in exceptional circumstances, one single report can also generate a signal.

172 **2.3.3. Prioritisation criteria for other types of signals**

173 It is not uncommon for medicinal products used widely or in diseased animals that a relatively large
174 number of potential signals are generated. Many such signals are false positive and further
175 prioritisation is essential.

176 When prioritising other newly identified signals than emerging safety issues or signals involving MI
177 terms, the following criteria, or a combination thereof, should be considered:

- 178 • Novelty of the medicinal product-event association. The focus should be on new associations or
179 new aspects on a known association, such as a change in frequency, severity, duration or temporal
180 persistence, further anatomical specification, change in the outcome or reported fatality rate.
- 181 • Strength of the evidence supporting the association, including the number of case reports.
- 182 • Seriousness, severity, outcome or reversibility of the event involved and the potential for
183 prevention.
- 184 • ROR value (not exclusive, i.e. a non-significant ROR does not exclude a potential signal).
- 185 • Public health, animal health and environmental protection implications.
- 186 • Species-specific events.

187 Results from previous analyses of identified signals can be used as a prioritisation criterion, e.g. a
188 signal that was previously refuted, but where new cases are expected to provide further supporting
189 evidence and re-opening of the signal could be expected based on new relevant information.

² https://www.ema.europa.eu/en/documents/other/incident-management-plan-medicines-veterinary-use_en.pdf

³ Reporting Odds Ratio (ROR) is a statistical measure based on the odds observed for an event occurring with a particular product compared to the odds observed of that same event in a reference data set of products.

190 In some cases, signals that could cause media attention and/or public concerns may deserve special
191 attention. These include situations where compliance with certain treatments or public health measures
192 may be affected by misinformation originating in e.g. social media.

193 **2.4. Signal detection**

194 If a marketing authorisation holder is responsible for the same or similar veterinary medicinal products
195 in different Member States authorised through different authorisation procedures, signal detection and
196 the signal management process shall be performed by grouping all relevant same and similar products.

197 Depending on the size and nature of the database used, signal detection may involve the review of
198 individual spontaneous reports, the use of statistical analyses, or a combination of both. Aggregated
199 data analyses and the use of several data sources can also increase the quality of the process.

200 When using the Union Pharmacovigilance Database for signal detection, the marketing authorisation
201 holder should make use of the available pre-defined queries in the Union Pharmacovigilance Database.

202 These include:

- 203 • Signal detection dashboard: Overview, Signal detection with RORs up to date 2 and up to date 1
204 (cumulative ROR), Static ROR evaluation.
- 205 • Signal evaluation dashboard: Animal Data (species/breed, age, weight analysis, pharmaceutical
206 form, regional distribution, time to onset), Product information (pharmaceutical form, regional
207 distribution), Product association (product used in association with another product), Associated
208 VeDDRA terms (other reactions in the same Adverse Events reports).
- 209 • Incidence calculation queries.
- 210 • If needed, more tailored queries can be constructed based on the individual data elements.

211 The outputs of Union Pharmacovigilance Database are generally provided at the level of the active
212 substance or combination of active substances. Outputs can also be generated on a product basis.

213 Marketing authorisation holders can use their own specific data analytical tools for the purpose of
214 signal detection and assessment, when available. However, all marketing authorisation holders shall
215 conduct at least one signal detection analysis per year in the Union Pharmacovigilance database
216 (Article 17(7) of the draft Implementing Act).

217 **2.5. Evaluation during signal validation and further assessment**

218 The evaluation of the data supporting a detected signal can be divided in different steps.

219 Signal validation is the first step in analysing a detected signal. Signal validation allows evaluating the
220 initial data supporting a signal, in order to verify that the available information contains sufficient
221 evidence demonstrating the existence of a new potential causal association, or a new aspect of a
222 known association, and therefore justifies further analysis.

223 As a minimum it is expected that the marketing authorisation holder should check at this step that:

- 224 • the event occurred after exposure to the medicinal product (i.e. there is a temporal association);
 - 225 • the signal is not based only on duplicate reports;
 - 226 • the suspected adverse event is not already adequately reflected in the current product information.
227 Even if certain VeDDRA terms are not explicitly included in the product information it may occur
228 that the observed symptoms are already covered by the text included in the product information.
-

229 Other information that can be checked at this step is, for example, if the signal concerns an increase in
230 the number of reports involving an expected event, reflected in the product information, that this
231 increase is not related to an increase in sales volumes.

232 Signal validation serves thus as a first quality check of the cases and the evidence supporting a signal
233 in the context of any previous awareness, e.g. previous cases reported, previous analysis done on the
234 same issue, any information available on the same issue in other regulatory procedures, etc. Non-
235 validated signals do not require any further in-depth assessment and should not be recorded in the
236 Union Pharmacovigilance database.

237 Once a signal is validated, further assessment shall be performed by the marketing authorisation
238 holder.

239 The assessment should include a cumulative review of all available evidence (i.e. not only the cases
240 received during a certain reporting period, but all previously reported cases). In this cumulative
241 review, the pharmacological, pre-clinical, clinical, and epidemiological data from all available sources
242 should be reviewed, as applicable, in order to conclude on a potential causal association between the
243 medicinal product and the concerned suspected adverse event.

244 The assessment of the signal should be as comprehensive as possible and include all available data
245 from different sources to increase the strength of the evidence in order to reach a high-quality decision
246 and signal outcome, e.g. literature review, expert consultation, etc.

247 Some elements regarding the clinical relevance of the reaction such as the seriousness, severity, the
248 outcome and reversibility, are important in the assessment of a signal given that regulators may act on
249 a precautionary principle and accept lower levels of evidence to recommend a regulatory action such
250 as e.g. adding a warning in the product information.

251 The following elements should be considered, as applicable, when performing the assessment:

- 252 • Total number of cases (after exclusion of duplicates), and from those, the number of supportive
253 cases, e.g. cases showing a compatible time to onset, positive de- or rechallenge, lack of potential
254 alternative causes, assessed as possibly related by the reporting veterinarian or healthcare
255 professional, with supportive results of relevant investigations.
- 256 • Incidence (see section 3.5).
- 257 • Additional cases reported with related terms (e.g. other VedDRA terms indicating clinical
258 complications or different stages of the same reaction).
- 259 • Consistency of the evidence across cases (e.g. consistent time to onset, pattern with repeated
260 observations of an association).
- 261 • Quality of the data and their supporting documentation.
- 262 • Dose-reaction relationship.
- 263 • Possible mechanism based on a biological and pharmacological plausibility.
- 264 • Disproportionality of reporting, if applicable.
- 265 • Potential drug-drug interactions.

266 Additional sources of information may provide further evidence for or against a causal association and
267 may be considered:

- 268 • Experimental, non-clinical data and clinical trial data.

- 269 • Findings regarding similar cases in the scientific literature, including information on substances of
270 the same class of medicinal products.
- 271 • Information on the epidemiology of the adverse reaction or the underlying disease.
- 272 • Databases with larger datasets, if available.
- 273 • Information from other regulatory authorities worldwide.

274 **2.6. Recommendation for action by the marketing authorisation holder**

275 As a result of the assessment of a signal, the marketing authorisation holder should conclude whether
276 the available evidence reviewed supports a potential causal association, or not, between the veterinary
277 medicinal product or active substance concerned and the suspected adverse event and therefore, if it
278 this adverse event constitutes a new risk or a new aspect of a known risk. If it is concluded that the
279 safety profile of the product/substance has changed, the need for additional risk minimisation
280 measures and/or any other regulatory actions should be considered, including a variation to the terms
281 of the marketing authorisation.

282 This leads to the following possible actions to be concluded, as appropriate, by the marketing
283 authorisation holder following signal assessment;

- 284 • The available evidence supports a causal association resulting in a change to the benefit-risk or a
285 new risk:
 - 286 – The new risk is considered an Emerging Safety Issue (see section 2.3.1 of this document).
 - 287 – Notify within 30 calendar days with a proposal for the necessary action (Article 81(2) of
288 Regulation (EU) 2019/6).
 - 289 – Propose other actions and risk minimisation measures as applicable.
- 290 • The available evidence does not support a causal association at this moment:
 - 291 – Signal refuted, no further action besides routine pharmacovigilance.
 - 292 – Close monitoring.
 - 293 – A post-marketing surveillance study is required to further investigate.

294 **2.6.1. Close monitoring**

295 When the available evidence does not support a causal association between the medicinal product and
296 the suspected adverse event, the signal can be closed without the need for any further regulatory
297 action (i.e. routine pharmacovigilance activities will continue to be performed). In this case the signal
298 could still be reopened in the future should any new relevant information become available.

299 In some cases, it might be decided that the signal should not be closed and some further follow-up
300 (i.e. close monitoring) is required. In this case, the marketing authorisation holder should report at
301 each yearly signal detection submission on the status of the signals under close monitoring. Shorter
302 reporting time-periods for certain signals may be set by the relevant competent authority (ies) (e.g. 6-
303 months).

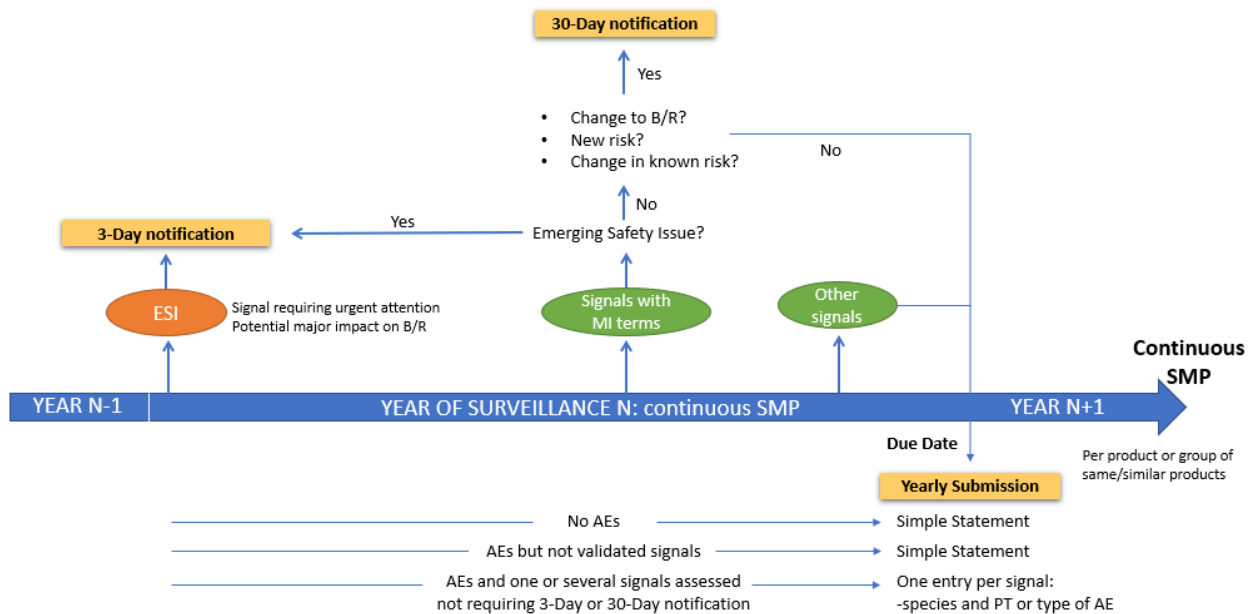
304 2.6.2. Post-marketing surveillance study

305 In some cases, it might be concluded that spontaneous data are not sufficient to evaluate a certain
306 potential risk identified through signal management. Additional data collection may be needed to
307 conclude on the potential causal association with the veterinary medicinal product. In these cases, the
308 marketing authorisation holder may propose to conduct voluntarily a post-marketing surveillance
309 study. In some cases, a post-marketing surveillance safety study may also be requested by the Agency
310 or national competent authorities (Article 76(3) and (4) of Regulation (EU) 2019/6).

311 3. Operation of the EU network

312 Figure 2 below summarises the continuous signal management performed by marketing authorisation
313 holders and the different types of submissions to competent authorities throughout a year of
314 surveillance.

315



316

317 **Figure 2. Overview of the continuous signal management process performed by MAHs**
318 **throughout a year of surveillance**

319 3.1. Roles, responsibilities, and procedural aspects

320 As stated in the legislation, marketing authorisation holders are responsible for the continuous
321 monitoring of pharmacovigilance data and the assessment of the benefit-risk balance of their
322 veterinary medicinal products (Articles 77(4) and 81 of Regulation (EU) 2019/6).

323 Signals detected by the marketing authorisation holder, regardless of the source, should be handled
324 according to the principles outlined in this module. Some signals detected throughout the year will
325 require more urgent attention by the regulators than others (see section 2.3 of this document).
326 Accordingly, two separate procedures can be identified that will require evaluation by the competent
327 authorities: the evaluation of signals that are submitted continuously throughout the year by the
328 marketing authorisation holder which require regulatory action (including emerging safety issues and
329 signals involving MI terms with a proposed regulatory action), and the evaluation of an annual
330 statement by the marketing authorisation holder together with a summary of the validated signals

331 assessed throughout the year which did not require urgent attention or did not lead to any proposals
332 for action as well as a conclusion on the benefit-risk balance of the veterinary medicinal product.

333 In order to facilitate and coordinate the evaluation by the competent authorities, due dates for
334 submission of the annual statement on the benefit-risk balance (see section 3.2 of this document) and
335 data on signals assessed throughout the year by the marketing authorisation holder (see section 2 of
336 this document) will be set up for all active substances concerned. These will be defined annually,
337 although more frequent than annual submission may be specified by the Agency (e.g. for specific new
338 active substances (Article 81(2) referring to Article 42(2)(c)). At the time of submission, the marketing
339 authorisation holders should submit and record the outcomes of the signal management process
340 throughout the period in the Union Pharmacovigilance Database.

341 **3.2. Recording of the outcome of signal management by the marketing** 342 **authorisation holder**

343 **3.2.1. Signals which require reporting without delay**

344 Emerging safety issues (see section 2.3.1 of this document), including those involving MI terms,
345 should be notified as soon as possible and no later than 3 working days following the discovery of an
346 emerging safety issue by the marketing authorisation holder. Emerging safety issues should be entered
347 in the relevant module in the Union Pharmacovigilance Database with a description of the issue and the
348 proposed actions.

349 For signals (except for those considered an emerging safety issue) where the marketing authorisation
350 holder identifies a change to the benefit-risk balance or a new risk, that requires potential regulatory
351 action, they should record the outcome of the signal management process into the Union
352 Pharmacovigilance Database without delay and no later than 30 calendar days following the conclusion
353 of the signal assessment. For this purpose, the signal should be entered in the signal module of the
354 Union Pharmacovigilance Database.

355 The data to be entered should include the following fields:

- 356 • Administrative information: name of medicinal product(s), marketing authorisation holder, active
357 substance(s).
- 358 • per signal: one entry specifying the species and the VeDDRA Preferred Term or type of adverse
359 event, cumulative number or cases supporting the signal attached as line listing, the rationale for
360 the decisions and the results of the signal assessment in an appropriate signal assessment report
361 (*under development*) which should include a conclusion on the potential causal association and
362 proposals for risk minimisation measures as necessary.

363 **3.2.2. Annual reporting including annual statement**

364 Marketing authorisation holders shall record at least once a year the results and outcomes of their
365 signal management process in the Union Pharmacovigilance Database (Article 81 of Regulation (EU)
366 2019/6). This obligation applies for each veterinary medicinal product for which the marketing
367 authorisation holder is responsible. As laid down in the Commission Implementing Regulation
368 (<reference to be included upon publication>), at least annually, marketing authorisation holders shall
369 record a conclusion on the benefit-risk balance of each of their products in the Union
370 Pharmacovigilance Database and confirm that the signal management process has been conducted.
371 This should be done regardless of any signals detected throughout the year.

372 The annual reporting shall take place by the due date set for each veterinary medicinal product.
373 Signals falling under 3.2.1. of this document or any other signals reported already to the Union
374 Pharmacovigilance database since the previous due date, do not need to be re-sent.

375 However, any other signals involving MI terms, should be recorded in the Union Pharmacovigilance
376 database by the yearly due date, regardless of the conclusion of the assessment.

377 The data to be entered should include the following fields:

- 378 • Administrative information: name of veterinary medicinal product(s), marketing authorisation
379 holder, active substance(s).
- 380 • Entry identified as "Yearly signal management", and due date.
- 381 • Per signal: one entry specifying the species and the VeDDRa Preferred Term or type of adverse
382 event, cumulative number or cases supporting the signal attached as line listing, the rationale for
383 the decisions and the results of the signal assessment in an appropriate signal assessment report
384 (*under development*) which should include a conclusion on the potential causal association.

385 For signals that are considered under close monitoring and which were already submitted more than
386 six months prior to the due date, the existing signal entry shall be updated by the due date with a
387 summary of the new and similar cases received since the last update.

388 **3.3. Incidence reporting by marketing authorisation**

389 **3.4. Targeted signal management by the competent authorities**

390 This section is under development.

391 **3.5. Transparency**

392 In relation to the EU signal management of veterinary medicinal products, the following information
393 will be published by the Agency on the European Medicines web-portal:

- 394 • Pharmacovigilance Working Party-veterinary (PhVWP), Committee for Medicinal Products for
395 Veterinary Use (CVMP) and Veterinary Mutual Recognition Facilitation Group (CMDv) agendas.
- 396 • PhVWP-V, CVMP and CMDv recommendations.
- 397 • Cumulative list of signals discussed by the PhVWP-V, CVMP and CMDv with links to the relevant
398 minutes.
- 399 • List of due dates for the submission of the yearly signal management outcomes for each veterinary
400 medicinal product authorised in the EU, including homeopathic products.

401 **4. Quality management system requirements**

402 Signal management is considered a critical process. Marketing authorisation holders should make sure
403 to document their signal management process, including detailed policies, processes and procedures,
404 to ensure that the system functions properly and effectively, that the roles, responsibilities and
405 required tasks are clear and standardised, that these tasks are conducted by staff with appropriate
406 qualifications and expertise and that there are provisions for appropriate control and, when needed,
407 improvement of the system. A quality management system should be applied to all signal management
408 processes. Detailed procedures for this quality management system should be developed, documented,

409 and implemented. This includes the rationale for the method and periodicity of signal detection
410 activities.

411 Through a tracking system, all organisations should keep an audit trail of signal management
412 activities, allowing traceability (i.e. recording of dates and confirmation of timeliness) and process
413 control of the details of all steps of signal management, including analyses, decisions, and rationale.

414 When the marketing authorisation holder opts to use its own database for signal detection and
415 analysis; detailed description of the data collection process, the data-tables and available queries shall
416 be made available on request or at the time of pharmacovigilance inspections.

417 The organisational roles and responsibilities for the activities including maintenance of documentation,
418 quality control and review, and for ensuring corrective and preventive action should be assigned and
419 recorded. Each organisation should ensure that staff members are specifically trained in signal
420 management activities in accordance with their roles and responsibilities.

421 **Definitions**

422 Please refer to the VGVP Glossary (EMA/118227/2021) for relevant definitions.

423

424 **Appendix 1. Medically Important (MI) terms list**

425 As a guidance to prioritise the analysis of data during signal detection in the Union Pharmacovigilance
 426 database, a Medically Important (MI) terms list based on VeDDRA terms at the VeDDRA Preferred
 427 Terms level has been developed. This list should be used by the European Medicines Agency, EEA
 428 Member States, and market authorisation holders for signal prioritisation, as described in this module.
 429 The MI terms list contains VeDDRA Preferred Terms (PT) that identify serious medical concepts often
 430 causally associated with drugs across multiple pharmacological/therapeutic classes and should
 431 automatically be prioritised. However, if a MI term is already listed in the product information, limited
 432 assessment may be required (e.g., calculating if the observed incidence is similar to the expected
 433 incidence, etc.).

434 The MI terms list is not definitive and the absence of an event from the MI terms list does not exclude
 435 the event from analysis. PT terms on the MI terms list will be highlighted in the Union
 436 Pharmacovigilance Database to assist in the identification of these specific terms when performing
 437 signal detection. The content of the MI terms list may change as further experience with its use is
 438 gathered. Suggestions for changes to the MI terms list should be submitted using the appropriate
 439 template to the VeDDRA subgroup for consideration at the annual meeting.

440 All events that occur in humans should be automatically prioritised during signal management process
 441 in the Union Pharmacovigilance database.

442 Further specifications are described here below:

443 (1) Some VeDDRA PT terms are only considered medically important when associated with a specific
 444 species and the related species are specified in the list #.

445 (2) As a result of the current structure of the VeDDRA list, not all Lower Level Terms (LLT) within a PT
 446 term possess the same degree of medical importance and the excluded LLTs terms are specified in the
 447 list*

MI PTs	Species association #	Excluded LLTs *
Abdominal pain	Horse	Abdominal cramp, Abdominal discomfort, Praying position, Stomach cramp, Tense abdomen
Abomasitis	Ruminant, Camelid	
Abortion	All	
Acute mastitis	Ruminant, Camelid, Horse	
Aggression	All	
Anaphylaxis	All	
Anorexia	Horse	
Apnoea	All	
Ataxia	Horse	
Bee systemic disorders NOS	Bee	
Birth defect	All	
Blindness	All	
Bone marrow hypoplasia	All	
Cardiac arrest	All	
Cardiac insufficiency	All	
Circulatory shock	All	
Coagulopathy	All	

MI PTs	Species association #	Excluded LLTs *
Collapse NOS	All	
Coma	All	
Convulsion	All	
Deafness	All	
Death	All	Unrelated death
Diabetes mellitus	All	
Disseminated intravascular coagulation	All	
Dyspnoea	All	
Epileptic seizure	All	
Fish asphyxia	Fish	
Fish body deformity	Fish	
Haemolytic anaemia	All	
Haemorrhagic gastroenteritis	All	
Heart block	All	
Hepatic failure	All	
Hypersensitivity reaction	All	Allergic pruritus, Allergic reaction, Allergic skin reaction, Allergy NOS
Hypocalcaemic condition	Ruminant, Camelid	
Hypomagnesaemic condition	Ruminant, Camelid	
Impaired hearing	All	
Impaired vision	All	
Immune mediated thrombocytopenia	All	
Increased coagulation time	All	
Ketosis	Ruminant, Camelid	
Laminitis	Horse	
Loss of consciousness	All	
Lying down	Horse, Ruminant, Pig, Camelid	
Metastatic neoplasia	All	
Metritis	Horse, Ruminant, Camelid	
Moribund	All	
Multi-organ failure NOS	All	
Myoglobinuria (Horses only)	Horse	
Paralysis	All	
Paresis	All	
Perinatal mortality	All	
Recumbency	Horse, Ruminant, Pig, Camelid	
Renal insufficiency	All	
Reticulitis	Ruminant, Camelid	
Stillbirth	All	
Suspected infectious agent transmission	All	
Thrombocytopenia	All	