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Guideline on good pharmacovigilance practices (GVP)

Module VI – Collection, management and reporting-submission of reports of suspected adverse reactions to medicinal products (Rev 2)

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* For this reason, the timetable above, and in particular the date of coming into effect, apply only the clean version published as final.

For the final version of this module and any future updates, please see the GVP webpage of the Agency's website.

* **Note:** Revision 2 contains the following:

- Updated guidance on ICSRs submission, follow-up, duplicate detection and data quality management, taking into account the implementation of the new EudraVigilance system, and of the simplified submission of ICSRs in the EU in line with the provisions provided in Article 24 of Regulation (EC) No 726/2004 and Article 107 and 107a of Directive 2001/83/EC;
- Updated guidance on the validation of ICSRs based on patients and reporters identifiability;

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- Updated guidance on the management of ICSRs described in the medical literature;
- Updated guidance on the collection of information on patient's age;
- Updated guidance on the management of suspected adverse reactions reported through medical enquiry and product information services;
- New guidance on the electronic submission modalities of ICSRs under the new ICH-E2B(R3) format;
- New guidance on the management of individual reports of off-label use, based on the Reflection Paper on Collecting and Reporting Information on Off-label Use in Pharmacovigilance (EMA/293194/2016), published for public consultation in 2016;
- New guidance on the management of reports from post-authorisation efficacy studies;
- Transfer of the guidance on emerging safety issue to GVP Module IX;
- Editorial amendments to align the format with other GVP Modules.

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VI.A. Introduction

~~VI.A.1. Scope~~ This Module of GVP addresses the legal requirements detailed in ~~Title TITLE IX of~~ Directive 2001/83/EC [DIR] and ~~chapter Chapter 3 of TITLE II of~~ Regulation (EC) No 726/2004 [REG], which are applicable to competent authorities in Member States, marketing authorisation holders and the Agency as regards the collection, data management and ~~reporting-submission of individual reports of~~ suspected adverse reactions (serious and non-serious) associated with medicinal products for human use authorised in the European Union (EU).

~~Section VI.B. of this Module highlights the general principles, based on the pharmacovigilance guidelines E2A, E2B and E2D of the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) (see GVP Annex IV), in relation to the collection, recording and submission of individual reports of suspected adverse reactions associated with medicinal products for human use. The definitions and guidance provided in Section VI.A. and the EU specific requirements presented in Section VI.C. should be followed.~~

~~All applicable legal requirements are referenced in the way explained in the GVP Introductory Cover Note and are usually identifiable by the modal verb "shall". Guidance for the implementation of legal requirements is provided using the modal verb "should".~~

~~The guidance provided in this Module does not address the collection, management and submission of individual reports of events or patterns of use, which do not result in suspected adverse reactions (e.g. asymptomatic overdose, abuse, misuse or medication error) and which are not required to be submitted as individual case safety reports (ICSRs). This information may however need to be collected and presented in periodic safety update reports for the interpretation of safety data or for the benefit risk evaluation of medicinal products. With regard to this, the guidance provided in GVP Module VII applies.~~

~~Recommendations regarding the reporting of emerging safety issues or of suspected adverse reactions occurring in special situations are also presented in this Module. The requirements provided in chapters Chapters IV, V and IX of the Commission Implementing Regulation (EU) No 520/2012 [IR] shall be applied in this Module.~~

~~The guidance provided in this Module does not address the collection, management and reporting of events or patterns of use, which do not result in suspected adverse reactions (e.g. asymptomatic overdose, abuse, off-label use, misuse or medication error) or which do are not require required to be reported submitted as individual case safety report or as emerging safety issues. This information may however need to be collected and presented in periodic safety update reports for the interpretation of safety data or for the benefit risk evaluation of medicinal products. In this aspect, the guidance provided in GVP Module VII applies.~~

~~Section B of this Module highlights the general principles in relation to the collection, recording and of reports of suspected adverse reactions associated with medicinal products for human use, which are applicable to competent authorities and marketing authorisation holders. The definitions and recommendations provided in VI.A. should be followed. EU requirements are presented in VI.C.~~

~~All applicable legal requirements detailed in this Module are referenced in the way explained in the GVP Introductory Cover Note and are usually identifiable by the modal verb "shall". Guidance for the implementation of legal requirements is provided using the modal verb "should".~~

VI.A.21. Definitions and Terminology

The definitions provided in ~~Article 1 of Directive 2001/83/EC of Directive 2001/83/EC~~ shall be applied for the purpose of this Module; of particular relevance are those provided in this Section. Some general principles presented in ~~the ICH-E2A and ICH-E2D guidelines~~ (see [GVP Annex IV](#)) should also be adhered to; they are included as well in this Section (see [GVP Annex I](#) for all definitions applicable to GVP).

VI.A.1.1. Adverse reaction, causality

VI.A.2.1. Adverse reaction:

~~An adverse reaction is a~~ response to a medicinal product which is noxious and unintended ~~–~~[DIR Art 1]. ~~This includes adverse reactions which arise from:~~(11). Adverse reactions may arise from use of the product within or outside the terms of the marketing authorisation or from occupational exposure [DIR Art 101(1)]. Use outside the marketing authorisation includes off-label use, overdose, misuse, abuse and medication errors.

~~Causality: the use of a medicinal product within the terms of the marketing authorisation;~~

~~the use outside the terms of the marketing authorisation, including overdose, off-label use, misuse, abuse and medication errors;~~

~~occupational exposure.~~

VI.A.2.1.1. Causality

In accordance with ICH-E2A (see [GVP Annex IV](#)), the definition of an adverse reaction implies at least a reasonable possibility of a causal relationship between a suspected medicinal product and an adverse event¹. ~~(see GVP Annex I)~~. An adverse reaction, in contrast to an adverse event, is characterised by the fact that a causal relationship between a medicinal product and an occurrence is suspected. For regulatory reporting purposes, as detailed in ICH-E2D (see [GVP Annex IV](#)), if an event is spontaneously reported, even if the relationship is unknown or unstated, it meets the definition of an adverse reaction. Therefore all spontaneous reports notified by healthcare professionals² or consumers² are considered suspected adverse reactions, since they convey the suspicions of the primary sources³, unless the reporters specifically state that they believe the events to be unrelated or that a causal relationship can be excluded.

VI.A.21.12.2. Overdose, off-label use, misuse, abuse, occupational exposure, medication error, falsified medicinal product

~~a. Overdose:~~ This refers to the administration of a quantity of a medicinal product given per administration or cumulatively, which is above the maximum recommended dose according to the authorised product information. Clinical judgement should always be applied.

~~b. Off-label use:~~ This relates to situations where the medicinal product is intentionally used for a medical purpose not in accordance with the ~~authorised product information~~terms of the marketing authorisation.

¹ An adverse event is defined in ICH-E2D (see [GVP Annex IV](#)) as any untoward medical occurrence in a patient administered a medicinal product and which does not necessarily have to have a causal relationship with this treatment.

² See VI.A.2.3. for definition of primary source

³ See VI.A.1.4. for definition of primary source.

~~c-~~ **Misuse:** This refers to situations where the medicinal product is intentionally and inappropriately used not in accordance with the ~~authorised product information~~ terms of the marketing authorisation.

~~d-~~ **Abuse:** This corresponds to the persistent or sporadic, intentional excessive use of a medicinal product, which is accompanied by harmful physical or psychological effects [DIR Art 1~~7~~(16)].

~~e-~~ **Occupational exposure:** This refers to the exposure to a medicinal product (~~as-see definition defined in [DIR-VI.A.1.3.Art 1](2)~~), as a result of one's professional or non-professional occupation. It does not include the exposure to one of the ingredients during the manufacturing process before the release as finished product.

Medication error: This is an unintended failure in the drug treatment process that leads to, or has the potential to lead to harm to the patient⁴.

Falsified medicinal product: This relates to any medicinal product with a false representation of:

- its identity, including its packaging and labelling, its name or its composition as regards any of the ingredients including excipients and the strength of those ingredients;
- its source, including its manufacturer, its country of manufacturing, its country of origin or its marketing authorisation holder; or
- its history, including the records and documents relating to the distribution channels used.

This definition does not include unintentional quality defects and is without prejudice to infringements of intellectual property rights [DIR Art 1(33)].

VI.A.21.23. Active substance, excipient, Medicinal product, Active substance, excipient

Active substance: Any substance or mixture of substances intended to be used in the manufacture of a medicinal product and that, when used in its production, becomes an active ingredient of that product intended to exert a pharmacological, immunological or metabolic action with a view to restoring, correcting or modifying physiological functions or to make a medical diagnosis [DIR Art 1(3a)].

Excipient: Any constituent of a medicinal product other than the active substance and the packaging material [DIR Art 1(3b)]; E.g. colouring matter, preservatives, adjuvant, stabilisers, thickeners, emulsifiers, flavouring and aromatic substances [DIR Annex I].

Medicinal product: A medicinal product is characterised by any substance or combination of substances,

- presented as having properties for treating or preventing disease in human beings; or
- which may be used in, or administered to human beings either with a view to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action, or to making a medical diagnosis [DIR Art 1~~7~~(2)].

~~**Active substance:** An active substance corresponds to any substance or mixture of substances intended to be used in the manufacture of a medicinal product and that, when used in its production, becomes an active ingredient of that product intended to exert a pharmacological, immunological or~~

⁴ From: Good practice guide on recording, coding, reporting and assessment of medication errors (EMA/762563/2014); EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medication errors](#).

~~metabolic action with a view to restoring, correcting or modifying physiological functions or to make a medical diagnosis [DIR Art 1(3a)].~~

~~**Excipient:** An excipient corresponds to any constituent of a medicinal product other than the active substance and the packaging material [DIR Art 1(3b)].~~

~~In accordance with Article 107 of Directive 2001/83/EC, the scope of this moduleModule is not only applicable to medicinal products authorised in the EU but also to any such medicinal products commercialised outside the EU by the same marketing authorisation holder (see VI.C.2.2.). Given that a medicinal product is authorised with a defined composition, all the adverse reactions suspected to be related to any of the active substances being part of a medicinal product authorised in the EU should be managed in accordance with the requirements presented in this moduleModule. This is valid independently of the strengths, pharmaceutical forms, routes of administration, presentations, authorised indications, or trade names of the medicinal product. For the definition of the name and strength of a medicinal product, refer to Article 1(20) and Article 1(22) of Directive 2001/83/EC.~~

~~The guidance provided in this Module also applies, subject to amendments where appropriate, to medicinal products supplied in the context of compassionate use (see VI.C.1.2.2.) as defined in Article 83(2) of Regulation (EC) No 726/2004., subject to and without prejudice to applicable national law of the EU Member States. As the case may be, this guidance may also apply to named patient use as defined under Article 5(1) of Directive 2001/83/EC.~~

~~For devices containing active substances, whether they are authorised in the EU as medicinal products or CE-marked as medical devices determines which procedure should be followed for the safety reporting of suspected adverse reactions and/or incidents. In this aspect, medicinal products follow the requirements for pharmacovigilance provided in Directive 2001/83/EC and Regulation (EC) No 726/2004, whereas medical devices follow the requirements for medical device vigilance in accordance with Directive 90/385/EEC and Directive 93/42/EEC. As detailed in the Guidelines on a Medical Devices Vigilance System⁵, a medical device incorporating a medicinal product or substance, where the action of the medicinal product or substance is ancillary to that of the device, follows the legal requirements of Directive 90/385/EEC and Directive 93/42/EEC.~~

VI.A.21.34. Primary source, healthcare professional and consumer

~~The In accordance with ICH-E2B, the primary source of the information on a suspected adverse reaction(s) is the person who reports the facts: about an individual case safety reportICSR. Several primary sources, such as healthcare professionals and/or a consumerconsumers, may provide information on the same case. In this situation, all the primary sources' details, including the qualifications, should be provided in the case reportICSR, with and the "Primary source(s)" section should be repeated as necessary in line with ICH-E2B(R2) (see GVP Annex IV)⁶: VI.B.2. for ICSRs validation based on the primary source identifiability-of-reports).~~

~~In accordance with the ICH-E2D (see GVP Annex IV),~~

- ~~• a healthcare professional is defined as a medically-qualified person such as a physician, dentist, pharmacist, nurse, coroner or as otherwise specified by local regulations;~~
- ~~• a consumer is defined as a person who is not a healthcare professional such as a patient, lawyer, friend, relative of a patient or carer.~~

⁵ Ref.: MEDDEV 2.12-1 rev 8 (Ref. Ares(2016)856772 – 18/02/2016)

⁶ See VI.C.6 as regards the electronic reporting of ICSRs in the EU.

~~Medical documentations~~The "Primary Source for Regulatory Purposes" is defined in ICH-E2B(R3)⁷ and is not applicable for the electronic ~~transmissionsubmission~~ of ICSRs under the ICH-E2B(R2) format. This data element refers to the person who first reported the facts. In case of multiple primary sources from different countries, ~~it~~this data element identifies the country source ~~for the ICH-E2B data element "worldwide unique case unique-identification number" by defining the country where the case occurred.~~

Where the patient experienced a suspected adverse reaction in another country than the one of the primary source, this information should be captured in the ICH-E2B data element "Identification of the Country Where the Reaction / Event Occurred", e.g. a male patient from Ireland is reporting experiencing an anaphylactic reaction with drug X while travelling in Spain, in this instance the primary source country is Ireland and the occurrence country is Spain. Guidance about the automatic rerouting of the ICSR to the competent authority of the EU Member State where the reaction occurred is provided in VI.C.4..

VI.A.1.35. Medical confirmation

~~A consumer may provide medical documentations~~ (e.g. laboratory or other test data) ~~provided by a consumer that supports~~ supports the occurrence of ~~the~~a suspected adverse reaction, ~~or and~~ which ~~indicate~~indicates that an identifiable healthcare professional suspects a reasonable possibility of causal relationship between a medicinal product and the reported adverse ~~eventreaction~~, ~~are sufficient to consider the spontaneous report as confirmed by a healthcare professional.~~

~~If a consumer initially reports more than one reaction and at least one receives medical confirmation, the whole report should be documented as a spontaneous report confirmed by a healthcare professional and be reported accordingly..~~ Similarly, if a report ~~is~~may be ~~submitted-notified~~ by a medically qualified patient, friend, relative ~~or carer~~ of the patient ~~or carer~~. ~~In these situations, the case should also be reported information is~~ considered ~~as a spontaneous report~~medically confirmed ~~by a healthcare professional.~~

~~In the same way, where one or more suspected adverse reactions initially reported by a consumer~~ ~~is~~are subsequently confirmed by a healthcare ~~professional-professional~~or ~~contains medical documentation that supports the occurrence of a suspected adverse reaction, the case~~ICSR should be considered medically confirmed. It should be updated at case level in line with ICH-E2B(R2), or at adverse reaction level in accordance with ICH-E2B(R3) for each subsequently medically confirmed suspected adverse reaction.

VI.A.21.46. Seriousness

As described in ICH-E2A (see [GVP Annex IV](#)), a serious adverse reaction corresponds to any untoward medical occurrence that at any dose results in death, is life-threatening, requires inpatient hospitalisation or prolongation of existing hospitalisation, results in persistent or significant disability or incapacity, or is a congenital anomaly/birth defect.

The characteristics/consequences should be considered at the time of the reaction to determine the seriousness ~~of a case~~. For example, life-threatening refers to a reaction in which the patient was at risk of death at the time of the reaction; it does not refer to a reaction that hypothetically might have caused death if more severe.

⁷ ICH Implementation Guide for Electronic Transmission of Individual Case Safety Reports (ICSRs) E2B(R3) Data Elements and Message Specification (Accessible at <http://estri.ich.org/e2br3/index.htm>)

Medical judgement should be exercised in deciding whether other situations should be considered as serious reactions. Some medical events may jeopardise the patient or may require an intervention to prevent one of the above characteristics/consequences. Such important medical events should be considered as serious⁸. The EudraVigilance Expert Working Group has co-ordinated the development of an important medical event (IME) terms list based on the Medical Dictionary for Regulatory Activities (MedDRA) (see [GVP Annex IV](#)). This IME list aims to facilitate the classification of suspected adverse reactions, the analysis of aggregated data and the assessment of ~~the individual case safety reports (ICSRs)~~ in the framework of the day-to-day pharmacovigilance activities. The IME list is intended for guidance purposes only and is available on ~~the Agency the EudraVigilance~~ web-site⁹ to stakeholders who wish to use it for their pharmacovigilance activities. It is regularly updated in line with the latest version of MedDRA.

Where one or more serious suspected adverse reactions are reported in an ICSR, the information on the seriousness should be documented at case level in line with ICH-E2B(R2) or for each reported suspected adverse reaction in accordance with ICH-E2B(R3), depending on the ICH-E2B format used for the ICSR electronic submission.

VI.A.21.57. Individual case safety report (ICSR)

This refers to the format and content for the ~~submission of an individual report reporting of one or several~~ suspected adverse reactions in relation to a medicinal product that occur in a single patient at a specific point of time. [\[IR Art 27\]](#). A valid ICSR should include at least one identifiable reporter, one single identifiable patient, at least one suspect adverse reaction, and at least one suspect medicinal product ([see VI.B.2. for ICSRs validation](#)).

VI.A.21.68 NnullFlavors

The NnullFlavors are a collection of codes specifying why a valid value is not present in an ICSR. They are available with the ICH-E2B(R3) format and not with ICH-E2B(R2). They is refers to instances, where for example a proper value is applicable, but not known (e.g. age of the patient is unknown: code UNK), or where the value is masked i.e. information is available to a sender of an ICSR but it is masked because it cannot be provided due to security, privacy or other reasons (e.g. date of birth of the patient cannot be shared due to local data protection laws: code MSK). ICH-E2B(R3) ICSR uses the nullFlavorNullflavour code sets from the HL7 Messaging Standard primarily to classify the set of source data situations that may give rise to a missing value. For examples how a nullFlavorNullflavors can be used to code values in the ICSR, refer to [chapter 3.3.6. of the ICH Implementation Guide for Electronic Transmission of Individual Case Safety Reports \(ICSRs\) E2B\(R3\) Data Elements and Message Specification, Version 5.01, 12 April 2013](#)¹⁰. Additional EU guidance on the use of the nullFlavorNullflavor in some specific situations is also provided in [chapter I.C.3.7. of the EU Individual Case Safety Report \(ICSR\) Implementation Guide](#)¹¹.

⁸ Examples are provided in section II.B of ICH-E2A (see [GVP Annex IV](#)).

⁹ EMA website: [Home/Human regulatory/Post-authorisation/Pharmacovigilance/EudraVigilance/System overview http://eudravigilance.ema.europa.eu/human/textforIME.asp](#).

¹⁰ Accessible at <http://estri.ich.org/e2br3/index.htm>

¹¹ Ref. [EMA/51938/2013EMA/51938/2013](#); EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting, 4 December 2014](#).

VI.B. Structures and processes

~~Section B of this Module highlights the general principles in relation to the collection, recording and reporting of reports of suspected adverse reactions associated with medicinal products for human use, which are applicable to competent authorities and marketing authorisation holders. The definitions and recommendations provided in VI.A, should be followed. EU requirements are presented in VI.C.~~

VI.B.1. Collection of reports

Competent authorities and marketing authorisation holders should take appropriate measures ~~in order~~ to collect and collate all reports of suspected adverse reactions associated with medicinal products for human use originating from unsolicited or solicited sources.

For this purpose, a pharmacovigilance system should be developed to allow the acquisition of sufficient information for the scientific evaluation of those reports.

The system should be designed so that it helps to ensure that the collected reports are authentic, legible, accurate, consistent, verifiable and as complete as possible for their clinical assessment.

All notifications that contain pharmacovigilance data should be recorded and archived in compliance with the applicable data protection requirements (see [VI.C.6.2.2.8](#)[VI.C.6.2.2.10](#) for guidance on the [processing of personal data in the EU](#) for EU requirements).

The system should also be structured in a way that allows for reports of suspected adverse reactions to be validated (see [VI.B.2](#) for ICSRs validation) in a timely manner and exchanged between competent authorities and marketing authorisation holders within the legal [reporting submission](#) time frame (see [VI.B.7.1](#) for ICSRs time frames submission).

In accordance with the ICH-E2D (see [GVP Annex IV](#)), two types of safety reports are distinguished in the post-authorisation phase: ~~;~~ reports originating from unsolicited sources and those reported as solicited.

VI.B.1.1. Unsolicited reports

VI.B.1.1.1. Spontaneous reports

A spontaneous report is an unsolicited communication by a healthcare professional, or consumer to a competent authority, marketing authorisation holder or other organisation (e.g. [Regional regional Pharmacovigilance pharmacovigilance Centrecentre](#), [Poison-poison Control-control Centrecentre](#)) that describes one or more suspected adverse reactions in a patient who was given one or more medicinal products ~~and that. It~~ does not derive from a study or any organised data collection systems ~~where adverse events reporting is actively sought~~, as defined in [VI.B.1.2](#). ~~In this aspect~~ [With regard to this, the following situations should also be considered as spontaneous reports:](#)

- ~~Stimulated-stimulated~~ reporting that occurs consequent to a direct healthcare professional communication (see [Module XV](#), [GVP Module XV](#)), publication in the press, questioning of healthcare professionals by company representatives, communication from patients' organisations to their members, or class action lawsuits ~~should be considered spontaneous reports.~~
- ~~Unsolicited-unsolicited~~ consumer adverse reactions reports ~~should be handled as spontaneous reports~~ irrespective of any subsequent "medical confirmation" ~~;~~

- ~~R~~reports of suspected adverse reactions, which are not related to any organised data collection systems and (i) which are notified through medical enquiry/product information services or (ii) which are consequent of the distribution of information or educational materials;
- ~~u~~nsolicited reports of suspected adverse reactions collected from the internet or digital media (see [VI.B.1.1.4.](#) for guidance on ICSRs management from the internet or digital media);
- ~~a~~n individual ~~c~~ases notified by different reporters, ~~referring to the same patient and same suspected adverse reaction,~~ and at least one notification is done ~~in an unsolicited manner~~spontaneously;
- ~~R~~reports of suspected adverse reactions ~~originating~~ from non-interventional post-authorisation studies ~~and~~ related to specified adverse events for which the protocol does not require ~~a~~their systematic collection (see [VI.C.1.2.1.1.](#) for EU guidance on this type of non-interventional post-authorisation studies, and [VI.6.2.3.7 Subsection 2](#) for EU guidance on the electronic submission of these ICSRs);
- ~~R~~reports of suspected adverse reactions ~~originating~~ from compassionate use or named patient use conducted in ~~a~~ countries where the ~~active~~systematic collection of adverse events ~~occurring in these programmes is not required~~ (see [VI.C.1.2.2.](#) for EU guidance on compassionate use or named patient use, and [VI.6.2.3.7 Subsection 2](#) for EU guidance on the electronic submission of these ICSRs).

The ~~reporting~~ modalities [for the submission of spontaneous reports of suspected adverse reactions](#) and [the applicable time frames for spontaneous reports](#) are described in [VI.B.7.](#) and [VI.B.8.](#)

VI.B.1.1.2. Literature reports

The ~~scientific and medical literature~~[medical literature](#) is a significant source of information for the monitoring of the safety profile and of the risk-benefit balance of medicinal products, particularly in relation to the detection of new safety signals or emerging safety issues. Marketing authorisation holders are therefore expected to maintain awareness of possible publications through a systematic literature review of widely used reference databases (e.g. Medline, Excerpta Medica or Embase) no less frequently than once a week. The marketing authorisation holder should ensure that the literature review includes the use of reference databases that contain the largest reference of articles in relation to the medicinal product properties¹². In addition, marketing authorisation holders should have procedures in place to monitor scientific and medical publications in local journals in countries where medicinal products have a marketing authorisation, and to bring them to the attention of the company safety department as appropriate.

Reports of suspected adverse reactions from the ~~scientific and medical literature~~[medical literature](#), including relevant published abstracts from meetings and draft manuscripts, should be reviewed and assessed by marketing authorisation holders to identify and record ICSRs ~~originating from spontaneous reports or non-interventional post-authorisation studies~~.

If multiple medicinal products are mentioned in the publication, only those which are identified by the publication's author(s) as having at least a possible causal relationship with the suspected adverse reaction should be considered [for literature review](#) by the concerned marketing authorisation holder(s).

¹² See [VI.-Appendix App. 2-](#) for ~~the~~ detailed guidance on the monitoring of [the](#) medical ~~and scientific~~ literature.

Valid ICSRs should be ~~reported~~submitted according to in accordance with the time frames and modalities detailed in VI.B.7. and VI.B.8.

One case should be created for each single identifiable patient ~~identifiable based on~~ in line with the characteristics provided in VI.B.2.. Relevant medical information should be provided~~recorded~~ and the first publication author ~~(s)~~ (or the corresponding author, if designated) should be considered as the primary source ~~(s) of information, as well as the primary source for regulatory purposes in line with ICH E2B(R3) (see VI.A.2.3.)~~. Details about ~~t~~The co-authors should do not need to be reflected~~documented~~ ~~among~~as part of the primary sources of information.

EU ~~specific~~ requirements, ~~as regards~~concerning the medicinal products~~active substances~~ and the scientific and medical publications, ~~which are~~ not monitored by the Agency and for which valid ICSRs shall be ~~reported~~submitted to the EudraVigilance database by marketing authorisation holders, are provided in VI.C.2.2.3.1. Exclusion criteria in relation to the submission in the EU of ICSRs published in the literature are also detailed in VI.C.2.2.3.2.

VI.B.1.1.3. Reports from ~~other non-medical sources (e.g. general news or other media)~~

If a marketing authorisation holder becomes aware of a report of suspected adverse reactions originating from a non-medical source, for example the lay press or other media, it should be handled~~managed~~ as a spontaneous report. Every attempt should be made to follow-up the case to obtain the minimum information that constitutes a valid ICSR. With regard to the submission of those ICSRs, ~~T~~the same reporting modalities and time frames should be applied as for other spontaneous reports.

VI.B.1.1.4. Information on suspected adverse reactions from the internet or digital media

~~Marketing~~In line with ICH-E2D (see GVP Annex IV), marketing authorisation holders should regularly screen the internet or digital media¹³ under their management or responsibility, for potential reports of suspected adverse reactions. ~~In this~~With respect to this aspect, a digital medium is considered to be company sponsored if it is owned, paid for and/or controlled by the marketing authorisation holder¹⁴. The frequency of the screening should allow for potential valid ICSRs to be ~~reported~~submitted to the competent authorities within the appropriate regulatory reporting submission time frames based on the date the information was posted on the internet site/digital medium. Marketing authorisation holders may also consider utilising their websites to facilitate the collection of reports of suspected adverse reactions (see VI.C.2.2.1. for marketing authorisation holders' responsibilities in the EU on spontaneous reports).

If a marketing authorisation holder becomes aware of a report of suspected adverse reaction described in any non-company sponsored digital medium, the report should be assessed to determine whether it qualifies for reporting~~submission~~ as ICSR.

Unsolicited cases of suspected adverse reactions from the internet or digital media should be handled as spontaneous reports. The same reporting submission time frames as for spontaneous reports should be applied (see VI.B.7VI.B.7.1. for ICSRs time frames submission).

In relation to cases from the internet or digital media, the identifiability of the reporter refers to the possibility of verification of the existence of a real person; ~~that is, it is possible to verify the contact details of the reporter (based on the information available~~ e.g., an email address under a valid format

¹³ Although not exhaustive, the following list should be considered as digital media: web site, web page, blog, vlog, social network, internet forum, chat room, health portal.

¹⁴ A donation (financial or otherwise) to an organisation/site by a marketing authorisation holder does not constitute ownership, provided that the marketing authorisation holder does not control the final content of the site.

has been provided ([see VI.B.2. for ease ICSRs validation](#)). If the country of the primary source is missing, the country where the information was received, or where the review took place, should be used as the primary source country.

VI.B.1.2. Solicited reports

As defined in ICH-E2D (see [GVP Annex IV](#)), solicited reports of suspected adverse reactions are those derived from organised data collection systems, which include clinical trials, non-interventional studies, registries, post-approval named patient use programmes, other patient support and disease management programmes, surveys of patients or healthcare [providers](#), compassionate use or named patient use, or information gathering on efficacy or patient compliance.

Reports of suspected adverse reactions obtained from any of these data collection systems should not be considered spontaneous. This is with the exception of:

- [reports of suspected adverse reactions in relation to those adverse events from non-interventional post-authorisation studies related to specified adverse events](#) for which the protocol ~~of non-interventional post-authorisation studies provides differently and~~ does not require their systematic collection (see [VI.C.1.2.1.1. for EU guidance on this type of non-interventional post-authorisation studies](#), and [VI.6.2.3.7 Subsection 2 for EU guidance on the electronic submission of these ICSRs](#)),
- [reports of suspected adverse reactions originating](#) from compassionate use or named patient use conducted in [countries](#) where the [systematic active](#) collection of adverse events [occurring](#) in these programmes is not required (see [VI.C.1.2.2. for EU guidance on compassionate use or named patient use](#), and [VI.6.2.3.7 Subsection 2 for EU guidance on the electronic submission of these ICSRs](#)).

~~For the purpose of safety reporting~~ [With regard to the submission as ICSRs](#), solicited reports should be classified as study reports. ~~They, and~~ should have an appropriate causality assessment, to consider whether they refer to suspected adverse reactions and therefore meet the [minimum validation](#) criteria ([see VI.B.2. for ICSRs validation](#)) ~~for reporting~~. [Valid cases ICSRs of suspected adverse reactions should be sent submitted according to in line with the time frames and modalities detailed in VI.B.7. and VI.B.8.](#)

General ~~reporting rules for~~ [principles concerning the management of reports of](#) suspected adverse reactions occurring in organised data collection systems conducted in the EU under the scope of ~~Directive 2001/83/EC~~ [Directive 2001/83/EC, Regulation \(EC\) No 726/2004](#) or ~~Regulation (EC) No 726/2004~~ or Directive 2001/20/EC, are presented in [VI.C.1.](#) [Guidance on the management of solicited reports in the EU by marketing authorisation holders in the EU is provided in VI.C.2.2.2.](#)

VI.B.2. Validation of reports

Only valid ICSRs qualify for [reporting submission](#). [In accordance with ICH-E2D \(see GVP Annex IV\)](#), ~~a~~ All reports of suspected adverse reactions should ~~therefore~~ be validated before [reporting-submitting](#) them to the competent authorities to make sure that the minimum criteria [for reporting](#) are included in the reports (~~see ICH-E2D (see -)~~).

~~These~~ [Four minimum criteria](#) are [required for ICSRs validation](#):

a. one or more identifiable¹⁵ reporter (~~primary source~~); see ~~VI.A.2.3-VI.A.1.4.~~ for ~~primary source definition~~), characterised by ~~parameters such as a~~ qualification (e.g. physician, pharmacist, other healthcare professional, lawyer, consumer or other non-healthcare professional), name, initials, or address (e.g. reporter's organisation, department, street, city, state or province, postcode, country, email, phone number). Local data protection laws might apply.

~~In line with ICH-E2D, the term 'identifiable' indicates that the organisation notified about the case has sufficient evidence of the existence of the person who reports the facts based on the available information. In addition, in accordance with ICH E2B, an ICSR is not valid for submission unless information concerning the qualification and the country is available for at least one reporter. Thus, an ICSR is valid if the rules from ICH-E2D regarding the reporter's identifiability and from ICH-E2B regarding the reporter's qualification and country are fulfilled for at least one reporter.~~

~~If information on the reporter's qualification is missing, the notification should be considered by default as a consumer report. If information on the reporter's country is not available, the country where the notification was received or where the review took place should be used in the ICSR.~~

~~(e.g. physician, pharmacist, other healthcare professional, lawyer, consumer or other non-healthcare professional) name, initials or address¹⁶, and at least one of the following parameters¹⁷: name, address¹⁸ or phone number. An ICSR should not be considered valid for reporting unless this information is available for at least one reporter.~~ Whenever possible, contact details for the reporter should be recorded ~~so that to facilitate~~ follow-up activities ~~can be performed~~. However, if the reporter does not wish to provide contact ~~details information~~, the ICSR should still be considered ~~as~~ valid, ~~providing as long as~~ the ~~notified organisation who was informed of the case was~~ able to confirm ~~the case~~ directly with the reporter.

~~To enable duplicate detection activities, a~~All parties providing case information or approached for case information should be ~~recorded in the ICSR~~ identifiable, (not only the initial reporter-).

~~When the information is based on second-hand or hearsay, the report should be considered non-valid until it can be verified directly with the patient, the patient's healthcare professional or a reporter who had direct contact with the patient.~~

b. one single identifiable¹² patient, characterised by ~~at least one of the following qualifying descriptors~~: initials, ~~patient identification~~ medical record number (from general practitioner, specialist, hospital, or investigation), date of birth, age, age group, ~~or~~ gestation period, or gender.

~~In line with ICH-E2D, the term 'identifiable' refers to the possibility of verification of the existence of a patient based on the available information.~~

The information should be as complete as possible ~~in accordance with local data protection laws.~~

~~An ICSR should not be considered valid for reporting submission unless information is available for at least one of the patient qualifying descriptors. Furthermore, as specified in ICH-E2D, in the absence of a qualifying descriptor, a report notification referring to a definite number of patients should not be regarded as valid until an individual the patients can be characterised by one of the aforementioned qualifying descriptors for creating a valid ICSR.~~

~~a. For example, "Two patients experienced nausea with drug X ..." should not be considered valid without further information.~~

¹⁵ ~~In line with ICH-E2D, the term 'identifiable' is considered in EU as referring to the possibility of verification of the existence of a reporter and of a patient based on the information available.~~

¹⁶ ~~Local data privacy laws regarding patient's and reporter's identifiability might apply.~~

¹⁷ ~~Local data protection laws regarding reporter's and patient's identifiability might apply.~~

¹⁸ ~~Such as reporter's organisation, department, street, city, state/province, postcode, country, or email.~~

~~b.c.~~ **one or more suspected¹⁹ substance/medicinal product** (see ~~VI.A.2.2~~**VI.A.1.3.** for definition). Interacting substances or medicinal products are also considered suspected.

d. one or more suspected adverse reaction (see ~~VI.A.2.1~~**VI.A.1.1.** for definition). ~~Examples of case validity assessment based on the reporter and the patient identifiability are provided in VI.App.8.~~ If the primary source has made an explicit statement that a causal relationship between the medicinal product and the **reported** adverse event has been excluded and the **receiver (notified competent authority or marketing authorisation holder)** agrees with this **assessment**, the report does not qualify as a valid ICSR since the minimum information **for validation reporting** is incomplete (**there is no suspected adverse reaction**)²⁰.

The report **also** does not ~~also~~ qualify as a valid ICSR if it is reported that the patient experienced an unspecified adverse reaction and there is no information **provided** on the type of adverse reaction **experienced**.

Similarly, the report is not valid if only an outcome (or consequence) is notified and (i) no further information about the clinical circumstances is provided to consider it as a suspected adverse reaction, or (ii) the primary source has not indicated a possible causal relationship with the suspected medicinal product. For instance a marketing authorisation holder is made aware that a patient was hospitalised or died, without any further information. In this particular situation, medical judgement should always be applied in deciding whether the notified information is an adverse reaction or an event. For example, a report of sudden death would usually need to be considered as a case of suspected adverse reaction and ~~reported~~**the valid ICSR should be submitted to the competent authorities**.

The lack of any of ~~thesethe~~ four elements means that the case is considered incomplete and does not qualify for **reportingsubmission as ICSR**. Competent authorities and marketing authorisation holders are expected to exercise due diligence in following ~~up~~**up the case to collect the missing data elements and follow-up activities should be documented**. Reports, for which the minimum information is incomplete, should ~~nevertheless~~ be recorded within the pharmacovigilance system for use in on-going safety evaluation activities.

~~Recommendations on the electronic reporting of valid ICSRs, when~~ **When the** missing information has been obtained (**including for example when the medicinal product causal relationship with the reported adverse event is no longer excluded**), **the ICSR becomes valid for submission and the EU guidance are** provided in ~~VI.C.6.2.3.8.~~ **should be followed**.

~~When collecting reports of suspected adverse reactions via the internet or digital media, the term "identifiable" refers to the possibility of verification of the existence of a reporter and a patient (see VI.B.1.1.4.)~~.

Further guidance is available in VI.C.6.2.2.10. for the electronic reportingsubmission in the EU of ICSRs where primary source information cannot be transmitted for data protection considerations.

When one party (competent authority or a marketing authorisation holder) is made aware that the primary source may also have reported the suspected adverse reaction to another concerned party, the **valid** report should still be ~~submitted considered~~ **as a valid** ICSR. All the relevant information necessary for the detection of the duplicate case should be included in the ICSR²¹. **GEU guidance on**

¹⁹ ~~Interacting medications are also considered suspected.~~

²⁰ ~~There is no suspected adverse reaction.~~

²¹ ~~For further guidance on reporting of other duplicate ICSRs, refer to section A.1.11 "Other case identifiers in previous transmission" of ICH E2B(R2) (see GVP Annex IV).~~

the electronic transmission submission of information allowing the detection of duplicate ICSRs in line with ICH-E2B is provided in VI.C.6.2.2.6.

A valid case of suspected adverse reaction initially ~~submitted~~~~reported~~~~notified~~ by a consumer cannot be downgraded to a report of non-related adverse event if ~~the a~~ contacted healthcare professional (nominated by the consumer for follow-up information) ~~subsequently~~ disagrees with the consumer's suspicion (see ~~VI.A.2.2.1.VI.A.2.2.1.VI.A.1.21~~ for causality definition). In this situation, the opinions of both the consumer and the healthcare professional should be ~~included~~~~detailed~~ in the narrative section of the ICSR. This information can also be submitted in a structured manner in ICH-E2B format, which provides the means to transmit the degree of suspected relatedness expressed by several primary sources for each reported drug event combination.

~~Guidance on the reporting of the medical confirmation of a case, provided in ICH E2B(R2) Section A.1.14 ("Was the case medically confirmed, if not initially from a healthcare professional?") (see GVP Annex IV), VI.A.2.3, should be followed.~~

Similarly, For a solicited reports of suspected adverse reactions should not be downgraded to a report of non-related adverse event, (see VI.B.1.2.), where when the receiver notified recipient (competent authority or marketing authorisation holder) disagrees with the reasonable possibility of causal relationship between the suspected medicinal product and the adverse reaction expressed by the primary source on the supplied medicinal product, the case should not be downgraded to a report of non-not causally related adverse event. The opinions of both, the primary source and the ~~recipient~~~~receiver~~, should be recorded in the narrative section of the ICSR or in structured manner in line with ICH-E2B.

The same principle applies to the ICSR seriousness criterion, which should not be downgraded from serious to non-serious if the ~~receiver~~~~notified recipient~~ disagrees with the seriousness reported by the primary source.

VI.B.3. Follow-up of reports

When first received, the information in suspected adverse reactions reports may be incomplete. These reports should be followed-up as necessary to obtain supplementary detailed information significant for the scientific evaluation of the cases. This is particularly relevant for monitored events of special interest, prospective reports of pregnancy (see VI.B.6.1. for guidance on the management of pregnancy reports), cases notifying the death of a patient, or cases reporting new risks or changes in the known risks. This is in addition to any effort to collect missing minimum ~~information criteria for reports validation reporting~~ (see VI.B.2. for ICSRs validation). Any attempt to obtain follow-up information should be documented.

The provision in ICSRs of information on the patient's age information is important in order to be able to identify safety issues occurring specifically in the paediatric or elderly population. All possible Reasonable efforts should be made to follow-up on an individual case ICSRs where information on the patient's to obtain age information or age group of the patient, where it is initially not reported by the primary source (see VI.B.6.2. for guidance on paediatric or elderly population).

Similarly, for suspected adverse reactions related to biological medicinal products, the definite identification of the concerned products with regard to their manufacturing is of particular importance. Therefore, all appropriate measures should be taken to clearly identify the names of the products and their batch numbers. With respect to this, it is recommended to specify in the case narrative if information on the batch number has been requested, when it is missing in the initially submitted ICSR. The business process map and a process description in VI.App.1.1. take into account the

[mandatory follow-up in the EU of information for the identification of suspected biological medicinal products.](#)

[For cases related to vaccines, GVP Product- or Population-Specific Considerations I: Vaccines for prophylaxis against infectious diseases and GVP Product- or Population-Specific Considerations II: Biological medicinal products should also be followed as appropriate.](#)

~~Any attempt to obtain follow-up information should be documented.~~

Follow-up methods should be tailored towards optimising the collection of missing information. This should be done in ways that encourage the primary source to submit new information relevant for the scientific evaluation of a particular safety concern. The use of targeted specific forms in the local language should avoid requesting the primary source to repeat information already provided in the initial report and/or to complete extensive questionnaires, which could discourage future spontaneous reporting. Therefore, consideration should be given to pre-populating some data fields in those follow-up report forms to make their completion by the primary source easy.

~~Further requirements applicable to competent authorities in Member States and to marketing authorisation holders are provided respectively in VI.C.2.1. and VI.C.2.2. with business process maps and process descriptions included in . Guidance on the electronic reporting of follow-up reports is available in VI.C.6.2.2.7..~~

When information is received directly from a consumer suggesting that an adverse reaction may have occurred, [and](#) if the information is incomplete, attempts should be made to ~~obtain follow-up with the consumer to collect further information and to obtain~~ consent to contact a nominated healthcare professional to obtain further ~~follow-up~~ information. When ~~such at the~~ case, ~~initially reported by a consumer, has been~~ [is subsequently confirmed](#) (totally or partially) by a healthcare professional, ~~the~~ [this information medical confirmation](#) should be ~~clearly highlighted~~[captured](#) in the ICSR [in line with ICH-E2B \(see VI.A.1.4. for healthcare professionals definition, and VI.A.1.5. for ICSRs medical confirmation\)²². in line with ICH E2B \(see VI.A.2.3.\).](#)

~~For suspected adverse reactions relating to biological medicinal products, the definite identification of the concerned product with regard to its manufacturing is of particular importance. Therefore, all appropriate measures should be taken to clearly identify the name of the product and the batch number. A business process map and a process description in relation to the mandatory follow-up of information for the identification of suspected biological medicinal products is/are presented in VI.Appendix 1.VI.App.1.4.~~

~~For cases related to vaccines, should also be followed as appropriate.~~

~~For some individual cases related to medication errors that result in harm, it may not always be possible to perform follow-up activities taking into account that the [primary source](#) reporter information may have been anonymised in accordance with local legal requirements or due to provisions that allow for anonymous reporting (see VI.C.6.2.2.10. for guidance on the processing of personal data in the EU), for example in case of medication error with harm and the reporter does not wish to disclose an identity. These cases should be considered valid for submission as ICSRs, providing that the notified organisation was able to confirm them directly with the primary sources and that the other minimum criteria for reports validation are satisfied (see VI.B.2. for ICSRs validation).~~

²²~~For further guidance on reporting this information, refer to ICH E2B(R2), section A.1.14 (“Was the case medically confirmed, if not initially from a healthcare professional?”) (see GVP Annex IV).~~

[Further EU guidance on follow-up activities applicable to competent authorities in Member States and to marketing authorisation holders is provided respectively in VI.C.2.1. and VI.C.2.2., with business process maps and process descriptions included in VI.App.1.1. and VI.Ap.1.2.. Guidance on the electronic submission in the EU of follow-up reports is available in VI.C.6.2.2.7..](#)

VI.B.4. Data management

Electronic data and paper reports of suspected adverse reactions should be stored and treated in the same way as other medical records with appropriate respect for confidentiality regarding patients' and reporters' identifiability and in accordance with ~~local~~[applicable](#) data ~~privacy~~[protection](#) laws.

Confidentiality of patients' records including personal identifiers, if provided, should always be maintained. Identifiable personal details of reporting healthcare professionals should be kept in confidence, ~~protected from unauthorised access~~. With regards to patient's and reporter's identifiability, case report information should be transmitted between stakeholders (marketing authorisation holders or competent authorities) in accordance with local data ~~privacy~~[protection](#) laws (see [VI.C.6.2.2.8-VI.C.6.2.2.10.](#) for [guidance on](#) the processing of personal data ~~in ICSRs~~ in the EU).

~~In order to~~[To](#) ensure pharmacovigilance data security and confidentiality, strict ~~access~~[control measures](#) should be ~~applied in place to provide access~~ to documents and to databases [only](#) to authorised personnel ~~only~~. This security ~~measure should be~~ [extended](#) to the complete data path. ~~In this aspect~~[With regard to this](#), procedures should be implemented to ensure security and non-corruption of data during data transfer.

When transfer of pharmacovigilance data occurs within an organisation or between organisations having ~~concluded set up~~[contractual](#) agreements, the mechanism should be such that there is confidence that all notifications are received; in that, a confirmation and/or reconciliation process should be undertaken.

~~Correct data entry, including the appropriate use of terminologies, should be verified by quality assurance auditing, either systematically or by regular random evaluation. Data entry staff should be instructed in the use of the terminologies, and their proficiency confirmed.~~

Data received from the primary source should be treated in an unbiased and unfiltered way and inferences as well as imputations should be avoided during data entry or electronic ~~transmission~~[submission](#). The reports should include the verbatim text as used by the primary source ~~or and/or~~ an accurate translation of it: ~~where applicable (see VI.C.6.2.2.11. for EU guidance on languages management in ICSRs).~~[\(see for EU requirements on languages handling\)](#). The original verbatim text should be coded using the appropriate terminology as described in [VI.B.8.](#) ~~In order to~~[To](#) ensure consistency in the coding practices, it is recommended to use, where applicable, the translation of the terminology in the local language to code the verbatim text.

Electronic data storage should allow traceability (audit trail) of all data entered or modified, including dates and sources of received data, as well as dates and destinations of transmitted data.

A procedure should be in place to account for identification and management of duplicate cases at data entry and during the generation of aggregated reports (see [VI.C.6.2.4.](#) for EU guidance on [duplicate management](#)).

VI.B.5. Quality management

Competent authorities and marketing authorisation holders should have a quality management system in place to ensure compliance with the necessary quality standards at every stage of case documentation, such as data collection, data transfer, data management, data coding, case validation,

case evaluation, case follow-up, ICSR [reporting-submission](#) and case archiving (see [VI.C.6.2.4.](#) and [GVP Module I for EU guidance on data quality of ICSRs](#)).

[Correct data entry, including the appropriate use of terminologies \(see VI.B.8. for ICSRs content and format\), should be monitored by quality controlled assurance auditing, either systematically or by regular random evaluation.](#) Conformity of stored data with initial and follow-up reports should be verified by quality control procedures, which permit for the validation against the original data or images thereof. ~~In this aspect~~ [With regard to this](#), the source data (e.g. letters, emails, records of telephone ~~calls that calls, which~~ include details of an event) or an image of the source data should be easily accessible. [The whole process should be monitored by quality assurance audits.](#)

Clear written standard operating procedures should guarantee that the roles and responsibilities and the required tasks are clear to all parties involved and that there is provision for proper control and, when needed, change of the system. This is equally applicable to activities that are contracted out to third parties, whose procedures should be reviewed to verify that they are adequate and compliant with applicable requirements.

Staff directly performing pharmacovigilance activities, should be appropriately trained in applicable pharmacovigilance legislation and guidelines, in addition to specific training in report processing activities for which they are responsible and/or undertake. [Data entry staff should be instructed in the use of the appropriate standards and terminologies \(see VI.B.8. for ICSRs content and format\), and their proficiency confirmed \(see VI.C.6.2.4. for EU guidance on training of personnel for pharmacovigilance\).](#) Other personnel who may receive or process safety reports (e.g. clinical development, sales, medical information, legal, quality control) should be trained in adverse events/[reactions](#) collection and [reporting-submission to the pharmacovigilance department](#) in accordance with internal policies and procedures.

VI.B.6. Special situations

VI.B.6.1. Use of a medicinal product during pregnancy or breastfeeding

a. Pregnancy

Reports, where the embryo or foetus may have been exposed to medicinal products (either through maternal exposure [and/or if the suspected medicinal product was taken by the father](#)~~transmission of a medicinal product via semen following paternal exposure~~), should be followed-up in order to collect information on the outcome of the pregnancy and [the](#) development of the child after birth. The ~~recommendations~~[guidance](#) provided in the [Guideline on the Exposure to Medicinal Products during Pregnancy: Need for Post-Authorisation Data](#) (see [GVP Annex III](#)) [and in GVP Product- or Population-Specific Considerations III.](#) should be considered as regards [the](#) monitoring, collection and [reporting-submission](#) of information in these specific situations in order to facilitate the scientific evaluation. When an active substance (or one of its metabolites) has a long half-life, this should be taken into account when assessing the possibility of exposure of the embryo [through the mother and/or the father](#); if the medicinal product was taken before conception.

Not infrequently, pregnant women or healthcare professionals will contact either competent authorities or marketing authorisation holders to request information on the teratogenicity of a medicinal product and/or [on the](#) experience of use during pregnancy. Reasonable attempts should be made to obtain information on any possible medicinal product exposure to an embryo or foetus and to follow-up on the outcome of the pregnancy ([see VI.B.3. for follow-up guidance](#)).

Reports of exposure to medicinal products during pregnancy should contain as many detailed elements as possible in order to assess the causal relationships between any reported adverse ~~events~~ [reactions](#) and the exposure to the suspected medicinal product. In this context the use of standard structured questionnaires is recommended.

Individual cases with an abnormal outcome associated with a medicinal product following exposure during pregnancy are classified as serious reports and should be ~~reported~~ [submitted](#), in accordance with the requirements outlined in [VI.B.7.²³](#), ~~and in line with the guidance provided in VI.C.6.2.3.1. for the electronic reporting~~ [submission of those ICSRs in the EU recommendations provided in](#).

This especially refers to:

- a. reports of congenital anomalies or developmental delay, in the foetus or the child;
- b. reports of foetal death and spontaneous abortion; and
- c. reports of suspected adverse reactions in the neonate that are classified as serious.

Other cases, such as reports of induced termination of pregnancy without information on congenital malformation, reports of pregnancy exposure without outcome data, or reports which have a normal outcome, should not be ~~reported~~ [submitted as ICSRs](#) since there is no suspected adverse reaction (see [VI.B.2. for ICSR validation](#)). These reports should however be collected and discussed in the periodic safety update reports (see [GVP Module VII and VI.C.6.2.3.1. Subsection c for the management of the individual reports in the EU](#)).

~~However, i~~ In certain circumstances, reports of pregnancy exposure with no suspected reactions may necessitate to be ~~reported~~ [submitted as ICSRs](#). This may be a condition of the marketing authorisation or stipulated in the risk management plan; for example pregnancy exposure to medicinal products contraindicated in pregnancy or medicinal products with a special need for surveillance because of a high teratogenic potential (e.g. thalidomide, isotretinoin).

A signal of a possible teratogen effect (e.g. through a cluster of similar abnormal outcomes) should be notified immediately to the competent authorities in accordance with the ~~recommendations~~ [guidance](#) presented in [VI.C.2.2.6 GVP Module IX](#).

b. Breastfeeding

~~The guidance provided in GVP Product- or Population-Specific Considerations III. on the conduct of pharmacovigilance for medicines exposed via breastfeeding should be followed.~~ Suspected adverse reactions which occur in infants following exposure to a medicinal product from breast milk should be ~~reported~~ [submitted](#) in accordance with the criteria outlined in [VI.B.7.²⁴](#), ~~and in line with the guidance provided in VI.C.6.2.3.1. for the electronic submission of those ICSRs in the EU~~ [recommendations on electronic reporting provided in VI.C.6.2.3.1.](#)

VI.B.6.2. Use of a medicinal product in a paediatric or elderly population

The collection of safety information in the paediatric or elderly population is important. Reasonable attempts should therefore be made to obtain and submit the age or age group of the patient when a case is reported by a healthcare professional, or consumer in order to be able to identify potential

²³ See [VI.C.6.2.3.1](#) for electronic reporting recommendations in the EU.

²⁴ See Footnote 16.

safety signals specific to a particular population. [General guidance in VI.B.3. on reports follow-up should be applied.](#)

~~As regards the paediatric population, the guidance published by the Agency²⁵ Guidance provided in GVP Product- or Population-Specific Considerations IV. on the conduct of pharmacovigilance in this for medicines used in the paediatric population, and in- GVP Product- or Population-Specific Considerations V. on the conduct of pharmacovigilance for medicines used in the elderlygeriatric population should be followed.~~

VI.B.6.3. Reports of overdose, abuse, ~~off-label use~~, misuse, medication error or occupational exposure

~~For the purpose of this Module, medication error refers to any unintentional error in the prescribing, dispensing, or administration of a medicinal product while in the control of the healthcare professional or consumer.~~

~~The definitions for overdose, abuse, ~~off-label use~~, misuse, medication error or occupational exposure are detailed provided in VI.A.1.2. should be applied.~~

Reports ~~of overdose, abuse, off-label use, misuse, medication error or occupational exposure~~ with no associated [suspected](#) adverse reaction should not be ~~reported~~[submitted](#) as ICSRs. They should be [recorded when becoming aware of them and](#) considered in [the](#) periodic safety update reports as applicable ([see GVP Module VII](#)). When those reports constitute safety issues impacting on the risk-benefit balance of ~~the~~ medicinal products [authorised in the EU](#), they should be notified to the competent authorities [in Member States and to the Agency](#) in accordance with the [recommendation guidances](#) provided in [VI.C.2.2.6.](#)

Reports associated with suspected adverse reactions should be subject to ~~reporting submission~~ in accordance with the [criteria modalities](#) outlined in [VI.B.7.](#) and with the electronic [reporting submission](#) requirements [in the EU](#) described in [VI.C.6.2.3.3.](#) They should be routinely followed-up to ensure that the information is as complete as possible with regards to the symptoms, ~~treatments~~[suspected medicinal products name](#), outcomes, context of occurrence (e.g. ~~.~~ error in prescription, administration, dispensing, dosage, unauthorised indication or population, etc.).

~~With regards to reports of medication errors, further guidance concerning their management and assessment, provided in the Good Practice Guide on Recording, Coding, Reporting and Assessment of Medication Errors²⁶, should be followed.~~

~~Guidance is available in VI.C.2.2.12. with regard to the management in the EU of reported information on the off-label use of medicinal products.~~

VI.B.6.4. Lack of therapeutic efficacy

Reports of lack of therapeutic efficacy should be [collected and](#) recorded [when notified](#) and followed-up if incomplete. They should ~~not~~ normally ~~not~~ be ~~reported,~~[but submitted as ICSRs if there is no associated suspected adverse reaction, but they](#) should be discussed in periodic safety update reports as applicable. ([see GVP Module VII](#)). ~~However,~~

In certain circumstances, ~~these~~ reports of lack of therapeutic efficacy [with no suspected adverse reactions](#) may require to be ~~reported~~[submitted](#) within a 15-day time frame (see [VI.C.6.2.3.4.](#) ~~as~~

²⁵ ~~Guideline on conduct of pharmacovigilance for medicines used by the paediatric population.~~

²⁶ Ref.: [EMA/762563/2014](#)EMA/762563/2014; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medication errors](#)

~~regards for EU guidance on the electronic reporting management of these ICSRs in the EU~~). Medicinal products used in critical conditions or for the treatment of life-threatening diseases, vaccines, contraceptives are examples of such cases. This applies unless the reporter has specifically stated that the outcome was due to disease progression and was not related to the medicinal product. ~~The requirement to submit these specific reports of lack of efficacy does not apply when the notification occurred in the frame of a non-interventional post-authorisation efficacy study. This is because they refer to the main end point of the study. For those efficacy studies, the requirements EU guidance provided in VI.C.1.2.1. for non-interventional post-authorisation studies should be followed regarding the management of adverse events occurring in those efficacy studies.~~

Clinical judgement should be used when considering if ~~other~~ cases of lack of therapeutic efficacy qualify for ~~reporting submission as ICSRs~~. For example, ~~a report of lack of therapeutic efficacy with~~ an antibiotic used in a life-threatening situation where the ~~use of the~~ medicinal product was not in fact appropriate for the infective agent should not be ~~reported submitted~~. However, a ~~report of lack of therapeutic efficacy for a~~ life-threatening infection, ~~where the lack of therapeutic efficacy which~~ appears to be due to the development of a newly resistant strain of a bacterium previously regarded as susceptible, should be ~~reported submitted as ICSR~~ within 15 days.

For vaccines, cases of lack of ~~therapeutic prophylactic~~ efficacy should be ~~reported submitted as ICSRs~~, in particular with the view to highlight potential signals of reduced immunogenicity in a sub-group of vaccinees, waning immunity, or strain replacement. With regard to the latter, it is considered that spontaneously reported cases of lack of ~~therapeutic prophylactic~~ efficacy by a healthcare professional may constitute a signal of strain replacement. Such a signal may need prompt action and further investigation through post-authorisation safety studies as appropriate. General guidance regarding the monitoring of vaccines failure, provided in the Report of CIOMS/WHO Working Group on Vaccine Pharmacovigilance²⁷, may be followed.

VI.B.7. ~~Reporting Submission of individual case safety reports (ICSRs)~~

Only valid ICSRs (see ~~VI.B.2. for ICSRs validation~~) should be ~~reported submitted~~. The clock for the ~~reporting submission~~ of a valid ICSR starts as soon as the information containing the minimum ~~reporting~~ criteria has been brought to the attention of the national or regional pharmacovigilance centre of a competent authority or of any personnel of the marketing authorisation holder, including medical representatives and contractors. This date should be considered as day zero. It is the first day when a ~~notified competent authority or marketing authorisation holder receiver gains gets~~ knowledge of a valid ICSR, irrespective of whether the information is received during a weekend or public holiday. ~~Reporting~~ ~~†~~ ~~The~~ ~~timelines~~ ~~for~~ ~~submission~~ are based on calendar days.

Where the marketing authorisation holder has set up contractual arrangements with a person or an organisation, explicit procedures and detailed agreements should exist between the marketing authorisation holder and the person/organisation to ensure that the marketing authorisation holder can comply with the ~~reporting obligations submission of valid ICSRs within the appropriate time frames~~. These procedures should in particular specify the processes for ~~the~~ exchange of safety information, including ~~the~~ timelines and ~~responsibilities for the~~ regulatory ~~reporting submission of valid ICSRs, responsibilities and~~ ~~They~~ should ~~be organised in order to~~ avoid ~~the submission of~~ duplicate ~~ICSRs reporting~~ to the competent authorities.

²⁷ Council for International Organizations of Medical Sciences (CIOMS). Definition and application of terms of vaccine pharmacovigilance (report of CIOMS/WHO Working Group on Vaccine Pharmacovigilance). Genève: CIOMS; 2012. Accessible at: <http://www.cioms.ch/>

For ICSRs described in the ~~scientific and medical literature~~ medical literature (see VI.B.1.1.2. for guidance on the management of medical literature reports), the clock starts (day zero) with awareness of a publication containing the minimum ~~information for reporting~~ criteria (see VI.B.2. for ICSRs validation, and VI.App.2.7. for guidance on day zero estimation for medical literature reports). Where contractual arrangements are made with a person/organisation to perform literature searches and/or ~~report-submit~~ valid ICSRs, detailed agreements should exist to ensure that the marketing authorisation holder can comply with its regulatory submission ~~the reporting~~ obligations.

When additional significant information is received for a previously ~~reported~~ submitted case, the ~~reporting time~~ clock ~~starts again~~ for the submission of a follow-up report starts again from the date of receipt of the relevant follow-up information. For the purpose of ~~reporting~~ submission of ICSRs, significant follow-up information corresponds to new medical or administrative information that could impact on the assessment or management of a case, or could change its seriousness criteria; non-significant information includes updated comments on the case assessment, or corrections of typographical errors in the previous case version. See also VI.C.6.2.2.7. as-regard sing the distinction between significant and non-significant follow-up information for the submission of ICSRs in the EU.

VI.B.7.1. Reporting-Submission time frames of ICSRs

In general, the reporting-submission of serious valid ICSRs is required as soon as possible, but in no case later than 15 calendar days after initial receipt of the information by the national or regional pharmacovigilance centre of a competent authority or by any personnel of the marketing authorisation holder, including medical representatives and contractors. This applies to initial and follow-up information. Where a case initially ~~reported~~ sent as serious becomes non-serious, based on new follow-up information, this information should still be ~~reported~~ submitted within 15 days; the reporting submission time frame for non-serious reports should then be applied for the subsequent follow-up reports.

Information as regards the reporting-submission time frame of non-serious valid ICSRs in the EU is provided in VI.C.3.

ICH-E2B provides a mechanism to the sender to indicate whether the case fulfils the local expedited requirements. Further EU guidance on this aspect is provided in VI.C.3.

VI. B.7.2 Report nullification

The nullification of a report should be used to indicate that a previously transmitted ICSR is considered completely void (nullified), for example when the whole case was found to be erroneous. EU guidance on ICSRs nullification in line with ICH-E2B is provided in VI.C.6.2.2.10-VI.C.6.2.2.9.

VI.B.7.3. Amendment report

There may be instances, where an ICSR report which has already been submitted may need to be amended for example when, after an internal review or according to an expert opinion some items have been corrected; (such as adverse event/reaction terms, seriousness, seriousness criteria or causality assessment) but without receipt of new information that would warrant submission of a follow-up report. The same would apply where documentations mentioned in an ICSRs, translations or literature articles are requested by competent authorities the Agency or other Member States and are further sent as attachments in line with ICH E2B(R3). These submissions are considered as amendment reports. -Further EU guidance on the amendment of ICSRs in line with ICH-E2B is provided in VI.C.6.2.2.8.

VI.B.8. Reporting modalities for submission of individual case safety reports (ICSRs)

Taking into account the international dimension of adverse reactions reporting and the need to achieve harmonisation and high quality between all involved parties, ICSRs should be submitted electronically as structured data with the use of controlled vocabularies for the relevant data elements where applicable.

In this aspect, with regard to the content and format of electronic ICSRs, competent authorities and marketing authorisation holders should adhere to the following internationally agreed ICH²⁸ guidelines and standards (see GVP Annex IV) taking into account the transition from ICH-E2B(R2) to ICH-E2B(R3) formats:

- the ICH M1 terminology - Medical Dictionary for Regulatory Activities (MedDRA) (see GVP Annex IV), which should be used at the lowest level term (LLT) level for in the transmission of ICSRs. Stakeholders should follow the recommendations of the MedDRA Maintenance Support Service Organisation (MSSO) regarding the switch to a new MedDRA version²⁹;
- the latest version of the ICH endorsed Guide for MedDRA Users [MedDRA Term Selection: Points to Consider](#)³⁰ (see GVP Annex IV);
- ICH M2 EWG - Electronic Transmission of Individual Case Safety Reports Message Specification (see GVP Annex IV);
- ICH E2B(R2) - Maintenance of the ICH Guideline on Clinical Safety Data Management: Data Elements for Transmission of Individual Case Safety Reports (see GVP Annex IV);
- ICH E2B Implementation Working Group - Questions & Answers (R5) (March 3, 2005) (see GVP Annex IV);
- the guidelines applicable for the ICH-E2B based on ICSRs ICH-E2B formats:

Reference	Guidelines
ICH-E2B(R2)	<ul style="list-style-type: none"> • ICH-M2 EWG - Electronic Transmission of Individual Case Safety Reports Message Specification (see GVP Annex IV); • ICH-E2B(R2) - Maintenance of the ICH Guideline on Clinical Safety Data Management: Data Elements for Transmission of Individual Case Safety Reports (see GVP Annex IV); • ICH E2B Implementation Working Group - Questions & Answers (R5) (see GVP Annex IV);
ICH-E2B(R3)	<ul style="list-style-type: none"> • ICH Implementation guide package including the ICH-E2B(R3) Implementation Guide for Electronic Transmission of Individual Case Safety Reports (ICSRs) - Data Elements and Message Specification (see GVP Annex IV);

²⁸ <http://www.ich.org/>

²⁹ The latest supported MedDRA versions in line with the official semi-annual releases are posted on the EudraVigilance webpage (EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ System overview](#)).

³⁰ For off-label, misuse, abuse and medication error, the definitions provided in VI.A.1.2. should be followed.

Reference	Guidelines
	<ul style="list-style-type: none"> <li data-bbox="427 253 1342 360">• ICH-E2B(R3) Implementation Working Group - Electronic Transmission of Individual Case Safety Reports (ICSRs) - Questions & Answers (see GVP Annex IV).

As technical standards evolve over time, the above referred documents may require ~~revision and~~ maintenance or revision. In this context, the latest version of these documents should always be taken into account.

~~Information regarding~~ EU specific ~~reporting~~ modalities ~~is~~ for ICSRs submission and the applicable guidelines, definitions, formats, standards and terminologies are provided respectively in VI.C.4. and VI.C.6.1.

VI.C. Operation of the EU network

Section VI.C of this Module highlights the EU specific requirements, as defined in Directive 2001/83/EC [DIR] and Regulation (EC) No 726/2004 [REG], in relation to the collection, management and reporting submission of reports of suspected adverse reactions (serious and non-serious) associated with medicinal products for human use authorised in the EU, independently irrespective of the products conditions of use within or outside the terms of the marketing authorisation in the EU. ~~They~~ These requirements are applicable to competent authorities in Member States and/or to marketing authorisation holders in the EU.

~~Section C should be read in conjunction with~~ the definitions and general principles detailed in Sections VI.A and VI.B ~~of this Module and with the requirements provided in chapters IV, V and IX of the Commission Implementing Regulation (EU) No 520/2012 [IR]~~ should be applied in conjunction with the guidance provided in this Section. The requirements provided in Chapters IV, V and IX of the Commission Implementing Regulation (EU) No 520/2012 [IR] on the use of terminology, formats and standards, on the submission of reports of suspected adverse reactions, and on the processing of personal data shall also be followed.

In accordance with Article 107 of Directive 2001/83/EC, marketing authorisation holders have to submit in addition to information on adverse reactions that occur in the EU, information on serious suspected adverse reactions that occur in third countries. Given that a medicinal product is authorised with a defined composition, all the adverse reactions suspected to be related to any of the active substances being part of a medicinal product authorised in the EU should be managed in accordance with the requirements presented in this Module. This is valid irrespective of the strengths, pharmaceutical forms, routes of administration, presentations, authorised indications, or names of the medicinal product (see VI.C.2.2. for detailed requirements applicable to marketing authorisation holders). For the definition of the name and strength of a medicinal product, refer to Article 1(20) and 1(22) of Directive 2001/83/EC.

The guidance provided in this Module also applies to

- homeopathic and herbal medicinal products with the exception of homeopathic medicinal products authorised under the special simplified registration procedure detailed in Article 14 (1) of Directive 2001/83/EC [DIR Art 16 (3) and Art 16g], and to
- medicinal products supplied in the context of compassionate use as defined in Article 83(2) of Regulation (EC) No 726/2004, subject to and without prejudice to the applicable national laws of EU Member States. As the case may be, this guidance may also apply to named patient use as defined under Article 5(1) of Directive 2001/83/EC (see VI.C.1.2.2. for ICSRs management in compassionate use and named patient use).

For devices containing active substances, the procedure to be followed for the submission of individual reports of suspected adverse reactions and/or incidents varies depending if these devices have been authorised in the EU as an integral part of medicinal products (products covered by the second paragraph of Article 1(3) of Directive 93/42/EEC) or CE marked as medical devices. With regard to this, devices authorised as an integral part of medicinal products follow the pharmacovigilance requirements provided in Directive 2001/83/EC and Regulation (EC) No 726/2004, whereas devices CE marked as medical devices follow the requirements for medical device vigilance given in Directive 90/385/EEC and Directive 93/42/EEC. As detailed in the Guidelines on a Medical Devices Vigilance

System³¹, a medical device incorporating a medicinal product or substance, where the action of the medicinal product or substance is ancillary to that of the device, follows the legal requirements of Directive 90/385/EEC and Directive 93/42/EEC.

VI.C.1. Reporting rules Management of individual safety reports for clinical trials, and post-authorisation studies, compassionate use and named patient use in the EU

In line with Article 3(3) and 107(1) of Directive 2001/83/EC, the pharmacovigilance rules laid down in Directive 2001/83/EC and Regulation (EC) No 726/2004 do not apply to investigational medicinal products (IMPs) and non-investigational medicinal products³² (NIMPs) intended for research and development trials used in clinical trials conducted in accordance with Directive 2001/20/EC³³.

In the EU, post-authorisation safety or efficacy studies can be imposed requested by competent authorities in Member States or the Agency during the evaluation of the initial marketing authorisation application in accordance with Article 21a(b)(f) of Directive 2001/83/EC and Article 9(4)(cb)(cc) of Regulation (EC) No 726/2004, or they can be requested during the post-authorisation phase in line with Article 22a(1)(a)(b) of Directive 2001/83/EC and Article 10a(1)(a)(b) of Regulation (EC) No 726/2004, or. They can also be conducted voluntarily by the marketing authorisation holders.

As shown in Figure VI.1, post-authorisation studies can either be clinical trials or non-interventional post-authorisation studies and the management of individual safety reporting falls therefore either

- under the scope of Directive 2001/20/EC for any clinical trials; or
- under the provisions set out in Directive 2001/83/EC and Regulation (EC) No 726/2004 for any non-interventional post-authorisation studies.

Suspected adverse reactions should not be reported submitted under both regimes, legislations that is are Directive 2001/20/EC as well as Regulation (EC) No 726/2004 and Directive 2001/83/EC, as since this creates duplicate reports.

Further guidance on post-authorisation safety studies is provided in GVP Module VIII.

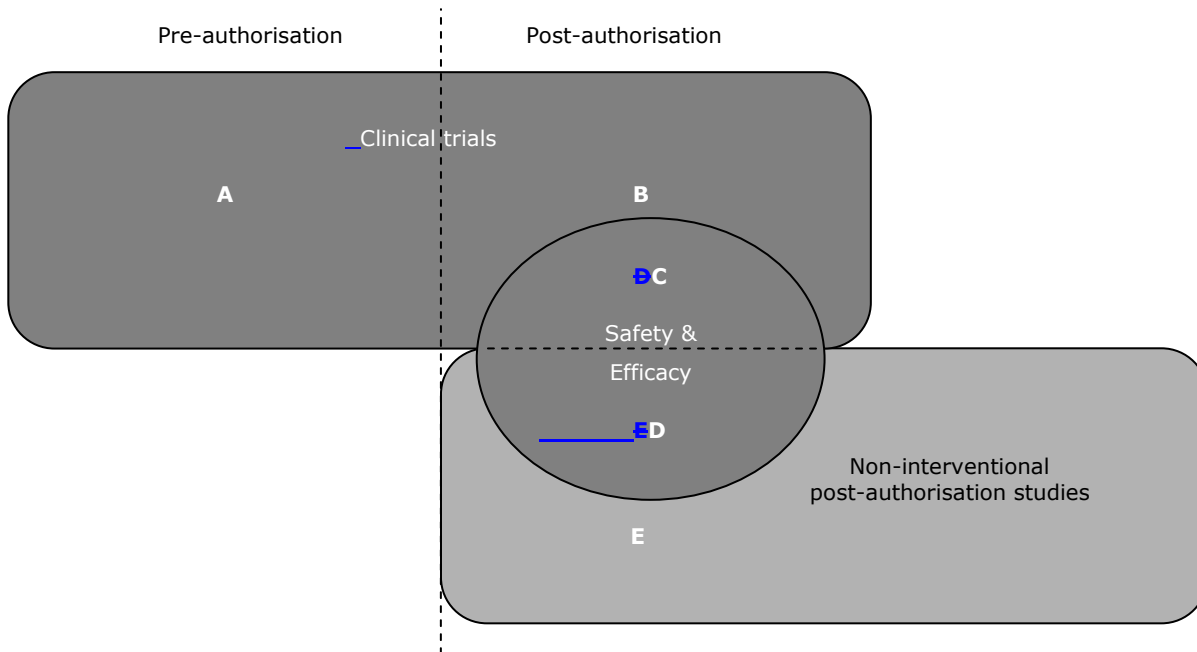
Figure VI.1 illustrates the different types of studies and clinical trials and post-authorisation studies which can be conducted in the EU. The management of individual safety reporting for clinical trials corresponding to designated by sections A, B, C and D of Figure VI.1 follows the requirements of Directive 2001/20/EC, whereas the safety individual safety reporting for non-interventional post-authorisation studies corresponding to section E and F follows the requirements of Directive 2001/83/EC and Regulation (EC) No 726/2004.

³¹ Ref.: MEDDEV 2.12-1 rev 8 (Ref. Ares(2016)856772 - 18/02/2016)

³² For guidance on investigational medicinal products (IMPs) and non-investigational medicinal products (NIMPs) these terms, see The Rules Governing Medicinal Products in the European Union, Volume 10, Guidance Applying to Clinical Trials, Guidance on Investigational Medicinal Products and Non-Investigational Medicinal Products (NIMPs) (Ares(2011)300458 - 18/03/2011), and the Detailed guidance on the collection, verification and presentation of adverse event/reaction reports arising from clinical trials on medicinal products for human use ('CT-3'), (2011/C 172/01).

³³ See DIR Art 3(3) and Art 107(1) third subparagraph.

The [reporting rules for the submission of valid reports of suspected adverse reactions \(CSRs\)](#) to the [appropriate](#) EudraVigilance database modules [are dependent depends](#) on the types of organised collection systems where [theythe suspected adverse reactions](#) occurred [and the;](#) [recommendationsguidance](#) provided in [VI.C.6.2.1](#), should be followed. [Diagram illustrating differentDifferent](#) types of clinical trials and studies [conducted](#) in the EU



Section A: Clinical trials [conducted where no marketing authorisation exists in the EU, and](#) which fall under the scope of Directive 2001/20/EC ~~and which are conducted when no marketing authorisation exists in the EU.~~

~~Section B: Clinical trials, which fall under the scope of Directive 2001/20/EC and which are conducted in the post-authorisation period, e.g. for new indication.~~

Section ~~CB~~: Post-authorisation clinical trials conducted [by marketing authorisation holders or other organisationsin accordance with the summaryterms of the marketing authorisation of the medicinal product characteristics \(SmPC\) indication and condition of use, but, and](#) which fall under the scope of Directive 2001/20/EC due to the nature of the intervention, [e.g. for the development of new indications or new formulations.](#)

Section ~~BC~~: Post-authorisation safety or efficacy clinical trials [imposed in accordance with Article 21a\(b\)\(f\) of Directive 2001/83/EC and Article 9\(4\)\(cb\)\(cc\) of Regulation \(EC\) No 726/2004,](#) requested in accordance with ~~Directive 2001/83/EC Article 22a(1)(a)(b) of Directive 2001/83/EC andor Regulation (EC) No 726/2004, Article 10a(1)(a)(b) of Regulation (EC) No 726/2004,~~ or conducted voluntarily by marketing authorisation holders [or other organisations, and but](#) which fall under the scope of Directive 2001/20/EC due to the nature of the intervention.

Section ~~ED~~: Non-interventional post-authorisation safety or efficacy studies [imposed in accordance with Article 21a\(b\)\(f\) of Directive 2001/83/EC and Article 9\(4\)\(cb\)\(cc\) of Regulation \(EC\) No 726/2004,](#) requested in accordance with ~~Directive 2001/83/EC Article 22a(1)(a)(b) of Directive 2001/83/EC andor Regulation (EC) No 726/2004 Article 10a(1)(a)(b) of Regulation (EC) No 726/2004,~~ or conducted voluntarily by ~~the~~ marketing authorisation holders [or other organisations and which follow the same legal requirements. The assignment of the patient to a particular therapeutic strategy is not decided in advance by the study protocol but falls within current practice. The prescription of the product in the usual manner in accordance with the terms of the marketing authorisation is clearly separated from the decision to include the patient in the study. The requirements set out in Article 107\(3\) and 107a\(4\) of Directive 2001/83/EC and Article 28\(1\) of Regulation \(EC\) No 726/2004 apply to studies initiated, managed, or financed by a marketing authorisation holder, or where the design is controlled by a marketing authorisation holder.](#)

Section ~~FE~~: Non-interventional post-authorisation studies conducted [voluntarily by marketing authorisation holders or other organisationsin accordance with SmPC indication and condition of use the terms of the marketing authorisation of the medicinal product and](#) which fall under the scope of Directive 2001/83/EC or Regulation ~~(EC) No 726/2004. The assignment of the patient to a particular therapeutic strategy is not decided in advance by the study protocol but falls within current practice. The prescription of the product in the usual manner in accordance with the terms of the marketing authorisation is clearly separated from the decision to include the patient in the study. The requirements set out in Article 107(3) and 107a(4) of Directive 2001/83/EC and Article 28(1) of Regulation (EC) No 726/2004 apply to studies initiated, managed, or financed by a marketing authorisation holder, or where the design is controlled by a marketing authorisation holder.~~

VI.C.1.1. Management of individual safety reports Reporting rules for clinical trials

A suspected adverse reaction to an investigational medicinal product (IMP) occurring in a clinical trial ~~which~~ falls under the scope of Directive 2001/20/EC. It is only to be addressed by the sponsor based on the requirements detailed in that Directive. It is therefore excluded from the scope of this Module, even if the clinical trial where the suspected adverse reaction occurred is a post-authorisation safety or efficacy ~~study~~ clinical trial, imposed in line with Article 21a of Directive 2001/83/EC and Article 9(4) of Regulation (EC) No 726/2004, requested in accordance with ~~Directive 2001/83/EC or Regulation (EC) No 726/2004,~~ Article 22a of Directive 2001/83/EC and Article 10a of Regulation (EC) No 726/2004, or if it is conducted voluntarily by a marketing authorisation holder.

If a clinical trial, conducted under the scope of Directive 2001/20/EC, yields safety concerns which impact on the risk-benefit balance of an authorised medicinal product, the competent authorities in the Member States where the medicinal product is authorised and the Agency should be notified immediately in accordance with the modalities detailed in [VI.C.2.2.6.](#) This applies as well if a safety concern arises from a clinical trial conducted exclusively outside the EU.

The safety data from clinical trials to be presented in the relevant sections of the periodic safety update report of the authorised medicinal product are detailed in [GVP Module VII](#).

~~Where an untoward and unintended response originating from a clinical trial conducted in accordance with Directive 2001/20/EC, is suspected to be related only to a non-investigational medicinal product (or another medicinal product, which is not part of other than the clinical trial protocol) IMP or NIMP and does not result from a possible interaction with the investigational medicinal product IMP or NIMP, it does not follow the expedited reporting requirements of Directive 2001/20/EC, which apply only to the investigational medicinal product.~~ an untoward and unintended response from a clinical trial conducted in accordance with Directive 2001/20/EC is suspected to be related only to a medicinal product other than the IMP and does not result from a possible interaction with the IMP, it should be managed in line with the requirements provided in Art 107(3) and 107a(4) of Directive 2001/83/EC. The same applies when the adverse reaction is suspected to be related only to an authorised non-investigational medicinal product (NIMP)³⁴. In this context, ~~t~~he investigator or the sponsor is encouraged to report the case to the competent authority in the Member State where the reaction occurred or to the marketing authorisation holder of the suspected medicinal product, but not to both to avoid duplicate ~~reporting~~ ICSRs submission³⁵. Where made aware of such case, the competent authority or the marketing authorisation holder should apply the time frames and reporting requirements modalities described in [VI.C.3.](#), [VI.C.4.](#) and [VI.C.6.](#) ~~As regards electronic reporting, the~~ The report should be managed, classified and submitted as spontaneous and the recommendations guidance detailed in [VI.C.6.2.3.7. Subsection 3](#) should be followed with regard to the electronic submission of ICSRs.

³⁴ For guidance on investigational medicinal products (IMPs) and non-investigational medicinal products (NIMPs), see the [Guidance on Investigational Medicinal Products and Non-Investigational Medicinal Products \(NIMPs\) \(Ares\(2011\)300458 - 18/03/2011\)](#).

³⁵ See ~~The Rules Governing Medicinal Products in the European Union, Volume 10, Chapter 7.11.3 of the~~ [Detailed guidance on the collection, verification and presentation of adverse event/reaction reports arising from clinical trials on medicinal products for human use \('CT-3'\), \(2011/C 172/01\)](#).

VI.C.1.2. Management of individual safety reports Reporting rules for non-interventional post-authorisation studies, compassionate use and named patient use

This ~~Section~~ chapter applies to non-interventional post-authorisation studies, compassionate use and named patient use. For these organised data collection schemes, a system should be put in place to record and document complete and comprehensive case information on solicited adverse events³⁶ (see ~~GVP Annex IV~~ [GVP Annex IV.A.1.1. and GVP Annex I for definition](#)) which need to be collected as specified in [VI.C.1.2.1.](#) and in [VI.C.1.2.2.](#) These

~~In line with ICH-E2D (see GVP Annex IV), these collected~~ adverse events should be systematically assessed to determine whether they are possibly related to the studied (or supplied) medicinal products ~~(see ICH E2D (see GVP Annex IV)).~~ A method of causality assessment should be applied for assessing the causal role of the studied (or supplied) medicinal products in the [occurrence of the solicited adverse events](#) (for example, the ~~WHO-UMC system~~ [System for Standardised case-Case causality-Causality aAssessment](#)³⁷). An adverse event should be classified as an adverse reaction, if there is at least a reasonable possibility of causal relationship [with the product](#).

~~Only valid ICSRs (see VI.B.2.) Reports~~ of adverse reactions, ~~which are,~~ suspected to be related to the studied (or supplied) medicinal product by the primary source or [by the notified organisation, receiver of the case,](#) should be ~~reported~~ [classified and submitted](#) in accordance with the [guidance requirements](#) provided in [VI.C.1.2.1., VI.C.1.2.2.,](#) ~~and~~ [VI.C.6.2.3.7.](#) [Depending on the seriousness and country of origin of the suspected reaction, the submission time frames and modalities detailed in VI.C.3. and VI.C.4. should be applied.](#) Other reports of adverse events should be summarised as part of any interim safety analysis and in the final study report, where applicable.

In situations where ~~an~~ [adverse reactions is/are](#) suspected to be related to ~~a~~ [medicinal products](#) other than the studied (or supplied) medicine [and does not result from a possible interaction with it,](#) these reports should be managed, classified and ~~reported~~ [submitted](#) as spontaneous ICSRs. ~~They~~ ~~It~~ should be notified by the primary source [\(healthcare professional or consumer\)](#) to the competent authority in the Member State where the reaction ~~s~~ occurred or to the marketing authorisation holder of the suspected medicinal product, but not to both ~~(to avoid duplicate reporting/ICSRs submission).~~

Where made aware, in the frame of these organised data collection schemes, of events which affect the known risk-benefit balance of the studied (or supplied) medicinal product and/or impact on public health, the marketing authorisation holder should notify the concerned competent authorities and the Agency in accordance with the modalities detailed in [VI.C.2.2.6.](#)

Further guidance on post-authorisation studies conducted by marketing authorisation holders is provided in [VI.C.2.2.2.](#)

The requirements provided in this Module do not apply to non-interventional post-authorisation studies conducted by organisations such as academia, medical research charities or research organisations in the public sector. These organisations should follow [the](#) local requirements as regards the [reporting submission](#) of cases of suspected adverse reactions to the competent authority in the Member State where the reaction occurred. However, where a study conducted by one of these organisations is directly initiated, managed, ~~financed~~ ~~or~~ [financed by a marketing authorisation holder,](#) or where its design is controlled by a marketing authorisation holder (voluntarily or pursuant to obligations imposed in accordance with ~~Articles 21a and/or 22a of Directive 2001/83/EC, or of Directive 2001/83/EC and Articles 10 9(4) and -or- 10(a of Regulation (EC) No 726/2004)~~ ~~of Regulation 726/2004~~), the

³⁶ See ~~GVP Annex I~~ [for definition of adverse event.](#)

³⁷ <https://www.who-umc.org/>

requirements provided in this Module are applicable³⁸. In this context, contractual agreements should be in place to clearly define the role and responsibilities of each party for implementing these requirements (see GVP Module I).

VI.C.1.2.1. Non-interventional post-authorisation studies

Non-interventional post-authorisation studies³⁹ (see GVP Annex I) should be distinguished between

- Studies these with a design based on primary data collection directly from healthcare professionals or consumers (i.e. where the events of interest are collected as they occur specifically for the study), and
- Studies with a design which are based on the secondary use of data (i.e. where the events of interest have already occurred and have been collected for another purpose).

Depending on the study design, the requirements provided hereafter in VI.C.1.2.1.1. and VI.C.1.2.1.2. apply⁴⁰.

For combined studies with a design based on both primary data collection and secondary use of data, the submission of ICSRs is required exclusively for the data obtained through primary data collection and the guidance provided hereafter in VI.C.1.2.1.1. should be followed. For the events identified through secondary use of data, the guidance in VI.C.1.2.1.2. applies. All adverse events/reactions collected as part of this type of studies should be recorded and summarised in the interim safety analysis and in the final study report.

In case of doubt, the management of individual safety reports reporting requirements should be clarified with the concerned competent authorities in the Member States.

National legislation should be followed as applicable regarding the obligations towards local ethics committees.

VI.C.1.2.1.1. Non-interventional post-authorisation studies with a design based on primary data collection

Information on all adverse events should be collected and recorded from healthcare professionals or consumers in the course of the study unless the protocol provides differently with a due justification for not collecting certain adverse events. Any reference to adverse events that are not collected should be made using the appropriate level of the MedDRA classification (see GVP Module VIII).

For all collected adverse events, comprehensive and high quality information should be sought in a manner which allow for valid ICSRs to be reported submitted within the appropriate time frames (see VI.C.3.). For all collected adverse events, cases Cases of adverse reactions, which are suspected to be related to the studied medicinal product by the primary source or the receiver of the case notified organisation, should be recorded in the pharmacovigilance database and reported submitted as ICSRs in accordance with the requirements time frames and modalities provided in VI.C.3. and VI.C.4. Valid ICSRs They should be classified as solicited reports (s(see summary in Table VI.1., and -VI.6.2.3.7 Subsection 1 for guidance on the electronic submission of these ICSRs)VI.C.2.2.2. and VI.C.6.2.3.7.). See summary in Table VI.1.

³⁸ This does not concern the donation of a medicinal product for research purpose if the marketing authorisation holder has no control on the study.

³⁹ See GVP Annex I for definition of non-interventional study.

⁴⁰ For combined study designs with based on primary and secondary data collection and secondary use of data, the same requirements as for studies with primary data collection should be followed.

All fatal outcomes should be considered as adverse events which should be collected. In certain circumstances, suspected adverse reactions with fatal outcome may not be subject to ~~expedited reporting submission~~ as ICSRs, for example because they refer to study outcomes (efficacy end points), because the patients included in the study have a disease with high mortality, or because the fatal outcomes have no relation to the objective of the study. For these particular situations, the rationale for not ~~reporting-submitting as ICSRs~~ certain adverse reactions with fatal outcomes should be clearly described in the protocol ~~together with a list using the appropriate level of the MedDRA classification (see GVP Module VIII)~~.

All ~~collected~~ adverse events collected during the study should be summarised ~~as part of any in the~~ interim safety analysis and in the final study report.

For adverse events specified in the study protocol which are not systematically collected ~~for which the protocol provides differently and does not require their systematic collection~~, healthcare professionals and consumers should be informed in the protocol (or other study documents) of the possibility to report adverse reactions (for which they suspect a causal role of a medicine) to the marketing authorisation holder of the suspected medicinal product (studied or not) or to the concerned competent ~~authorities~~ authority via the national spontaneous reporting system ~~(see summary in Table VI.1.)~~ Valid. ~~The resulting valid~~ ICSRs should be managed, classified and ~~reported~~ submitted as spontaneous ~~(see VI.C.6.2.3.7, subsection 2)~~ by the ~~receiver of the reports, notified competent authority or marketing authorisation holder (see VI.6.2.3.7 Subsection 2 for guidance on the electronic submission of these ICSRs)~~. ~~When~~ Where made aware of them, these reports should also be summarised in the relevant study reports by the marketing authorisation holder sponsoring the study ~~in the relevant study reports~~.

Table VI.1. Non-interventional post-authorisation studies with primary data collection: Requirements concerning Management of adverse events-adverse events collection and suspected adverse reactions reporting- for non-interventional post-authorisation studies with a design based on primary data collection

For collected adverse events, for which the protocol does not provide differently requires their systematic collection and including all the adverse events with fatal outcome	
Collection requirements for adverse events	<ul style="list-style-type: none"> • Collect <u>and record</u> comprehensive and high quality information. • Perform causality assessment. • <u>Summarise all collected adverse events in the interim safety analysis and in the final study report.</u>
Reporting requirements for suspected adverse reactions	<ul style="list-style-type: none"> • Cases of adverse reactions, which are suspected to be related to the studied medicinal product by the primary source or the <u>receiver of the case notified organisation</u>, should be <u>recorded in the pharmacovigilance database.</u> reported • <u>Valid ICSRs should be managed submitted classified in the form of and submitted as valid solicited ICSRs</u> in line with the appropriate time frames. (See VI.C.3) see VI.C.3. • In certain circumstances, <u>suspected adverse reactions with fatal outcome</u> may not be subject to <u>expedited reporting submission</u> as ICSRs. A justification should always be provided in the protocol.
Reporting requirements for adverse events	<ul style="list-style-type: none"> 1. Summarise all collected adverse events as part of any interim safety analysis and in the final study report.
For adverse events not collected, as specified in the study protocol	
Requirements for suspected adverse reactions	<ul style="list-style-type: none"> • <u>Inform healthcare professionals and consumers of the possibility to report suspected adverse reactions to the marketing authorisation holder or to the concerned competent authority via the national spontaneous reporting system.</u> • <u>Valid ICSRs should be managed, classified and submitted as spontaneous in line with the appropriate time frames.</u> • <u>When made aware of them, these ICSRs should also be summarised in the relevant study reports by the marketing authorisation holder sponsoring the study.</u>

VI.C.1.2.1.2. Non-interventional post-authorisation studies with a design based on secondary use of data

The design of such studies is characterised by the secondary use of data previously collected from consumers or healthcare professionals for other purposes. Examples include medical chart reviews (including following-up on data with healthcare professionals), analysis of electronic healthcare records, systematic reviews, meta-analyses.

For these studies, the reporting submission of suspected adverse reactions in the form of ICSRs is not required. Reports of aAll a adverse events/reactions collected for the study should be recorded and summarised as part of any in the interim safety analysis and in the final study report unless the protocol provides for different reporting with a due justification (see GVP Module VIII).

VI.C.1.2.2. Compassionate use and named patient use

The guidance provided in this Module applies, ~~subject to amendments where appropriate,~~ to medicinal products supplied in the context of compassionate use as defined in ~~Article 83(2) of Regulation (EC) No 726/2004 of Regulation (EC) No 726/2004,~~ ~~subject to and without prejudice to the applicable national laws in the EU Member States.~~ As the case may be, this guidance may also apply to named patient use as defined under ~~Article 5(1) of Directive 2001/83/EC of Directive 2001/83/EC.~~ Local requirements should be followed as applicable.

Where an organisation⁴¹ or a healthcare professional, supplying a medicinal product under compassionate use or named patient use, is notified or becomes aware of an adverse event, it should be managed as follows depending on the requirements in the concerned Member State:

- For compassionate use and named patient use conducted in Member States ~~(or in countries outside the EU)~~ where the active collection of adverse events occurring in these programmes is required, ~~the~~ reports of adverse reactions, ~~which are~~ suspected to be related to the supplied medicinal product by the primary source or the ~~receiver of the case~~ notified organisation, should be ~~reported-submitted as ICSRs in line with the time frames and modalities provided in VI.C.3. and VI.C.4.~~ They should be considered as solicited reports (~~see see VI.C.2.2.2. and VI.6.2.3.7 Subsection 1 for guidance on the electronic submission of these ICSRs).~~
- For compassionate use and named patient use conducted in Member States ~~(or in countries outside the EU)~~ where the active collection of adverse events occurring in these programmes is not required, any notified noxious or unintended response to the supplied medicinal product should be ~~reported-submitted as ICSR in accordance with the time frames and modalities provided in VI.C.3. and VI.C.4.~~ It should be considered as a spontaneous report of suspected adverse reaction- (~~see see VI.6.2.3.7 Subsection 2 for guidance on the electronic submission of these ICSRs VI.C.6.2.3.7. subsection 2).~~

VI.C.2. Collection of reports

VI.C.2.1. Responsibilities of Member States

Each Member State shall have in place a system for the collection and recording of unsolicited and solicited reports of suspected adverse reactions that occur in its territory and which are brought to its attention by healthcare professionals, consumers, or marketing authorisation holders⁴² [DIR Art 101(1) and 107a(1)]. In this context, ~~the~~ competent authorities ~~in a Member States~~ shall establish procedures for collecting and recording all reports of suspected adverse reactions that occur in ~~their-its~~ territory [IR Art 15 (2)]. The ~~definitions and~~ general principles detailed in ~~VI.A.1. and Section VI.B.7.~~ together with the ~~time frames and reporting~~ modalities presented in ~~VI.C.3., VI.C.4. and VI.C.6. should be applied with regard to their submission as ICSRs to the EudraVigilance database~~ ~~should be applied to those reports.~~ ~~should be applied to those reports.~~

~~Member States shall involve patients and healthcare professionals, as appropriate, in the follow-up of any reports they receive in order to comply with Article 102(c) and (e) [DIR Art 107a(1)]. Furthermore, for reports submitted by a marketing authorisation holder, Member States on whose territory the suspected adverse reaction occurred may involve the marketing authorisation holder in the follow-up of the reports [DIR Art 107a(2)]. In support of the operation of these follow-up procedures, business~~

⁴¹ E.g. sponsor, applicant, marketing authorisation holder, hospital or wholesaler.

⁴² ~~The M~~marketing authorisation holders shall ~~report-submit~~ ICSRs to ~~EudraVigilance the competent authorities in Member States~~ in accordance with the ~~transitional~~ provisions set out in ~~Article 107(3) of Directive 2001/83/EC and Article 2(5) of Directive 2010/84/EU~~ and further detailed in ~~VI.C.4.~~

~~process maps and process descriptions are provided in VI.App.1.2 and VI.App.1.3. The criteria upon which competent authorities in Member States may involve a marketing authorisation holder in the follow-up of individual cases refer to the need to seek clarifications on inconsistent data in ICSRs, but also to the need to obtain further information in the context of the validation of a signal, the evaluation of a safety issue, the assessment of a periodic safety update report or the confirmation of a safety concern in a risk management plan. Further guidance on the follow-up of ICSRs is provided in VI.B.3..~~

~~Pharmacovigilance data and documents relating to individual authorised medicinal products shall be retained as long as the product is authorised and for at least 10 years after the marketing authorisation has expired. However, the documents shall be retained for a longer period where Union law or national law so requires [IR Art 16(2)].~~

Each Member State shall take all appropriate measures to encourage healthcare professionals and consumers in their territory to report suspected adverse reactions to their competent authority. In addition, the competent authority in a Member State may impose specific obligations on healthcare professionals. To this end, the competent authorities in a Member States shall facilitate in theirits territory the reporting of suspected adverse reactions by means of alternative straightforward reporting systems, accessible to healthcare professionals and consumers, in addition to web-based formats [DIR Art 102]. Information on the different ways of reporting suspected adverse reactions related to medicinal products, shall be made publicly available, including by means of national medicines web-based portals [DIR 106(e)]. To increase awareness of the reporting systems, organisations representing consumers and healthcare professionals may be involved as appropriate [DIR Art 102].

~~StandardIn line with Articleicle 25 of Regulation (EC) No 726/2004 of Regulation (EC) No 726/2004, standard web-based structured forms for the reporting of suspected adverse reactions by healthcare professionals and consumers shall have been developed by the AgencyMember States in collaboration with Member Statesthe Agency in order to collect across the EU harmonised information relevant for the evaluation of suspected adverse reactions, including errors associated with the use of medicinal products [REG Art 25]. In this context, core data fields for reporting will be made available by the Agency to the competent authorities in Member States for use in their national reporting systems as applicable..~~

The reports of suspected adverse reactions received from healthcare professionals and consumers should be acknowledged where appropriate and further information should be provided to the reporters as requested and when available.

Member States shall involve patients and healthcare professionals, as appropriate, in the follow-up of any reports they receive in order to comply with Article 102(c) and (e) of Directive 2001/83/EC [DIR Art 107a(1)]. Furthermore, for reports submitted by a marketing authorisation holder, Member States on whose territory the suspected adverse reaction occurred may involve the marketing authorisation holder in the follow-up of the reports [DIR Art 107a(2)]. The criteria upon which a marketing authorisation holder may be involved include situations where:

- important additional information is necessary for case evaluation or reconciliation,
- clarifications is needed regarding inconsistent data within ICSRs,
- there is a need to obtain further information in the context of the validation of a signal, the evaluation of a safety issue, the assessment of a periodic safety update report, or the confirmation of a safety concern in a risk management plan.

[In support of the operation of these follow-up procedures, business process maps and process descriptions are provided in VI.App.1.1. and VI.App.1.2.. Further guidance on the follow-up of ICSRs is provided in VI.B.3. and in VI.C.6.2.2.7..](#)

~~For reports submitted by a marketing authorisation holder, Member States on whose territory the suspected adverse reaction occurred may involve the marketing authorisation holder in the follow-up of the reports [DIR Art 107a(2)].~~

~~Each Member State shall ensure that the competent authority reports of suspected adverse reactions arising from an error associated with the use of a medicinal product (see VI.A.1.2. for medication error definition) that are brought to their attention are made available to the EudraVigilance database and to any authorities, bodies, organisations and/or institutions, responsible for patient safety within that Member State. They shall also ensure that the authorities responsible for medicinal products within that Member State ~~is~~ are informed of any suspected adverse ~~reaction, reactions~~ brought to the attention of any other authority, ~~body, institution or organisation responsible for patient safety within that Member State,~~ and that valid ICSRs are made available to the EudraVigilance database. Therefore, ~~where reports of suspected adverse reactions are sent directly to other authorities, bodies, organisations and/or institutions within a Member State,~~ the competent authority in that Member State shall have data exchange agreements in place so that these reports are brought to its attention and are made available to EudraVigilance in a timely manner [DIR Art 107a(5)]. This applies as well to reports of suspected adverse reactions arising from an error associated with the use of a medicinal product. Those error reports of suspected adverse reactions for which a competent authority in a Member State is made aware of, including those received from the EudraVigilance database in accordance with Article 24(4) of Regulation (EC) No 726/2004, shall also be brought to the attention of other authorities, bodies, organisations and/or institutions responsible for patient safety within that Member State [DIR Art 107a(5)]. within that Member State. These reports shall be appropriately identified in the standard web-based structured forms referred to in Article 25 of Regulation (EC) No 726/2004, developed for the reporting of suspected adverse reactions by healthcare professionals and patients [DIR Art 107a(5)]. To facilitate such reporting, it may be necessary to implement data exchange agreements or other arrangements, as appropriate. Further guidance concerning the management and assessment of reports of medication errors is provided in the Good Practice Guide on Recording, Coding, Reporting and Assessment of Medication Errors⁴³.~~

[Pharmacovigilance data and documents relating to individual authorised medicinal products shall be retained by the national competent authorities in Member States and the Agency as long as the product is authorised and for at least 10 years after the marketing authorisation has expired. However, the documents shall be retained for a longer period where Union law or national law so requires \[IR Art 16\(2\)\] \(see VI.C.6.2.4. and GVP Module I for guidance on ICSRs data quality\).](#)

Unless there are justifiable grounds resulting from pharmacovigilance activities, individual Member States shall not impose any additional obligations on marketing authorisation holders for the reporting of suspected adverse reactions [DIR Art 107a(6)].

VI.C.2.2. Responsibilities of the marketing authorisation holder in the EU

Each marketing authorisation holder shall have in place a system for the collection and recording of all reports of suspected adverse reactions [in the EU or in third countries](#) which are brought to its

⁴³ Ref.: EMA/762563/2014; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medication errors](#)

attention, whether reported spontaneously by healthcare professionals or consumers or occurring in the context of a post-authorisation study [DIR Art 104(1), Art 107(1)].

~~The marketing authorisation holders shall establish procedures in order to obtain accurate and verifiable data for the scientific evaluation of suspected adverse reaction reports [Dir Art 107(4)]. They shall not refuse to consider reports of suspected adverse reactions received electronically or by any other appropriate means from patients and healthcare professionals [DIR Art 107(2)].~~

~~The~~ ~~All those reports shall be accessible at a single point within the Union [Dir Art 107(1)]. All these reports of suspected adverse reactions shall be accessible at a single point within the Union [Dir Art 107(1)].~~ Marketing authorisation holders shall establish procedures in order to obtain accurate and verifiable data for the scientific evaluation of suspected adverse reaction reports [Dir Art 107(4)]. They shall also collect follow-up information on these reports and submit the updates to the EudraVigilance database [Dir Art 107(4)]. ~~The~~ ~~In support of the operation of the follow-up procedures, a business process map and a process description are provided in VI.App.1.1. General guidance on the following-up of reports of suspected adverse reactions is provided in VI.B.3..~~ Marketing authorisation holders shall establish mechanisms enabling the traceability and follow-up of adverse reaction reports while complying with the data protection legislation [IR Art 12 (1)]. ~~In support of the operation of the follow-up procedures, business process maps and process descriptions are provided in VI.App.1.1. and VI.App.1.2.. Further guidance on the follow-up of ICSRs is provided in VI.B.3. and in VI.C.6.2.2.7..~~

~~For the ICSRs made accessible to a marketing authorisation holder from the EudraVigilance database in accordance with Article 24(2) of Regulation (EC) No 726/2004 and in line with the EudraVigilance Access Policy for Medicines for Human Use⁴⁴, the routine request for follow-up by the marketing authorisation holder is not foreseen. If the follow-up of an ICSR is necessary for a specific situation, a justification should be provided with the request, which should be addressed directly to the sender organisation of the ICSR.~~

Pharmacovigilance data and documents relating to individual authorised medicinal products shall be retained by the marketing authorisation holder as long as the product is authorised and for at least 10 years after the marketing authorisation has ceased to exist. However, the documents shall be retained for a longer period where Union law or national law so requires [IR Art 12 (2)] (see VI.C.6.2.4. and GVP Module I for guidance on ICSRs data quality).

With regard to the collection and recording of reports of suspected adverse reactions, the marketing authorisation holders responsibilities apply to reports related to medicinal products (~~see~~) for which ownership cannot be excluded on the basis of one the following criteria: medicinal product name, active substance name, pharmaceutical form, batch number or route of administration (see also the introduction to Section VI.C. for the type of medicinal products concerned by EU requirements).

Exclusion based on the primary source country or country of origin of the adverse reaction is possible if the marketing authorisation holder can demonstrate that the suspected medicinal product has never been supplied or placed on the market in that territory or that the product is not a travel medicine (e.g., anti-malarial medicinal product).

The marketing authorisation holder shall ensure that any information on adverse reactions, suspected to be related to at least one of the active substances of its medicinal products authorised in the EU, is brought to its attention by any company outside the EU belonging to the same mother company (or group of companies)⁴⁵. The same applies to the marketing authorisation holder when having concluded a commercial agreement with a company outside the EU for one of its medicinal product

⁴⁴ EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](#)

⁴⁵ As outlined in the Commission Communication on the Community Marketing Authorization Procedures for Medicinal Products (Ref.: 98/C 229/03).

authorised in the EU. Pursuant to ~~Dir~~ Article 107(1) of Directive 2001/83/EC, the marketing authorisation holder shall record those reports of suspected adverse reactions and shall also ensure that they are accessible at a single point within the EU. The source data or an image should be easily accessible in order to be made available to competent authorities in Member States upon request (see VI.B.5. for guidance on quality management). The clock for reporting the submission (see VI.B.7. for day zero definition) starts when a valid ICSR is first received by one of these companies outside the EU.

In addition to the requirements presented in this ~~Section~~chapter, the definitions and general principles detailed in VI.A.1. and Section VI.B., together with the time frames and reporting modalities presented in VI.C.3., VI.C.4. and VI.C.6. should be applied by the marketing authorisation holders to all reports of suspected adverse reactions.

VI.C.2.2.1. Spontaneous reports

The marketing authorisation holders shall record all reports of suspected adverse reactions originating from within or outside the EU, which are brought to their attention spontaneously by healthcare professionals, or consumers. This includes reports of suspected adverse reactions received electronically or by any other appropriate means [DIR Art 107(1), Art 107(2)]. In this context, the marketing authorisation holders may consider utilising their websites to facilitate the collection of reports of suspected adverse reactions by providing adverse reactions forms for reporting, or appropriate contact details for direct communication (see VI.B.1.1.4. for guidance on ICSRs management from the internet or digital media).

VI.C.2.2.2. Solicited reports

In accordance with Article 107(1) of Directive 2001/83/EC of Directive 2001/83/EC, the marketing authorisation holders shall record all reports of suspected adverse reactions originating from within or outside the EU, which occur in post-authorisation studies, initiated, managed, or financed by that organisation⁴⁶. For non-interventional post-authorisation studies, this requirement applies to study designs based on primary data collection and the guidance provided in VI.C.1.2.1.1. should be followed.

For all solicited reports (see VI.B.1.2. for definition), the marketing authorisation holders should have mechanisms in place to record and document complete and comprehensive case information and to evaluate that information, in order to allow the meaningful assessment of individual cases and reporting the submission of valid ICSRs (see VI.B.2. for ICSRs validation) related to the studied (or supplied) medicinal product. The marketing authorisation holders should therefore exercise due diligence in establishing such system, in following-up those reports (see VI.B.3. for follow-up guidance) and in seeking the view of the primary source as regards the causal role of the studied (or supplied) medicinal product on the notified adverse event. Where this opinion is missing, the marketing authorisation holder should exercise its own judgement to perform a causality assessment based on the information available in order to decide whether the report is a valid ICSR, which should be reported submitted in accordance with the time frames and modalities presented in VI.C.3., VI.C.4. and VI.C.6. to the competent authorities. This requirement does not apply to study designs based on secondary use of data since reporting the submission of ICSRs is not required (see VI.C.1.2.1.2. for guidance on this type of studies VI.C.1.2.1.). Safety data from solicited reports to be presented in the

⁴⁶ This does not concern donation of a medicinal product for research purpose if the marketing authorisation holder has no control on the study.

relevant sections of the periodic safety update report of the authorised medicinal product are detailed in [GVP Module VII](#).

VI.C.2.2.3. Case reports published in the ~~scientific literature~~ [medical literature](#)

General principles in relation to the monitoring for individual cases of suspected adverse reactions described in the ~~scientific and medical literature~~ [medical literature](#) are provided in [VI.B.1.1.2](#).

~~As~~ [Detailed guidance on the monitoring of the ~~scientific and medical literature~~ \[medical literature\]\(#\) is provided in \[VI.App.2\]\(#\). ~~Electronic reporting submission recommendations~~ \[guidance for ICSRs published in the ~~scientific and medical literature~~ \\[medical literature\\]\\(#\\) are provided in \\[VI.C.6.2.3.2\\]\\(#\\).\]\(#\)](#)

~~With~~ [regards to](#) the screening of the ~~scientific and medical literature~~ [medical literature](#), the requirements provided in this Module are part of the [marketing authorisation holder obligations reporting in relation to \(i\) the submission of individual cases of suspected adverse reactions, as well as and to \(ii\) the wider literature searches which need to be conducted for periodic safety update reports \(see \[GVP Module VII\]\(#\)\)](#).

~~VI.C.2.2.3.1 Monitoring of the ~~medical literature~~ [medical literature](#) by the European Medicines Agency~~

~~In line with Article 27 of Regulation (EC) No 726/2004, the Agency shall monitor selected medical literature for reports of suspected adverse reactions to medicinal products containing certain active substances. It shall publish a list of active substances being monitored and the medical literature subject to this monitoring. The Agency shall enter into the EudraVigilance database relevant information from the selected medical literature. The Agency shall, in consultation with the European Commission, Member States and interested parties, draw up a detailed guide regarding the monitoring of medical literature and the entry of relevant information into the EudraVigilance database [REG Art 27].~~

~~The medical literature and the active substances subject to the monitoring by the Agency are published on a dedicated webpage⁴⁷ of the Agency's website together with supporting documents. Further information is also provided in the Detailed Guide Regarding the Monitoring of Medical Literature and the Entry of Relevant Information into the EudraVigilance Database by the European Medicines Agency⁴⁸, which defines the different steps of the medical literature monitoring (MLM) business processes.~~

~~ICSRs resulting from the MLM service performed by the Agency can be accessed from the EudraVigilance database by the marketing authorisation holder concerned. They are also made available for download in XML format. This refers to ICSRs of serious suspected adverse reactions occurring within and outside the EU, and to ICSRs of non-serious suspected adverse reactions from within the EU.~~

~~In accordance with Article 107(3) of Directive 2001/83/EC of Directive 2001/83/EC, in order and to avoid the reporting submission of duplicate ICSRs, the marketing authorisation holders shall only report submit those ICSRs described in the ~~scientific and medical literature~~ [medical literature](#) which is not reviewed by the Agency, for all medicinal products containing active substances which are not included in the list monitored by the Agency pursuant to ~~Article 27 of Regulation (EC) No 726/2004 of Regulation (EC) No 726/2004~~.~~

⁴⁷ [EMA website: Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medical literature monitoring Monitoring of medical literature and entry of adverse reaction reports into EudraVigilance](#)

⁴⁸ [Ref.: \(Doc Ref. EMA/161530/2014EMA/161530/2014EMA/161530/2014; EMA website: Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medical literature monitoring \)](#)

~~Until such lists of scientific and medical literature and active substance names are published by the Agency, marketing authorisation holders should monitor all the active substances for which they hold a marketing authorisation in the EU by accessing a widely used systematic literature review and reference database, in line with the principles detailed in [VI.B.1.1.2](#), and in [VI. Appendix 2](#).~~

~~Articles can be excluded from the reporting of ICSRs by the marketing authorisation holder if another company's branded medicinal product is the suspected medicinal product. In the absence of a specified medicinal product source and/or invented name, ownership of the medicinal product should be assumed for articles about an active substance, unless alternative reasons for exclusion detailed hereafter apply:~~

VI.C.2.2.3.2 Exclusion criteria for the ~~reporting~~ submission of ICSRs published in the ~~scientific literature~~ medical literature

~~The following exclusion criteria for the submission of ICSRs ~~reporting~~ to the EudraVigilance database by a marketing authorisation holders may be applied for ~~individual~~ cases published in the ~~scientific literature~~ medical literature:~~

- a. ~~where ownership of the suspected medicinal product by the marketing authorisation holder can be excluded on the basis of the criteria detailed in [VI.C.2.2](#), medicinal product name, active substance name, pharmaceutical form, batch number or route of administration;~~
- b. ~~for individual case safety reports identified in the scientific and medical literature that originate ~~which originates~~ in a country where a company holds a marketing authorisation but has never commercialised the medicinal product;~~
- c. ~~for literature ICSRs which are ~~is~~ based on an analysis from a competent authority database within the EU. ~~The~~ ~~However, the~~ ~~reporting-submission~~ requirements remain for those ICSRs which are based on the analysis from a competent authority database outside the EU;~~
- d. ~~for literature articles, which present ~~presents~~ aggregated data analyses or line listings ~~refers to data~~ from publicly available databases ~~or, (e.g. poison control centres); and where the cases are presented in aggregate tables or line listings. The submission requirement remains for valid cases described individually;~~~~
- e. ~~which summarises ~~summarises~~ presents the results from post-authorisation studies, meta-analyses, (see [VI.C.1.2](#)). This type of literature article ~~or literature reviews~~;~~
- f. ~~which describes suspected adverse reactions, ~~which occur~~ in a group of patients with a designated medicinal product with the aim of and the individual patients cannot be identified individually for creating valid case reports ICSRs (see [VI.B.2](#) for ICSRs validation).~~

~~For points d to f, this type of literature aims at identifying or quantifying a safety hazard related to a medicinal product, and aggregated data on patients are often presented in tables or line listings. The main objective ~~of those studies~~ is to detect/evaluate specific risks that could affect the overall risk-benefit balance of a medicinal product.~~

New and significant safety findings presented in these articles, for which reporting the submission of ICSRs is not required, should however be discussed in the relevant sections of the concerned periodic safety update report (see [GVP Module VII](#)) and analysed as regards their overall impact on the medicinal product risk-benefit profile. In addition, any new safety information, which may impact on the risk-benefit profile of a medicinal product, should be notified immediately to the competent authorities in Member States where the medicinal product is authorised and to the Agency in accordance with the recommendations guidance provided in [VI.C.2.2.6](#).

~~A detailed guidance on the monitoring of the scientific and medical literature has been developed in accordance with Article 27(3) of Regulation (EC) No 726/2004; it is included in VI. Appendix 2.~~

~~The electronic reporting recommendations regarding suspected adverse reactions reports published in the scientific and medical literature are provided in VI.C.6.2.3.2.~~

VI.C.2.2.4. Suspected adverse reactions related to quality defect or falsified medicinal products

When a report of suspected adverse reactions is associated with a suspected or confirmed falsified medicinal product⁴⁹ ~~or (see GVP Annex I) or with a~~ quality defect of a medicinal product, a valid ICSR should be ~~reported submitted~~. The seriousness of the ICSR is linked to the seriousness of the reported suspected adverse reactions in accordance with the definitions provided in ~~VI.A.2.4VI.A.2.4VI.A.1.6~~. ~~The guidance on the eElectronic reporting submission recommendations of ICSRs~~ provided in ~~VI.C.6.2.3.5~~ should be followed.

In addition in order to protect public health, it may become necessary to implement urgent measures such as the recall of one or more defective batch(es) of a medicinal product from the market. Therefore, ~~the~~ marketing authorisation holders should have a system in place to ensure that reports of suspected adverse reactions related to falsified medicinal products or to quality defects of a medicinal products are investigated in a timely fashion and that confirmed quality defects are notified separately to the manufacturer and to ~~the~~ competent authorities ~~in Member States~~ in accordance with the provisions described in Article 13 of ~~Directive 2003/94/EC~~.

VI.C.2.2.5. Suspected transmission via a medicinal product of an infectious agent

~~For the purposes of reporting, A~~ any suspected transmission of an infectious agent via a medicinal product ~~(including vaccines)~~ should be considered as a serious adverse reaction and such cases should be ~~reported submitted~~ within 15 days in accordance with the requirements outlined in ~~VI.C.4. and the electronic submission guidance detailed in VI.C.6.2.3.6~~.⁵⁰ If no other criterion is applicable, the seriousness of this ICSR should be considered as important medical event (see ~~VI.A.2.4VI.A.1.6 for seriousness definition~~). This also applies to vaccines. ~~Electronic reporting recommendations provided in VI.C.6.2.3.6.VI.C.6.2.3.6. should be followed.~~

In the case of medicinal products derived from human blood or human plasma, haemovigilance procedures may also apply in accordance with ~~Directive 2002/98/EC~~ Directive 2002/98/EC. Therefore the marketing authorisation holder should have a system in place to communicate ~~any~~ suspected transmission ~~of an infectious agent~~ via a medicinal product ~~of an infectious agent~~ to the manufacturer, the relevant blood establishment(s) and national competent authorities in Member States.

Any organism, virus or infectious particle (e.g. prion protein transmitting transmissible spongiform encephalopathy), pathogenic or non-pathogenic, is considered an infectious agent.

A transmission of an infectious agent may be suspected from clinical signs or symptoms, or laboratory findings indicating an infection in a patient exposed to a medicinal product.

Emphasis should be on the detection of infections/infectious agents known to be potentially transmitted via a medicinal product, but the occurrence of unknown agents should also always be considered.

⁴⁹ see ~~GVP Annex I and EMA webpage on falsified medicines: Home/ Human regulatory/ Overview/ Public health threats/ Falsified medicines~~

⁵⁰ See ~~VI.C.6.2.3.6. for electronic reporting submission recommendations of ICSRs.~~

In the context of evaluating a suspected transmission of an infectious agent via a medicinal product, care should be taken to discriminate, whenever possible, between the cause (e.g. injection/ administration) and the source (e.g. contamination) of the infection and the clinical conditions of the patient at the time of the infection (immuno-suppressed /vaccinee).

Confirmation of contamination (including inadequate inactivation/attenuation of infectious agents as active substances) of the concerned medicinal product increases the evidence for transmission of an infectious agent and may therefore be suggestive of a quality defect for which the procedures detailed in [VI.C.2.2.4.](#) should be applied.

Medicinal products should comply with the recommendations provided in the [Note for Guidance on Minimising the Risk of Transmitting Animal Spongiform Encephalopathy Agents via Human and Veterinary Products](#)⁵¹. For advanced therapy medicinal products, Article 14(5) of Regulation (EC) No 1394/2007 and the [Guideline on Safety and Efficacy Follow-up - Risk Management of Advanced Therapy Medicinal Products](#)⁵², should also be followed as appropriate.

VI.C.2.2.6. Emerging safety issues

~~Events/observations may occur [in relation to an authorised medicinal product](#), which [do not fall within the definition of reportable valid ICSRs](#), and thus are not subject to the reporting requirements, even though they may lead to [changes in may have major impacts on](#) the [known](#) risk-benefit balance [of of](#) [the a medicinal](#) product and/or [impact on patients or](#) public health. [Examples include:](#)~~

~~major safety findings from a newly completed non-clinical study;~~

~~major safety concerns identified in the course of a non-interventional post-authorisation study or of a clinical trial;~~

~~signal of a possible teratogen effect or of significant hazard to public health;~~

~~safety issues published in the scientific and medical literature;~~

~~safety issues arising from the signal detection activity (see Module IX) or emerging from a new ICSR and which impact on the risk-benefit balance of the medicinal product and/or have implications for public health;~~

~~safety issues related to the use outside the terms of the marketing authorisation;~~

~~safety issues due to misinformation in the product information;~~

~~marketing authorisation withdrawal, non-renewal, revocation or suspension outside the EU for safety-related reasons;~~

~~urgent safety restrictions outside the EU;~~

~~safety issues in relation to the supply of raw material;~~

~~lack of supply of medicines.~~

~~These events/observations, which may affect the risk-benefit balance of a medicinal product, are not to be submitted as ICSRs. They should be notified as emerging safety issues in writing to the competent authorities in Member States where the medicinal product is authorised and to the Agency via email~~

⁵¹ ~~Latest revision.~~ (Ref.: [EMA/410/01](#)~~EMA/410/01~~; EMA website: [Home/ Human regulatory/ Research and development/ Advanced therapies/ Scientific guidelines](#))

⁵² Ref.: [EMEA/149995/2008](#)~~EMEA/149995/2008~~[EMEA/149995/2008](#); EMA website: [Home/ Human regulatory/ Post-authorisation/ Advanced therapies/ Pharmacovigilance](#)

(P-PV-emerging-safety-issue@ema.europa.eu); this should be done immediately when becoming aware of them. The document should indicate the points of concern and the actions proposed in relation to the marketing application/authorisation for the concerned medicinal product. Those safety issues should also be analysed in the relevant sections of the periodic safety update report of the authorised medicinal product. They may require urgent attention of the competent authority and could warrant prompt regulatory action and communication to patients and healthcare professionals. They These important new evidences should be notified/considered as emerging safety issues (see GVP Annex I). They should be notified to the competent authorities and the Agency in accordance with the requirements provided in GVP Module IX. This is in addition to the ICSR submission requirements detailed in VI.C.3. and VI.C.4., when the emerging safety issue refers to a single case of suspected adverse reactions (see VI.C.6.2.2.1. for general guidance on ICSRs preparation).

VI.C.2.2.7. Period between the submission of the marketing authorisation application and the granting of the marketing authorisation

In the period between the submission of the marketing authorisation application and the granting of the marketing authorisation, information (quality, non-clinical, clinical) that could impact on the risk-benefit balance of the medicinal product under evaluation may become available to the applicant⁵³. It is the responsibility of the applicant to ensure that this information is immediately submitted in accordance with the modalities described in VI.C.2.2.6. to the competent authorities in the Member States where the application is under assessment (including Reference Member State and all concerned Member States for products assessed under the mutual recognition or decentralised procedures) and to the Agency. For applications under the centralised procedure, the information should also be provided to the (Co-) Rapporteur.

In the situation where a medicinal product application is under evaluation in the EU while it has already been authorised in a third country, valid ICSRs from outside the EU, originating from unsolicited reports (see VI.B.1.1. for definition) or solicited reports (see VI.B.1.2. for definition), should be reported/submitted in accordance with the time frames and modalities/requirements provided in VI.C.3., VI.C.4. and VI.C.6..

VI.C.2.2.8. Period after suspension, revocation or withdrawal of marketing authorisation

The marketing authorisation holder shall continue to collect any reports of suspected adverse reactions related to the concerned medicinal product following the suspension of a marketing authorisation. The time frames and reporting-submission requirements outlined in VI.C.3., VI.C.4. and VI.C.6. remain for valid ICSRs.

Where a marketing authorisation is withdrawn or revoked, the former marketing authorisation holder is encouraged to continue to collect spontaneous reports of suspected adverse reactions originating within the EU to, for example, facilitate the review of delayed onset adverse reactions or of retrospectively notified cases.

VI.C.2.2.9. Period during a public health emergency

A public health emergency is a public health threat duly recognised either by the World Health Organization (WHO) or the Community in the framework of Decision No. 2119/98/EC/Decision No. 2119/98/EC as amended of the European Parliament and of the Council. In the event of a public health

⁵³ See also chapter 1, section 5.1.1 of Volume 2A (Notice to Applicants) of The Rules Governing Medicinal Products in the European Union, accessible at http://ec.europa.eu/health/documents/eudralex/vol_2/index_en.htm.

emergency, regular [reporting-submission](#) requirements may be amended. Such arrangements will be considered on a case-by-case basis and will be appropriately notified on the Agency website.

VI.C.2.2.10. Reports from class action lawsuits

Stimulated reports arising from class action lawsuits should be managed as spontaneous reports. Valid ICSRs should describe [suspected](#) adverse reactions related to the concerned medicinal product. They should be [reportedsubmitted](#) in accordance with the time frames and modalities described in [VI.C.3.](#), [VI.C.4.](#) and [VI.C.6.](#)

Where large batches of potential ICSRs are received, [the](#) marketing authorisation holders may request, in exceptional circumstances, for an exemption in order to submit serious cases of suspected adverse reactions within 30 days from their date of receipt instead of 15 days. The 90 days [reporting submission](#) time frame for non-serious ICSRs remains unchanged. ~~It will be possible to apply for this exemption only once the functionalities of the EudraVigilance database specified in Article 24(2) of Regulation (EC) No 726/2004 are established.~~ The request should be made to the Agency's pharmacovigilance department.

VI.C.2.2.11. Reports from patient support programmes and market research programmes

A patient support programme is an organised system where a marketing authorisation holder receives and collects information relating to the use of its medicinal products. Examples are post-authorisation patient support and disease management programmes, surveys of patients and healthcare [providersprofessionals](#), information gathering on patient compliance, or compensation/re-imburement schemes.

A market research programme refers to the systematic collection, recording and analysis by a marketing authorisation holder of data and findings about its medicinal products, relevant for marketing and business development.

Safety reports originating from those programmes should be considered as solicited reports. [The](#) marketing authorisation holders should have the same mechanisms in place as for all other solicited reports (see [VI.C.2.2.2. for marketing authorisation holders responsibilities on solicited reports](#)) to manage that information and [report to submit, in line with the time frames and modalities outlined in VI.C.3. and VI.C.4.](#), valid cases of adverse reactions, which are suspected to be related to the concerned medicinal product.

Valid ICSRs should be [reportedsubmitted](#) as solicited in accordance with the [electronic-reporting requirementsguidance](#) provided in- [VI.6.2.3.7 Subsection 1.](#)

VI.C.2.2.12. Reporting of off-label use

[The off-label use of a medicinal product may occur for various reasons \(see definition in VI.A.1.2. and GVP Annex I\). Examples include the intentional use of a product in situations other than the ones described in the authorised product information, such as:](#)

- [a different indication in term of medical condition;](#)
- [a different group of patients;](#)
- [a different route or method of administration;](#)
- [a different posology.](#)

With regard to the management of individual reports referring to the off-label use of a product, the responsibilities of the marketing authorisation holder can be summarised as follows, depending if the off-label use results in the patient's harm:

a. The off-label use of a medicinal product results in patient's harm with occurrence of a suspected adverse reaction

In line with Article 107(1), 107(3) and 107(4) of Directive 2001/83/EC, the marketing authorisation holder shall collect individual reports of suspected adverse reactions when becoming aware of them. The reports shall be routinely followed-up to ensure that the information is as complete as possible (see VI.C.2.2. for marketing authorisation holders' responsibilities on ICSRs). Valid ICSRs shall be submitted to the EudraVigilance database in accordance with the time frames, and modalities provided in VI.C.3., VI.C.4., and VI.C.6.2.3.3.

Where relevant and appropriate, the benefit-risk analysis evaluation presented in the periodic safety update report should take into account the clinical importance of a risk in relation to the off-label use of the concerned medicinal product (see GVP Module VII).

In line with the guidance provided in GVP Module V, where there is a scientific rationale that an adverse clinical outcome might be associated with the off-label use of the product, the adverse reaction should be considered a potential risk, and if deemed important, should be included in the list of safety concerns of the risk management plan as an important potential risk. This is particularly relevant, when differences in safety concerns between the target and the off-label population are anticipated. Important potential risks included in the risk management plan would usually require further evaluation as part of the pharmacovigilance plan.

b. The off-label use of a medicinal product does not result in patient's harm and occurrence of a suspected adverse reaction

The potential obligations regarding the collection of data on the off-label use of a medicinal product are set out in Article 23(2) of Directive 2001/83/EC, which requires the marketing authorisation holder to report to competent authorities in Member States any other new information which might influence the evaluation of the benefits and risks of the medicinal product, including data on the use of the product where such use is outside the terms of the marketing authorisation.

Under this condition, the most appropriate way to deliver a planned and risk proportionate approach to enable the monitoring of the use of a specific medicinal product in routine clinical settings is through the risk management plan. Where the potential for off-label use has been identified for a product and such use could raise a safety concern (i.e. because there is a justified supposition that an important potential risk might be associated with the off-label use of the product) the risk management plan should discuss the need of pharmacovigilance activities in terms of:

- Specific follow-up questionnaires for suspected adverse reactions derived from the off-label use;
- Other required forms of routine pharmacovigilance activities for the targeted collection and follow-up of individual reports of off-label use not associated with suspected adverse reactions;
- Additional structured investigations (such as drug utilisation studies, searches in databases).

If collected in the frame of the routine pharmacovigilance activities, individual reports of off-label use with no suspected adverse reaction should not be submitted to the EudraVigilance database since the minimum criteria for ICSRs validation are incomplete (see VI.B.2. for ICSRs validation).

As part of risk management planning, the monitoring of the off-label use should focus on collection and assessment of information which might influence the evaluation of the benefits and risks of the concerned medicinal product.

For products without a risk management plan, the marketing authorisation holder and the competent authority should consider whether the off-label use of the product constitutes a safety concern. If it does, then consideration should be given to requiring a risk management plan or a post-authorisation safety study.

Some Member States may already have put in place specific requirements at national level regarding the collection and submission by marketing authorisation holders of information on the off-label use of their products. The guidance presented in this chapter should not be interpreted as preventing the fulfilment of those local obligations.

VI.C.3. Reporting-Submission time frames of ICSRs in EU

The general rules in relation to the reporting-submission of initial and follow-up reports, including those for defining the clock start are detailed in VI.B.7.

According to Articles 107(3) and 107a(4) of Directive 2001/83/EC of Directive 2001/83/EC,

- serious valid ICSRs shall be reportedsubmitted by the competent authorities in a Member States or by the marketing authorisation holders within 15 days from the date of receipt of the reports;
- non-serious valid ICSRs shall be reportedsubmitted by the competent authorities in a Member States or by the marketing authorisation holders within 90 days from the date of receipt of the reports.

This should be done in accordance with the reporting modalities detailed in VI.C.4.

ICH-E2B provides a mechanism to the sender to indicate whether a valid ICSR ~~the case~~ fulfils the local ~~expedited~~regulatory requirements for submission to the EudraVigilance database within the 15 or 90-day time frame. In line with ICH-E2B the following applies for ~~all~~the -serious and non-serious ICSRs which need to be submitted ~~reportable~~ in the EU based on the modalities detailed in VI.C.4.:

<u>Reference</u>	<u>E2B(R2)/(R3) requirements</u>
<u>ICH-E2B(R2)</u>	<ul style="list-style-type: none">• <u>Data element A.1.9 'Does this case fulfil the local criteria for an expedited report?' should be completed with the value 1 (YES) when the ICSR needs to be submitted within the 15 or 90-day time frame.</u>• <u>The population of this data element is optional under ICH-E2B(R2).</u>
<u>ICH-E2B(R3)</u>	<ul style="list-style-type: none">• <u>Data element C.1.7 'Does this Case fulfil the local criteria for an expedited report?' should be completed with the value TRUE when the ICSR needs to be submitted within the 15 or 90-day time frame.</u>• <u>The population of this data element is mandatory under ICH-E2B(R3).</u>

VI.C.4. Reporting-Submission modalities of ICSRs in EU

In addition to the [recommendations-guidance](#) provided in [VI.B.8.](#), [the](#) competent authorities in a Member States and [the](#) marketing authorisation holders shall use the formats, standards and terminologies for the electronic [transmission-submission](#) of suspected adverse reactions as referred to in [chapter-Chapter IV of the Commission Implementing Regulation \(EU\) No 520/2012-of the Commission Implementing Regulation \(EU\) No 520/2012](#). ICSRs shall be used for [reporting-the submission](#) to the [Eudravigilance-EudraVigilance](#) database [of reports of](#) suspected adverse reactions to a medicinal product that occur in a single patient at a specific point in time [IR Art 27]. [The](#) [c](#)Competent [authorities-authority](#) in a Member States and [the](#) marketing authorisation holders shall also ensure that all [reportedsubmitted electronic](#)-ICSRs are well documented and as complete as possible in accordance with the requirements provided in [IR-Article 28 of the Commission Implementing Regulation \(EU\) No 520/2012](#)].

The time frames for [reporting-submitting](#) serious and non-serious valid ICSRs are provided in [VI.C.3.](#) The [recommendationsguidance](#) provided in [VI.C.6.](#) should be adhered to as regards the electronic exchange of pharmacovigilance information between competent authorities in Member States, marketing authorisation holders and the Agency.

~~ICSRs reported electronically to the EudraVigilance database will be made accessible to stakeholders such as competent authorities, healthcare professionals, consumers, as well as marketing authorisation holders and research organisations in accordance with Article 24(2) of Regulation (EC) No 726/2004 and the EudraVigilance Access Policy for Medicines for Human Use⁵⁴. This policy defines the overall principles of the provision of access to EudraVigilance data in line with the current legal framework, while guaranteeing personal data protection. As detailed in the EudraVigilance access policy, a selection of ICSRs could be downloaded by marketing authorisation holders in ICH E2B format and in accordance with the ICH M2 message specifications, to facilitate their pharmacovigilance activities.~~

~~VI.C.4.1. Interim arrangements~~

~~In [accordance-line](#) with the provisions set out in [Article 2\(4\)](#), [Article 2\(5\)](#) and [Article 2\(6\)](#) of Directive 2010/84/EU, until the Agency can ensure the functionalities of the EudraVigilance database as specified in [Article 24\(2\) of Regulation \(EC\) No 726/2004](#), [Article 107\(3\) and 107a\(4\) of Directive 2001/83/EC-of Directive 2001/83/EC](#), the following [reporting-submission](#) requirements shall apply to valid unsolicited and solicited ICSRs reported by healthcare professionals and non-healthcare professionals. This is independently of the condition of use of the suspected medicinal product and of the expectedness of the adverse reaction.~~

~~**a- Serious ICSRs**~~

~~Marketing authorisation holders shall report all serious ICSRs that occur in the EU to the competent authority of the Member State on whose territory the suspected adverse reactions occurred.~~

~~Marketing authorisation holders shall report to the EudraVigilance database all serious ICSRs that occur outside the EU, including those received from competent authorities. If required by Member States, those reports shall also be submitted to the competent authorities in the Member States in which the medicinal product is authorised.~~

~~Competent authorities in Member States shall ensure that all serious ICSRs that occur in their territory and that are reported to them, including those received from marketing authorisation holders, are made available to the EudraVigilance database. Competent authorities in Member States should also~~

⁵⁴ <http://www.ema.europa.eu>

make available, to the marketing authorisation holders of the suspected medicinal products, all serious ICSRs reported directly to them.

~~b. Non-Serious ICSRs~~

~~If required by Member States, marketing authorisation holders shall report all non-serious ICSRs that occur in the EU to the competent authority of the Member State on whose territory the suspected adverse reactions occurred.~~

~~Overviews of the reporting requirements of serious and non-serious reports during the interim period, applicable to marketing authorisation holders or competent authorities in Member States, are presented in [VI.App3.1](#), together with a detailed business process map.~~

~~Member States reporting requirements for serious non-EU ICSRs and for non-serious EU ICSRs are also included in this Appendix.~~

~~VI.C.4.2. Final arrangements~~

~~Once the functionalities of the EudraVigilance database specified in Article 24(2) of Regulation (EC) No 726/2004 are established, the following requirements, detailed in Articles 107(3) and 107a(4) of Directive 2001/83/EC, shall apply within 6 months of the announcement by the Agency to valid unsolicited and solicited ICSRs reported by healthcare professionals and non-healthcare professionals [in relation to medicinal products for human use authorised in the EU in accordance with Directive 2001/83/EC and Regulation \(EC\) No 726/2004](#). This is [relevant independently irrespective](#) of the condition of use of the suspected medicinal product and of the expectedness of the adverse reaction.~~

a. Serious ICSRs

- [The marketing authorisation holders](#) shall submit all serious ICSRs that occur within or outside the EU, including those received from competent authorities outside the EU, to the EudraVigilance database only.
- [The competent authorities](#) in [a Member States](#) shall submit to the EudraVigilance database all serious ICSRs that occur in [their-its](#) territory and that are directly reported [by healthcare professionals or consumers to them](#).

b. Non-Serious ICSRs

- [The marketing authorisation holders](#) shall submit all non-serious ICSRs that occur in the EU to the EudraVigilance database only.
- [The competent authorities](#) in [a Member States](#) shall submit [to the EudraVigilance database](#) all non-serious ICSRs that occur in [their-its](#) territory [to the EudraVigilance database and that are directly reported by healthcare professionals or consumers](#).

~~Overviews of the [reporting submission](#) requirements ~~of-for~~ serious and non-serious [ICSRs reports](#), applicable to marketing authorisation holders ~~or-and~~ competent authorities in Member States, [together with a business process map and a process description](#), ~~once the final arrangements are implemented, are~~ presented in [VI.App3App.3.21](#), [VI.App.3.2](#), and [VI.App.3.3](#), ~~together with a detailed business process map and a process description~~.~~

~~In [accordance-line](#) with the requirement detailed in ~~Article~~ [Article](#) 24(4) of Regulation (EC) No 726/2004 ~~of Regulation (EC) No 726/2004 for the final arrangements~~, the ICSRs submitted to the EudraVigilance database by [a marketing authorisation holders](#) shall be automatically transmitted upon receipt, to the competent authority of the Member State where the reaction occurred. [When the primary source country and the country of occurrence of the reaction differ, the competent authorities of the](#)~~

~~concerned member states in the EU will be automatically notified about these specific ICSRs. A detailed Relevant business process map is and a process description concerning the automatic retransmission of ICSRs are included in VI.App3App.3.34.~~

~~In accordance with Article 24(2) of Regulation (EC) No 726/2004, the data submitted to the EudraVigilance database are made accessible to stakeholders such as competent authorities, healthcare professionals, consumers, as well as marketing authorisation holders and research institutions. This is made Access is provided based on the latest version of the EudraVigilance Access Policy for Medicines for Human Use⁵⁵. This policy defines the overall principles of in relation to the provision of access to EudraVigilance data in line with the current legal framework, while guaranteeing personal data protection. VI.C.5.~~

~~Additionally, the EudraVigilance database shall also be accessible to marketing authorisation holders to the extent necessary for them to comply with their pharmacovigilance obligations [REG Art 24(2)].~~

~~Further guidance on the access by stakeholders of the data submitted to the EudraVigilance database is available on the EudraVigilance webpage⁵⁶.~~

~~**VI.C.5. Collaboration with bodies outside the EU regulatory network**~~

~~**VI.C.5.1. Collaboration with the World Health Organization and the European Monitoring Centre for Drugs and Drug Addiction**~~

~~In accordance with Article 28c(1) of Regulation (EC) No 726/2004, the Agency shall make available to the WHO (in practice the Uppsala Monitoring Centre (UMC) as the WHO Collaborating Centre for International Drug Monitoring) all suspected adverse reaction reports occurring in the EU [REG Art 28c(1)]. In this regard, ICSRs from the EU submitted to the EudraVigilance database by competent authorities in Member States and marketing authorisation holders are transmitted to the WHO electronically in ICH-E2B(R3) format. This will take place on a weekly basis after their transmission to the EudraVigilance database by competent authorities in Member States or marketing authorisation holders. It will replace in line with the latest version of the EudraVigilance Access Policy for Medicines for Human Use⁵⁷. Details are set out in a service level agreement between the Agency and the WHO, accessible on EMA website⁵⁸. This replaces the requirements of EU Member States participating in the WHO Programme for International Drug Monitoring to directly report to WHO suspected adverse reactions reports occurring in their territory. This will be implemented once the functionalities of the EudraVigilance database specified in Article 24(2) of Regulation (EC) No 726/2004 are established.~~

~~A detailed business process map and a process description for the reporting submission of ICSRs, from the EudraVigilance database to the WHO Collaborating Centre for International Drug Monitoring, is presented in VI. Appendix 4.~~

The Agency and the European Monitoring Centre for Drugs and Drug Addiction shall also exchange information that they receive on the abuse of medicinal products including information related to illicit drugs [REG Art 28c(2)].

⁵⁵ Ref.: EMA/759287/2009; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](#) Ref.: EMA/759287/2009

⁵⁶ EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](#)

⁵⁷ Ref.: EMA/759287/2009; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](#)

⁵⁸ EMA website: [Home/ Partners & Networks/ International organisations/ WHO](#)

VI.C.6. Electronic exchange of safety information in the EU

Chapter VI.C.6. highlights the requirements, as defined in ~~Articles 24(1) and 24(3) of Regulation (EC) No 726/2004~~ [of Regulation \(EC\) No 726/2004](#), for the establishment and maintenance of the European database and data processing network (the EudraVigilance database) in order to collate and share pharmacovigilance information electronically between competent authorities in Member States, marketing authorisation holders and the Agency, in ways which ensure the quality and integrity of the data collected.

The information provided here is relevant for the electronic exchange of ICSRs in the EU between all stakeholders and for the electronic submission of information on medicinal products to the Agency.

VI.C.6.1. Applicable guidelines, definitions, international formats, standards and terminologies

For the classification, retrieval, presentation, risk-benefit evaluation and assessment, electronic exchange and communication of pharmacovigilance and medicinal product information, Member States, marketing authorisation holders and the Agency shall adhere to the legal requirements provided in ~~chapter Chapter IV and V of the Commission Implementing Regulation (EU) No 520/2012~~ [of the Commission Implementing Regulation \(EU\) No 520/2012](#).

In addition the following guidelines should be applied:

- ~~Note for guidance – EudraVigilance Human – Processing of Safety Messages and Individual Case Safety Reports (ICSRs) (EMA/H/20665/04/Final Rev. 2) (EudraVigilance Business Rules);~~
- ~~Note for Guidance on the Electronic Data Interchange (EDI) of Individual Case Safety Reports (ICSRs) and Medicinal Products (MPRS) in Pharmacovigilance during the pre and post authorisation phase in the European economic area (EEA) (EMEA/115735/2004);~~
- The ICH ~~guidelines~~ [Guidelines](#) detailed in [VI.B.8.](#);
- ~~The ICH M5 guideline~~ [Guideline 'Routes of Administration Controlled Vocabulary' \(CHMP/ICH/175860/2005\)](#), which provides standard terms for routes of administration;
- ~~The guidelines applicable based on ICSRs for the ICH-E2B(R2) and ICH-E2B(R3) formats:~~

Reference	Guidelines
ICH-E2B(R2)	<ul style="list-style-type: none">Note for guidance - EudraVigilance Human - Processing of Safety Messages and Individual Case Safety Reports (ICSRs) (EMA/H/20665/04/Final Rev. 2) (also referred as EudraVigilance Business Rules);Note for Guidance on the Electronic Data Interchange (EDI) of Individual Case Safety Reports (ICSRs) and Medicinal Products (MPRS) in Pharmacovigilance during the pre and post authorisation phase in the European economic area (EEA) (-);
ICH-E2B(R3)	<ul style="list-style-type: none">EU Individual Case Safety Report (ICSR) Implementation Guide (-)⁵⁹;EU ICSR Implementation Guide Business Rules Spreadsheet⁶⁰;

⁵⁹ Ref.: [EMA/51938/2013](#); EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting](#)

⁶⁰ EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/change management](#)

- [EU Backwards Forwards Conversion Element Mapping Spreadsheet](#)
- [EU E2B\(R3\) code lists](#)
- [EU reference instances](#)
- [EU example instances](#)

The latest version of these documents should always be [considered taken into account](#).

VI.C.6.2. Electronic [reporting-submission](#) of individual case safety reports

The [reporting-submission](#) of valid ICSRs electronically, by competent authorities in Member States and marketing authorisation holders, is mandatory for all medicinal products authorised in the EU [DIR Art 107(3), Art 107a(4)]. Non-adherence to this requirement constitutes a non-compliance with EU legislation. [Responsibilities](#)

[The responsibilities](#) in case of communication failure (including adherence to compliance for [reporting-submission of ICSRs](#)) are detailed in [the EU Individual Case Safety Report \(ICSR\) Implementation Guide](#), chapter IV of the [Note for Guidance on the Electronic Data Interchange \(EDI\) of Individual Case Safety Reports \(ICSRs\) and Medicinal Product Reports \(MPRs\) in Pharmacovigilance during the Pre- and Post- authorisation Phase in the European Economic Area \(EEA\) \(EMA/115735/2004\)](#).

Reference	Guidelines
EudraVigilance database (current)	Chapter IV of the Note for Guidance on the Electronic Data Interchange (EDI) of Individual Case Safety Reports (ICSRs) and Medicinal Product Reports (MPRs) in Pharmacovigilance during the Pre- and Post- authorisation Phase in the European Economic Area (EEA) (EMA/115735/2004) .
EudraVigilance database (new functionalities) Applicable six months following the announcement by the Agency that the new functionalities specified in Article 24(2) of Regulation (EC) No 726/2004 are established.	Chapter I.C.2.1.6 of the EU ICSR Implementation Guide (EMA/51938/2013) .

Technical tools (EVWEB) have been made available by the Agency to interested electronic data interchange partners, including small and medium-sized enterprises, to facilitate compliance with the electronic [reporting-submission](#) requirements [of ICSRs](#) as defined in EU legislation. Information is available on [the EudraVigilance webpage](#)⁶¹, [together with some guidance on the access by stakeholders to the data submitted to the EudraVigilance database](#)⁶².

⁶¹ -EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance http://eudravigilance.ema.europa.euhttp://eudravigilance.ema.europa.eu](#)

⁶² EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](#)

VI.C.6.2.1. EudraVigilance Database Modules

Two modules are available in the EudraVigilance database to address the collection of reports of suspected adverse reactions related to medicinal products for human use, in accordance with EU legislation:

- EudraVigilance Post-Authorisation Module (EVPM), implemented based on the requirements defined in Regulation (EC) No 726/2004 and Directive 2001/83/EC; and
- EudraVigilance Clinical Trial Module (EVCTM), implemented based on the requirements defined in Directive 2001/20/EC.

VI.C.6.2.1.1. Adverse reaction data collected in the EudraVigilance Post-Authorisation Module

The adverse reaction reports collected in the EudraVigilance Post-Authorisation Module (EVPM) refer to unsolicited reports and solicited reports which do not fall under the scope of the Clinical Trials Directive 2001/20/EC (see [VI.C.1.VI.C.1.2. for ICSRs management in non-interventional studies, compassionate and named patient use](#)). The ICSRs should be submitted with the value 'EVHUMAN' in the data element 'Message receiver identifier' (ICH M2 M.1.6) [VI.C.1.1.](#).

In line with ICH-E2B the ICSRs should be submitted to EVPM with the following value:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	• 'EVHUMAN' in the data element M.1.6 'Message receiver identifier' (ICH M2).
ICH-E2B(R3))	• 'EVHUMAN' in the data elements N.1.4 'Batch Receiver Identifier' and 'N.2.r.3 Message Receiver Identifier'.

Depending on their type, these ICSRs should be classified ~~with~~ based on one of the following options [in line with ICH-E2B](#); in accordance with the [EudraVigilance Business Rules](#)⁶³:

- Data element 'Type of report' (ICH-E2B(R2) A.1.4):
 - spontaneous report;
 - other;
 - not available to sender (unknown); or
 - report from study.

In addition, when the value in the data element ICH-E2B(R2) A.1.4 is 'Report from study', the data element 'Study type in which the reaction(s)/event(s) were observed' (ICH-E2B(R2) A.2.3.3) should be populated ~~line~~ with [ICH-E2B](#):

- individual patient use, e.g. compassionate use or named patient basis; or
- other studies, e.g. pharmacoepidemiology, pharmacoconomics, intensive monitoring, PMS.

Reference	E2B(R2)/(R3) requirements
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⁶³ Note for guidance – EudraVigilance Human – Processing of Safety Messages and Individual Case Safety Reports (ICSRs) (EMA/H/20665/04/Final Rev. 2).

Reference	E2B(R2)/(R3) requirements
<u>ICH-E2B(R2)</u>	<ul style="list-style-type: none"> • <u>Data element A.1.4 'Type of report':</u> <ul style="list-style-type: none"> – <u>spontaneous report;</u> – <u>other;</u> – <u>not available to sender (unknown); or</u> – <u>report from study.</u> • <u>When the value of the data element A.1.4 is 'Report from study', the data element A.2.3.3 'Study type in which the reaction(s)/event(s) were observed' should be populated with:</u> <ul style="list-style-type: none"> – <u>individual patient use, e.g. compassionate use or named-patient basis; or</u> – <u>other studies, e.g. pharmacoepidemiology, pharmacoconomics, intensive monitoring, PMSpost-authorisation study.</u>
<u>ICH-E2B(R3)</u>	<ul style="list-style-type: none"> • <u>Data element C.1.3 'Type of report':</u> <ul style="list-style-type: none"> – <u>spontaneous report;</u> – <u>other;</u> – <u>not available to sender (unknown); or</u> – <u>report from study.</u> • <u>When the value of the data element C.1.3 is 'Report from study', the data element C.5.4 'Study type in which the reaction(s)/event(s) were observed' should be populated with:</u> <ul style="list-style-type: none"> – <u>individual patient use, e.g. compassionate use or named-patient basis; or</u> – <u>other studies, e.g. pharmacoepidemiology, pharmacoconomics, intensive monitoring, post-authorisation studyPMS.</u>

VI.C.6.2.1.2. Adverse reaction data collected in the EudraVigilance Clinical Trial Module

Only cases of suspected unexpected serious adverse reactions (SUSARs), related to investigational medicinal products (IMPs) ~~or non-investigational medicinal products (NIMPs)~~⁶⁴ studied in clinical trials which fall under the scope of Directive 2001/20/EC (see ~~VI.C.1.), VI.C.1.1. for ICSRs management in clinical trials~~), should be ~~reported~~submitted by the sponsor to the EudraVigilance Clinical Trial Module (EVCTM). The requirements provided in chapter II of EudraLex Volume 10 of The Rules Governing Medicinal Products in the European Union⁶⁵ should be applied with regard to the collection, verification and presentation of adverse event/reaction reports arising from clinical trials. ~~The ICSRs should be submitted with the value 'EVCTMPROD' in the data element 'Message receiver identifier' (ICH M2 M.1.6) and should be classified as followed, in accordance with the EudraVigilance Business Rules~~⁶⁶:
~~data element 'Type of report' (ICH E2B(R2) A.1.4):~~
~~report from study; and~~

⁶⁴ ~~For guidance on these terms, see The Rules Governing Medicinal Products in the European Union, Volume 10, Guidance Applying to Clinical Trials, Guidance on Investigational Medicinal Products and Non-Investigational Medicinal Products (NIMPs) (Ares(2011)300458 – 18/03/2011), and the Detailed guidance on the collection, verification and presentation of adverse event/reaction reports arising from clinical trials on medicinal products for human use ('CT-3'), (2011/C 172/01).~~

⁶⁵ EC website: European Commission/ DG Health and Food Safety/ Public health/ Vol 10: Clinical Trials

⁶⁶ See Footnote 38.

data element 'Study type in which the reaction(s)/event(s) were observed' (ICH E2B(R2) A.2.3.3):
clinical trials.

The ICSRs should be submitted to EVCTM with the following value in line with ICH-E2B:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> 'EVCTMPROD' in the data element M.1.6 'Message receiver identifier' (ICH M2).
ICH-E2B(R3)	<ul style="list-style-type: none"> 'EVCTMPROD' in the data elements N.1.4 'Batch Receiver Identifier' and 'N.2.r.3 Message Receiver Identifier'.

These ~~Depending on their type, ICSRs submitted to EVCTM should be classified based on one of theas~~
~~followsing options~~ in line with ICH-E2B:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Data element A.1.4 'Type of report': <ul style="list-style-type: none"> <u>report from study.</u> When the value of the data element A.1.4 is 'Report from study', the data element A.2.3.3 'Study type in which the reaction(s)/event(s) were observed' should be populated with: <ul style="list-style-type: none"> <u>clinical trials.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> Data element C.1.3 'Type of report': <ul style="list-style-type: none"> <u>report from study.</u> When the value of the data element C.1.3 is 'Report from study', the data element C.5.4 'Study type in which the reaction(s)/event(s) were observed' should be populated with: <ul style="list-style-type: none"> <u>clinical trials.</u>

VI.C.6.2.2. Preparation of individual case safety reports

VI.C.6.2.2.1. General principles

The content of each valid ICSR transmitted electronically between all stakeholders should comply with the legal requirements and guidelines detailed in the Commission Implementing Regulation (EU) No 520/2012 and in [VI.C.6.1.](#), particularly:

- the requirements provided in [Cehapters IV and V of the Commission Implementing Regulation \(EU\) No 520/2012 of the Commission Implementing Regulation \(EU\) No 520/2012](#);
- the latest version of the [ICH Endorsed Guide for MedDRA Users—MedDRA Term Selection: Points to Consider Document](#)⁶⁷ (see [GVP Annex IV/GVP Annex IV](#));
- the EudraVigilance business rules ~~for the electronic transmission of ICSRs detailed in the Note for Guidance—EudraVigilance Human—Processing of Safety Messages and Individual Case Safety Reports (ICSRs) (EMA/H/20665/04/Final Rev. 2).~~ ~~and or the EU ICSR Implementation Guide -as referred to in VI.C.6.1., depending on the ICH-E2B format applied.~~

⁶⁷ For off-label, misuse, abuse and medication error, the definitions provided in [VI.A.1.2.](#) should be followed.

It is recognised that it is often difficult to obtain all the details on a specific case. However, the complete information (medical and administrative data) for a valid ICSR that is available to the sender should be ~~reported~~submitted in a structured manner in the relevant ICH-E2B(R2) data elements (~~see GVP Annex IV~~) (which should be repeated as necessary when multiple information is available) and in the narrative section for serious cases (see VI.C.6.2.2.4. for guidance on case narrative). This applies to all types of ICSRs, such as reports with initial information on the case, follow-up information and cases highlighted for amendment⁶⁸ or nullification⁶⁹.

In the situation where it is evident that the sender has not transmitted the complete information available on the case, the receiver may request the sender to re-transmit the ICSR within 24 hours with the complete case information in electronic format in accordance with the requirements applicable for the electronic reporting-submission of ICSRs. This should be seen in the light of the qualitative signal detection and evaluation activity, where it is important for the receiver to have all the available information on a case to perform the medical assessment (see VI.C.6.2.4. for guidance on ICSRs data quality).

Where the suspected adverse reactions reported in a single ICSR have a major impact on the ~~known~~ risk-benefit balance of a-the medicinal product, this should be considered as an emerging safety issue and notified accordingly (see VI.C.2.2.6. and GVP Module IX for guidance on emerging safety issue), ~~which should be immediately notified in writing to the competent authorities of the Member States where the medicinal product is authorised and to the Agency.~~ This is in addition to the ICSR submission-reporting requirements detailed in VI.C.3. and VI.C.4. A summary of the points of concerns and the action proposed should be recorded in the ICSR as follows in the data element 'Sender's comments' in (line with ICH-E2B_(R2)-B.5.4):

Reference	<u>E2B(R2)/(R3)-requirements</u>
<u>ICH-E2B(R2)</u>	<u>—Data element B.5.4 'Sender's comments'</u>
<u>ICH-E2B(R3)</u>	<u>—Data element H.4 'Sender's comments'</u>

VI.C.6.2.2.2. Information on suspect, interacting and concomitant medicinal products

a. General guidance

Information on the suspect, interacting and/or concomitant active substances/invented names ~~offor~~ the reported medicinal products (suspect, interacting, concomitant) should be provided in accordance with the requirements provided in IR Article 28 (3) (g) to (i) of the Commission Implementing Regulation (EU) No 520/2012. ~~ICH-E2B(R2) (see GVP Annex IV) and Depending on the ICH E2B format used,~~ the guidance detailed in the Note for guidance – EudraVigilance Human – Processing of safety messages and individual case safety reports (ICSRs)⁷⁰ ~~EudraVigilance Business Rules. and and in the EU Individual Case Safety Report (ICSR) Implementation Guide~~⁷¹ (see VI.C.6.1.) should also be followed.

The characterisation of the medicinal products as suspect, interacting or concomitant is based on the information provided by the primary source. Where the notified competent authority or marketing

⁶⁸ See also VI.C.6.2.2.8. on amendment of individual cases.

⁶⁹ See also VI.C.6.2.2.109. on nullification of individual cases.

⁷⁰ Ref.: EMA/H/20665/04/Final Rev. 2; EMA website: Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting

⁷¹ Ref.: EMA/51938/2013; EMA website: Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting

authorisation holder disagrees with the primary source characterisation, this should be indicated in the data element 'Sender's comments' in line with ICH-E2B while respecting the reporter description.

~~For combination medicinal products, which contain more than one active substance, each active substance needs to be reflected individually the following applies in the data element 'Active substance name(s)' (line with ICH-E2B(R2) B.4.k.2.2), which needs to be repeated for each active substance contained in the combination medicinal product.:~~

Reference	E2B(R2)/(R3) requirements
<u>ICH-E2B(R2)</u>	<ul style="list-style-type: none"> <u>In addition to the information included in the data element B.4.k.2.1 'Proprietary medicinal product name', each active substance needs to be reflected individually in the data element B.4.k.2.2 'Active substance name(s)', which needs to should be repeated for each active substance contained in the medicinal product.</u>
<u>ICH-E2B(R3)</u>	<ul style="list-style-type: none"> <u>In addition to the information included in the mandatory data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source', each active substance needs to be reflected individually in the section G.k.2.3.r. 'Substance / Specified Substance Identifier and Strength', which should be repeated for each active substance contained in the medicinal product. This applies where there is no Medicinal Product Identifier (MPID), Pharmaceutical Product Identifier (PhPID) or where no Substance/Specified Substance TermID is available as referred to in the EU Individual Case Safety Report (ICSR) Implementation Guide <u>EU-ICSR Implementation Guide</u>⁷² (EMA/51938/2013).</u>

b. Suspicion of a branded/proprietary medicinal product name without information on its active substance(s) or its pharmaceutical form and with different compositions depending on the country or on the pharmaceutical form

~~2.1.~~ When the primary source reports a suspect or interacting branded/proprietary medicinal product name without indicating the active substance(s) of the medicinal product and where the proprietary medicinal product can be one of two or more possible generics, which have ~~a~~ different compositions depending on the country where the medicinal product is marketed, the ICSR should be populated as follows in line with ICH-E2B:

- ~~data element 'Proprietary medicinal product name' (ICH-E2B(R2) B.4.k.2.1) should be populated with the proprietary/branded medicinal product name as reported by the primary source;~~
- ~~data element 'Active substance name(s)' (ICH-E2B(R2) B.4.k.2.2) should be completed with the active substance(s) that correspond(s) to the composition of the proprietary/branded medicinal product of the country where the reaction/event occurred.~~

Reference	E2B(R2)/(R3) requirements
<u>ICH-E2B(R2)</u>	<ul style="list-style-type: none"> <u>Data element B.4.k.2.1 'Proprietary medicinal product name' should be populated with the proprietary/branded medicinal product name as reported by the primary source.</u> <u>Data element B.4.k.2.2 'Active substance name(s)' -should be completed with the active substance(s) that correspond(s) to the composition of the</u>

⁷² Ref.: EMA/51938/2013; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting](#)

Reference	E2B(R2)/(R3) requirements
	<p><u>proprietary/branded medicinal product of the country where the reaction/event occurred.</u></p> <ul style="list-style-type: none"> • <u>Where there is more than one active substance contained in the medicinal product, data element B.4.k.2.2 'Active substance name(s)' should be repeated accordingly.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> • <u>Data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source' should be populated with the proprietary/branded medicinal product name as reported by the primary source.</u> • <u>The Data element G.k.2.3.r.1 'Substance/Specified Substance Name' should be completed with the active substance(s) that correspond(s) to the composition of the proprietary/branded medicinal product of the country where the reaction/event occurred.</u> • <u>Where there is more than one active substance contained in the medicinal product, section G.k.2.3.r 'Substance/Specified Substance Identifier and Strength' should be repeated accordingly.</u>

However if the information is available on:

the 'Identification of the country where the drug was obtained' (data element ICH-E2B(R2) B.4.k.2.3),

the 'Authorization/application number' (data element ICH-E2B(R2) B.4.k.4.1),

the 'Country of authorization/application' (data element ICH-E2B(R2) B.4.k.4.2), and/or

the 'Batch/lot number' (data element ICH-E2B(R2) B.4.k.3),

the composition with regard the active substance(s) of the [suspected or interacting](#) proprietary medicinal product [name](#) should be provided accordingly, [if information is also available on the following ICH-E2B data elements for the reported product:](#)

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • <u>The Data element B.4.k.2.3 'Identification of the country where the drug was obtained',</u> • <u>The Data element B.4.k.4.1 'Authorization/application number',</u> • <u>The Data element B.4.k.4.2 'Country of authorization/application', and/or</u> • <u>The Data element B.4.k.3 'Batch/lot number'.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> • <u>The Data element G.k.2.4 'Identification of the Country Where the Drug Was Obtained',</u> • <u>Data element G.k.3.1 'Authorization/application number',</u> • <u>The Data element G.k.3.2 'Country of Authorisation/Application', and/or</u> • <u>The Data element G.k.4.r.7 'Batch/lot number'.</u>

~~3.2.~~ Where the primary source reports a suspect or interacting branded/proprietary medicinal product name without indicating the pharmaceutical form/presentation of the product and where the proprietary/branded medicinal product can be one of two or more possible pharmaceutical forms/presentations, which have different compositions in a country, the ICSR should be populated as follows in line with ICH-E2B:

- ~~• data element 'Proprietary medicinal product name' (ICH E2B(R2) B.4.k.2.1) should be populated with the medicinal product name as reported by the primary source;~~
- ~~• data element 'Active substance name(s)' (ICH E2B(R2) B.4.k.2.2) should be completed with those active substances which are in common to all pharmaceutical forms/presentations in the country of authorisation.~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • <u>Data element B.4.k.2.1 'Proprietary medicinal product name' should be populated with the proprietary/branded medicinal product name as reported by the primary source.</u> • <u>Data element B.4.k.2.2 'Active substance name(s)' should be completed with those active substances, which are in common to all pharmaceutical forms/presentations in the country of authorisation.</u> • <u>Where there is more than one active substance contained in the medicinal product, data element B.4.k.2.2 'Active substance name(s)' should be repeated accordingly.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> • <u>Data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source' should be populated with the proprietary/branded medicinal product name as reported by the primary source.</u> • <u>The dData element G.k.2.3.r.1 'Substance/Specified Substance Name' should be completed with the active substance(s) which are in common to all pharmaceutical forms/presentations in that correspond(s) to the composition of the proprietary/branded medicinal product of the country of authorisation where the reaction/event occurred.</u> • <u>Where there is more than one active substance contained in the medicinal product, section G.k.2.3.r 'Substance/Specified Substance Identifier and Strength' should be repeated accordingly.</u>

c. Reporting of suspicion of a therapeutic class of medicinal products

Where the medicinal products cannot be described on the basis of the active substances or the invented names, for example when only the therapeutic class is reported by the primary source, or in case of other administered therapies that cannot be structured, this information should only be reflected in the case narrative (~~data element ICH E2B(R2) B.5.1~~). The information should not be included in the structured data elements 'Proprietary related to of the medicinal product name' (ICH E2B(R2) B.4.k.2.1) name and 'Active/or the active substance name(s)' (ICH E2B(R2) B.4.k.2.2) should not be populated. The same applies if a suspected food interaction is reported (e.g. to grapefruit juice).

Where a case of adverse reactions is ~~reported~~suspected to be related only to a therapeutic class, it is considered incomplete and does not qualify for reporting submission as ICSR (see VI.B.2. for ICSRs

[validation](#)). Efforts should be made to follow-up the case in order to collect the missing information regarding the suspected medicinal product (see [VI.B.3. for follow-up guidance](#)).

d. ~~Reporting Suspicion of drug interactions~~

~~As regards~~For the ~~reporting~~ of drug interactions, which concerns drug/drug (including biological products), drug/food, drug/device, and drug/alcohol interactions, the coding of the [suspected interaction along with the resulting adverse reactions](#) should be performed in [the following ICH-E2B section 'Reactions/Events' \(ICH-E2B\(R2\) B.2\)](#) in line with the [appropriate recommendations provided in the latest version of the ICH Endorsed Guide for MedDRA Users - MedDRA Term Selection: Points to Consider](#) ~~MedDRA Term Selection: Points to Consider Document~~ (see [GVP Annex IV/GVP Annex IV](#)).) ~~along with any adverse reactions resulting from the suspected interaction.~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.2 'Reactions/Events'
ICH-E2B(R3)	<ul style="list-style-type: none"> Section E.i.1'Reaction/Events'

In addition, ~~for in instances of drug/drug interactions,~~ [information on the active substances/proprietary medicinal product names](#) ~~the following applies for the suspected interacting medicinal products in line with ICH-E2B:~~

1. For drug/drug interactions:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.4 'Drug information' should be completed with information reported by the primary source on the active substances/proprietary medicinal products concerned. Data element B.4.k.1 'Characterisation of drug role' is to be completed as 'interacting' for all suspected interacting medicines.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section G.k 'Drug(s) Information' should be completed with information reported by the primary source on the active substances/proprietary medicinal products concerned. Data element G.k.1 'Characterisation of Drug Role' is to be completed as 'interacting' for all suspected interacting medicines.

2. ~~If an interaction is suspected with~~For drug/ food interactions or interactions with other non-drug compounds

~~The information on the suspected 'interacting' medicine should be included in ICH E2B section 'Drug information' selected for the suspect medicine, however the information concerning the interacting food or other non-drug compounds should be provided in the section 'Drug information' (ICH-E2B(R2) B.4), which should be characterised as interacting in the data element 'Characterisation of drug role' (ICH-E2B(R2) B.4.k.1).~~ [case narrative.](#)

e. ~~Reporting Suspicion of one of the excipients/adjuvants~~

If the primary source suspects a possible causal role of one of the [excipients ingredients](#) (e.g., ~~excipient or~~ [colouring matter, preservatives, adjuvant, stabilisers, thickeners, emulsifiers, flavouring and aromatic substances](#), see [VI.A.1.3. for definition](#)) of the suspected medicinal product, this

information should be provided in ~~the section 'Drug information' (line with ICH-E2B(R2) B.4)~~ as a separate entry in addition to the information given regarding the suspected medicinal product. This should also be specified in the case narrative (data element ICH-E2B(R2) B.5.1). If available, tests results (positive or negative) in relation to the causal role of the suspected ingredient should be included in the section 'Results of tests and procedures relevant to the investigation of the patient' (ICH-E2B(R2) B.3).follows:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> In the section B.4 'Drug information':— as a separate entry specifying the <u>suspected excipient/adjuvant</u>, in addition to the information given regarding the suspected medicinal product. This should also be specified in the case narrative. If available, tests results (positive or negative) in relation to the causal role of the suspected <u>excipient ingredient</u> should be included in the section B.3 'Results of tests and procedures relevant to the investigation of the patient'.
ICH-E2B(R3)	<ul style="list-style-type: none"> In the section G.k 'Drug(s) Information': —as a separate entry <u>specifying the suspected excipient</u>, in addition to the information given regarding the suspected medicinal product. This should also be specified in the case narrative. If available, tests results (positive or negative) in relation to the causal role of the suspected <u>excipient ingredient</u>—should be included in the section F.r.3 'Results of tests and procedures relevant to the investigation of the patientTest Result'.

f. Additional information on ~~Drug~~the medicinal product

Often, additional information on the medicine(s) is provided in individual cases, which is important for the purpose of data analysis and case review; for example in the context of counterfeit, overdose, drug taken by father, drug taken beyond expiry date, batch and lot tested and found within specifications, batch and lot tested and found not within specifications, medication error, misuse, abuse, occupational exposure and off label use.

~~The following applies~~ In line with ICH-E2B, the following applies to capture this information for the respective suspected medicinal products, along with the guidance provided:

- in section VI.C.6.2.3.3. for the provision of information on the suspected adverse reactions associated to overdose, abuse, off-label use, misuse, medication error or occupational exposure, and
- in section VI.C.6.2.3.5. for the provision of information on suspected adverse reactions associated to quality defect or falsified medicinal product;

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> As a general principle, additional characteristics related to the medicines that <u>cannot be structured in one of the data elements of section B.4 'Drug(s) information'</u> and which are pertinent to the case should be provided in free text. Data element B.4.k.19 'Additional information on drug' should be used to specify any additional information (e.g.: beyond expiration date, batch and lot tested and found to be within specifications). Additional information concerning the indication for the drug, which cannot be described in data element B.4.k.11 'Indication for use in the case' should also be provided as applicable in the data

Reference E2B(R2)/(R3) requirements

	<p><u>element B.4.k.19.</u></p> <ul style="list-style-type: none"> • <u>Along with the resulting suspected adverse reactions, an appropriate MedDRA term should be provided in the data element section B.2.i.1 'Reactions/events' in MedDRA terminology (Lowest Level Term)–where applicable in line with the latest version of the ICH Endorsed Guide for MedDRA Users, MedDRA Term Selection: Points to Consider</u>⁷³. • <u>Data elements 'B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' and B.5.4 Sender's comments' can also be used to combine reported signs and symptoms into a succinct diagnosis, or to provide the sender's assessment of the drug role, with a reasoning included in the data element B.5.4 'Sender's comments'.</u>
<p><u>ICH-E2B(R3)</u></p>	<ul style="list-style-type: none"> • <u>As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information provided in free text.</u> • <u>Data element G.k.10.r 'Additional Information on Drug (coded)' should be completed using one or more of the following values as applicable: Counterfeit, Overdose, Drug taken by father, Drug taken beyond expiry date, Batch and lot tested and found within specifications, Batch and lot tested and found not within specifications, Medication error, Misuse, Abuse, Occupational exposure, or and Off label use. The value(s) should be used where the primary source has made a clear statement related to the additional characteristics of the drug.</u> • <u>Along with the resulting suspected adverse reactions, An appropriate MedDRA term should be provided in the data element section E.i.2.1b 'Reaction(s)/Event(s)' (MedDRA code)–where applicable in line with the latest version of the ICH Endorsed Guide for MedDRA Users, MedDRA Term Selection: Points to Consider</u>⁷³. • <u>Section H.3.r 'Sender's Diagnosis' and data element H.4 'Sender's Comments' can also be used to combine reported signs and symptoms into a succinct diagnosis, or to provide the sender's assessment of the drug role, with a reasoning included in the data element H.4 'Sender's comments'. If the primary source did not provide an explicit statement about the drug characterisation which would clearly transpose into a MedDRA term in the reaction section but there is an indication in the context of the clinical course description, the sender may also choose the most applicable value(s) of G.k.10.r 'Additional Information on Drug (coded)' at their discretion. The case should be followed--up to obtain further information.</u> • <u>Data element G.k.11 'Additional Information on Drug (free text)' should be used to capture any additional drug information in free text format not described in G.k.10.r, e.g. expiry date for the lot number.</u>

⁷³ For off-label, misuse, abuse and medication error, the definitions provided in VI.A.1.2. should be followed.

Reference	E2B(R2)/(R3) requirements	
	<u>Values and Definitions for data element G.k.10.r 'Additional Information on Drug (coded)'</u> . Note: for overdose, off-label use, misuse, abuse, occupational exposure, medication error, the definitions provided in <u>VI.A.1.2.</u> should be applied.	
	<ul style="list-style-type: none"> • <u>Counterfeit⁷⁴</u> 	This is to indicate that the medicine was suspected or confirmed to be a falsified medicinal product in line with the definition provided in <u>Article 1, paragraph (33) of Directive 2001/83/EC of Directive 2001/83/EC.</u>
	<ul style="list-style-type: none"> • <u>Drug taken beyond expiry date</u> 	This is to indicate that the medicine administered to or taken by the patient was beyond its expiry date as indicated in the <u>SmpC product information or on the packaging of the medicine.</u>
	<ul style="list-style-type: none"> • <u>Batch and lot tested and found within specifications</u> 	This is to indicate that a batch or lot of a medicine was tested and found within the specifications of the marketing authorisation.
	<ul style="list-style-type: none"> • <u>Batch and lot tested and found not within specifications</u> 	This is to indicate that a batch or lot of a medicine was tested and found outside the specifications of the marketing authorisation.
	<ul style="list-style-type: none"> • <u>Drug taken by father</u> 	This is to indicate that suspect drug was taken by the father for cases describing miscarriage, stillbirth or early spontaneous abortion. In this situation only a mother report is applicable and the data elements in Section D 'Patient Characteristics' apply to the mother (see <u>VI.C.6.2.3.1.</u> for guidance on the electronic submission of pregnancy ICSRs).

VI.C.6.2.2.3. Suspected adverse reactions

In line with Article 28(3)(j) of the Commission Implementing Regulation (EU) No 520/2012, All available information on the reported suspected adverse reactions as described in [IR Art 28 (3) (j)] shall be provided for each individual case. Examples of relevant information include: the start and end date or duration, seriousness, outcome at the time of last observation, time intervals between the suspect medicinal product administration and the start of the reactions, the original reporter's words or short phrases used to describe the reactions, the country of occurrence of the reactions.

The coding of diagnoses and provisional diagnoses with signs and symptoms in the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH E2B(R2) B.2.i.1) should be performed with the supported versions⁷⁵ of the MedDRA dictionary used at the lowest level term (LLT)

⁷⁴ This value should not be used to refer to medicines that do not comply with EU law on intellectual and industrial property rights, such as registered trademarks or patent rights, as defined for counterfeit medicines in the European Commission Q&A: Directive on falsified medicines.

⁷⁵ Stakeholders should follow the recommendations of MedDRA MSSO regarding the switch to a new MedDRA version. The latest supported MedDRA versions in line with the official semi-annual releases are posted on the EudraVigilance webpage (EMA website: Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance).

level and in line with the applicable recommendations provided in the latest version of the ICH-Endorsed Guide for MedDRA Users, MedDRA Term Selection: Points to Consider Guide for MedDRA Users, MedDRA Term Selection: Points to Consider (see GVP Annex IV GVP Annex IV).

In practice, if a diagnosis is reported with characteristic signs and symptoms, the preferred option is to select a term for the diagnosis only and to MedDRA code it ~~in the ICH-E2B(R2) section B.2 'Reaction(s)/event(s)'~~. If no diagnosis is provided, all reported signs and symptoms should be listed and MedDRA-coded ~~in the ICH-E2B(R2) section B.2 'Reaction(s)/event(s)'~~. If these signs and symptoms are typically part of a diagnosis, the diagnosis can be MedDRA-coded in addition in the ICSR by the competent authority in the Member States or by the marketing authorisation holders ~~in the ICH-E2B(R2) data element B.5.3 'Sender's~~ as part of the sender's diagnosis and sender's comment/syndrome and/or reclassification of reaction/event' ~~event in the ICSR~~.

If in the narrative other events have been reported, which are not typically signs or symptoms of the primary source's diagnosis or provisional diagnosis, and those events are suspected to be adverse reactions, they should also be listed and MedDRA-coded ~~in the ICH-E2B(R2) section B.2 'Reaction(s)/event(s)'~~ in the ICSR.

~~In case~~ Where a competent authority in a Member State or a marketing authorisation holder disagrees with the diagnosis reported by the primary source, an alternative diagnosis can be provided in addition as part of the sender's diagnosis ~~in the ICH-E2B(R2) data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event'~~ in addition to the reported diagnosis provided in the ICH-E2B(R2) section B.2 'Reaction(s)/event(s)'. In this situation, ~~a~~ reasoning should be included ~~in the data element 'Sender's comments' (ICH-E2B(R2) B.5.4)~~ as additional sender's comment (see VI.C.6.2.2.4 for guidance on the provision of comments in ICSRs).

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.2 'Reaction(s)/event(s)' should be used and <u>completed</u> in line with the <u>EudraVigilance Business Rules</u>⁷⁶, <u>including the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)'</u> completed. Section <u>Data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event'</u> should be used where the sender would like to combine <u>reported signs and symptoms that were reported</u> <u>into a succinct diagnosis</u>, <u>whereby the reasoning should be included in the data element B.5.4 'Sender's comments'</u>. Section <u>Data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event'</u> should also be used, if there is disagreement with the <u>diagnosis reported by the primary source and to provide an alternative diagnosis</u>. Reasoning should be included in the in the data element B.5.4 <u>'Sender's comments'</u>.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section E.i 'Reaction(s)/Event(s)' should be <u>completed</u> in line with the <u>EU Individual Case Safety Report (ICSR) Implementation Guide</u>⁷⁷ used and,

⁷⁶ Note for guidance – EudraVigilance Human – Processing of safety messages and individual case safety reports (ICSRs) (EMA/H/20665/04/Final Rev. 2); EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting](#)

Reference	E2B(R2)/(R3) requirements
	<p><u>including the data element E.i.2.1b 'Reaction/Event (MedDRA code)'</u>completed.</p> <ul style="list-style-type: none">• <u>Section H.3.r 'Sender's Diagnosis' should be used where the sender would like to combine reported signs and symptoms that were reported into a succinct diagnosis. whereby the rReasoning should be included in the data element H.4 'Sender's Comments'.</u>• <u>Section H.3.r 'Sender's Diagnosis' should also be used, if there is disagreement with the diagnosis reported by the primary source and to provide an alternative diagnosis. Reasoning should be included in the in the data element H.4 'Sender's Comments'.</u>

In the event of death of the patient, the date, cause of death including autopsy-determined causes shall be provided as available [IR 28 (3) (I)]. ~~If the death is unrelated to the reported suspected adverse reaction(s) and is linked for example to disease progression, the seriousness criterion of the ICSR should not be considered as fatal; t~~he recommendation provided in the EudraVigilance Business Rules EudraVigilance Business Rules⁷⁶ and the EU Individual Case Safety Report (ICSR) ICSR Implementation Guide⁷⁷ should be followed with regard to the provision in the ICSR of information on the patient's death. If the death is unrelated to the reported suspected adverse reaction(s) and is linked for example to disease progression, the seriousness criterion should not be considered as fatal.

VI.C.6.2.2.4. Case narrative, ~~causality assessment and comments~~ and causality assessment

a. Case narrative

In accordance with ~~IR~~Article 28 (3)-(m) of the Commission Implementing Regulation (EU) No 520/2012, a case narrative (~~data element ICH E2B(R2) B.5.1~~) shall be provided, where possible⁷⁸, for all cases with the exception of non-serious cases. The information shall be presented in a logical time sequence, in the chronology of the patient's experience including clinical course, therapeutic measures, outcome and follow-up information obtained. Any relevant autopsy or post-mortem findings shall also be summarised.

The narrative should be presented in line with the recommendations ~~described in chapter 5.2~~ of detailed in ICH-E2D (see GVP Annex IV). ~~In this aspect, I~~it should serve as a comprehensive, stand-alone "medical report" containing all known relevant clinical and related information, including patient characteristics, therapy details, medical history, clinical course of the event(s), diagnoses, adverse reactions and their outcomes, relevant laboratory evidence (including normal ranges) and any other information that supports or refutes the suspected adverse reactions. ~~(see VI.C.6.2.2.11. for EU guidance on languages management in ICSRs for handling of languages).~~ With regards to the identifiability of the patient, information should be provided in accordance with local data protection laws⁷⁹ (see VI.C.6.2.2.10. for guidance on the processing of personal data in the EU). Case narratives should not include information that could lead to the identification of the patient, including references to healthcare professionals or treatment centres.

⁷⁷ Ref.: EMA/51938/2013; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Electronic reporting](#)

⁷⁸ 'Where possible' ~~should be interpreted as usually understood~~ as meaning having received sufficient information from the primary source to prepare a concise clinical summary of the individual case.

⁷⁹ ~~See VI.C.6.2.2.10. for the processing of personal data in ICSRs in the EU.~~

An example of a standard narrative template is available in the [Report of the CIOMS Working Group V](#)⁸⁰.

The information provided in the narrative should be consistent with the data appropriately reflected in all the other relevant ICH-E2B(R2) data elements of the ICSR ~~(see GVP Annex IV)~~. In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.5 'Narrative case summary and further information' should be used and the data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' completed.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section H 'Narrative Case Summary and Further Information' should be used and the data element H.1 'Case Narrative Including Clinical Course, Therapeutic Measures, Outcome and Additional Relevant Information' completed.

~~b. During the interim arrangements (see [VI.C.4.1](#)), the case narratives included in the ICSRs submitted to the competent authorities in Member States by marketing authorisation holders, should not be modified or deleted when the ICSRs are forwarded to the EudraVigilance database by the competent authorities.~~

b. Comments

Where available, comments from the primary source should be provided on the diagnosis, the causality assessment, or on other relevant issue/issues ~~should be provided~~ in the ~~data element 'Reporter's comments' (following ICH-E2B(R2) B.5.2)~~ data elements:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Data element B.5.2 'Reporter's comments'.
ICH-E2B(R3)	<ul style="list-style-type: none"> Data element H.2 'Reporter's Comments'.

~~The c~~Competent authority ies in a Member States and the marketing authorisation holders may provide an assessment of the case and describe a disagreement with, and/or alternatives to the diagnoses given by the primary source (see [VI.C.6.2.2.3. for guidance on the processing of suspected adverse reactions in ICSRs](#)). ~~This should be done in the data element 'Sender's comments' (ICH-E2B(R2) B.5.4), where discrepancies~~Discrepancies or confusions in the information notified by the primary source may also be highlighted. Where applicable, a summary of the points of concerns and the actions proposed should also be included in the ~~data element 'Sender's comments' (ICH-E2B(R2) B.5.4), if the ICSR~~ICSR ~~whene it~~ leads to the notification of an emerging safety issue (see [VI.C.2.2.6. for guidance on emerging safety issue](#)). ~~The degree of suspected relatedness of each medicinal product to the adverse reaction(s) may be indicated in the data element 'Relatedness of drug to reaction(s)/event(s)' (ICH-E2B(R2) B.4.k.18), which should be repeated as necessary. This also allows presenting the degree of relatedness from different sources or with different methods of assessment.~~In line with ICH-E2B this information should be provided in the following data elements:

Reference	E2B(R2)/(R3) requirements
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⁸⁰ Council for International Organizations of Medical Sciences (CIOMS). Current Challenges in Pharmacovigilance: Pragmatic Approaches (CIOMS V). Geneva: CIOMS; 2001. [Accessible at: http://www.cioms.ch/](http://www.cioms.ch/).

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Data element B.5.4 'Sender's comments'.
ICH-E2B(R3)	<ul style="list-style-type: none"> Data element H.4 'Sender's Comments'.

c. Causality assessment

The degree of suspected relatedness of each medicinal product to ~~the~~each reported adverse reaction(s) can be presented in a structured manner in the ICSR. It can be expressed for multiple sources (reporters, competent authorities, marketing authorisation holders) ~~may be used to . present the degree of relatedness from different sources or with different~~while using multiple methods of causality assessment. In line with ICH-E2B this information should be provided in the following sections~~applies~~:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.4.k.18 'Relatedness of drug to reaction(s)/event(s)'. should be completed andThe data elements of this section should be repeated as applicable to provide the assessment of relatedness of each drug-reaction pair expressed by multiple sources and with multiple methods of assessment.;
ICH-E2B(R3)	<ul style="list-style-type: none"> Section G.k.9.i 'Drug-reaction(s)/Event(s) Matrix'. should be completed and The data elements of this section should be repeated as applicable to provide the assessment of relatedness of each drug-reaction pair expressed by multiple sources and with multiple methods of assessment.repeated as applicable.

VI.C.6.2.2.5. Test results

In accordance with the requirements provided in Article 28(3)(k) of the Commission Implementing Regulation (EU) No 520/2012, information on the rResults of tests and procedures relevant to the investigation of the patient shall be provided ~~[IR Art 28 (3) (k)]~~in the ICSR.

~~As described in ICH E2B(R2) (see GVP Annex IV), the section B.3 'Results of tests and procedures relevant to the investigation of the patient' should capture the~~ This includes tests and procedures performed to diagnose or confirm the reaction/event, including those tests done to investigate (exclude) a non-drug cause, (e.g.7 serologic tests for infectious hepatitis in suspected drug-induced hepatitis). Both positive and negative results should be ~~reported.~~included in the ICSR.

The coding of investigations should be performed in line with the latest version of the ~~ICH Endorsed Guide for MedDRA Users, MedDRA Term Selection: Points to Consider~~Guide for MedDRA Users, MedDRA Term Selection: Points to Consider (see ~~GVP Annex IV~~GVP Annex IV). If it is not possible to provide information on tests and test results in a structured manner, provisions have been made to allow for the transmission presentation of the information ~~as in~~ free text~~in the data element ICH-E2B(R2) B.3.2. 'Results of tests and procedures relevant to the investigation'.~~.

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.3 'Results of tests and procedures relevant to the investigation of the patient' should be completed and the data elements repeated as applicable. Data element B.3.1 'Structured information' should be used to structure the information on the test, the outcomeresult and unit, the date the test was

Reference	E2B(R2)/(R3) requirements
	<p>performed, and the normal low and high range. Where several tests or procedures were performed, the sectiondata element should be completed accordinglyrepeated as necessary.</p> <ul style="list-style-type: none"> • Data element B.3.2 'Results of tests and procedures relevant to the investigation' should be used to provide information on tests and procedures, which cannot be captured in sectiondata element B.3.1.
ICH-E2B(R3)	<ul style="list-style-type: none"> • Section F.r 'Results of Ttests and Pprocedures Rrelevant to the Iinvestigation of the Ppatient' should be used to structure the information on the date the test was performed (data element F.r.1 'Test date'), the test (section F.r.2 'Test name'), the outcome (section F.r.3 'Test result') and the normal low (data element F.r.4 'Normal low value') and normal high (data element F.r.5 'Normal high value')and the date the test was performed. Where several tests or procedures were performed, the section should be completed accordingly. • Data element F.r.2.1 'Test Name (free text)' should be used for the description of a test when an appropriate MedDRA code is unavailable for use in data element F.r.2.2b 'Test Name (MedDRA code)'. • Data element F.r.3.4 'Result Unstructured Data (free text)' should be used when the data elements F.r.3.1 'Test results (code)', F.r.3.2 'Test results (value / qualifier) and F.r.3.3 'Test result (units)' cannot be splitused; (often because a Unified Code for Units of Measure (UCUM) code is not available for the test unit). • Data elements F.r.4 'Normal low value' and F.r.5 'Normal high value' should be used to capture the lowest and highest values in the normal range for the test. The same units as used in F.r.3.3 are implied. • Data element F.r.6 'Comments (free text)' should be used to capture any relevant comments made by the reporter about the test result. • A separate block (r) should be used for each test/procedure.

VI.C.6.2.2.6. Supplementary records/information

Key information from supplementary records should be provided in the relevant section of the ICSR, and their availability should be mentioned in the E2B section 'Additional Available Documents Held by Sender' in the data element 'List of documents held by sender' (ICH-E2B(R2) A.1.8.2). Provision has been made in ICH-E2B(R3) format for the electronic submission of documents as attachments to the ICSR message itself. This option is not available in ICH-E2B(R2) and requested documents should be sent separately as specified in the request.

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • Data elementSection A.1.8 'Additional available documents held by sender' should be completed as applicable.
ICH-E2B(R3)	<ul style="list-style-type: none"> • Data elementC.1.6.1 'Are Additional Documents Available' should be completed. • Section C.1.6.1.r 'Documents Held by Sender' should be completed as

Reference	E2B(R2)/(R3) requirements
	applicable , where the data element C.1.6.1.r.1 'Documents Held by Sender' should provide a description of the nature of documents (e.g. clinical records, hospital records, autopsy reports) and C.1.6.1.r.2 'Included Documents' should contain the actual attached document, if the sender chooses to send the document or is required to do so. The processing of personal data should be done in accordance with local data protection law (see VI.C.6.2.2.10 , for guidance on the processing of personal data in the EU).

Other known case identifiers relevant for the detection of duplicates should be presented systematically [in ICSRs in the following section](#) ~~in the data element 'Other case identifiers in previous transmissions' (ICH E2B(R2) A.1.11).~~ [in line with ICH-E2B the following applies:](#)

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Data element Section A.1.11 'Other case identifiers in previous transmissions' should be completed.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section C.1.9.1 'Other Case Identifiers in Pprevious Ttransmissions' should be completed as applicable.

VI.C.6.2.2.7. Follow-up information

[In addition to the guidance](#) [general principles provided in VI.B.3.](#), the following guidance should be followed concerning the management of follow-up information on ICSRs.:

ICSRs are sent at different times to multiple receivers. Therefore the initial/follow-up ~~status~~ [status for a report](#) is dependent upon the receiver. For this reason an item to capture follow-up status is not included in ~~the ICH-E2B(R2) data elements.~~ However, the ~~data element 'Date~~ [date](#) of receipt of the most recent information ~~for this report' (ICH E2B(R2) A.1.7) report~~ taken together with the ~~data element 'Sender identifier' (ICH E2B(R2) A.3.1.2) and the data element 'Sender's~~ [sender's \(case\) report unique identifier' \(ICH E2B\(R2\) A.1.0.1\)](#) [worldwide unique case identification number and the sender's identifier](#) provide a mechanism for each receiver to identify whether the report being transmitted is an initial or a follow-up report. ~~For this reason t~~ [these items are therefore](#) considered critical for each ~~transmission submission~~ and a precise date should always be used (i.e. day, month, year).

[In this context, t](#) ~~The data element 'Date~~ [date](#) of receipt of the most recent information ~~for this report' (ICH E2B(R2) A.1.7) report~~ should ~~therefore~~ always be updated each time ~~a a~~ [a](#) follow-up information is received by a competent authority or a marketing authorisation holder, ~~independently~~ [irrespective](#) whether the follow-up information ~~received~~ is significant enough to be ~~reported~~ [submitted](#). ~~The worldwide unique case identification number of the initial ICSR should be maintained and The the data element 'Date~~ [date](#) the report was first received from ~~the a source' (ICH E2B(R2) A.1.6)~~ [source reporter](#) should remain unchanged to the date the competent authority or the marketing authorisation holder became aware of the initial report.

[When an organisation \(competent authority or marketing authorisation holder\) is receiving follow-up information on a case initially received and submitted to the EudraVigilance database by a different organisation, the worldwide unique case identification number of the initial report submitted by the first organisation should be preserved in the subsequent submissions of the ICSR. In line with ICH E2B,](#)

the sender's (case) safety report unique identifier and the sender's identifier should be updated with the new organisation's own unique identifiers.

New follow-up information should always be clearly identifiable in the case narrative (required for serious reports of suspected adverse reactions) ~~(data element ICH-E2B(R2)-B.5.1)~~ and should also be provided/captured in a structured format in the as applicable ICH-E2B(R2) data elements.

In line with ICH-E2B the following ~~applies~~ data elements/sections should always be completed for follow-up ICSRs submission:

Reference	E2B(R2)/(R3) requirements
<u>ICH-E2B(R2)</u>	<p>—The following data elements should always be completed:</p> <ul style="list-style-type: none"> • <u>Data element A.1.0.1 'Sender's (case) safety report unique identifier'.</u> • <u>Data element A.1.6 'Date report was first received from source' (which should remain unchanged).</u> • <u>Data element A.1.7 'Date of receipt of the most recent information for this report'.</u> • <u>Data element A.1.10 'Worldwide unique case identification number' (which should remain unchanged).</u> • <u>Data element A.3.1.2 'Sender identifier'.</u> • <u>Data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' (for serious reports of suspected adverse reactions).</u>
<u>ICH-E2B(R3)</u>	<p>—The following data elements should always be completed:</p> <ul style="list-style-type: none"> • <u>Data element C.1.1 'Sender's (case) Safety Report Unique Identifier'.</u> • <u>Data element C.1.4 'Date Report Was First Received from Source' (which should remain unchanged).</u> • <u>Data element C.1.5 'Date of Most Recent Information for this Report'.</u> • <u>Section C.1.8 'Worldwide Unique Case Identification' (which should remain unchanged).</u> • <u>Data element C.3.2 'Sender's organisation'.</u> • <u>Data element H.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' (for serious reports of suspected adverse reactions).</u>

a. Significant information

Competent authorities in Member States or marketing authorisation holders should report-submit follow-up information-ICSRs if significant new medical information has been received. Significant new information relates to, for example, a new suspected adverse reaction(s),reactions, a change in the causality assessment, and any new or updated information on thea case that impacts on its medical interpretation. Medical judgement should therefore be applied for ~~Therefore,~~ the identification of significant new information requiring to be reportedsubmitted as follow-up ICSR ~~always necessitates medical judgement.~~

Situations where the seriousness criteria and/or the causality assessment are downgraded (e.g. ~~the~~ follow-up information leads to a change of the seriousness criteria from serious to non-serious, ~~or the~~ causality assessment is changed from related to non-related) should also be considered as significant changes and thus ~~reported~~ submitted as ICSR (see VI.C.3.VI.B.7.1 for ICSRs reporting submission time frames).

In addition, ~~the~~ competent authorities in a Member States or ~~the~~ marketing authorisation holders should also ~~report follow-up information, where~~ submit a new version of an ICSR, when new administrative information is available, that could impact on the case management; ~~for. For~~ example, if new case identifiers have become known to the sender, which may have been used in previous ~~transmissions~~ submissions (data element 'Other case identifiers in previous transmissions' (ICH-E2B(R2) A.1.11)). This information may be specifically relevant to manage potential duplicates. ~~Another example refers to data element 'Additional available documents held by sender' (ICH-E2B(R2) A.1.8), whereby new documents that have become available to~~ In this context, the sender may following data elements/sections should be relevant for the medical assessment of the case completed in line with ICH-E2B:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> <u>Data element</u> <u>Section A.1.11 'Other case identifiers in previous transmissions'.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> <u>Section C.1.9.1 'Other Case Identifiers in Previous Transmissions'.</u>

~~Another example refers to additional documents held by sender, whereby new documents that have become available to the sender may be relevant for the medical assessment of the case. In this context~~ regard, the following data elements/sections should be completed in line with ICH-E2B :

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> <u>Section A.1.8 'Additional available documents held by sender'.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> <u>Section C.1.6 'Additional Available Documents Held by Sender'.</u>

b. Non-significant information

In contrast, a follow-up report which contains non-significant information does not require to be ~~reported~~ submitted as ICSR. This may refer, for example, to minor changes to some dates ~~in the case~~ with no implication for the evaluation or transmission-submission of the case, or to some corrections of typographical errors in the previous case version. Medical judgement should be applied since a change to the birth date may constitute a significant modification (e.g. with implications on the age information of the patient). Similarly, a change of the status of a MedDRA code/term from current to non-current, due to a version change of MedDRA, can be considered as a non-significant change as long as this change has no impact on the medical content of a case. ~~However, an amendment of the MedDRA coding due to a change in the interpretation of a previously reported suspected adverse reaction may constitute a significant change and therefore should be reported.~~

In situations where the case is modified without impacting on its medical evaluation, while no new follow-up is received (e.g., for correcting a mistake or typographical error), the date of receipt of the most recent information reported in the data element 'Date of receipt of the most recent information for this report' (ICH E2B(R2) A.1.7) should not be changed. This data element should however be updated in any other situations, to the date when new follow-up information is received (independently whether it is significant or not) or to the date when changes are made which impact on the interpretation of the case.

Where follow-up information of a case initially reported submitted by a marketing authorisation holder is received directly by a competent authority, the 'Worldwide unique case identification number' (ICH E2B(R2) A.1.10) number of the initial report should be maintained, in adherence with ICH E2B(R2) (see GVP Annex IV). The same principle should be applied if a follow-up is received by a marketing authorisation holder of a case initially reported submitted by a competent authority.

VI.C.6.2.2.8. Amendment Report

General guidance is provided in VI.B.7.3.. Serious and non-serious cases which have already been submitted to EudraVigilance may need to be amended when, after an internal review or according to an expert opinion some items have been corrected, without receipt of new information that would warrant for the submission of a follow-up report.

Where the amendment significantly impacts on the medical evaluation of the case, an ICSR should be resubmitted and information on the amendment should be explained in the case narrative. For example, an amendment of the MedDRA coding due to a change in the interpretation of a previously submitted ICSR may constitute a significant change and therefore should be sent resubmitted as amendment report (see VI.C.6.2.2.7. Subsection a and b for examples of significant and non-significant information).

Additionally, for reports for which cases translations should be provided by a marketing authorisation holders when requested by the Agency or another Member States (see VI.C.6.2.2.11. for EU guidance on languages management in ICSRs), the translations should be submitted in the form of amendment reports. The same would apply where documentations or articles mentioned in the ICSRs are requested by the Agency or another Member States and are further sent as attachments in data element ICH E2B(R3) C.4.r.2 'Included documents' (the attachment of document is not available under the ICH E2B(R2) format).

However when new received information (significant or non-significant) is received, it should be considered as follow-up report and not as amendment report and in this context, the guidance provided in VI.C.6.2.2.7. should be followed.

In line with ICH-E2B the following applies for the submission of amendment ICSRs:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<p>The principle of amending a report as such possibility of flagging an ICSR as amendment report is not supported under the ICH-E2B(R2) format. In situations, where the amendment of a report an ICSR is necessary, the same principles as for a follow-up report should be applied, as follows even where there is no receipt of new information:-</p> <ul style="list-style-type: none"> Data element A.1.0.1 'Sender's (case) Safety Report Unique Identifier' should remain unchanged. Data element A.1.6 'Date report was first received from source' should remain

Reference

E2B(R2)/(R3) requirements

unchanged.

- Data element A.1.7 'Date of receipt of the most recent information for this report' should remain unchanged.
- Data element A.1.10 'Worldwide Unique Case Identification Number' should remain unchanged.
- Data element A.3.1.2 'Sender identifier' should remain unchanged.
- Information on the amendment should be identifiable in the case narrative (data element B.5.1).

~~It should be noted that amendment ICSRs submitted in the ICH-E2B(R2) format this can lead to situations, where these reports may will appear as "late reports" i.e. do not meet the established reporting timelines in the compliance monitoring performed by the Agency (see VI.C.6.2.4. for guidance on ICSRs data quality) if they are submitted beyond the 15 or 90 days submission time frames since the date of receipt of the most recent information;~~

~~In situations where the case is modified without impacting on its medical evaluation, while no new follow up is received (e.g., for correcting a mistake or typographical error), the date of receipt of the most recent information included in the data element A.1.7 'Date of receipt of the most recent information for this report' should not be remain un-changed.~~

ICH-E2B(R3)

- ~~— The data element C.1.11.1 'Report Nullification/Amendment' should be set to 'Amendment'.~~
- ~~— The data element C.1.11.2 'Reason for Nullification/Amendment' should be completed to indicate the reason why a previously transmitted ICSR is amended.~~
- Data element C.1.1 'Sender's (case) Safety Report Unique Identifier' (data element C.1.1) previously submitted should be used remain unchanged. (see exceptions in ICH ICSR Implementation Guide for C.1.1).
- ~~— The same 'Worldwide Unique Identifier' (data element C.1.8) previously submitted should be used.~~
- Data element C.1.4 'Date Report Was First Received from Source' should remain unchanged.
- Data element C.1.5 'Date of Most Recent Information for This Report' should remain unchanged.
- Section C.1.8 'Worldwide Unique Identifier' should remain unchanged.
- Data element C.1.11.1 'Report Nullification/Amendment' should be set to 'Amendment'.
- Data element C.1.11.2 'Reason for Nullification/Amendment' should be completed to indicate the reason why a previously transmitted ICSR is amended.
- Data element C.3.2 'Sender's organisation' should remain unchanged. ~~For~~

Reference	E2B(R2)/(R3) requirements
	<p>example MedDRA coding needs to be changed following internal quality review; in this example the date should remain unchanged</p> <ul style="list-style-type: none"> Information on the amendment should be identifiable in the case narrative (data element H.1). <p>ICSRs set as amendment reports in the ICH-E2B(R3) format are not considered in the compliance monitoring performed by the Agency. They will be however monitored as part of the regular review of the ICSRs quality and integrity conducted by the Agency (see VI.C.6.2.4. for guidance on ICSRs data quality). This is to ensure that they have not been misclassified by the sending organisation as amendment reports instead of follow-up reports which should be taken into account in the compliance monitoring.</p>

VI.C.6.2.2.9. Nullification of cases

In line with ICH-E2B (see GVP Annex IV), the nullification of individual cases should be used to indicate that a previously transmitted report should be considered completely void (nullified), for example when the whole case was found to be erroneous or in case of duplicate reports.

The following principles should be followed:

- The nullification reason should be clear and concise to explain why this case is no longer considered to be a valid report. For example a nullification reason stating, 'the report no longer meets the reporting-criteria for submission' or 'report sent previously in error' are not detailed enough explanations;
- An individual case can only be nullified by the original sending organisation;
- Once an individual case has been nullified, the case cannot be reactivated;
- Individual versions (i.e. follow-up reports) of a case cannot be nullified, only the entire individual case to which they refer;
- A nullified case is one that should no longer be considered for scientific evaluation. The process of the nullification of a case is by means of a notification by the sender to the receiver that this is no longer a valid case. However, the case should be retained in the sender's and receiver's pharmacovigilance database for auditing purposes.

In line with ICH-E2B the following should be applied/applies for nullified ICSRs submission:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<p>The data element A.1.13 'Report nullification' should be set to "Yes".</p> <p>The data element A.1.13.1 'Reason for nullification' should be completed to indicate the reason why a previously transmitted ICSR is considered completely void.</p> <ul style="list-style-type: none"> Data element A.1.0.1 'Sender's (case) Safety Report Unique Identifier' should remain unchanged. The same 'Worldwide unique case identification number' (data element A.1.10) previously submitted should be used. Data element A.1.6 'Date report was first

Reference	E2B(R2)/(R3) requirements
	<p>received from source' should remain unchanged.</p> <ul style="list-style-type: none"> • The data element A.1.7 'Date of receipt of the most recent information for this report' should either reflect the date when information was received that warrants the nullification of the report or otherwise should remain unchanged. • Data element A.1.10 'Worldwide unique case identification number' should remain unchanged. • Data element A.1.13 'Report nullification' should be set to "Yes". • Data element A.1.13.1 'Reason for nullification' should be completed to indicate the reason why a previously transmitted ICSR is considered completely void. • Data element A.3.1.2 'Sender identifier' should remain unchanged.
ICH-E2B(R3)	<p>The data element C.1.11.1 'Report Nullification/Amendment' should be set to 'Nullification'.</p> <p>The data element C.1.11.2 'Reason for Nullification/Amendment' should be completed to indicate the reason why a previously transmitted ICSR is considered completely void.</p> <ul style="list-style-type: none"> • The sameData element C.1.1 'Sender's (case) Safety Report Unique Identifier' (data element C.1.1) previously submitted should be usedremain unchanged. (see exceptions in ICH ICSR Implementation Guide for C.1.1). <p>—</p> <ul style="list-style-type: none"> • The same 'Worldwide Unique Identifier' (data element C.1.8) previously submitted should be used.Data element C.1.4 'Date Report Was First Received from Source' should remain unchanged. • The data element C.1.5 "Date of Most Recent Information for This Report" should either reflect the date when information was received that warrants the nullification of the report or otherwise should remain unchanged. • Data element C.1.8 'Worldwide Unique Identifier' should remain unchanged. • Data element C.1.11.1 'Report Nullification/Amendment' should be set to 'Nullification'. • Data element C.1.11.2 'Reason for Nullification/Amendment' should be completed to indicate the reason why a previously transmitted ICSR is considered completely void. • Data element C.3.2 'Sender's organisation' should remain unchanged.

Examples of scenarios for which ICSRs should be nullified are provided in [VI.App.5](#).

If it becomes necessary to resubmit the case that has been previously nullified the following should be considered in line with ICH-E2B:

Reference	E2B(R2)/(R3) requirements
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Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> A new 'Sender's (case) safety report unique identifier' (data element A.1.0.1) and a new 'Worldwide unique case identification number' (data element A.1.10) should be assigned.;
ICH-E2B(R3)	<ul style="list-style-type: none"> A new 'Sender's (Case) Safety Report Unique Identifier' (data element C.1.1) and a new 'Worldwide Unique Case Identification' (Section C.1.8) should be assigned.;

VI.C.6.2.2.10. What to take into account for data privacy protection laws

To detect, assess, understand and prevent adverse reactions and to identify, and take actions to reduce the risks of, and increase the benefits from medicinal products for the purpose of safeguarding public health, the processing of personal data concerning the patient or the primary source within the EudraVigilance database is possible while respecting EU legislation in relation to data protection (Directive 95/46/EC, and Regulation (EC) No 45/2001).

Where in accordance with the applicable national legislation, the patient's direct identifiers information related to personal data cannot be transferred to the EudraVigilance database, pseudonymisation may be applied by the competent authorities y in the Member States and by the marketing authorisation holders, thereby replacing identifiable personal data such as name and address with pseudonyms or key codes, for example in accordance with the ISO Technical Specification DD ISO/TS 25237:2008, Health informatics – Pseudonymization [IR Recital 17]. The application of pseudonymisation will facilitate the ability of the EudraVigilance system to adequately support case processing and detect duplicates. This Alternatively where pseudonymisation is not feasible, the following may be applied in line with ICH-E2B:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> In certain data elements which can identify an individual such as in the <u>reporter's name, initials, address, or in the patient's name, initials, medical record number, where the information cannot be transmitted for data protection reasons, the data element should be populated with the value 'PRIVACY', in line with the EudraVigilance business rules detailed in the Note for guidance - EudraVigilance Human - Processing of Safety Messages and Individual Case Safety Reports (ICSRs) (EMA/H/20665/04/Final Rev. 2).</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> The <u>nullFlavor</u> <u>nullflavor</u> 'MSK' (see <u>VI.A.2.6-VI.A.1.8. for definition of nullFlavor</u>) should be used if personal information is available but cannot be provided by the sender due to local <u>privacy-protection legislation. It informs the receiver that the information does exist without providing personal details such as birth date or name. See EU ICSR Implementation Guide (EMA/51938/2013) for ICH-E2B(R3) sections/data elements where the use of the nullFlavor 'MSK' is not permitted.</u>

Pseudonymisation or the use of the nullFlavor nullflavor 'MSK' should however be done applied without impairing the information flow in the EudraVigilance database and the interpretation and evaluation of safety data relevant for the protection of public health; given the high-level nature of the information, data elements such as patient's age, age group and gender should in principle be kept un-redacted/visible.

VI.C.6.2.2.911. Handling of languages

The ICH E2B(R2) (see ~~GVP Annex IV~~) concept for the ~~The~~ electronic ~~reporting-submission~~ of ICSRs is based on the fact that structured and coded information is used for data outputs of pharmacovigilance systems (e.g. listings) and for signal detection. However, for scientific case assessment and signal evaluation, ~~the medical summary provided in the data element 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' (ICH E2B(R2) B.5.1) a medical summary~~ is normally required (see [VI.6.2.2.4. for guidance on case narrative](#)).

Where suspected adverse reactions are reported by the primary source in narrative and textual descriptions in an official language of the Union other than English, the original verbatim text and the summary thereof in English shall be provided by the marketing authorisation holder⁸¹ [\[IR 28 \(4\)\]](#). [In practice, the original verbatim text reported by the primary source in an official language of the Union other than English should be included in the ICSR, if it is requested by the Member State where the reaction occurred or by the Agency. The ICSR should be completed and submitted in English if not otherwise requested.](#)

Member States may report case narratives in their official language(s). For those reports, case translations shall be provided when requested by the Agency or other Member States for the evaluation of potential signals. For suspected adverse reactions originating outside the EU, English shall be used in the ICSR [\[IR 28 \(4\)\]](#).

Additional documents held by the sender, which may be only available in a local language, should only be translated if requested by the receiver.

~~In line with ICH E2B~~ [When requested by a Member State or the Agency, the following applies in line with ICH-E2B for the provision of the original verbatim text in an official language of the Union other than English for the suspected adverse reaction and the additional description of the case:](#)

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none">Data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' should be used to capture<ul style="list-style-type: none">- the original verbatim text for the suspected adverse reactions,- the reporter's description and comments for the case in the original language (if provided),- and the English summary of the case thereof.
ICH-E2B(R3)	<ul style="list-style-type: none">Data element E.i.1.1a 'Reaction / Event as reported by the primary source in Native Language' should be completed with the original verbatim text for the suspected adverse reactions.Data element E.i.1.1b 'Reaction / event as reported by the primary source language' should provide information on the language used in E.i.1.1a.Data element E.i.1.2 'Reaction / event as reported by the primary source for translation' should provide the translation in English of the original reporter's words used to describe the suspected adverse reactions.

⁸¹ ~~In practice, the original verbatim text reported by the primary source in an official language of the Union other than English should be included in the ICSR, if it is requested by the Member State where the reaction occurred or by the Agency.~~

Reference E2B(R2)/(R3) requirements

- Data element H.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' should be used to provide the English summary of the case.
- Section H.5.r 'Case Summary and Reporter's Comments in Native Language (repeat as necessary)' should be used to provide capture the reporter's description and comments for the case in the original verbatim information on the clinical course of the case, therapeutic measures, outcome and other relevant information, as well as the reporter's comments on the case text (if provided) in a language different from that used in sections H.1, H.2, and H.4.

~~VI.C.6.2.2.10. Nullification of cases~~

~~In line with ICH E2B(R2) (see GVP Annex IV), the nullification of individual cases should be used to indicate that a previously transmitted report should be considered completely void (nullified), for example when the whole case was found to be erroneous or in case of duplicate reports. It is essential to use the same case report numbers previously submitted in the data element 'Sender's (case) safety report unique identifier' (ICH E2B(R2) A.1.0.1) and in the data element 'Worldwide unique case identification number' (ICH E2B(R2) A.1.10).~~

~~A nullified case is one that should no longer be considered for scientific evaluation. The process of the nullification of a case is by means of a notification by the sender to the receiver that this is no longer a valid case. However, the case should be retained in the sender's pharmacovigilance database for auditing purposes.~~

~~The principles to be considered when nullifying a case are detailed in VI. Appendix 5.~~

VI.C.6.2.3. Special situations

VI.C.6.2.3.1. Use of a medicinal product during pregnancy or breastfeeding

~~General principles/general recommendations provided in VI.B.6.1 should be followed.~~

~~With regard to the electronic reporting submission of parent-child/foetus cases, the following should be adhered to for the creation of ICSRs depending on the situation. This is in addition to the recommendations included in the latest version of the Guide for MedDRA Users, MedDRA Term Selection: Points to Consider for the provision of the appropriate reaction/event terms in line with ICH-E2B.†~~

- ~~**The child/In the situation where if a foetus is and experiences suspected adverse reactions other than early spontaneous abortion/foetal demise**, information on both the parent and the child/foetus should be provided in the same report. These cases are referred to as parent-child/foetus reports. The information provided in the section 'Patients characteristics' (ICH E2B(R2) B.1) applies only to the child/foetus. The characteristics concerning the parent (mother or father), who was the source of exposure to the suspect medicinal product should be provided in the data element 'For a parent-child/fetus report, information concerning the parent' (ICH E2B(R2) B.1.10). If both parents are the source of the suspect drug(s) then the case should reflect the mother's information in the data element 'For a parent-child/fetus report, information concerning the parent' (ICH E2B(R2) B.1.10). The data element 'Case narrative~~

~~including clinical course, therapeutic measures, outcome and additional relevant information' (ICH-E2B(R2) B.5.1) should describe the entire case, including the father's information.:~~

When the child or foetus, exposed to one or several medicinal products through the parent, experiences one or more suspected adverse reactions other than early spontaneous abortion/foetal demise, information on both the parent and the child/foetus should be provided in the same report. This case is referred to as a parent-child/foetus report. The information provided for the patient's characteristics applies only to the child/foetus. The characteristics concerning the mother or father, who was the source of exposure to the suspect medicinal product, should be captured as part of the information concerning the parent. If both parents are the source of the suspect drug(s), the structured parent information in the case should reflect the mother's characteristics; information regarding the father should be provided in the narrative together with all other relevant information.

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.1 'Patient characteristics' should be completed for the <u>child/fetusfoetus</u>. Section B.1.10 'For a parent-child/<u>fetusfoetus</u> report, information concerning the parent' should be completed for the mother or the father as applicable. Data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' should be used to provide the medical summary for the entire case and where both parents are the source of the suspected drug(s), the father's characteristics should be also reflected here.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section D 'Patient Characteristics' should be completed for the child/<u>foetus</u>. Section D.10 'For a Parent-child/-Foetus Report, Information Concerning the Parent' should be completed for the mother or the father as applicable. Data element H.1 'Case Narrative Including Clinical Course, Therapeutic Measures, Outcome and Additional Relevant Information' Section H.5.r 'Case Summary and Reporter's Comments in Native Language (repeat as necessary)' should be used to provide the medical summary for the entire case and where <u>both parents are the source of the suspected drug(s), the father's characteristics should be also reflected here.</u>

b. ~~If b~~Both the parent and child/foetus experience suspected adverse reactions, ~~two~~:

When the parent and the exposed child/ foetus experience suspected adverse reactions other than early spontaneous abortion/foetal demise, ~~two~~ separate reports, i.e. one for the parent (mother or father) and one for the child/foetus, should be created ~~but they~~. Both reports should be linked to identify cases that warrant being evaluated together by using the following data element 'Identification number of the report which is linked to this report' (in line with ICH-E2B(R2) A.1.12) in each report. ~~as followed~~:

Reference E2B(R2)/(R3) requirements

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section Data element A.1.12 'Identification number of the report which is linked to this report' should be used to identify cases that warrant being evaluated together e.g. a mother-child pair where both had reactions.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section Data element C.1.10.r 'Identification Number of the Report Linked to this Report (repeat as necessary)' should be completed for all linked reports. For example, if a sender wishes to reference (link) an ICSR A to ICSR B, then the sender populates C.1.10.r in both reports.

c. ~~If there has been~~ No reaction is affecting the child/foetus, the:

When no reaction is reported for the exposed child/foetus, ~~the~~ parent-child/foetus report does not apply; ~~i.e.~~ Only a parent report should be created to describe the child exposure to the medicinal product. the section 'Patients characteristics' (ICH-E2B(R2) B.1) applies the parent's characteristics. The patient characteristics refer only apply to the parent (mother or father) who may as well experienced the suspected adverse reactions with the suspected medicinal product. Reports with no reaction should not be submitted as ICSRs (see VI.B.6.1. for general guidance on the management of these reports).

~~For those cases describing~~ In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.1 'Patient characteristics' should be completed for the mother or father as applicable.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section D 'Patient Characteristics' should be completed for the mother or father as applicable.

d. ~~If there has been a m~~ Miscarriage or early spontaneous abortion is reported, only:

When miscarriage or early spontaneous abortion is reported, only a parent report is applicable, ~~i.e.~~ with the section 'Patients characteristics' (ICH-E2B(R2) B.1) apply patient's characteristics to be provided for the mother. However, if the suspect medicinal product was taken by the father, the data element 'Additional this information on drug' (ICH-E2B(R2) B.4.k.19) should specify that the medication was taken by the fathers should also be recorded.

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section B.1 'Patient characteristics' should be completed for the characteristics of the mother. The data element B.4.k.19 'Additional information on drug' should be completed if suspect drug(s) were taken by the father.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section D 'Patient Characteristics' should be completed for the characteristics of the mother. Data element G.k.10.r 'Additional Information on Drug (coded)' should be completed if <u>the</u> suspect drug(s) were taken by the father. The value to be selected is 'Drug taken by father'. <u>Guidance on the use of data element</u>

Reference	E2B(R2)/(R3) requirements
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	G.k.10.r is provided in VI.C.6.2.2.2. Subsection f.
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VI.C.6.2.3.2. Suspected adverse reaction reports published in the ~~scientific literature~~medical literature

EU requirements in relation to the monitoring of suspected ~~adverse drug~~ reactions reported in the ~~scientific and medical literature~~medical literature are provided in ~~VI.C.2.2.3., VI.C.2.2.3.1.~~ With regard to the electronic ~~reporting submission~~ of ICSRs published in the ~~scientific and medical literature~~medical literature, the following ~~applies recommendation should be followed~~:

The literature references shall be ~~included in the data element 'Literature reference(s)' (ICH-E2B(R2) A.2.2) provided~~ in the Vancouver Convention (known as "Vancouver style"), developed by the International Committee of Medical Journal Editors [IR Art 28 (3) (b)]. ~~The standard format as well as those for special situations can be found in the following reference: International Committee of Medical Journal Editors. Uniform requirements for manuscripts submitted to biomedical journals. N Engl J Med. 1997; 336: 309-16, which is in the Vancouver style]~~⁸².

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> The data element A.2.2 'Literature reference(s)' should be populated with the literature reference. The Digital Object Identifier (DOI) for the article should be included where available, e.g.: "International Committee of Medical Journal Editors. Uniform requirements for manuscripts submitted to biomedical journals. N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422"
ICH-E2B(R3)	<ul style="list-style-type: none"> Section C.4.r 'Literature Reference(s)' should be populated with the literature reference reflected in the dData element C.4.r.1 'Literature Reference(s)' should be populated with the literature reference. The Digital Object Identifier (DOI) for the article should be included where available e.g.: " International Committee of Medical Journal Editors. Uniform requirements for manuscripts submitted to biomedical journals. N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422"

~~In accordance with Article 28(3) (b) of the Commission Implementing Regulation (EU) No 520/2012, a comprehensive English summary of the article shall be provided in as part of the data element 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' (ICH-E2B(R2) B.5.1) information [IR Art 28 (3) (b)] in the following. In line with ICH-E2B data element/section the following applies:~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' should be used to provide the comprehensive English summary.

⁸² ~~The Vancouver recommendations are also available on the International Committee of Medical Journal Editors website <http://www.icmie.org>. See International Committee of Medical Journal Editors. Uniform requirements for manuscripts submitted to biomedical journals. N Engl J Med. 1997; 336: 309-16.~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R3)	<ul style="list-style-type: none"> Section Data element H.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' should be used to provide the comprehensive English summary.

Upon request of the Agency, for specific safety review, a full translation in English and a copy of the relevant literature article shall be provided by the marketing authorisation holder that transmitted the initial report, taking into account copyright restrictions [IR 28-(3)]. ~~The recommendations detailed in VI.App2.10, regarding the mailing of the literature article, should be adhered to.~~

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> The recommendations guidance detailed in VI.App2.10, regarding the mailing of the literature article, should be adhered to.
ICH-E2B(R3)	<ul style="list-style-type: none"> The electronic version of the document (i.e. the journal article and a copy of the translation where applicable) should be attached to the ICSR in data element C.4.r.2 'Included Documents'. If the article and/or translation are not provided at the time of the ICSR reporting submission, attachments can be transmitted separately from the ICSR transmission. In this situation When the sender transmits an attachment later, the original ICSR along with all the same medical information captured in the E2B(R3) data elements is should be retransmitted as an 'amendment' report (see VI.C.2.2.8-VI.C.6.2.2.8. for guidance on amendment reports). However if new additional information is provided, then the ICSR with the attachment is transmitted should be submitted as a follow-up report.

~~Recommendations~~ Guidance presented in VI.App2.10, for the ~~reporting submission~~ of several ~~individual~~ cases when they are ~~published~~ presented in the same literature article, should be followed.

VI.C.6.2.3.3. Suspected adverse reactions related to overdose, abuse, off-label use, misuse, medication error or occupational exposure

General principles ~~are provided~~ detailed in VI.B.6.3. should be followed. Further guidance on the management of individual reports of off-label use is provided in VI.C.2.2.12..

~~Along with the resulting suspected adverse reactions, If a case of overdose, abuse, off-label use, misuse, medication error or occupational exposure is reported with clinical consequences, the an appropriate MedDRA Lowest Level Term LLT term code, corresponding to the term closest most closely to the description of the reported overdose, abuse, off-label use, misuse, medication error or occupational exposure should be added specified in the ICH-E2B section 'Reactions/Events'. This should be done in accordance with the applicable recommendations given in the latest version of the Guide for MedDRA Users, MedDRA Term Selection: Points to Consider, while respecting the definitions provided in VI.A.1.2. to the observed suspected adverse reaction(s) in the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH-E2B(R2) B.2.i.1),~~

~~in line with recommendations included in the latest version of the ICH Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider' (see GVP Annex IV).~~

In line with ICH-E2B the following applies:

ICH-E2B(R2)

- As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information provided in free text.
- Data element B.4.k.2.1 'Proprietary medicinal product name' and/or B.4.k.2.2 'Active substance name(s)' should be completed in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products).
- Data element B.4.k.19 'Additional information on drug' can be used to specify any additional information pertinent to the case (e.g.; overdose, medication error, misuse, abuse, occupational exposure, off-label use, ~~misuse, medication error or occupational exposure~~). This data element can also be used to provide ~~a~~Additional information concerning the indication for the drug not covered in data element B.4.k.11 'Indication for use in the case'~~should be provided as applicable.~~
- Likewise, ~~the~~An appropriate MedDRA terms should be provided for the drug characterisation in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)' along with the resulting suspected adverse reaction. ~~or~~ If applicable, ~~in~~ the data element 'B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' should be completed with a reasoning provided in the data element B.5.4 'Sender's comments' (in line with ICH Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider').
- If the primary source did not provide an explicit statement about the overdose, medication error, misuse, abuse, occupational exposure or off-label use, which would clearly transpose into a MedDRA term in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)', but there is an suggestion in the context of the clinical course description, the sender may provide that information in the data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' with a reasoning provided in the data element B.5.4 'Sender's comments'. The case should be followed up to obtain further information.

ICH-E2B(R3)

- As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information provided in free text.
- In addition to the mandatory data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source', section G.k 'Drug(s) Information' should be completed in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products).
- Data element G.k.10.r 'Additional Information on Drug (coded)' should be completed using one or more of the following values as applicable: ~~O~~overdose, ~~M~~medication error, ~~M~~misuse, ~~A~~abuse, ~~O~~occupational exposure, ~~and~~ ~~O~~off label use. The value(s) should be used where the primary source has made a clear

statement related to the additional characteristics of the drug.

- ~~Likewise, an~~ appropriate MedDRA terms should be provided for the drug characterisation in the data element E.i.2.1b 'Reaction/Event (MedDRA code)' along with the resulting suspected adverse reaction. If applicable, the ~~Alternatively,~~ section H.3.r 'Sender's Diagnosis' should be completed with a reasoning provided in the data element H.4 'Sender's comments' ~~(in line with ICH Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider')~~.
- If the primary source did not provide an explicit statement about the overdose, medication error, misuse, abuse, occupational exposure or off label use, ~~drug characterisation~~ which would clearly transpose into a MedDRA term in the data element E.i.2.1b 'Reaction/Event (MedDRA code)', ~~the reaction section~~ but there is an ~~indicationsuggestion~~ in the context of the clinical course description, the sender may choose the most applicable value(s) of G.k.10.r ~~at their discretion~~: 'Additional Information on Drug (coded)'. The case should be followed up to obtain further information.
- Data element G.k.11 'Additional Information on Drug (free text)' should be used to capture any additional drug information in free text format not described in G.k.10.r.
- The data element G.k.1 'Characterisation of Drug Role' should be populated with the value 'Drug not administered' for ~~reports of medication errors if~~ where the patient did not receive the actual prescribed drug but ~~another~~ a different one, based on the information provided ~~by the primary source or, if this information is missing, by the sender. This applies where the patient did not receive the actual prescribed drug.~~ There is no equivalent in ICH-E2B(R2). Sections G 'Drug(s) Information' should be completed with the information about the prescribed drug (including the fact that it was not administered), as well as the information on the dispensed drug as the 'suspect' drug.

Values and definition for data element 'G.k.10.r 'Additional Information on Drug (coded)'

• <u>Overdose</u>	This is to indicate that the medicine may have been subject to an overdose as defined in VI.A.1.2.chapter VI.A.2.1.2.a.
• <u>Medication error</u>	This is to indicate that the medicine may have been associated with a medication error as defined in VI.A.1.2.
• <u>Misuse</u>	This is to indicate that the medicine may have been associated with misuse as defined in VI.A.1.2.chapter VI.A.2.1.2.a.
• <u>Abuse</u>	This is to indicate that the medicine may have been associated with abuse as defined in VI.A.1.2.chapter VI.A.2.1.2.a.
• <u>Occupational exposure</u>	This is to indicate that the medicine may have been

Reference	E2B(R2)/(R3) requirements
	associated with occupational exposure as defined in VI.A.1.2.chapter VI.A.2.1.2.a.
— Off label use	This is to indicate that the medicine may have been associated with off label use as defined in VI.A.1.2.chapter VI.A.2.1.2.a.
• Medication error	This is to indicate that the medicine may have been associated with a medication error as defined in chapter VI.A.2.1.2.a.

VI.C.6.2.3.4. Lack of therapeutic efficacy

General principles are provided in [VI.B.6.4.](#)

If the primary source suspects a lack of therapeutic efficacy, the MedDRA [LLT term](#) [Lowest Level Term code](#), corresponding ~~to the term closest~~ [most closely](#) to the description of the reported lack of therapeutic efficacy, should be ~~provided specified in the ICSR in the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH E2B(R2) B.2.i.1), in line~~ [accordance](#) with the ~~recommendations included given~~ in the latest version of the [Guide for MedDRA Users, MedDRA Term Selection: Points to Consider](#) ~~ICH Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider'~~ (see [GVP Annex IV](#)).

[In line with ICH-E2B the following applies:](#)

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	• The appropriate MedDRA term should be provided in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)'.
ICH-E2B(R3)	• The appropriate MedDRA term should be provided in the data element E.i.2.1b 'Reaction/Event (MedDRA code)'.

Unless aggravation of the medical condition occurs, the indication for which the suspected medicinal product was administered should not be included in ~~the ICH-E2B section 'Reactions/Events'~~ [the data element 'Reaction/event in MedDRA terminology \(Lowest Level Term\).'](#) ~~or 'Reaction/Event (MedDRA code)'.~~

[When the lack of therapeutic efficacy is reported with no suspected adverse reaction, The the same reporting submission modalities as for serious ICSRs \(see \[VI.C.4.\]\(#\) for ICSRs submission modalities in EU\) should be applied for those cases related to classes of medicinal products where, as described detailed in \[VI.B.6.4.\]\(#\), reports of lack of therapeutic efficacy for which ICSRs submission is required \(e.g. medicinal products used in critical conditions or for the treatment of life-threatening diseases, vaccines, contraceptives\). The ICSRs should be reported submitted within a 15-day time frame even - If no seriousness criterion is specified available, it is acceptable to submit the ICSR within 15 days as non-serious.](#)

VI.C.6.2.3.5. Suspected adverse reactions related to quality defect or falsified medicinal products

EU requirements are provided in [VI.C.2.2.4.](#). In order to be able to clearly identify cases related to quality defect or falsified medicinal products (see [GVP Annex I](#)) when they are exchanged between stakeholders, the following [recommendations guidance](#) should be applied:

a. ~~a~~-Quality defect

Where a report of suspected adverse reactions is associated with a suspected or confirmed quality defect of a medicinal product, the MedDRA ~~LLT term~~ Lowest Level Term code of the term corresponding most closely to the product quality issue, should be added to the observed suspected adverse reaction(s) in ~~the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH E2B(R2) B.2.i.1).~~ accordance with the applicable recommendations given in the latest version of the Guide for MedDRA Users, MedDRA Term Selection: Points to Consider~~ICH-Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider.~~

~~b~~In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
<p><u>ICH-E2B(R2)</u></p>	<ul style="list-style-type: none"> • <u>As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information related to the quality defect provided in free text.</u> • <u>Data element B.4.k.2.1 'Proprietary medicinal product name' and/or B.4.k.2.2 'Active substance name(s)' should be populated in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products).</u> • <u>Data element B.4.k.19 'Additional information on drug' should be used to specify any additional information pertinent to the case (e.g.: beyond expiration date, batch and lot tested and found to be within/not within specifications).; This data element can also be used to provide additional information concerning the indication for the drug not covered in data element B.4.k.11 'Indication for use in the case' should be provided as applicable.</u> • <u>TheAn appropriate MedDRA term should be provided for the drug characterisation in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)' along with the resulting suspected adverse reaction. If applicable, the data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' should be completed with a reasoning provided in the data element B.5.4 'Sender's comments'.</u>
<p><u>ICH-E2B(R3)</u></p>	<ul style="list-style-type: none"> • <u>As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information related to the quality defect provided in free text.</u> • <u>In addition to the mandatory data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source', section G.k 'Drug(s) Information' should be completed in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products).</u> • <u>Data element G.k.10.r 'Additional Information on Drug (coded)' should be completed using one or more of the following values as applicable: <u>drug taken beyond expiry date, Bbatch and lot tested and found within specifications;</u> <u>Bbatch and lot tested and found not within specifications.</u> These values should be used where the primary source has made a clear statement related to the</u>

Reference E2B(R2)/(R3) requirements	
	<p>additional characteristics of the drug.</p> <ul style="list-style-type: none"> Likewise, a An appropriate MedDRA term should be provided for the drug characterisation in the data element E.i.2.1b 'Reaction/Event (MedDRA code)' along with the resulting suspected adverse reaction. If applicable, the Alternatively, section H.3.r 'Sender's Diagnosis' should also be completed with a reasoning provided in the data element H.4 'Sender's comments'. Data element G.k.11 'Additional Information on Drug (free text)' should be used to capture any additional drug information in free text format not described in G.k.10.r.
Values of definition for data element 'G.k.10.r Additional Information on Drug (coded)'	
<ul style="list-style-type: none"> -Drug taken beyond expiry date 	<p>This is to indicate that the medicine administered to or taken by the patient was beyond its expiry date as indicated in the SmPC product information or on the packaging of the medicine.</p>
<ul style="list-style-type: none"> Batch and lot tested and found within specifications 	<p>This is to indicate that a batch or lot of a medicine was tested and found within the specifications of the marketing authorisation.</p>
<ul style="list-style-type: none"> Batch and lot tested and found not within specifications 	<p>This is to indicate that a batch or lot of a medicine was tested and was found outside the specifications of the marketing authorisation.</p>

b. Falsified medicinal products

Where a report of suspected adverse reactions is associated with a suspected or confirmed falsified⁸³ ~~ingredient~~~~excipient~~, active substance or medicinal product, the MedDRA [LLT term](#) ~~Lowest Level Term code of the term~~ corresponding most closely to the reported information should be added to the observed suspected adverse reaction(s) in accordance with the [data element 'Reaction/event applicable recommendations given in MedDRA terminology \(Lowest Level Term\)'](#) (ICH-E2B(R2) B.2.i.1) ~~the latest version of the Guide for MedDRA Users, MedDRA Term Selection: Points to Consider~~ ~~ICH-Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider~~. Information on the suspected medicinal product, active substance(s) or excipient(s) should be ~~provided in the data elements 'Proprietary medicinal product name' (ICH-E2B(R2) B.4.k.2.1) and/or 'Active substance name(s)' (ICH-E2B(R2) B.4.k.2.2) as reported by the primary source.~~ ~~also provided in line with the guidance in VI.C.6.2.2.2.~~

In line with ICH-E2B the following applies:

Reference E2B(R2)/(R3) requirements	
ICH-E2B(R2)	<ul style="list-style-type: none"> As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information related to the falsified medicinal product provided in free text.

⁸³ ~~As presented in EU legislation (Directive 2011/62/EU).~~

Reference E2B(R2)/(R3) requirements

	<ul style="list-style-type: none"> • <u>Data element B.4.k.2.1 'Proprietary medicinal product name' and/or B.4.k.2.2 'Active substance name(s)' should be populated in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products).</u> • —Data element B.4.k.19 'Additional information on drug' should be used to specify any additional information pertinent to the case (e.g., falsified medicine), medicine purchased over the internet). This data element can also be used to provide additional information concerning the indication for the drug not covered in data element B.4.k.11 'Indication for use in the case' should be provided as applicable. • <u>An appropriate MedDRA term should be provided for the drug characterisation in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)' along with the resulting suspected adverse reaction. If applicable, the data element 'B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' should be completed with a reasoning provided in the data element B.5.4 'Sender's comments'.</u> • <u>If new information is received to confirm the product is not a counterfeit, the data element B.4.k.19 should be changed appropriately in a follow-up. If the product is confirmed as a counterfeit, the appropriate MedDRA code should be used in the data element 'B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' with a reasoning provided in the data element B.5.4 'Sender's comments' and information should be provided in the case narrative. Data element B.4.k.2.1 'Proprietary medicinal product name' and/or B.4.k.2.2 'Active substance name(s)' as reported by the primary source should be populated accordingly.</u>
<p><u>ICH- E2B(R3)</u></p>	<ul style="list-style-type: none"> • <u>As a general principle, additional characteristics related to the medicines and pertinent to the case should be coded and further information related to the falsified medicinal product provided in free textthe case narrative.</u> • —In addition to the mandatory data element G.k.2.2 'Medicinal Product Name as Reported by the Primary Source', section G.k 'Drug(s) Information' should be completed in accordance with the information reported by the primary source (see VI.C.6.2.2.2. for guidance on suspect, interacting and concomitant medicinal products). • —An appropriate MedDRA term should be provided in the data element E.i.2.1b 'Reaction/Event (MedDRA code)'. Alternatively, section H.3.r 'Sender's Diagnosis' should be completed. • —Section G.k 'Drug(s) Information' should be completed; information should be captured in the data element G.k.2.2 'Medicinal Product Name as Reported by

Reference E2B(R2)/(R3) requirements

the Primary source' and/or G.k.2.3.r.1 'Substance/Specified Substance name'.

- Data element G.k.10.r 'Additional Information on Drug (coded)' should be completed using the following value 'Counterfeit'⁸⁴. The value should be used where the medicine is suspected or confirmed to be a falsified medicinal product.
- An appropriate MedDRA term should be provided for the drug characterisation in the data element E.i.2.1b 'Reaction/Event (MedDRA code)' along with the resulting suspected adverse reaction. If applicable, the section H.3.r 'Sender's Diagnosis' should be completed with a reasoning provided in the data element H.4 'Sender's comments'.
- If new information is received to confirm the product is not a counterfeit, the data element G.k.10.r should be changed appropriately in a follow-up. If the product is confirmed as a counterfeit, the appropriate MedDRA code should be used in ~~data element~~the section in H.3.r 'Sender's Diagnosis' with a reasoning provided in the data element H.4 'Sender's comments' and information should be provided in the case narrative.
- Data element G.k.11 'Additional Information on Drug (free text)' should be used to capture any additional drug information in free text format not described in G.k.10.r (e.g. medicine purchased over the internet).

Values/Definition for data element G.k.10.r 'Additional Information on Drug (coded)'

- Counterfeit⁸⁴⁸⁵

This is to indicate that the medicine was suspected or confirmed to be a falsified medicinal product in line with the definition provided in Article 1, paragraph (3) of Directive 2001/83/EC.

VI.C.6.2.3.6. Suspected transmission via a medicinal product of an infectious agent

EU requirements are General guidance on the management of this type of reports in the EU is provided in VI.C.2.2.5.

The coding of a suspected transmission of an infectious agent via a medicinal product in the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH E2B(R2) B.2.i.1) should be performed in line with the latest version of the Guide for MedDRA Users, MedDRA Term Selection: Points to Consider ICH Endorsed Guide for MedDRA Users 'MedDRA Term Selection: Points to Consider' (see GVP Annex IV).

⁸⁴ This value should not be used to refer to medicines that do not comply with EU law on intellectual and industrial property rights, such as registered trademarks or patent rights, as defined for counterfeit medicines in Q&A: Directive on falsified medicines.

⁸⁵ This value should not be used to refer to medicines that do not comply with EU law on intellectual and industrial property rights, such as registered trademarks or patent rights, as defined for counterfeit medicines in Q&A: Directive on falsified medicines.

In addition, if the infectious agent is specified in the report, the MedDRA ~~Lowest Level Term code~~ LLT term corresponding most closely to the infectious agent should also be included in the ICSR ~~in the data element 'Reaction/event in MedDRA terminology (Lowest Level Term)' (ICH E2B(R2) B.2.i.1).~~

In line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> The appropriate MedDRA term should be provided in the data element B.2.i.1 'Reaction/event in MedDRA terminology (Lowest Level Term)'.
ICH-E2B(R3)	<ul style="list-style-type: none"> The appropriate MedDRA term should be provided in the data element E.i.2.1b 'Reaction/Event (MedDRA code)'.

VI.C.6.2.3.7. Reports of suspected adverse reactions originating from organised data collection systems and other systems

General guidance about the management of individual safety reports ~~ing requirements~~ in the EU for post-authorisation studies (interventional clinical trials and non-interventional studies) ~~are is~~ provided in VI.C.1. ~~and~~. Individual ~~case safety~~ reports originating from those studies shall contain information on study type, study name and the sponsor's study number or study registration number [IR Art 28 (3)(c)]. This should be provided in the following ICH E2B ~~(R2)~~ section A.2.3 'Study identification'.

In line with ICH E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> Section A.2.3 'Study identification' should be completed accordingly.
ICH-E2B(R3)	<ul style="list-style-type: none"> Section C.5 'Study Identification' should be completed accordingly.

Safety reporting Guidance concerning the management of individual safety reports requirements regarding for patient support programmes or market research programmes ~~are is~~ provided in VI.C.2.2.11.

All ICSRs ~~which are~~ reportable to the EudraVigilance database and which originate from organised data collection systems and other systems which do not fall under the scope of the clinical trials Directive 2001/20/EC, should be submitted to EVPM (see VI.C.6.2.1. for guidance on EudraVigilance database modules). The same applies to cases of adverse reactions originating from clinical trials if they are suspected to be related to a medicinal product other than the IMP ~~or NIMP~~ and does not result from a possible interaction with the IMP ~~or NIMP~~.

The following reporting submission rules for ICSRs should be applied based on (i) the type of data collection system and (ii) whether the suspected medicinal product is part of the scope of the data collection system.

- For ~~cases of~~ suspected adverse reactions (i) in relation to those adverse events for which the protocol of non-interventional post-authorisation studies ~~does not provide differently and~~ requires their systematic collection (see VI.C.1.2.1.1.), (ii) originating from compassionate use or named patient use conducted in Member States where the active collection of adverse events occurring in these programmes is required (see VI.C.1.2.2.), or (iii) originating from patient support programmes, or market research programmes (see VI.C.2.2.11.):**

a). Where the adverse reaction is suspected to be related at least to the studied (or supplied) medicinal product:

- the report should be considered ~~as~~-solicited;
- ~~the ICH E2B(R2) data element A.1.4 'Type of report' should be populated with the value 'Report from study';~~
- ~~the ICH E2B(R2) data element A.2.3.3 'Study type in which the reaction(s)/event(s) were observed' should be populated with the value 'Other studies' or 'Individual patient use'.~~
- in line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • <u>Data element A.1.4 'Type of report' should be populated with the value 'Report from study'.</u> • <u>Data element A.2.3.3 'Study type in which the reaction(s)/event(s) were observed' should be populated with the value 'Other studies' or 'Individual patient use'.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> • <u>Data element C.1.3 'Type of Rreport' should be populated with the value 'Report from study'.</u> • <u>Data element C.5.4 'Study tType Wwhere Rreaction(s)/Eevent(s) Wwere oObserved' should be populated with the value 'Other studies' or 'Individual patient use'.</u>

b). Where the adverse reaction is only suspected to be related to a medicinal product which is not subject to the scope of the organised data collection system and there is no interaction with the studied (or supplied) medicinal product:

- the report should be considered ~~as~~-spontaneous-~~report~~; as such it conveys the suspicion of the primary source;
- ~~The ICH E2B(R2) data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.~~
- in line with ICH-E2B the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • <u>Data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.</u>
ICH-E2B(R3)	<ul style="list-style-type: none"> • <u>Data element C.1.3 'Type of Rreport' should be populated with the value 'Spontaneous'.</u>

2. For suspected adverse reactions (i) in relation to those specified adverse events for which the protocol of non-interventional post-authorisation studies ~~provides differently and~~ does not require their systematic collection (see VI.C.1.2.1.1.), or (ii) originating from compassionate use or named patient use conducted in Member States where the active collection of adverse events occurring in these programmes is not required (see VI.C.1.2.2.):

- the report should be considered ~~as spontaneous-report~~; as such it conveys the suspicion of the primary source;
- ~~the ICH E2B(R2) data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.~~
- ~~In line with ICH-E2B the following applies:~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	• Data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.
ICH-E2B(R3)	• Data element C.1.3 'Type of Rreport' should be populated with the value 'Spontaneous'.

3. For clinical ~~trial~~trials conducted in accordance with Directive 2001/20/EC and where the adverse reaction is only suspected to be related to a ~~non-investigational~~ medicinal product (~~other than the IMP or another medicinal product which is NIMP and does not subject to the scope of the clinical trial~~) and there is ~~no~~result from a possible interaction with the ~~investigational medicinal product:IMP or NIMP~~(see VI.C.1.1.):

- the report should be considered ~~as~~spontaneous-report; as such it conveys the suspicion of the primary source;
- ~~the ICH E2B(R2) data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.~~
- ~~All ICSRs which are reportable to the EudraVigilance database and which originate from post-authorisation studies which do not fall under the scope of the clinical trials Directive 2001/20/EC, should be submitted to EVPM (see VI.C.6.2.1.). The same applies to cases of adverse reactions originating in clinical trials if they are not suspected to be related to the investigational medicinal product.~~
- ~~in line with ICH-E2B the following applies:~~

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	• Data element A.1.4 'Type of report' should be populated with the value 'Spontaneous'.
ICH-E2B(R3)	• Data element C.1.3 'Type of Rreport' should be populated with the value 'Spontaneous'.

VI.C.6.2.3.8. Receipt of missing minimum information

When missing minimum information (see [VI.B.2. for ICSRs validation](#)) has been obtained about a non-valid ICSR, the following rules should be applied:

- the ~~data element 'Date~~date where the report was first received from ~~the reporter~~source' (ICH-E2B(R2)-A.1.6)~~source~~ should ~~contain~~reflect the date of receipt of the initial non-valid ICSR;
- the ~~data element 'Date~~date of receipt of the most recent information ~~for this report'~~ (ICH-E2B(R2)-A.1.7)~~should contain~~reflect the date when ~~all the minimum criteria the four elements of the minimum information~~required for ~~ICSR validation reporting~~have become available;

- clarification should be provided in the case narrative (~~data element ICH-E2B(R2) B.5.1~~) that some of the four elements were missing in the initial report~~;~~;
- ~~as for any reported~~submitted cases, compliance monitoring is performed against the ~~data element~~ 'Date' of receipt of the most recent information for this ~~report~~' (~~report~~).

In line with ICH-E2B(R2) A.1.7), the following applies:

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • The dData element A.1.6 'Date report was first received from source' should capture the date of receipt of the initial non-valid ICSR;. • DThe data element A.1.7 'Date of receipt of the most recent information for this report' should capture the date when all the four elements of the minimum information criteria required for ICSR validation reporting have become available;. • Clarification should be provided in the data element B.5.1 'Case narrative including clinical course, therapeutic measures, outcome and additional relevant information' that some of the four elements were missing in the initial report.
ICH-E2B(R3)	<ul style="list-style-type: none"> • The dData element C.1.4 'Date Report Was First Received from Source' should capture the date of receipt of the initial non-valid ICSR;. • The dData element C.1.5 'Date of Most Recent Information for This Report' should capture the date when all the four elements of the minimum criteria information required for ICSR validation reporting have become available;. • Clarification should be provided in the data element H.1 'Case Narrative Including Clinical Course, Therapeutic Measures, Outcome and Additional Relevant Information' that some of the four elements were missing in the initial report.

VI.C.6.2.4. Data quality of individual case safety reports transmitted electronically and duplicate management

The EudraVigilance database should contain all cases of suspected adverse reactions that are reportable according to ~~Directive 2001/83/EC~~ Directive 2001/83/EC and ~~Regulation (EC) No 726/2004~~ Regulation (EC) No 726/2004 to support pharmacovigilance activities. This applies to all medicinal products authorised in the EU independent of their authorisation procedure.

The EudraVigilance database should also be based on the highest internationally recognised data quality standards.

To achieve these objectives, ~~all the~~ competent authorities in ~~a~~ Member States and ~~the~~ marketing authorisation holders should adhere to:

- the electronic ~~reporting-submission~~ requirements as defined in EU legislation;
- the concepts of data structuring, coding and ~~reporting-submission~~ in line with the EU legislation, guidelines, standards and principles referred to in ~~VI.C.6.1.2.2.1~~.

This is a pre-requisite to maintain a properly functioning EudraVigilance database intended to fully support the protection of public health.

In addition, the Agency in collaboration with stakeholders that submit ICSRs to EudraVigilance, are responsible to contribute to the quality and integrity of the data. This is also reflected in the legislation as follows:

- The Agency shall, in collaboration with the marketing authorisation holder or with the competent authority in Member Statestakeholder that submitted an ICSR to the EudraVigilance database, be responsible for operating procedures that ensure the highest quality and full integrity of the information collected in the EudraVigilance database [REG Art 24(3)].
- This includes as well the monitoring of use of the terminologies referred to in Chapter IV of the Commission Implementing Regulation (EU) No 520/2012, of the Commission Implementing Regulation (EU) No 520/2012either systematically or by regular random evaluation [IR Art 25(3)].

Specific quality system procedures and processes shall be in place in order to ensure:

- the submission of accurate and verifiable data on serious and non-serious suspected adverse reactions to the Eudravigilance-EudraVigilance database within the 15 or 90-day time frame [IR Art 11 (1) (c)];
- Specific quality system procedures and processes shall be in place in order to ensure the quality, integrity and completeness of the information-ICSRs submitted-on the risks of medicinal products, including processes to avoid duplicate submissions [IR Art 11 (1) (d)], which should also be entire and undiminished in their structure, format and content [IR Art 11 (1) (d) and Art 15 (1) (a)];
- the detection of duplicates of suspected adverse reactions reports in collaboration with the Agency [DIR Art 107(5) and Art 107a (3)].

Member States shall collaborate with the Agency and the marketing authorisation holders in the detection of duplicates of suspected adverse reaction reports [DIR Art 107a (3)].

To confirm that the quality system enables for the detection and management of duplicate ICSRs and the submission to the EudraVigilance database of ICSRs of the highest quality within the correct time frames, the marketing authorisation holders and the competent authorities in a Member States should have in place an audit systemshall perform risk-based audits of the quality system at regular interval, which ensures the highest quality of the ICSRs transmitted electronically to the EudraVigilance database within the correct time frames, and which enables the detection and management of duplicate ICSRs in their system. [IR Art 13(1) and Art 17(1)]. Corrective action, including a follow-up audit of deficiencies shall be taken where necessary. The dates and results of audits and follow-up audits shall be documented [IR Art 13 (2) and Art 17(2)].

Those transmitted ICSRs should be complete, entire and undiminished in their structure, format and content.

For the purpose of a systematic approach towards quality in accordance with the quality cycle as outlined in GVP Module I, the managerial staff (i.e. staff with management responsibilities) in any organisation should be responsible for ensuring that adequate resourcesare availablemarketing authorisation holder, the competent authority in Member States and the Agency shall have sufficient and appropriately qualified and trained personnel for the performance of pharmacovigilance activities [IR Art 10(1) and 14(1)]. All personnel involved in the performance of pharmacovigilance activities shall receive initial and continued training in relation to their role and responsibilities. Stakeholders shall keep training plans and records for documenting, maintaining and developing the competences of personnel based on an assessment of the training needs and make them available for audit or inspection [IR Art 10 (3) and Art 14 (2)].

~~and that appropriate training is provided to their personnel for pharmacovigilance. Competent authorities in Member States and marketing authorisation holders should regularly update their training plans based on an assessment of the training needs of their personnel for pharmacovigilance, which should be subject to monitoring. Records for documenting and developing the competences of personnel should be maintained and updated accordingly. To support assist the training of personnel for pharmacovigilance, the Agency has made available a detailed training plan and catalogue based on a modular training approach focusing on the management of individual safety reports adverse reactions reporting, signals management and EudraVigilance⁸⁶. It is accessible on the EudraVigilance training webpage⁸⁷ to stakeholders who wish to use it for their pharmacovigilance activities.~~

In support of the operation of the procedures that ensure the highest quality and full integrity of the information collected in the EudraVigilance database as well as the monitoring of use of the terminologies for the submission of ICSRs, business process maps and process descriptions in relation to the quality review of ICSRs ~~and the~~ are provided in VI.App.6.

~~A review of the ICSRs quality, integrity and compliance with the reportingsubmission time frames will beis performed by the Agency at regular intervals for all organisations reportingsubmitting ICSRs to the EudraVigilance database in line with the Agency's SOPs. Parameters upon which the review of organisations may be initiated, refer for example to the volume of reports being submitted to the EudraVigilance database, major changes to pharmacovigilance databases, quality issues identified as part of the signal management, requests from pharmacovigilance inspectors, and/or the time interval since the last review. For the purpose of the monitoring of the 15 or 90 days reporting time frames, the Agency provides competent authorities in Member States and marketing authorisation holders with monthly compliance reports.~~

~~The outcome of the review of the ICSRs quality and integrityreviews will beis provided to the organisations on the basis of a report, which includes the need for corrective measures where applicable and the time frames for these measures to be applied. The time frames and the method for corrective measures will depend on the quality issues identified (e.g. corrections of the MedDRA coding of ICSRs to be performed by means of amendment reports).~~

~~For the purpose of the monitoring of the compliance with the 15 or 90 days submission time frames, the Agency also provides the competent authority in a Member State and the marketing authorisation holder with monthly compliance reports, which apply to both initial and follow-up ICSRs. Specific rules on the compliance monitoring for amendment reports are detailed in VI.C.6.2.2.8.~~

~~With regard to the monitoring by the Agency of selected medical literature for reports of suspected adverse reactions to medicinal products containing certain active substances (see VI.C.2.2.3.1. for EU guidance on medical literature monitoring), and the entering of adverse reaction reportsthe reports in the EudraVigilance database in accordance with Article 27 of Regulation (EC) No 726/2004 of Regulation (EC) 726/2004, two-yearly audits are planned to ensure the quality and integrity of the reports. SOPs and WINs for the routine quality review process are published aton the Agency's dedicated medical literature monitoring webpage⁸⁸.~~

~~In support of the operation of procedures that ensure detection and management of duplicate ICSRs are provided in VI. Appendix 6 and VI. Appendix 7. Further guidance, business process maps and process descriptions are provided in VI.App.7. taking into account various scenarios acknowledging~~

⁸⁶ Accessible on EudraVigilance training webpage.

⁸⁷ EudraVigilance training and support; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ EudraVigilance training](#)

⁸⁸ Monitoring of medical literature and entry of adverse reaction reports into EudraVigilance; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ Medical literature monitoring](#)

that duplicates may be detected at various stages of the processing of ICSRs by numerous stakeholders and in EudraVigilance. The collaboration between the Agency, the competent authorities in a Member States and the marketing authorisation holders is required to ensure that potential duplicates of reports of suspected adverse reactions are reviewed, confirmed and processed as necessary. Guidance on the detection of duplicate ICSRs is available also provided in the GVP Module VI Addendum I – Duplicate management of adverse reaction reports Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009).

A review of the ICSRs quality, integrity and compliance with the reporting time frames will be performed by the Agency at regular intervals for all organisations reporting to the EudraVigilance database. Feedback from these reviews will be provided to those organisations.

VI.C.6.2.5. Electronic re-transmission of ICSRs between multiple senders and receivers

The electronic re-transmission of cases refers to the electronic exchange of ICSRs between multiple senders and receivers, for example where in case of contractual agreement, a third country ICSR is first reported submitted by a marketing authorisation holder outside the EU to another marketing authorisation holder in the EU and from there to the Agency. This applies as well for the interim arrangements period, where based on the reporting requirements detailed in VI.C.4.1, ICSRs originating in the EU are submitted by marketing authorisation holders to the competent authorities in the Member State where the reaction occurred and then re-transmitted to the EudraVigilance database.

During this re-transmission process, information on the case should not in principle be omitted or changed if no new information on the case is available to the re-transmitting sender. Exceptions apply to the following ICH-E2B data elements or sections:

Exceptions apply to the following data elements or sections:

- 'Sender's (case) safety report unique identifier' (ICH E2B(R2) A.1.0.1);
- 'Date of this transmission' (ICH E2B(R2) A.1.3);
- 'Date report was first received from source' (ICH E2B(R2) A.1.6), for initial reports;
- 'Date of receipt of the most recent information for this report' (ICH E2B(R2) A.1.7);
- 'Information on sender and receiver of case safety report' (ICH E2B(R2) A.3);
- 'Relatedness of drug to reaction(s)/event(s)' (ICH E2B(R2) B.4.k.18);
- 'Sender's diagnosis/syndrome and/or reclassification of reaction/event' (ICH E2B(R2) B.5.3);
- 'Sender's comments' (ICH E2B(R2) B.5.4).

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<ul style="list-style-type: none"> • <u>Data element A.1.0.1 'Sender's (case) safety report unique identifier'.‡</u> • <u>Data element A.1.3 'Date of this transmission'.‡</u> • <u>Data element A.1.6 'Date report was first received from source', for initial reports.‡</u> • <u>Data element A.1.7 'Date of receipt of the most recent information for this report'.‡</u>

Reference	E2B(R2)/(R3) requirements
	<ul style="list-style-type: none"> • Data elementSection A.3 'Information on sender and receiver of case safety report'.[‡] • Data elementSection B.4.k.18 'Relatedness of drug to reaction(s)/event(s)'.[‡] • Data element B.5.3 'Sender's diagnosis/syndrome and/or reclassification of reaction/event'.[‡] • Data element B.5.4 'Sender's comments'.
ICH-E2B(R3) guideline	<ul style="list-style-type: none"> • Data element C.1.1 'Sender's (case) Safety Report Unique Identifier'.[‡] • Data element C.1.2 'Date of creation'. • Data element C.1.4 'Date Report Was First Received from Source, for initial reports'.[‡] • Data element C.1.5 'Date of Most Recent Information for This Report'. • Section C.3 'Information on Sender of Case Safety Report'.[‡] • Data elementSection G.k.9.i.2.r 'Assessment of Relatedness of Drug to Reaction(s)/Event(s)'.[‡] • Data elementSection H.3.r 'Sender's Diagnosis (MedDRA code)'.[‡] • Data element H.4 'Sender's Comments'.[‡]

In the interest of improving data quality, in case of errors or inconsistencies in the report, the re-transmitters should go back to the originator of the report to correct the case accordingly. However, if this cannot be done within normal [reporting-submission](#) time frames, the re-transmitter can correct information that has been incorrectly structured.

In addition, any electronic data interchange partner should adhere to the ICH-E2B(R2) rules regarding the provision of follow-up information, ~~whereby the 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) should be maintained~~ in accordance with the ~~ICH-E2B(R2) guideline (see GVP Annex IV)-principles set out in VI.C.6.2.2.7.~~ Non-adherence to these administrative requirements endangers the electronic case management and leads to the potential for unnecessary duplication of reports in the receiver's database.

VI.C.6.2.6. Electronic ~~reporting-submission~~ of ICSRs through ~~company's the~~ headquarter of a marketing authorisation holders

If a ~~pharmaceutical company~~ [marketing authorisation holder](#) decides to centralise the electronic [reporting-submission](#) of ICSRs (e.g. by [reporting-submitting](#) through the company's global or EU headquarter), the following should be taken into account:

- the central [reporting-submitting](#) arrangement should be clearly specified in the marketing authorisation holder's pharmacovigilance system master file and in the internal standard operating procedures;
- ~~the~~ the company's headquarter designated for [reporting-submitting](#) the ICSRs should be registered with EudraVigilance[‡];
- ~~the~~ The same principles may be applied for reporting ICSRs from the competent authorities in Member States to the ~~marketing authorisation holders during the interim arrangements period,~~

~~that is the competent authorities in Member States report electronically to the company's headquarter instead of to the local affiliates.~~

VI.C.6.3. Electronic submission of information on medicinal products

To support the objectives of Directive 2001/83/EC and Regulation (EC) No 726/2004, the provisions provided in second sub-paragraph of Article 57(2) ~~of Regulation (EC) No 726/2004 of Regulation (EC) No 726/2004~~, regarding the electronic submission and update of information on medicinal products for human use authorised or registered in the EU, shall be followed by ~~the~~ marketing authorisation holders. ~~In this aspect~~With regard to this, ~~the~~ marketing authorisation holders shall apply the internationally agreed formats and terminologies described in ~~Chapter IV of the Commission Implementing Regulation (EU) No 520/2012 of the Commission Implementing Regulation (EU) No 520/2012. Recommendations~~Guidance related to the electronic submission of information on medicines ~~are~~ provided on the Agency's website⁸⁹.

⁸⁹ [EMA website: Home/ Human regulatory/ Post-authorisation/ Data submission on medicines \(Article 57\)/ Reporting requirements for authorised medicines/ Guidance documents](#)
See EMA documents for electronic submission of information on medicines:
http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000336.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac0580410138&jsenabled=true

VI. Appendix 1 Process for identification Follow-up process of ~~biological medicinal products~~ ICSRs

VI.App.1.1 Follow-up of ICSRs by competent authorities in Member States and marketing authorisation holders

Business process map - Follow-up of ICSRs by competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See steps description in Table VI.2.

Figure VI.1.

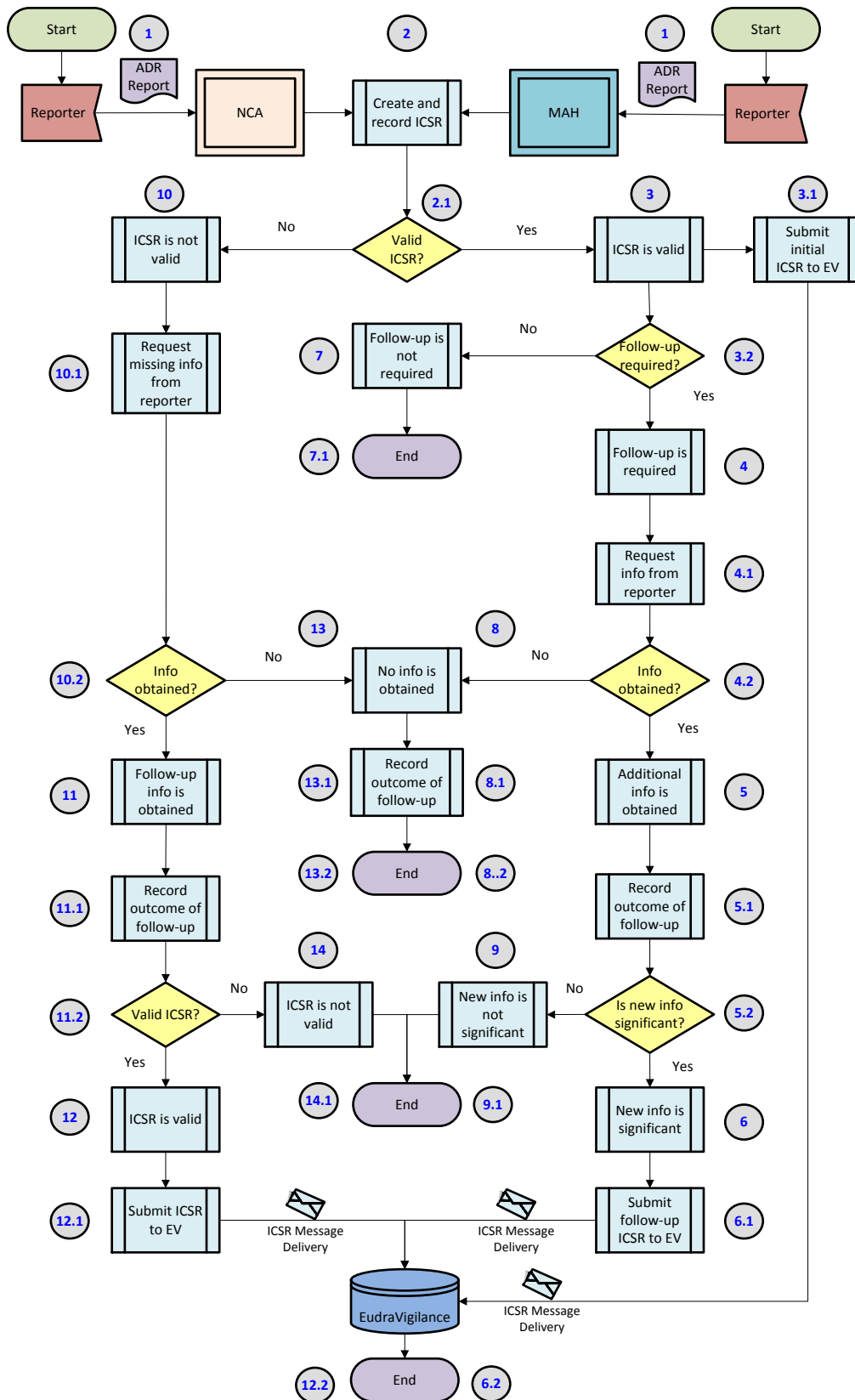


Table VI.2. Process description - Follow-up of ICSRs by competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See process map in Figure VI.2.

No	Step	Description	Responsible Organisation
1	Start.	Receipt by the NCA or the MAH of a report of a suspected adverse reaction related to a medicinal product (ADR report). Go to step 2.	NCA/MAH
1	Receive report of suspected drug adverse reaction(s) from primary source	Day 0: Receipt of the information	MAH
2	Create and record ICSR.	Create an individual case safety report (ICSR) and record it in the pharmacovigilance database. Go to step 2.1	NCA/MAH
2.1	Is the report ICSR valid?	Is the report received from the primary source reporter a valid ICSR in accordance with VI.B.2.1? If Yes, go to step 3. If No, go to step 10.	NCA/MAHMAH
3	The report received ICSR is valid.	The report received from the reporter primary source is a valid ICSR in accordance with chapter 3.1. The clock start (D0) for the submission of the valid ICSR is the date of receipt of the report (see VI.B.7. for day zero definition). Go to step 3.1. VI.B.2	NCA/MAH
3.1	Record the report	Record the valid ADR report received from the primary source in the pharmacovigilance database	MAH
3.21	Report Submit initial ICSR to EudraVigilance (EV).	Report Submit the initial valid ICSR (EEA and non-EEA serious and EEA non-serious) to EudraVigilance (EV) within the relevant time frames (15 or 90 days, as applicable) in accordance with the principles set out in chapter 3.2. Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 6.2 for the end of the process for this ICSR. Go to step 3.2 for follow-up activity.2 NOTE: NCA/MAH the MAH can organise the reporting submission of the initial report and the follow-up report in accordance with the reporting appropriate timelines frames. -set out in the pharmacovigilance legislation i.e. -If time permits and the follow-up information can be obtained and	NCA/MAHMAH

No	Step	Description	Responsible Organisation
		processed within the initial reporting submission time frames, the MAH/NCA/MAH is not required to report submit the initial and the follow-up report separately.	
3.32	Is follow-up required? for the valid ICSR?	Is follow-up with the reporter required for the valid ICSR? If Yes, go to step 4. If No, go to step 97.	NCA/MAH/MAH
4	Follow-up is required. for valid ICSR	The ICSR is valid. Follow-up is necessary to obtain significant missing information for the evaluation of the ICSR. This includes information on the patient age or age group if missing, or the mandatory information on the medicinal product batch number when it is missing and the reaction is suspected to be related to a biological medicinal product [DIR Art 102(e) and IR Art 28 (3)]. With respect to this, it is recommended to specify in the case narrative if information on the batch number has been requested, when it is missing in the initially submitted ICSR. Go to step 4.1.	NCA/MAH
4.1	Request information from reporter primary source.	Contact the reporter primary source to obtain additional information pertinent to the valid case in accordance with the principles set out in chapters and to obtain additional information pertinent to the valid case. (see follow-up guidance in VI.B.3. and VI.C.6.2.2.7.). Go to step 4.2. <u>Note: MAHs Stakeholders should define in their SOPs how many attempts to contact the reporter should be made until the to obtain follow-up information is obtained (or the follow-up attempts can be ceased).</u> are made	NCA/MAH/MAH
4.2	Is follow-up information obtained? Has new information on the case be obtained from the primary source?	Has follow-up information been obtained from the reporter on the ICSR? If Yes, go to point step 5. If No, go to point step 8.	NCA/MAH/MAH
5	Additional information has been obtained.	Additional follow-up information has been obtained from the reporter. Go to step 5.1.	NCA/MAH/MAH

No	Step	Description	Responsible Organisation
5.1	Record outcome of follow-up.	Record the outcome of the follow-up and record follow-up information obtained in the pharmacovigilance database . Go to step 5.2.	NCA/MAHMAH
5.2	Is new information significant and reportable ?	Determine if the new obtained information obtained is significant enough to be submitted in accordance with (see VI.C.6.2.2.7. Subsection a for examples of significant and non-significant information) to be submitted to EV. If Yes, go to point step 6. If No, go to point step 79.	NCA/MAHMAH
6	New information is significant and reportable	The new follow-up information is significant enough to be submitted to EV. Go to step 6.1.	NCA/MAH
6.1	Report Submit follow-up ICSR to EudraVigilance-EV.	Submit the follow-up ICSR (EEA and non-EEA serious and EEA non-serious) with the new information to EV within the relevant time frames (15 or 90 days, as applicable). Non-serious non-EEA ICSRs should not be submitted to EV. Report the ICSR with the follow-up information to EudraVigilance in accordance with VI.C.6 . Go to step 6.2.	NCA/MAHMAH
6.2	End.	The ICSR is stored in EV for signal detection and data quality analyses following recoding and duplicate detection (see VI.App.6 for ICSRs data quality monitoring in EV, and VI.App.7 for duplicate detection and management). It is also available for rerouting to the relevant NCA (See VI.App.3.4), and for access to MAHs to fulfil their pharmacovigilance activities. Go back to step 1 on the receipt of a new information for the ICSR.	NCA/MAH
7	Follow-up is not required.	ICSR is valid. Follow-up may be performed as necessary to obtain administrative information not required for the scientific evaluation of the ICSR. Go to step 7.1.	NCA/MAH
7.1	End.	End of the process for this ICSR. Go back to step 1 on the receipt of a new information for the ICSR.	NCA/MAH
7	New information is not significant and not reportable	The new information is not significant enough to be sent in accordance with VI.C.6.2.2.7.	
7.1	End		MAH
8	No information has been obtained.	The follow-up with the reporter primary source is	NCA/MAH

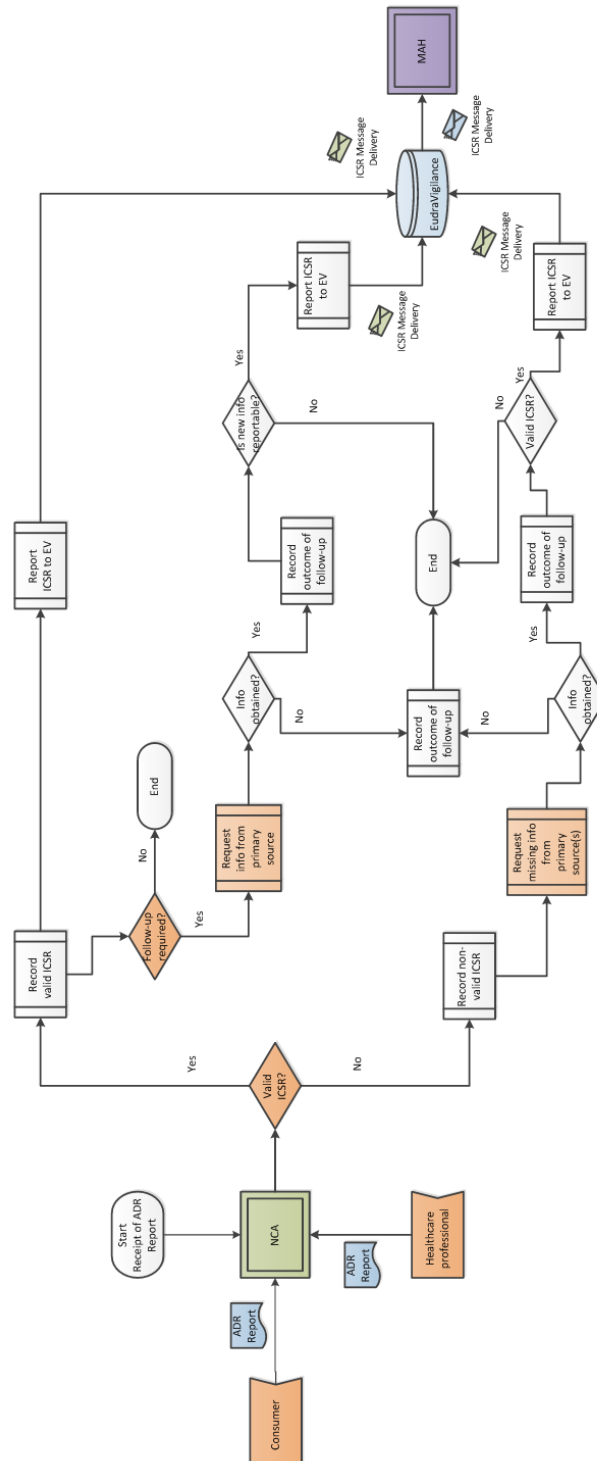
No	Step	Description	Responsible Organisation
		<u>unsuccessful and no additional information on the case ICSR can be obtained. Go to step 8.1.</u>	
8.1	<u>Record the outcome of follow-up.</u>	<u>Record the fact that no further information has been obtained from the reporter primary source. Go to step 8.2. in the pharmacovigilance database</u>	<u>NCA/MAHMAH</u>
8.2	<u>End.</u>	<u>End of the process for this ICSR. Go back to step 1 on the receipt of a new information for the ICSR.</u> <u>Note: when the suspected medicinal product is a biological product and the batch number information is not available in the initially submitted ICSR, a follow-up (or amendment) report should be submitted when no information is received on the missing batch number despite contact attempts with the reporter (see step 4). This should be specified in the narrative and with the null Flavor ASKU where applicable under ICH-E2B(R3) format.</u>	<u>NCA/MAH</u>
9	<u>Follow-up is not required for valid ICSR</u>	<u>ICSR is valid. Follow-up is not performed</u>	<u>MAH</u>
9.1	<u>End</u>		
9	<u>New information is not significant.</u>	<u>The new follow-up information is not significant enough to be submitted to EV. Go to step 9.1.</u>	<u>NCA/MAH</u>
9.1	<u>End.</u>	<u>End of the process for this ICSR. Go back to step 1 on the receipt of a new information for the ICSR.</u>	<u>NCA/MAH</u>
10	<u>ICSR is not valid. The report received from the primary source is NOT a valid ICSR</u>	<u>The report received from the reporter is NOT a valid ICSR. The report received is not a valid report in accordance with -VI.B.2.. Go to step 10.1. VI.B.2.</u>	<u>NCA/MAH</u>
10.1	<u>Record non-valid ICSR</u>	<u>Record the non-valid ICSR in pharmacovigilance database</u>	<u>MAH</u>
10.2 1	<u>Request missing info from reporter primary source</u>	<u>Request the missing information for the non-valid ICSR from the reporter primary source through follow-up in line with (see guidance in -VI.B.3. and VI.C.6.2.2.7.). Go to step 10.2. VI.B.3. and VI.C.6.2.2.7.</u>	<u>NCA/MAHMAH</u>
10.3 2	<u>Is follow-up missing information has been obtained?</u>	<u>Has follow-up missing information been obtained from the reporter for non-valid ICSR??</u> <u>If Yes, go to 11.</u> <u>If No, go to 143.</u>	<u>NCA/MAHMAH</u>
11	<u>Missing Follow-up information has been obtained. for</u>	<u>Follow-up information has been obtained for the non-valid ICSR. Go to step 11.1.</u>	<u>NCA/MAHMAH</u>

No	Step	Description	Responsible Organisation
	non-valid ICSR		
<u>11.1</u>	<u>Record the outcome of follow-up with reporter. primary source</u>	<u>Record the outcome of the follow-up of new follow-up missing information in the pharmacovigilance database. Go to step 11.2.</u>	<u>NCA/MAHMAH</u>
<u>11.2</u>	<u>Is the ICSR valid?</u>	<u>Is the report ICSR with the new follow-up information now-valid in accordance with the guidance in VI.B.2.. taking into account the follow-up information obtained from the primary source?</u> <u>If Yes, go to 12.</u> <u>If No, go to 134.</u>	<u>NCA/MAHMAH</u>
<u>12</u>	<u>ICSR is valid.</u>	<u>The ICSR is now valid taking into account the new information obtained from the reporter. The clock start (D0) for the submission of the valid ICSR is the date of receipt of the new information (see VI.B.7. for guidance on day zero).</u> <u>Go to step 12.1.</u>	<u>NCA/MAH</u>
<u>12.1</u>	<u>Report Submit ICSR to EV. EudraVigilance</u>	<u>Report the valid ICSR to EudraVigilance in line with the principles set out in VI.C.6 Submit the ICSR (EEA and non-EEA serious and EEA non-serious) with the new information to EV within the relevant time frames (15 or 90 days, as applicable).</u> <u>Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 12.2.</u>	<u>NCA/MAHMAH</u>
<u>12.2</u>	<u>End.</u>	<u>The ICSR is stored in EV for signal detection and data quality analyses following recoding and duplicate detection (see VI.App.6 for ICSRs data quality monitoring in EV, and VI.App.7 for duplicate detection and management). It is also available for rerouting to the relevant NCA (See VI.App.3.4), and for access to MAHs to fulfil their pharmacovigilance activities. Go back to step 1 on the receipt of a new information for the ICSR.</u>	<u>NCA/MAH</u>
<u>13</u>	<u>No information is obtained for non-valid ICSR.</u>	<u>No further information is obtained from the reporter for the non-valid ICSR. Go to step 13.1</u>	<u>NCA/MAH</u>
<u>13.1</u>	<u>Record outcome of the follow-up.</u>	<u>Record the fact that no further information has been obtained from the reporter for the non-valid ICSR. Go to step 13.2.</u>	<u>NCA/MAH</u>
<u>13.2</u>	<u>End.</u>	<u>End of the process for this non-valid ICSR. It should be considered as applicable in the safety evaluation</u>	<u>NCA/MAH</u>

No	Step	Description	Responsible Organisation
		<u>activities. Go back to step 1 on the receipt of a new information.</u>	
<u>134</u>	<u>ICSR is not valid.</u>	<u>The ICSR remains non-valid despite the new follow-up information received from the reporter. Go to step 14.1.</u>	<u>NCA/MAHMAH</u>
<u>134.1</u>	<u>End.</u>	<u>End of the process for this non-valid ICSR. It should be considered as applicable in the safety evaluation activities. Go back to step 1 on the receipt of a new information.</u>	<u>NCA/MAH</u>
<u>14</u>	<u>Missing information has not been obtained for non-valid ICSR</u>	<u>No further information is obtained from the primary source in the pharmacovigilance database</u>	
<u>14.1</u>	<u>Record the outcome of the follow up</u>	<u>Record the fact that no further information has been obtained from the primary source in the pharmacovigilance database</u>	<u>MAH</u>
<u>14.2</u>	<u>End</u>		

VI.App.1.2 Follow-up of ICSRs by competent authorities in Member States involving consumers or healthcare professionals

Business process map Follow-up of ICSRs by competent authorities in Member States involving consumers or healthcare professionals



Process description— Follow up of ICSRs by competent authorities in Member States involving consumers or healthcare professionals

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
	<u>Start</u>	<u>Receipt of a report of a suspected adverse reaction related to a medicine (ADR report)</u>	
<u>1</u>	<u>Receive report of suspected drug adverse reaction(s) from primary source</u>	<u>Day 0.</u> <u>Receipt of the information</u>	<u>NCA</u>
<u>2</u>	<u>Is the report valid?</u>	<u>Is the report received from the primary source a valid ICSR in accordance with chapter VI.B.2?</u> <u>If Yes, go to step 3.</u> <u>If No, go to step 10.</u>	<u>NCA</u>
<u>3</u>	<u>The report received is valid</u>	<u>The report received from the primary source is a valid ICSR in accordance with chapter VI.B.2</u>	
<u>3.1</u>	<u>Record the report</u>	<u>Record the valid ADR report received from the primary source in the pharmacovigilance database</u>	<u>NCA</u>
<u>3.2</u>	<u>Report ICSR to EudraVigilance (EV)</u>	<u>Report the valid ICSR to EudraVigilance in accordance with the principles set out in VI.C.6.2.</u> <u>NOTE: the NCA can organise the reporting of the initial report and the follow up report in accordance with the reporting timelines set out in the pharmacovigilance legislation i.e. if time permits and follow up information can be obtained and processed within the initial reporting timeframes, the MAH is not required to report the initial and the follow up report separately</u>	<u>NCA</u>
<u>3.3</u>	<u>Is follow up required for the valid ICSR?</u>	<u>If Yes, go to step 4</u> <u>If No, go to step 9</u>	<u>NCA</u>
<u>4</u>	<u>Follow up required for valid ICSR</u>		

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
<u>4.1</u>	<u>Request information from primary source</u>	<u>Contact the primary source to obtain additional information pertinent to the valid case in accordance with the principles set out in VI.B.3. and VI.C.6.2.2.7.</u> <u>Note: NCAs should define in their SOPs how many attempts to obtain follow up information are made</u>	<u>NCA</u>
<u>4.2</u>	<u>Has new information on the case be obtained from the primary source?</u>	<u>If Yes, go to point 5.</u> <u>If No, go to point 8.</u>	<u>NCA</u>
<u>5</u>	<u>Additional information has been obtained</u>		<u>NCA</u>
<u>5.1</u>	<u>Record outcome of follow-up</u>	<u>Record the outcome of the follow-up and record information obtained in the pharmacovigilance database</u>	<u>NCA</u>
<u>5.2</u>	<u>Is new information significant and reportable?</u>	<u>Determine if information obtained is significant enough to be reportable in accordance with VI.C.6.2.2.7.</u> <u>If Yes, go to point 6.</u> <u>If No, go to point 7.</u>	<u>NCA</u>
<u>6</u>	<u>New information is significant and reportable</u>		<u>NCA</u>
<u>6.1</u>	<u>Report ICSR to EudraVigilance</u>	<u>Report the ICSR with the follow-up information to EudraVigilance in accordance with VI.C.6.</u>	<u>NCA</u>
<u>7</u>	<u>New information is not significant and not reportable</u>	<u>The new information is not reportable in accordance with VI.B.3. and VI.C.6.2.2.7.</u>	
<u>7.1</u>	<u>End</u>		<u>NCA</u>
<u>8</u>	<u>No information has been obtained</u>	<u>The follow-up with the primary source is unsuccessful and no additional information on the case can be obtained</u>	
<u>8.1</u>	<u>Record the outcome of follow-up</u>	<u>Record the fact that no further information has been obtained from the primary source in the pharmacovigilance database</u>	<u>NCA</u>

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
<u>8.2</u>	<u>End</u>		
<u>9</u>	<u>Follow up is not required for valid ICSR</u>	<u>ICSR is valid. Follow up is not performed</u>	<u>NCA</u>
<u>9.1</u>	<u>End</u>		
<u>10</u>	<u>The report received from the primary source is NOT a valid ICSR</u>	<u>The report received is not a valid report in accordance with VI.B.2.</u>	
<u>10.1</u>	<u>Record non valid ICSR</u>	<u>Record the non valid ICSR in pharmacovigilance database</u>	<u>NCA</u>
<u>10.2</u>	<u>Request missing info from primary source</u>	<u>Request missing information for non valid ICSR from the primary source through follow-up in line with VI.B.3. and VI.C.6.2.2.7.</u>	<u>NCA</u>
<u>10.3</u>	<u>Missing info has been obtained?</u>	<u>Has missing information been obtained for non valid ICSR?</u> <u>If Yes, go to 11.</u> <u>If No, go to 14.</u>	<u>NCA</u>
<u>11</u>	<u>Missing information has been obtained for non valid ICSR</u>		<u>NCA</u>
<u>11.1</u>	<u>Record the outcome of follow up with primary source</u>	<u>Record the outcome of the follow up of missing information in the pharmacovigilance database</u>	<u>NCA</u>
<u>11.2</u>	<u>Is the ICSR valid?</u>	<u>Is the report now valid taking into account the follow up information obtained from the primary source?</u> <u>If Yes, go to 12.</u> <u>If No, go to 13.</u>	<u>NCA</u>
<u>12</u>	<u>ICSR is valid</u>		<u>NCA</u>
<u>12.1</u>	<u>Report ICSR to EudraVigilance</u>	<u>Report the valid ICSR to EudraVigilance in line with the principles set out in VI.C.6</u>	<u>NCA</u>
<u>13</u>	<u>ICSR is not valid</u>		<u>MAH</u>

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
13.1	End		NCA
14	Missing information has not been obtained for non-valid ICSR	No further information is obtained from the primary source in the pharmacovigilance database	NCA
14.1	Record the outcome of the follow-up	Record the fact that no further information has been obtained from the primary source in the pharmacovigilance database	NCA
14.2	End		NCA

VI.App.1.32 Follow-up of ICSRs by competent authorities in Member States with involvement of marketing authorisation holders

Figure VI.2. Business process map - Follow-up of ICSRs by competent authorities in Member States (NCAs) with involvement of marketing authorisation holders (MAHs). See steps description in Table VI.3.

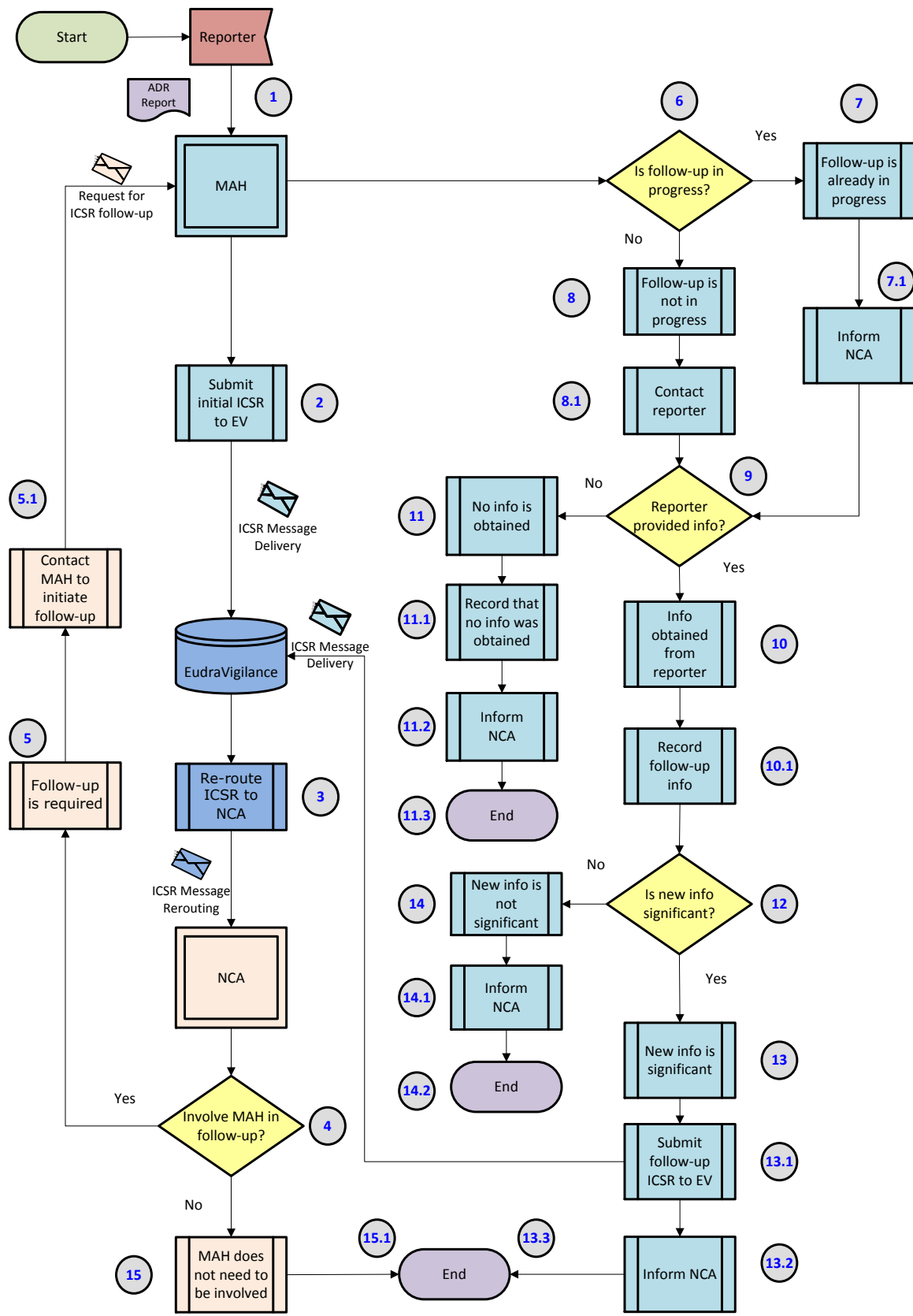


Table VI.3. Process description - Follow-up of ICSRs by competent authorities in Member States (NCAs) with involvement of marketing authorisation holders (MAHs). See process map in Figure VI.3.

No	Step	Description	Responsible Organisation
1	Start.	<u>Receipt by the MAH of a valid report of suspected adverse reaction related to a medicinal product (ADR report). The clock (D0) for the submission of the valid ICSR starts</u> (see VI.B.7. for day zero definition). Go to step 2. <u>Receipt of a report of a suspected adverse reaction related to a medicine (ISCR)</u>	MAH
1	Receive report of suspected drug adverse reaction(s) from primary source	Day 0: Receipt of the information	MAH
2	<u>Submit ICSR to EV. Report ICSR to EudraVigilance</u>	Report Submit the valid ICSR (EEA and non-EEA serious and EEA non-serious) to EudraVigilance (EV) within the relevant time frames (15 or 90 days, as applicable). Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 3. in line with the principles set out in	MAH
3	<u>Re-route ICSR to NCA.</u>	Following technical validation and process, the MAH EEA ICSR submitted by the MAH is rerouted from EV EudraVigilance to the relevant NCA of the country of the primary source for regulatory purposes. Go to step 4.	Agency EMA
4	<u>Involve MAH in follow-up? Is follow-up required with involvement of MAH?</u>	Is follow-up required for the ICSR with involvement of the MAH? If Yes, go to point step 5. If No, go to point step 125.	NCA
5	<u>Follow-up is required.</u>	Member States on whose territory the suspected adverse reaction occurred may involve the marketing authorisation holder in the follow-up of the reports [DIR Art 107a(2)] (see VI.C.2.1. for Member States responsibilities on ICSRs collection). The criteria for involving the MAH include: - <u>Need for important additional information for the ICSR evaluation or reconciliation,</u> - <u>Need for clarifications regarding inconsistent data,</u> - <u>Need to obtain further information in the context of the validation of a signal, the evaluation of a safety issue, the assessment of a periodic safety update report, or the confirmation of a safety</u>	NCA

No	Step	Description	Responsible Organisation
		<p>concern in a risk management plan.</p> <p><u>Go to step 5.1.</u></p>	
<u>5.1</u>	<u>Contact MAH to request initiate follow-up information.</u>	<p><u>Send an email to the MAH QPPV (or the local contact person where applicable) to request for the missing follow-up information.</u></p> <p><u>Indicate identify the reference to of the concerned individual case(s) ICSR(s) by using the World Wide Unique Case Identifier(s) for cases that require follow-up.</u></p> <p><u>Indicate the criterion/criteria for the request to involve the MAH in the ICSR(s) follow-up.</u></p> <p><u>Indicate the timeframe by when follow-up information should be is to be provided.</u></p> <p><u>Go to step 6.</u></p>	<u>NCA</u>
<u>5-26</u>	<u>Is follow-up already in progress?</u>	<p><u>Has follow-up of the reporter already been initiated by the MAH?</u></p> <p><u>If Yes, progress go to point step 67.</u></p> <p><u>If No progress go to point step 78.</u></p>	<u>MAH</u>
<u>67</u>	<u>Follow-up is already in progress.</u>	<p><u>Follow-up has already been initiated by the MAH to request additional information from the reporter. Go to step 7.1.</u></p>	<u>MAH</u>
<u>67.1</u>	<u>Inform NCA. that follow-up is in progress</u>	<p><u>Inform the NCA via e-mail that follow-up is already already in progress. Indicate using functional mailbox MAH.followup@cma.europa.eu if the follow-up information cannot be provided within the requested time frame and clarify the time by when the follow-up can be expected.</u></p> <p><u>Provide the reference to the individual case(s) using the World Wide Unique Case Identifier in the communication. Go to step 9.</u></p> <p><u>Indicate timeline by when follow-up info has been requested</u></p>	<u>MAH</u>
<u>6-2</u>	<u>End</u>		
<u>78</u>	<u>Follow-up has not been initiated is not in progress.</u>	<p><u>Follow-up has not yet been initiated by the MAH with the reporter. Go to step 8.1.</u></p>	<u>MAH</u>
<u>78.1</u>	<u>Contact reporter primary</u>	<p><u>Contact- the reporter primary source as soon as possible to obtain follow-up information as per</u></p>	<u>MAH</u>

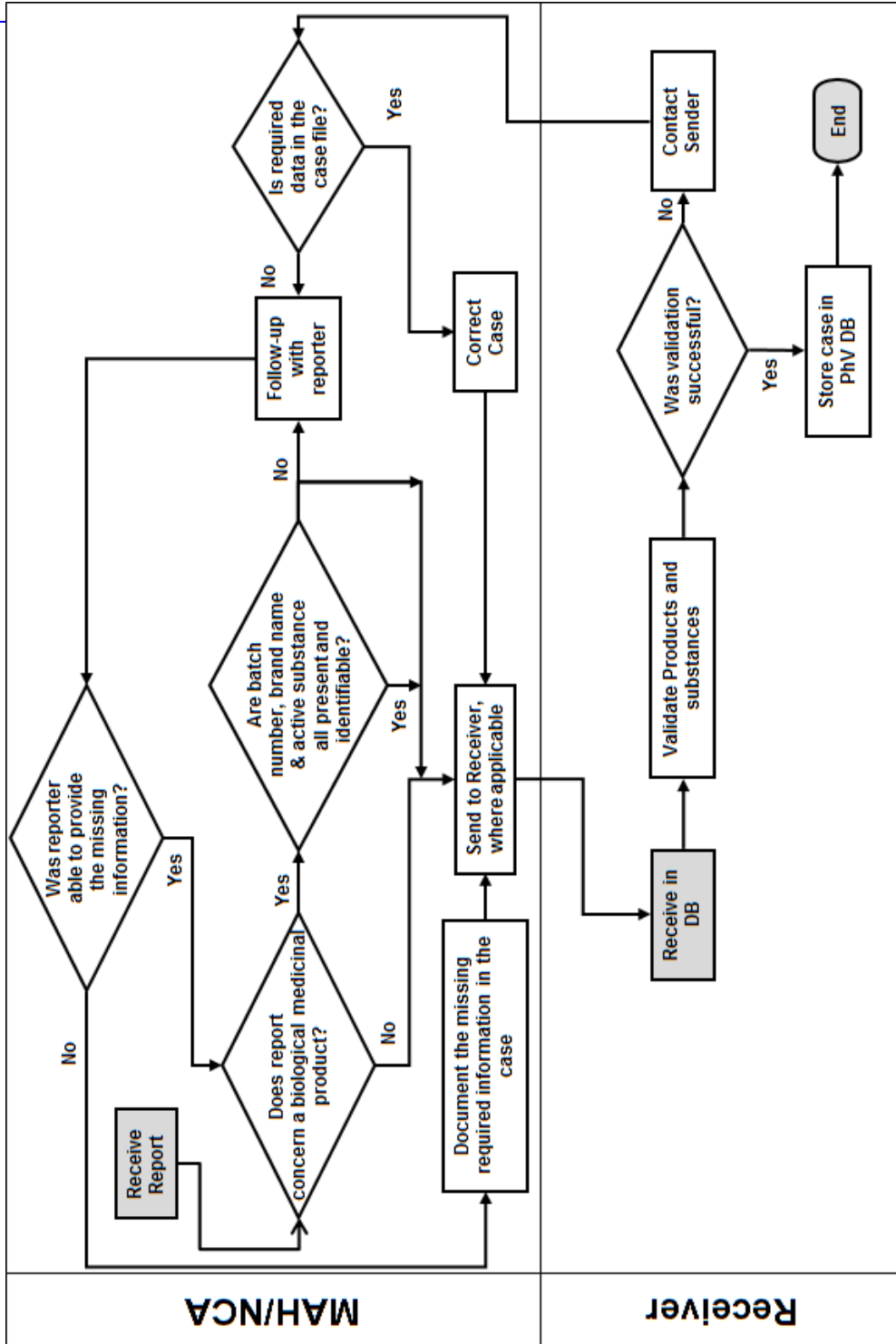
No	Step	Description	Responsible Organisation
	<u>source</u>	<u>request of the NCA's request. Go to step 9.</u> <u>Note: When contacting the primary source(s), MAH is allowed to indicate that the follow-up is performed upon request of a NCA.</u>	
<u>7-29</u>	<u>Did Reporter primary source provide information requested info?</u>	<u>Was the requested information provided by the reporter?</u> <u>If Yes, proceed to point step 910.</u> <u>If No, proceed to point step 811.</u>	<u>MAH</u>
<u>8</u>	<u>Primary source did not provide follow-up information</u>		<u>MAH</u>
<u>8-1</u>	<u>Record that no follow-up info was obtained</u>	<u>Record that primary source did not provide follow-up information</u>	<u>MAH</u>
<u>8-2</u>	<u>Inform NCA</u>	<u>Inform NCA via e-mail that it was not possible to obtain follow-up information from primary source using functional mailbox</u> <u>MAH.followup@ema.europa.eu</u> <u>Provide reference to individual cases using World Wide Unique Case Identifier</u>	<u>MAH</u>
<u>8-3</u>	<u>End</u>		
<u>910</u>	<u>Information obtained from reporter. Primary source did provide follow-up information</u>	<u>The requested information was obtained from the reporter. Go to step 10.1.</u>	<u>MAH</u>
<u>910.1</u>	<u>Record follow-up information.</u>	<u>Record the follow-up information in pharmacovigilance database. Go to step 12.</u>	<u>MAH</u>
<u>11</u>	<u>No information is obtained.</u>	<u>The reporter did not provide follow-up information. Go to step 11.1.</u>	<u>MAH</u>
<u>11.1</u>	<u>Record that no follow-up information was obtained.</u>	<u>Record that the reporter did not provide follow-up information. Go to step 11.2.</u>	<u>MAH</u>
<u>11.2</u>	<u>Inform NCA.</u>	<u>Inform the NCA that it was not possible to obtain</u>	<u>MAH</u>

No	Step	Description	Responsible Organisation
		<p>follow-up information from the reporter.</p> <p>Provide the reference to the individual case using the World Wide Unique Case Identifier in the communication. Go to step 11.3.</p>	
11.3	End.	End of this follow-up process.	NCA/MAH
9-21 2	Is new information significant and reportable?	<p>Determine if the new obtained follow-up information is significant enough (see VI.C.6.2.2.7. Subsection a for examples of significant and non-significant information) to be submitted to EV.</p> <p>Determine if follow-up information is significant enough to be reportable in accordance with principles set out in</p> <p>If Yes, proceed to pointstep 130.</p> <p>If No, proceed to pointstep 114.</p>	MAH
103	Follow-up New information is significant and reportable	The new follow-up information is significant enough to be submitted to EV. Go to step 13.1.	MAH
103. 1	Send submit follow-up ICSR to EudraVigilanceEV.	<p>Send Submit the follow-up ICSR to EV within the relevant time frames (15 or 90 days, as applicable). Following technical validation and process, the follow-up ICSR is rerouted from EV to the relevant NCA.</p> <p>Go to step 13.2. to EudraVigilance in accordance with principles set out in</p>	MAH
103. 2	Inform NCA. that follow-up info was received	<p>Inform the NCA via e-mail that significant follow-up information from primary source was received from the reporter and submitted to EV. using functional mailbox MAH.followup@ema.europa.eu</p> <p>Indicate reference to individual cases Provide the reference to the individual case using the World Wide Unique Case Identifier in the communication. Go to step 13.3. using World Wide Unique Case Identifier</p>	MAH
10.3	End		
13.3	End.	End of this follow-up process. The follow-up ICSR is now stored in the NCA database. It is available for signal detection and data quality analyses.	NCA/MAH
114	New information is not significant.	The new follow-up information is not significant enough to be submitted to EV. Go to step 14.1.	MAH

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
	<u>Follow-up information is not significant and not reportable</u>		
<u>114.1</u>	<u>Inform NCA.</u>	<p><u>Inform the NCA that the new follow-up information received from the reporter is not significant and does not require submission to EV.</u></p> <p><u>Provide the reference to the individual case using the World Wide Unique Case Identifier in the communication. Go to step 14.2. Inform NCA that no significant new information has been obtained in accordance with</u></p>	<u>MAH</u>
<u>114.2</u>	<u>End.</u>	<u>End of this follow-up process.</u>	<u>NCA/MAH</u>
<u>125</u>	<u>MAH does NOT need to be involved. in follow-up</u>	<u>There is no need to involve the MAH in the ICSR the follow-up process.</u>	<u>NCA</u>
<u>125.1</u>	<u>End.</u>	<u>The ICSR is now stored in the NCA database. It is available for signal detection and data quality analyses.</u>	<u>NCA</u>

VI.App.1.4 Follow-up of ICSRs for identification of biological medicinal products

Business process map – Identification of biological medicinal products⁹⁰



⁹⁰ Mandatory when they are the subject of reports of suspected adverse reactions [DIR Art 102(e) and IR Art 28 (3)].

~~Process description – Identification of biological medicinal products~~

No.	Step	Description	Responsible Organisation
1	Start. Receive report.	Day 0. Receipt of the information for the case that indicates that one of the suspect drugs is of biological origin.	MAH/NCA
2	Does report concern a biological medicinal product?	If Yes, go to step 3 If No, go to step 4	
3	Are batch number, brand name & active substance all present and identifiable?	If Yes, create the case and send it to the correct receiver (step 34). If there is more than one batch number, structure the batch number that coincided with the adverse reaction in the Drug section (ICH-E2B(R2) B.4) and enter the other batch numbers in the case narrative. —— ICH-E2B(R2) in the Drug section B.4, data element B.4.k.3 "Batch/lot number" and enter the other batch numbers in the case narrative. —— ICH-E2B(R3) in the Drug section G.k, and repeat the data element G.k.4.r.7 "Batch/Lot Number" as necessary. If No, create the case and send it to the correct receiver (step 34) and follow up with the reporter (step 3.1).	MAH/NCA
3.1	Follow up with reporter.	Follow up with the reporter to attempt to identify the missing information.	MAH/NCA

No.	Step	Description	Responsible Organisation
3.2	Was reporter able to provide the missing information?	If Yes, return to step 1—the information should be treated as follow-up and a new version created & transmitted. If No, document this (step 3.3).	MAH/NCA
3.3	Document the required missing information in the case.	Document in the case that the missing required information has been sought but the reporter was not able or willing to provide it.	MAH/NCA
4	Send to receiver, where applicable.	If the case requires transmission to a receiver, transmit the case electronically, in ICH-E2B(R2) format within the relevant timelines (15 or 90 days), to the relevant receiver.	MAH/NCA
5	Receive in PharmacoVigilance DataBase (PhV-DB).	Receive the case electronically and load it into the PharmacoVigilance DataBase.	Receiver
6	Validate products and substances	Validate the products and substances to ensure that the brand name, active substance & batch number are all present and identifiable. This validation should be complementary to the usual business rules validations.	Receiver
7	Was validation successful?	If Yes, store the case in the PharmacoVigilance DataBase (step 8). If No, contact the sender (Step 7.1).	Receiver

No.	Step	Description	Responsible Organisation
7.1	Contact sender.	Contact the sender regarding the missing or not identifiable information.	Receiver
7.2	Is required data in the case file?	Upon receipt of communication from the receiver, check in the case file to see if the missing or unidentifiable information is already on file. If it is on file, correct the case (step 7.3). If the information is not on file, contact the reporter to request the missing information (step 3.1).	MAH/NCA
7.3	Correct case.	Correct the case to include the missing information & send updated version to receiver (step 4).	MAH/NCA
8	Store case in Pharmacovigilance DataBase (PhV DB).	The case should now be stored in the pharmacovigilance database.	Receiver
9	End.	The case is now available for signal detection and data quality analyses.	

|

VI. Appendix 2 Detailed guidance on the monitoring of ~~scientific~~the medical literature

VI.App2App.2.1- When to start and stop searching in the ~~scientific~~medical literature

EU specific requirements, as regards the monitoring of ~~the scientific and medical literature~~medical literature are provided in [VI.C.2.2.3](#).

In addition to the [reporting-submission](#) of serious and non-serious ICSRs or their presentation in periodic safety update reports, the marketing authorisation holder has an obligation to review the worldwide experience with medicinal product in the period between the submission of the marketing authorisation application and the granting of the marketing authorisation. The worldwide experience includes published ~~scientific and medical literature~~medical literature. For the period between submission and granting of a marketing authorisation, literature searching should be conducted to identify published articles that provide information that could impact on the risk-benefit assessment of the product under evaluation. For the purpose of the preparation of periodic safety update reports (see [GVP Module VII](#)) and the notification of emerging safety issues (see [VI.C.2.2.6](#) and [GVP Module IX for guidance on emerging safety issue](#)), the requirement for literature searching is not dependent on a product being marketed. Literature searches should be conducted for all products with a marketing authorisation, irrespective of commercial status. It would therefore be expected that literature searching would start on submission of a marketing authorisation application and continue while the authorisation is active.

VI.App2App.2.2 Where to look

Articles relevant to the safety of medicinal products are usually published in well-recognised scientific and medical journals; however, new and important information may be first presented at international symposia or in local journals. Although the most well-known databases (e.g. Medline) cover the majority of scientific and medical journals, the most relevant publications may be collated elsewhere in very specialised medical fields for certain types of product (e.g. herbal medicinal products), or where safety concerns are subject to non-clinical research. The marketing authorisation holder should establish the most relevant source of published literature for each product.

Medline, Embase and Excerpta Medica are often used for the purpose of identifying ICSRs. These databases have broad medical subject coverage. Other recognised appropriate systems may be used. The database providers can advise on the sources of records, the currency of the data, and the nature of database inclusions. It is best practice to have selected one or more databases appropriate to a specific product. For example, in risk-benefit assessment, safety issues arising during non-clinical safety studies may necessitate regular review of a database that has a less clinical focus and includes more laboratory-based publications.

Relevant published abstracts from meetings and draft manuscripts should be reviewed for [valid reportable](#)-ICSRs and for inclusion in periodic safety update reports. Although it is not a requirement for marketing authorisation holders to attend all such meetings, if there are company personnel at such a meeting, or it is sponsored by a marketing authorisation holder, it is expected that articles of relevance would be available to the marketing authorisation holder's pharmacovigilance system. In addition, literature that is produced or sponsored by a marketing authorisation holder should be reviewed, so that any [valid reportable](#)-ICSRs can be [reported/submitted](#) as required in advance of publication. If ICSRs are brought to the attention of a marketing authorisation holder from this source, they should be processed in the same way as ICSRs found on searching a database or reviewing a

journal. Abstracts from major scientific meetings are indexed and available in some databases, but posters and communications are rarely available from this source.

~~VI.App2.3.Guidance in VI.C.2.2.3. should be followed for the searches of databases with broad medical coverage by the Agency in accordance with Article 27 of Regulation (EC) No 726/2004 of Regulation (EC) 726/2004 and the ICSRs submission reporting obligations of marketing authorisation holders in accordance with Article 107-(3) of Directive 2001/83/EC of Directive 2001/83/EC.~~

VI.App.2.3 Database Searches

A search is more than a collection of terms used to interrogate a database. Decisions about the database selection, approach to records retrieval, term or text selection and the application of limits need to be relevant to the purpose of the search. For searches in pharmacovigilance, some of the considerations for database searching are described below.

VI.App2.3.1- Precision and recall

Medical and scientific databases are a collection of records relating to a set of publications. For any given record, each database has a structure that facilitates the organisation of records and searching by various means, from simple text to complex indexing terms with associated subheadings. Search terms (text or indexed) can be linked using Boolean operators and proximity codes to combine concepts, increasing or decreasing the specificity of a search. In addition, limits to the output can be set. When searching, the application of search terms means that the output is less than the entire database of the records held. The success of a search can be measured according to precision and recall (also called sensitivity). Recall is the proportion of records retrieved ("hits") when considering the total number of relevant records that are present in the database. Precision is the proportion of "hits" that are relevant when considering the number of records that were retrieved. In general, the higher recall searches would result in low precision.

VI.App2.3.2- Search construction

Databases vary in structure, lag time in indexing and indexing policy for new terms. While some database providers give information about the history of a particular indexing term or the application of synonyms, other databases are less sophisticated. In addition, author abstracts are not always consistent in the choice of words relating to pharmacovigilance concepts or medicinal products/active substances names.

When constructing a search for pharmacovigilance, the highest recall for a search would be to enter the medicinal product name and active substance name (in all their variants) only. In practice, additional indexing terms and text are added to increase precision and to reduce the search result to return records that are of relevance to pharmacovigilance. There is a balance to be achieved. It is therefore expected that complicated searches are accompanied by initial testing to check that relevant records are not omitted, however, there is no defined acceptable loss of recall when searching for pharmacovigilance purposes. Term selection should be relevant to the database used and the subject of the search.

VI.App2.3.3- Selection of product terms

Searches should be performed to find records for active substances and not for brand names only. This can also include excipients or adjuvants that may have a pharmacological effect. When choosing search terms for medicinal products, there are a number of considerations.

- Is the active substance an indexed term?
- What spellings might be used by authors (particularly if the active substance is not indexed)?
- What alternative names might apply (numbers or codes used for products newly developed, chemical names, brand names, active metabolites)?
- Is it medically relevant to search only for a particular salt or specific compound for an active substance?

During searches for ICSRs, it may be possible to construct a search that excludes records for pharmaceutical forms or routes of administration different to that of the subject product, however, restrictions should allow for the inclusion of articles where this is not specified. Search construction should also allow for the retrieval of overdose, medication error, abuse, misuse, off-label use or occupational exposure information, which could be poorly indexed. Searches should also not routinely exclude records of unbranded products or records for other company brands.

VI.App2App.2.3.4- Selection of search terms

As described previously, there is no acceptable loss of recall when searching published literature for pharmacovigilance. The use of search terms (free text or use of indexing) to construct more precise searches may assist in managing the output. Deficiencies that have been found frequently during Competent Authority inspections include:

- the omission of outcome terms, for example "death" as an outcome may be the only indexed term in a case of sudden death;
- the omission of pregnancy terms to find adverse outcomes in pregnancy for [submission as ICSR reporting](#);
- the omission of terms to include special types of reports which needs to be addressed as well in periodic safety update reports, for example,
 - Reports of asymptomatic overdose, medication error, misuse, abuse, occupational exposure;
 - Reports of uneventful pregnancy.

VI.App2App.2.3.5- Limits to a search

Some databases apply indexing that allows the application of limits to a search, for example by subject age, sex, publication type. The limits applied to a search are not always shown in the "search strategy" or search string.

If limits are applied, they should be relevant to the purpose of the search. When searching a worldwide [scientific and medical literature](#) database, titles and abstracts are usually in English language. The use of limits that reduce the search result to only those published in the English language is generally not acceptable. Limits applied to patient types, or other aspects of an article, for example human, would need to be justified in the context of the purpose of a search.

Limits can be applied to produce results for date ranges, for example, weekly searches can be obtained by specifying the start and end date for the records to be retrieved. Care should be taken to ensure that the search is inclusive for an entire time period, for example, records that may have been added later in the day for the day of the search should be covered in the next search period. The search should also retrieve all records added in that period, and not just those initially entered or published

during the specified period (so that records that have been updated or retrospectively added are retrieved). This should be checked with the database provider if it is not clear.

Although one of the purposes of searching is to identify [valid ICSRs which qualify for reporting submission](#), the use of publication type limits is not robust. ICSRs may be presented within review or study publications, and such records may not be indexed as "case-reports", resulting in their omission for preparation of periodic safety update reports from search results limited by publication type.

VI.App2App.2.4: Record keeping

Records of literature searches should be maintained in accordance with the requirements described in Article 12 [of the Commission Implementing Regulation \(EU\) No 520/2012](#). Marketing authorisation holders should demonstrate due diligence in searching published [scientific and medical literature/medical literature](#). It is always good practice to retain a record of the search construction, the database used and the date the search was run. In addition, it may be useful to retain results of the search for an appropriate period of time, particularly in the event of zero results. If decision making is documented on the results, it is particularly important to retain this information.

VI.App2App.2.5: Outputs

Databases can show search results in different ways, for example, titles only or title and abstract with or without indexing terms. Some publications are of obvious relevance at first glance, whereas others may be more difficult to identify. Consistent with the requirement to provide the full citation for an article and to identify relevant publications, the title, citation and abstract (if available) should always be retrieved and reviewed.

VI.App2App.2.6: Review and selection of articles

It is recognised that literature search results are a surrogate for the actual article. Therefore, it is expected that the person reviewing the results of a search is trained to identify the articles of relevance. This may be an information professional trained in pharmacovigilance or a pharmacovigilance professional with knowledge of the database used. Recorded confirmation that the search results have been reviewed will assist in demonstrating that there is a systematic approach to collecting information about suspected adverse reactions from literature sources. It is recommended that quality control checks are performed on a sample of literature reviews / selection of articles to check the primary reviewer is identifying the relevant articles.

A common issue in selecting relevant articles from the results of a search is that often this process is conducted for the purposes of identification of ICSRs only. Whereas the review should also be used as the basis for collating articles for the periodic safety update report production, therefore relevant studies with no ICSRs should also be identified, as well as those reports of events that do not qualify for [reporting submission as ICSR \(see VI.C.2.2.3.2. for the exclusion criteria in the submission of ICSRs published in the medical literature\)](#).

Outputs from searches may contain enough information to be a valid ICSR, in which case the article should be ordered. All articles for search results that are likely to be relevant to pharmacovigilance requirements should be obtained, as they may contain valid ICSRs or relevant safety information. The urgency with which this occurs should be proportionate to the content of the material reviewed and the resulting requirement for action as applicable for the marketing authorisation holder.

Articles can be excluded ~~from the submission of valid ICSRs reporting~~ by the marketing authorisation holder if another company's branded medicinal product is the suspected medicinal product. In the absence of a specified medicinal product source and/or invented name, ownership of the medicinal product should be assumed for articles about an active substance. Alternative reasons for the exclusion of a published article for the ~~reporting-submission~~ of ICSRs are detailed in [VI.C.2.2.3.2](#).

~~VI.App2~~App.2.7: Day zero

As described in [VI.B.7](#), day zero is the date on which an organisation becomes aware of a publication containing the minimum information for an ICSR to ~~be reportable~~[qualify for submission](#). Awareness of a publication includes any personnel of that organisation, or third parties with contractual arrangements with the organisation. It is sometimes possible to identify the date on which a record was available on a database, although with weekly literature searching, day zero for [the submission of an reportable](#) adverse reaction present in an abstract is taken to be the date on which the search was conducted. For articles that have been ordered as a result of literature search results, day zero is the date when the minimum information for an ICSR to be valid is available. Organisations should take appropriate measures to obtain articles promptly in order to confirm the validity of a case.

~~VI.App2~~App.2.8: Duplicates

Consistent with the [general](#) requirements for [the reporting-submission of cases of suspected adverse reactions](#)~~ICSRs~~, literature cases should be checked to prevent ~~reportingthe submission~~ of duplicates ~~ICSRs, and previously reported cases should be identified as such when reported~~. It is, therefore, expected that ICSRs are checked in the organisation database to identify literature articles that have already been ~~reported~~[submitted](#). [Where applicable, this should include ICSRs resulting from the Agency's Medical Literature Monitoring activities in accordance with Article 27 of Regulation \(EC\) No 726/2004 of Regulation \(EC\) 726/2004](#).

~~VI.App2~~App.2.9: Contracting out literature search services

It is possible to use the services of another party to conduct searches of the published ~~scientific and medical literature~~[medical literature](#). In this event, the responsibility for the performance of the search and subsequent ~~reporting-submission of ICSRs~~ still remains: [with the exception of the provisions set out in Article 27 of Regulation \(EC\) No 726/2004 of Regulation \(EC\) 726/2004 and Article 107\(3\) of Directive 2001/83/EC of Directive 2001/83/EC](#). The transfer of a pharmacovigilance task or function should be detailed in a contract between the organisation and the service provider. The nature of third party arrangements for literature searching can range from access to a particular database interface only (access to a technology) to full literature searching, review and ~~reporting-ICSRs submission~~ (using the professional pharmacovigilance services of another organisation). It is recognised that more than one organisation may share services of a third party to conduct searches for generic active substances. In this instance, each organisation should satisfy itself that the search and service is appropriate to their needs and obligations.

Where an organisation is dependent on a particular service provider for literature searching, it is expected that an assessment of the service(s) is undertaken to determine whether it meets the needs and obligations of the organisation. In any case, the arrangement should be clearly documented.

The clock start for the ~~reportingsubmission~~ of ICSRs begins with awareness of the minimum information by either the organisation or the contractual partner (whichever is the earliest). This also applies where a third party provides a review or a collated report from the published ~~scientific and medical literature~~[medical literature](#), in order to ensure that published literature cases are

~~reported/submitted~~ as required within the correct time frames. That is, day zero is the date the search was run if the minimum criteria are available in the abstract and not the date the information was supplied to the organisation.

VI.App2App.2.10: Electronic submission of copies of articles on suspected adverse reactions published in the *scientific-medical* literature

~~Until standards for the electronic transmission of attachments (e.g. copies of literature articles) are developed in the framework of ICH, the sender should follow the rules outlined below for the submission of a copy of the literature article as detailed in VI.C.6.2.3.2:~~

~~Mailing address and format of literature articles:~~

~~Literature articles reportable to the Agency should be provided in PDF format and sent via e-mail to the following e-mail address: EVLIT@ema.europa.eu.~~

~~In relation to copies of articles from the published scientific and medical literature, marketing authorisation holders are recommended to consider potential copyright issues specifically as regards the electronic transmission and handling of electronic copies in the frame of regulatory activities.~~

~~File name of literature articles sent in electronic format to the Agency:~~

~~The file name of a literature article sent in PDF format should match exactly the 'World Wide Unique Case Identification Number' (ICH E2B(R2) A.1.10.1 or A.1.10.2 as applicable) assigned to the individual case, which is described in the article and which is reported in the E2B(R2) ICSR format.~~

~~If there is a follow-up article to the individual case published in the literature, the file name with the World Wide Unique Case Identification Number must be maintained but should include a sequence number separated with a dash.~~

~~Examples:~~

~~Initial ICSR published in the literature: FR-ORGABC-23232321 (data element 'World Wide Unique Case Identification Number' (ICH E2B(R2) A.1.10.1));~~

~~File name of the literature article: FR-ORGABC-23232321.pdf.~~

~~Follow-up information published in the literature in a separate article:~~

~~ICSR: FR-ORGABC-23232321 (data element World Wide Unique Case Identification Number remains unchanged (ICH E2B(R2) A.1.10.1));~~

~~File name: FR-ORGABC-23232321-1.pdf.~~

~~Reporting of cases reported in the scientific and medical literature referring to more than one patient:~~

~~When the literature article refers to the description of more than one patient, the copy of the literature article should be sent only once.~~

~~The file name of a literature article sent in PDF format should match exactly the 'World Wide Unique Case Identification Number' (data element ICH E2B(R2) A.1.10.1 or A.1.10.2 as applicable) assigned to the first reportable individual case described in the article.~~

~~In addition, all ICSRs which relate to the same literature article should be cross-referenced in the data element 'Identification number of the report which is linked to this report' (ICH E2B(R2) A.1.12). The data element should be repeated as necessary to cross-refer all related cases (see Table VI.2).~~

Examples for the reporting of ICSRs In accordance with ~~Article~~ [Article 28\(3\) of the Commission Implementing Regulation \(EU\) No 520/2012](#), ~~of the Commission Implementing Regulation (EU) 520/2012 and~~ upon request of the Agency, the marketing authorisation holder that transmitted the initial report shall provide a copy of the relevant article taking into account copyright restrictions, and a full translation of that article into English.

Table VI.4. ~~In line with ICH-E2B the following applies as regards the electronic submission of a copy of an article including a full translation where applicable:~~ [Electronic transmission submission of copies of literature articles/translations on suspected adverse reactions in line with ICH-E2B](#)

Reference	E2B(R2)/(R3) requirements
ICH-E2B(R2)	<p><u>1. Mailing address and format of literature articles:</u></p> <p>Literature articles reportable to the Agency should be provided in PDF format and sent via e-mail to the following e-mail address: EVLIT@ema.europa.eu.</p> <p>In relation to copies of articles from the published scientific and medical literature medical literature, marketing authorisation holders are recommended to consider potential copyright issues specifically as regards the electronic transmission submission and handling of electronic copies in the frame of regulatory activities.</p> <p><u>2. File name of literature articles sent in electronic format to the Agency:</u></p> <p>The file name of a literature article sent in PDF format should match exactly the data element A.1.10.1 or A.1.10.2 'World-Wide Unique Case Identification Number' assigned to the individual case, which is described in the article and which is provided in the E2B(R2) ICSR format.</p> <p><u>If there is a follow-up article to the individual case published in the literature, the file name with the World-Wide Unique Case Identification Number must be maintained but should include a sequence number separated with a dash.</u></p> <p><u>Examples:</u></p> <ul style="list-style-type: none"> • <u>Initial ICSR published in the literature: FR-ORGABC-23232321 data element A.1.10.1 'World-Wide Unique Case Identification Number';</u> <ul style="list-style-type: none"> – <u>File name of the literature article: FR-ORGABC-23232321.pdf.</u> • <u>Follow-up information published in the literature in a separate article:</u> <ul style="list-style-type: none"> – <u>ICSR: FR-ORGABC-23232321 data element A.1.10.1 'World-Wide Unique Case Identification Number' remains unchanged;</u> – <u>File name: FR-ORGABC-23232321-1.pdf.</u> <p><u>3. Reporting Submission of cases described in the scientific and medical literature medical literature referring to more than one patient:</u></p> <p><u>When the literature article refers to the description of more than one patient, the copy of the literature article should be sent only once.</u></p> <p><u>The file name of a literature article sent in PDF format should match exactly data element A.1.10.1 or A.1.10.2 as applicable 'World-Wide Unique Case Identification Number' assigned to the first reportable submitted individual case</u></p>

Reference	E2B(R2)/(R3) requirements
	<p>described in the article.</p> <p>In addition, all ICSRs which relate to the same literature article should be cross referenced in data element A.1.12 'Identification number of the report which is linked to this report'. The data element should be repeated as necessary to cross refer all related cases.</p>
ICH-E2B(R3)	<ul style="list-style-type: none"> Information on how to attach documents to an ICSR is provided in section 3.5 'Document Attachments' of the ICH-E2B(R3) Implementation Guide for Electronic Transmission of Individual Case Safety Reports (ICSRs) - Data Elements and Message Specification. When a literature article is sent as an attachment, the literature citation in Vancouver style is captured in data element C.4.r.1 'Literature Reference(s)'. The Digital Object Identifier (DOI) for the article should be included where available. The example reference hereafter highlights how this should be done: "International Committee of Medical Journal Editors. Uniform requirements for manuscripts submitted to biomedical journals. N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422." The electronic version of the document (i.e. the journal article and a copy of the translation where applicable) should be attached to the ICSR in data element C.4.r.2. 'Included Documents'. If the article and/or translation are not provided at the time of ICSR reporting submission, attachments can be transubmitted separately from the ICSR transmission. When the sender transmits an attachment later, the original ICSR along with all the same medical information captured in E2B(R3) data elements is retransmitted as an 'amendment' (see VI.C.6.2.2.8. for guidance on amendment reports). If new information has been received and the data elements in E2B(R3) have been updated, then the ICSR with attachment is transmitted as a follow-up. In addition, all ICSRs which relate to the same literature article should be cross referenced in data element C.1.10.r 'Identification Number of the Report Linked to this Report (repeat as necessary)'.

VI.App.2.11 Examples for the reporting submission as ICSRs of suspected adverse reactions described in the scientific and medical literature medical literature and referring to more than one patient

~~Table VI.2.~~ **Table VI.5.** Examples for the reporting submission as ICSRs of suspected adverse reactions described in the scientific and medical literature medical literature and referring to more than one patient

Ex.	Scenario	Action
±	A literature article describes suspected adverse reactions that have been experienced by up to	For Case 1 described in the literature article: e. ICH-E2B(R2) A.1.10.1 'World-Wide Unique-Case Identification Number':

Ex.	Scenario	Action
	<p>3 single patients.</p> <p>3 ICSRs should be created and reported for each individual identifiable patient described in the literature article.</p> <p>Each ICSR should contain all the available information on the case.</p>	<p>UK-ORGABC-0001</p> <p>d.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0002</p> <p>e.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0003</p> <p>f.—ICH E2B(R2) A.2.2 'Literature reference(s): Literature reference in line with uniform requirements for manuscripts submitted to biomedical journals: N Engl J Med. 1997;336:309-15.</p> <p>g.—File name for the copy of literature article to be sent via e-mail to EVLIT@ema.europa.eu:</p> <p>UK-ORGABC-0001.pdf</p> <p>For Case 2 described in the literature article:</p> <p>h.—ICH E2B(R2) A.1.10.1 'World Wide Unique Case Identification Number':</p> <p>UK-ORGABC-0002</p> <p>i.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0001</p> <p>j.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0003</p> <p>k.—ICH E2B(R2) A.2.2 'Literature reference(s): Literature reference in line with uniform requirements for manuscripts submitted to biomedical journals: N Engl J Med. 1997;336:309-15.</p> <p>l.—No copy of the literature article required since the copy was already submitted for case 1.</p> <p>For Case 3 described in the literature article:</p> <p>m.—ICH E2B(R2) A.1.10.1 'World Wide Unique Case Identification Number':</p> <p>UK-ORGABC-0003</p> <p>n.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0001</p> <p>o.—ICH E2B(R2) A.1.12 'Identification number of the report which is linked to this report':</p> <p>UK-ORGABC-0002</p> <p>p.—ICH E2B(R2) A.2.2 'Literature reference(s): Literature reference in line with uniform requirements for manuscripts submitted to biomedical journals: N Engl J Med. 1997;336:309-15.</p> <p>q.—No copy of the literature article required since the copy was already submitted for case 1.</p>

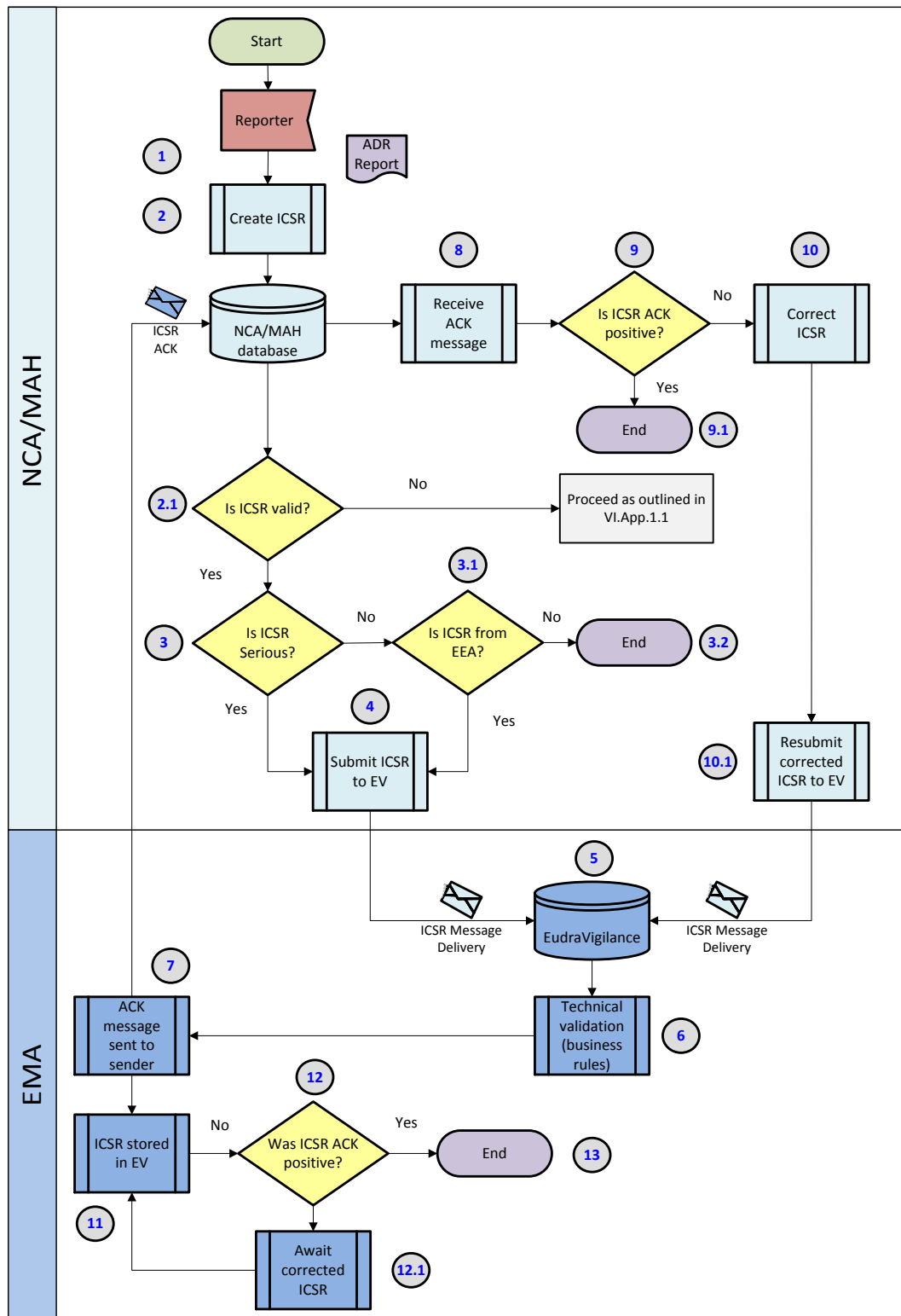
Ex.	Scenario	Action
21	<p>A literature article describes suspected adverse reactions that have been experienced by more than 3 single patients, one identifiable patient.</p> <p>ICSRs should be created and and reportedsubmitted for each individual identifiable patient described in the literature article.</p> <p>Each ICSR should contain all the available information on the case.</p> <p>The cross reference with all the linked ICSRs from this literature article should only be provided in the first casesubmitted ICSR, in the data element ICH-E2B(R2) A.1.12 'Identification number of the report which is linked to this report'. There is no need to repeat all the cross references in the other ICSRs.</p>	<p>For the ICSRs which relate to the same literature article, the cross reference in the data element ICH (E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report' ICH (E2B(R2) field A.1.12) should be conducted as follows:</p> <ul style="list-style-type: none"> • The first case should be linked to all other cases related to the same article; (1-n); • All the other cases (n) should be only linked to the first one, as in the example below. <p><i>Example for the reporting-submission of cases originally reporteddescribed in the scientific and medical literature medical literature referring to a large number of patients:</i></p> <p>For Casecase 1 described in the literature article:</p> <ul style="list-style-type: none"> • data element ICH-E2B(R2) A.1.10.1/ ICH-E2B(R3) C.1.8.1 'Worldwide Unique Case Identification Number': UK-ORGABC-0001 • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-0002 • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-0003 • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-0004 • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-000N • data element ICH-E2B(R2) A.2.2/ ICH-E2B(R3) C.4.r. 'Literature reference(s)': N Engl J Med. 1997;336:309-15. File name for the copyLiterature reference in line with uniform requirements for manuscripts submitted to biomedical journals including DOI if available: e.g. "N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422" • Copy of literature article to be sent via e-mail to EVLIT@ema.europa.eu; translation: follow steps as outlined in Table VI.4. UK-ORGABC-0001.pdf. <p>For Case 2 described in the literature article:</p>

Ex.	Scenario	Action
		<ul style="list-style-type: none"> • data element ICH-E2B(R2) A.1.10.1/ ICH-E2B(R3) C.1.8.1 'Worldwide Unique Case Identification Number': UK-ORGABC-0002 • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-0001 • data element ICH-E2B(R2) A.2.2/ ICH-E2B(R3) C.4.r. 'Literature reference(s)': N Engl J Med. 1997;336:309-15. Literature reference in line with uniform requirements for manuscripts submitted to biomedical journals including DOI if available: e.g. „N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422” • No copy of the literature article required since the copy was already submitted for case 1. <p>For Case N described in the literature article:</p> <ul style="list-style-type: none"> • data element ICH-E2B(R2) A.1.10.1/ ICH-E2B(R3) C.1.8.1 'Worldwide Unique Case Identification Number': UK-ORGABC-000N • data element ICH-E2B(R2) A.1.12/ ICH-E2B(R3) C.1.10.r 'Identification number of the report which is linked to this report': UK-ORGABC-0001 • data element ICH-E2B(R2) A.2.2/ ICH-E2B(R3) C.4.r. 'Literature reference(s)': N Engl J Med. 1997;336:309-15. Literature reference in line with uniform requirements for manuscripts submitted to biomedical journals including DOI if available: e.g. „N Engl J Med 1997; 336:309-15. doi:10.1056/NEJM199701233360422” • No copy of the literature article required since the copy was already submitted for case 1.

**VI. Appendix 3 ~~Modalities for reporting~~ Reporting m Modalities
for the submission of ICSRs in EU**

**VI.App.3.1. Modalities applicable to competent authorities in Member
States and to marketing authorisation holders**

Figure VI.1- Figure VI.3. Business process map - ICSRs submission in EU by competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See steps description in Table VI.6.



_VI.App3.1. Interim arrangements

Business process map—Suspected adverse reaction reporting in EU—Interim arrangements

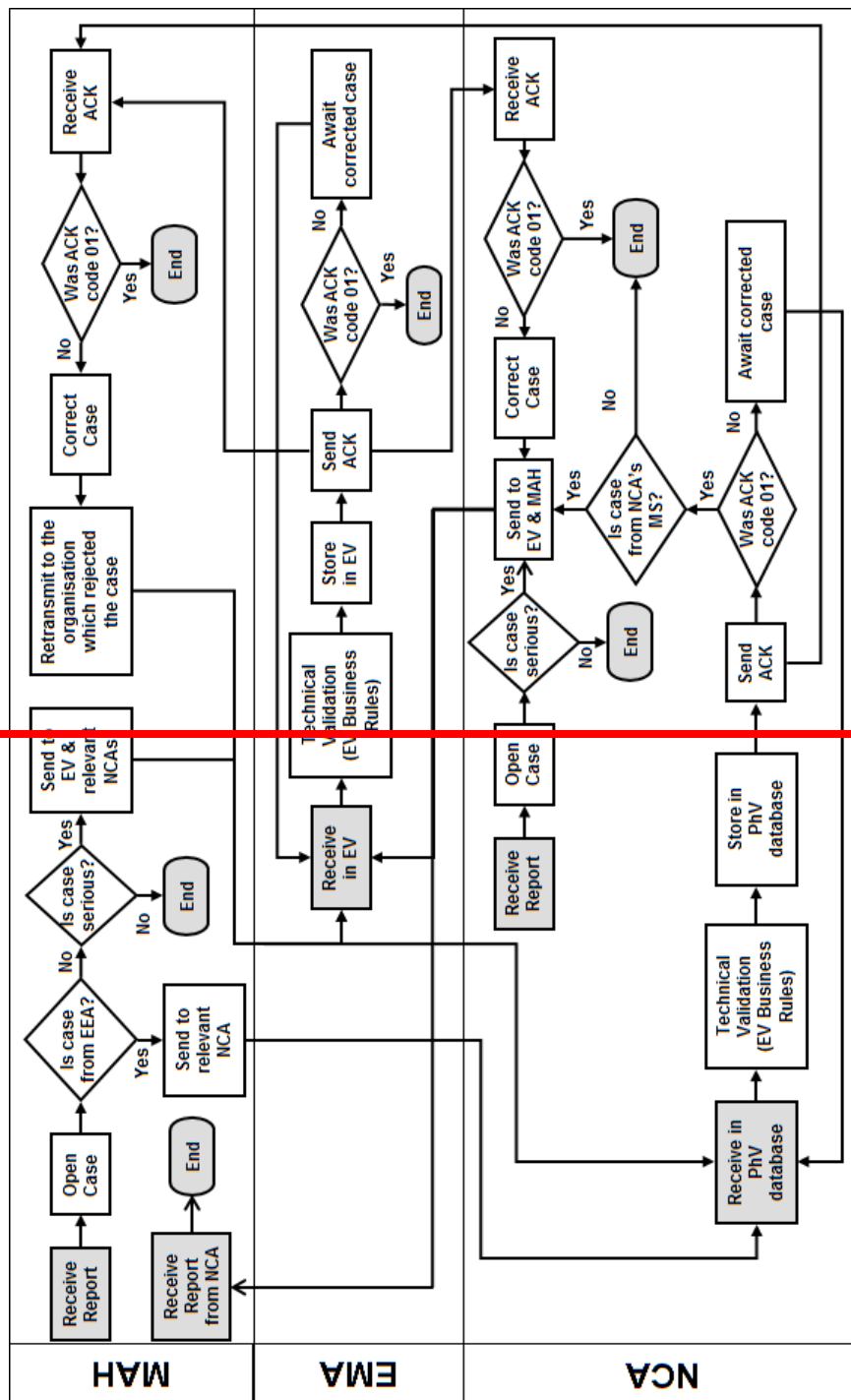


Table VI.3. Process description – Suspected adverse reaction reporting in EU – Interim arrangements

No.	Step	Description	Responsible Organisation
1	Start: Receive report:	Marketing Authorisation Holder (MAH) receives information on a	MAH

No.	Step	Description	Responsible Organisation
		suspected adverse reaction from a patient, healthcare professional or other valid reporter. If the case has been received from an EU NCA, do not retransmit it to EudraVigilance (EV).	
2	Open case.	Open and create an individual case safety report.	MAH
3	Is case from EEA?	Did the adverse reactions occur in the EU? If No, go to step 3.1. If Yes, go to step 5.	MAH
3.1	Is case serious?	If No, go to step 3.2. If Yes, go to step 4.	MAH
3.2	End.	The case is now stored in the MAHs pharmacovigilance database. Normal follow-up activities should continue and if any follow-up is received, return to step 1.	MAH
4	Send to EV & relevant NCAs.	Transmit the serious case electronically, in ICH E2B(R2) format as an xml message within the 15-day time frame to EV and to the relevant NCAs, where required. The case goes to step 4.1 & step 6.	MAH
4.1	Receive in EV.	Receive the message in EV database from MAH or NCA.	EMA
4.2	Technical Validation (EV Business Rules).	Every message that is received in EV is validated against the EudraVigilance Business Rules and an Acknowledgement message (ACK) is created specifying whether or not the message & the case(s) therein are valid. A valid message will have an ACK code 01. A non-valid message will have an ACK code 02 (if a case contained therein is non-valid) or 03 (if the message itself is not correctly formatted).	EMA
4.3	Store in EV.	Once the case has been validated, it is stored in EV.	EMA
4.4	Send ACK.	The acknowledgement message created in step 4.2 is transmitted to the case sender, no later than 2 business days following receipt of the case. Go to step 16 for MAHs receiving the ACK. Go to step 20 for NCAs receiving the ACK. Go to step 4.5 for the EMA's next step.	EMA
4.5	Was ACK code 01?	If No, go to step 4.6. If Yes, go to step 4.7.	EMA

No.	Step	Description	Responsible Organisation
4.6	Await corrected case.	The sender should correct every case with an error ACK and retransmit within the regulatory reporting timelines. Periodically the EMA should assess all cases with an error ACK for which a corrected case has not been transmitted and contact the Qualified Person responsible for Pharmacovigilance (QPPV) to inform of these missing corrected cases. If a sender fails to correct cases, then this information should be incorporated into data quality assessments and the appropriate committees should be informed. Go back to step 4.1 upon receipt of the corrected case.	EMA
4.7	End.	The case is now stored in EV & following duplicate detection & recoding will be available for signal detection and data quality analyses.	EMA
5	Send to relevant NCA.	Transmit the case (serious, and if required non-serious) electronically, in ICH E2B(R2) format as an xml message within the relevant time frames (15 or 90 days, as applicable), to the relevant NCA for the Member State where the reaction occurred. If country of occurrence has not been specified, then country of primary source should normally be taken to be the occurrence country.	MAH
6	Receive in Pharmacovigilance DataBase (PhV DB).	Receive the message from MAH in the NCA's PhV DB.	NCA
7	Technical Validation (EV Business Rules).	Every message that is received in the NCA's PhV DB should be validated against the EudraVigilance Business Rules and an Acknowledgement message (ACK) is created specifying whether or not the message & the case(s) therein are valid. A valid message will have an ACK code 01. A non-valid message will have an ACK code 02 (if a case contained therein is non-valid) or 03 (if the message itself is not correctly formatted).	NCA
8	Store in EV.	Once the case has been validated, it is stored in the NCA's PhV DB.	NCA

No.	Step	Description	Responsible Organisation
9	Send ACK.	The acknowledgement message created in step 7 is transmitted to the case sender no later than 2 business days following receipt of the case. Go to step 16 for MAHs receiving the ACK. Go to step 10 for the NCA's next step.	NCA
10	Was ACK code 01?	If No, go to step 10.1. If Yes, go to step 11.	NCA
10.1	Await corrected case.	The MAH should correct every case with an error ACK and retransmit it within the regulatory reporting timelines. Periodically the NCA should assess all cases with an error ACK for which a corrected case has not been transmitted and contact the QPPV to inform them of these missing corrected cases. If a sender fails to correct cases, then this information should be incorporated into any data quality assessments performed and the appropriate action can be taken. Go back to step 6 upon receipt of the corrected case.	NCA
11	Was case from NCA's MS?	Did the case occur in the territory of the receiving NCA? If No, go to step 11.1. If Yes, go to step 12.	NCA
11.1	End.	The case is now stored in the NCA's Pharmacovigilance DataBase & following duplicate detection & recoding will be available for signal detection and data quality analyses.	NCA
12	Send to EV & MAH.	Transmit the serious case electronically, in ICH E2B(R2) format as an xml message within the 15-day time frame to EV and to the relevant MAH(s). Go to step 4.1 for reception of the case in EV Go to step 24 for reception of the case by the relevant MAH(s)	NCA
13	Start. Receive report.	NCA receives information on a suspected adverse reaction from a patient, healthcare professional or other valid reporter concerning a suspected adverse reaction occurring in the territory of the receiving competent authority.	NCA

No.	Step	Description	Responsible Organisation
14	Open case.	Open and create an individual case safety report.	NCA
15	Is case serious?	If No, go to step 15.1 If Yes, go to step 12	NCA
15.1	End	The case is now stored in the NCA's Pharmacovigilance DataBase & following duplicate detection & recoding will be available for signal detection and data quality analyses.	NCA
16	Receive ACK.	Receive the ACK message, associate it with the relevant case(s) and check to ensure that the case was considered valid.	MAH
17	Was ACK code 01?	If yes, go to step 17.1. If no, then the regulatory timeline clock has not stopped and the case should be corrected and re-transmitted to EV within the relevant regulatory reporting timelines. Day 0 remains as the day that the first information was received. A 02 or 03 ACK does not constitute new information. Go to step 18 (Correct case).	MAH
17.1	End.	End the process of transmitting this version of the case to EV or NCA. Normal follow up activities should continue and if any follow up is received, return to step 1.	MAH
18	Correct case.	Correct the case to remove the errors identified in the ACK.	MAH
19	Retransmit to the organisation which rejected the case.	Retransmit the corrected case to the organisation which rejected the case with ACK code 02 or 03. Got to step 4.1 &/or step 6 as appropriate.	MAH
20	Receive ACK.	Receive the ACK message, associate it with the relevant case(s) and check to ensure that the case was considered valid.	NCA
21	Was ACK code 01?	If yes, go to step 23. If no, then the regulatory timeline clock has not stopped and the case should be corrected and re-transmitted to EV within the relevant regulatory reporting timelines. Day 0 remains as the day that the first information was received. A 02 or 03 ACK does not constitute new	NCA

No.	Step	Description	Responsible Organisation
		information. Go to step 22 (Correct case).	
22	Correct case:	Correct the case to remove the errors identified in the ACK and retransmit the case to EV and to the relevant MAH(s) (go back to step 12).	NCA
23	End.	End the process of transmitting this version of the case to EV and to the relevant MAH(s). Normal follow-up activities should continue and if any follow-up is received, return to step 6 or 13.	NCA
24	Receive report from NCA	MAH receives information on a suspected adverse reaction from an NCA. This case should not be retransmitted to EV and to the NCA which transmitted it to the MAH	MAH
25	End	The case is now stored in the MAH's Pharmacovigilance DataBase & following duplicate detection & recoding will be available for signal detection and data quality analyses.	MAH

~~VI.App3.1.1. Interim arrangements applicable to marketing authorisation holders~~

~~Reporting requirements of individual case safety reports applicable to marketing authorisation holders during the interim period are detailed in the latest version of [Doc. EMA/321386/2012](#) available on EMA website.~~

~~VI.App3.1.2. Interim arrangements applicable to competent authorities in Member States~~

~~**Table VI.4.** Reporting requirements applicable to competent authorities in Member States—Interim arrangements~~

Marketing authorisation procedure	Origin	Adverse reaction type	Destination	Time frame
c.—Centralised	EU	All serious	—EudraVigilance database	15 days
d.—Mutual recognition, decentralised or subject to referral			—Marketing authorisation holder of the suspected medicinal product	
e.—Purely national				

VI.App3.2. Final arrangements

Figure VI.2. Business process map—Suspected adverse reaction ICSRs reporting in EU—Final arrangements

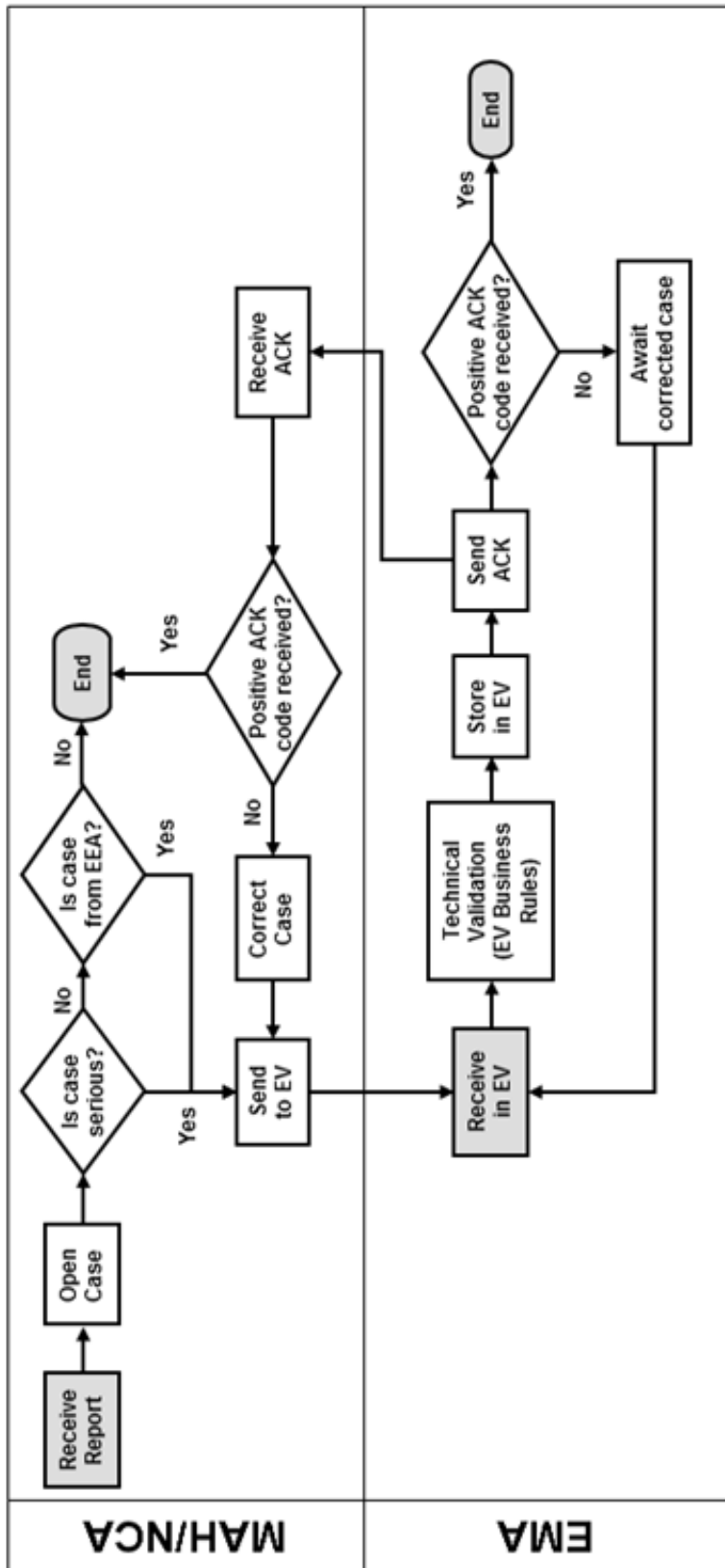


Table VI.5-Table VI.6. Process description - ~~Suspected adverse reaction ICSRs reporting submission~~ in EU by competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See process map in Figure VI.4. ~~Final arrangements~~

No.	Step	Description	Responsible Organisation
1	Start. Receive report.	<u>Receipt by the NCA or the MAH of a report of a suspected adverse reaction related to a medicinal product (ADR report). Go to step 2.</u>	NCA/MAH
2	Open Create ICSR case.	Open and e Create an individual case safety report (ICSR). <u>Go to step 2.1.</u>	NCA/MAH
2.1	<u>Is ICSR valid?</u>	<u>Is the report a valid ICSR in accordance with VI.B.2.?</u> <u>If no, follow-up on the ICSR as described in VI.App.1.1.</u> <u>If yes, go to step 3.</u>	<u>NCA/MAH</u>
3	Is case serious?	If No go to step 3.1. If Yes, go to step 4.	<u>NCA/MAH</u>
3	<u>Is ICSR serious?</u>	<u>Is the ICSR serious?</u> <u>If No go to step 3.1.</u> <u>If Yes, go to step 4.</u>	<u>NCA/MAH</u>
3.1	Is case ICSR from EEA?	<u>Is the ICSR from EEA?</u> <u>If No go to step 3.2.</u> <u>If Yes, go to step 4.</u>	NCA/MAH
3.2	End.	<u>The ICSR is not serious and it is not from the EEA. It should not be sent to EV.</u>	NCA/MAH
4	Send Submit ICSR to EV.	Transmit Submit the case ICSR (EEA and non-EEA serious, and EEA non-serious) to EudraVigilance (EV) (all serious and EU non-serious) electronically , in ICH-E2B(R2/R3) format as an XML message as an xmlXML message within the relevant time frame (15 or 90 days, as applicable), to EV. <u>Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 5.</u> <u>See guidance in the EU ICSR Implementation Guide (EMA/51938/2013) in case of system failure in safety message generation, submission, receipt, processing and rerouting.</u>	NCA/MAH
5	<u>Message received in EV.</u> Receive in EV.	Receive the message in the EV. <u>Go to step 6.</u>	EMA
6	Technical Validation	Every message that is received in EV is validated	EMA

No.	Step	Description	Responsible Organisation
	(EV Business Rules).	<p>against the EudraVigilance Business Rules and an Acknowledgement<u>acknowledgement</u> message (ACK) is created specifying whether or not the mmessage & the caseICSR(s) therein are valid<u>correct</u>.</p> <p><u>The acknowledgement message is sent to the sender (Go to step 7).</u></p> <ul style="list-style-type: none"> - <u>E2B(R2) messages will receive an E2B(R2) acknowledgement.</u> - and an E2B(R3) messages will receive an E2B(R3) acknowledgement. - <u>A valid correct messageE2B(R2) ICSR will have an E2B(R2) ACK code 01- (ACK B.1.8).</u> - <u>An non validE2B(R2) ICSR not correct will have an E2B(R2) ACK code 02 (ACK B.1.8).</u> - <u>An non valid E2B(R2) message will have an ACKreceive an 03 transmission<u>transmission acknowledgement</u> code 03 02(ACK A.1.6) (if a case contained therein the message itself is not correctly formatted).</u> - <u>A valid correct E2B(R3) ICSR will have an E2B(R3) ACK code "CA" (ACK.B.r.6).</u> - <u>An non valid or 03E2B(R3) ICSR not correct will have an E2B(R3) ACK code "CR" (ACK.B.r.6).</u> - <u>An non validE2B(R3) message will receive an "AR" transmission<u>transmission acknowledgement</u> code "AR" (ACK.A.4)- (if the message itself is not correctly formatted).</u> 	
7	<u>Send ACK message sent.</u>	<p>The acknowledgement message created in step 6 is transmitted to the casesender no later than 2 business days following <u>the</u> receipt of the caseICSR.</p> <p>Go to step 9-11 for the EMA's next step.</p> <p>Go to step 10-8 for MAH/NCA's next step.</p>	EMA
8	Store in EV.	Once the case has been validated, it is stored in the EV.	EMA
9	Was a positive ACK code 01 received?	<p>If No go to step 9.1.</p> <p>If Yes, go to step 9.2.</p>	EMA
9.1	Await corrected case.	The sender should correct every case with an error ACK and retransmit it within the regulatory reporting timelines. Periodically the EMA should assess all cases with an error ACK for which a corrected case has not been transmitted and contact the Qualified	EMA

No.	Step	Description	Responsible Organisation
		<p>Person responsible for Pharmacovigilance (QPPV) to inform these missing corrected cases.sender. If a sender fails to correct cases, this information should be incorporated into data quality assessments and the appropriate committees should be informed.</p> <p>Go back to step 6 upon receipt of the corrected case.</p>	
9.2	End.	<p>The case is now stored in EV &, following duplicate detection & recoding will be available for signal detection and data quality analyses.</p> <p>If the case occurred in the EU and was transmitted to EV by a MAH, it will be rerouted to the relevant NCA (see VI. Appendix App.3.3)</p>	EMA
108	Receive ACK message.Receive ACK.	<p>Receive the ACK message.7</p> <p>Associate it with the relevant caseICSR(s) and check that to ensure that the case wasit was considered valid. Go to step 9.</p>	NCA/MAHMAH/NCA
119	Is a ICSR positive ACK positive?code 01received?	<p>Is a positive acknowledgement code received for the ICSR?</p> <p>If yes, go to step 11 9.1.</p> <p>If no, then the regulatory timeline clock has not stopped and the case-ICSR should be corrected and re-transmitted to EV within the relevant regulatory reporting timelines. Day 0 remains as the day that the first information was received. Go to step 10 to correct the ICSR.A</p> <p>Neither an ICSR not correct (with an E2B(R2) ACK code 02 or E2B(R3) ACK code "CR"), nor a message not correct (with an E2B(R2) transmission acknowledgement code 03 ACK does not constituteor E2B(R3) transmission acknowledgement code "AR" transmission acknowledgement code) constitutes new information. Go to step 12 (Correct case)</p>	NCA/MAHMAH/NCA
11.1 9.1	End.	<p>End the process for this ICSRversion of the case. Normal follow-up activities should continue and if any follow-up report is received, return to step 1.</p>	NCA/MAHMAH/NCA
1210	Correct case ICSR.	<p>Correct the ICSR case to remove the errors identified in the ACK. Go to step 10.1.</p>	NCA/MAHMAH/NCA
12.1 10.1	Resubmit corrected ICSR.	<p>Resubmit the corrected ICSR to EV.</p> <p>Go back to step 5 for the receipt of the corrected</p>	NCA/MAHMAH/NCA

No.	Step	Description	Responsible Organisation
		<u>ICSR in EV.-</u>	
<u>11</u>	<u>Store ICSR in EV.</u>	Once the ICSR has been technically validated (step 6) and the acknowledgement message is transmitted to the sender (step 7), the ICSR is stored in the EV. Go to step 12.	<u>EMA</u>
<u>12</u>	<u>Was ICSR ACK positive?</u>	Did the technical validation of the ICSR in step 6 create a positive ACK code? <u>If no, perform no further processing on this version of the ICSR and go to step 12.1</u> <u>If Yes, go to step 13.</u>	<u>EMA</u>
<u>12.1</u>	<u>Await corrected case.</u>	The sender should correct every ICSR with an error ACK and retransmit it within the appropriate regulatory timelines. EMA periodically assesses all ICSRs with an error ACK for which a corrected version has not been transmitted and contact the sender to inform of these missing corrected ICSRs. If a sender fails to correct the ICSRs, this information is incorporated into data quality assessments and the appropriate committee is informed. The ICSR stored in EV (step 11) while waiting for corrected version. Go back to step 5 upon receipt of the corrected ICSR.	<u>EMA</u>
<u>13</u>	<u>End.</u>	The ICSR is now stored in EV. It is available for signal detection and data quality analyses following duplicate detection and recoding. If the ICSR occurred in the EU and was transmitted to EV by a MAH, it will be rerouted to the relevant NCA (see VI.App.3.4). See guidance in the <u>EU ICSR Implementation Guide (EMA/51938/2013)</u> in case of system failure in safety message generation, submission, receipt, processing and rerouting.	<u>EMA</u>

~~VI.App3.2~~App.3.12. Final arrangementsRequirements applicable to marketing authorisation holders

~~Table VI.6.~~Table VI.7. ICSRs submission requirements ~~Reporting requirements~~ applicable to marketing authorisation holders ~~Final arrangements~~

Marketing authorisation procedure	Origin	Adverse reaction type	Destination	Time frame
• Centralised	EU	All serious	• EudraVigilance database	15 days
• Mutual recognition, decentralised or subject to referral		All non-serious	• EudraVigilance database	90 days
• Purely national	Non-EU	All serious	• EudraVigilance database	15 days

~~VI.App3.2.2.~~Final arrangementsApp.3.23. Requirements applicable to competent authorities in Member States

~~Table VI.7.~~Table VI.8. ICSRs submission requirements ~~Reporting requirements~~ applicable to competent authorities in Member States ~~Final arrangements~~

Marketing authorisation procedure	Origin	Adverse reaction type	Destination	Time frame
• Centralised	EU	All serious	• EudraVigilance database	15 days
• Mutual recognition, decentralised or subject to referral		All non-serious	• EudraVigilance database	90 days
• Purely national				

VI.App3App.3.34 Transmission and rRerouting of ICSRs to competent authorities in Member States⁹¹ of ICSRs submitted to EudraVigilance by marketing authorisation holders

Figure VI.3- Figure VI.4. Business process map - Transmission and rRerouting of ICSRs to competent authorities in Member States (NCAs) of ICSRs submitted to EudraVigilance by marketing authorisation holders (MAHs). See steps description in Table VI.9.

⁹¹~~Once the functionalities of the EudraVigilance database specified in [REG Art 24(2)] are established.~~

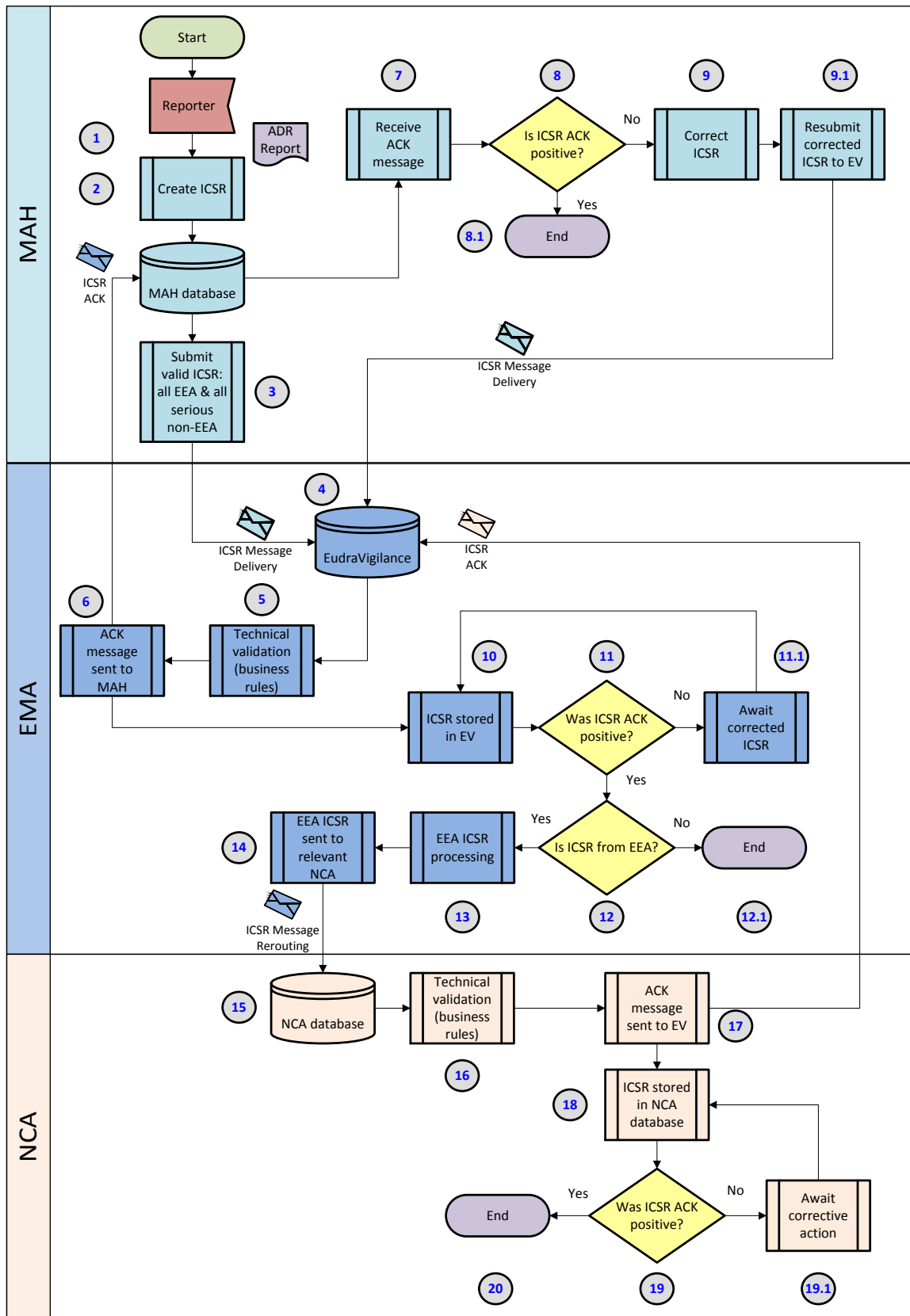


Table VI.8-Table VI.9. Process description - ~~Transmission and r~~erouting of ICSRs to competent authorities in Member States (NCAs) ⁹²of ICSRs submitted to EudraVigilance by marketing authorisation holders (MAHs). See process map in Figure VI.5.

No.	Name	Description	Responsible Organisation
1	Start. Receive report.	Receipt by the MAH of a report of a suspected adverse reaction related to a medicinal product (ADR report). Go to step 2.	MAH
2	Create ICSR. Open case.	Open and c reate an individual case safety report (ICSR). Go to step 3.	MAH
3	Send Submit valid ICSR to EudraVigilance (EV).	Submit the valid ICSR (EEA and non-EEA serious, and EEA non-serious) to EudraVigilance (EV) Transmit the case electronically, in ICH-E2B(R2/R3) format as an xmlXML message within the relevant time frames (15 or 90 days, as applicable), to EV. Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 4. Proceed as outlined in VI.App.1.1. if the ICSR is not valid. See guidance in the EU ICSR Implementation Guide (EMA/51938/2013) in case of system failure in safety message generation, submission, receipt, processing and rerouting.	MAH
4	Message r Received in EV.	Receive the message in the EV. Go to step 5.	EMA
5	Technical Validation (EV Business Rules).	Every message that is received in EV is validated against the EudraVigilance Business Rules and an Acknowledgement message (ACK) is created specifying whether or not the message & and the ICSR ase (s) therein are valid. The acknowledgement message is sent to the MAH (Go to step 6). - E2B(R2) messages will receive an E2B(R2) acknowledgement. - and an E2B(R3) message will receive an E2B(R3) acknowledgement. — - A valid correct message E2B(R2) ICSR will have an E2B(R2) ACK code 01: (ACK B.1.8). - An non-valid message E2B(R2) ICSR not correct will have an E2B(R2) ACK code 02. (if a case	EMA

⁹²Once the functionalities of the EudraVigilance database specified in [REG Art 24(2)] are established.

No.	Name	Description	Responsible Organisation
		<p>contained therein is (ACK B.1.8).</p> <p>— An non-valid or 03-E2B(R2) message will receive a an 03 transmission transmission acknowledgement code 03 (ACK A.1.6) (if the message itself is not correctly formatted).</p> <p>—</p> <p>- A correct valid E2B(R3) ICSR will have an E2B(R3) ACK code "CA" (ACK.B.r.6).</p> <p>- An non-valid E2B(R3) ICSR not correct will have an E2B(R3) ACK code "CR" (ACK.B.r.6).</p> <p>- An non-valid E2B(R3) message will receive a n "AR" transmission transmission acknowledgement code "AR" (ACK.A.4) (if the message itself is not correctly formatted).</p>	
6	ACK message sent.	<p>The acknowledgement message created in step 5 is transmitted to the MAH no later than 2 business days following the receipt of the ICSR.</p> <p>Go to step 10 for EMA's next step.</p> <p>Go to step 7 for MAH's next step.</p>	EMA
6	Store in EV.	Once the case has been validated, it is stored in EV.	EMA
7	Send ACK.	The acknowledgement message created in step 5 is transmitted to the case sender no later than 2 business days following receipt of the case.	EMA
7.17	Receive ACK message.	Receive the ACK message. Associate it with the relevant ICSR case(s) and check to ensure that the case it was considered valid. Go to step 8.	MAH
7.28	Was Is a positive ICSR ACK code received positive?	<p>Is a positive acknowledgement code received for the ICSR?</p> <p>If Yes, go to step 7.2.8.1.</p> <p>If no, then the regulatory timeline clock has not stopped and the ICSR case should be corrected and re-transmitted to EV within the relevant regulatory reporting timelines. Day 0 remains as the day that the first information was received. Go to step 9 to correct the ICSR.</p> <p>Neither an ICSR not correct (E2B(R2) ACK code 02 or E2B(R3) ACK code "CR"), nor a message not correct (E2B(R2) transmission acknowledgement code 03 ACK does not constitute or E2B(R3) transmission acknowledgement code "AR" transmission</p>	MAH

No.	Name	Description	Responsible Organisation
		acknowledgement code) constitutes new information. Go to step 7.2.2 (Correct case).	
7.2. 18.1	End.	End the process of transmitting this version of the <u>ICSR</u> to EV. Normal follow-up activities should continue and if any follow-up is received, return to step 1.	MAH
7.2. 29	Correct <u>ICSR</u> .	Correct the <u>ICSR</u> to remove the errors identified in the ACK. Go to step 9.1. and retransmit the case to EV (go back to step 3).	MAH
<u>9.1</u>	<u>Resubmit corrected ICSR.</u>	<u>Resubmit the corrected ICSR to EV.</u> <u>Go back to step 4 for the receipt of the corrected ICSR in EV.</u>	<u>MAH</u>
<u>10</u>	<u>ICSR stored in EV.</u>	<u>Once the ICSR has been technically validated (step 5) and the acknowledgement message is transmitted to the MAH (step 6), the ICSR is stored in EV. Go to step 11.</u>	<u>EMA</u>
<u>11</u>	<u>Was ICSR ACK positive?</u>	<u>Did the technical validation of the ICSR in step 5 create a positive ACK code?</u> <u>If no, perform no further processing on this version of the ICSR and go to step 11.1</u> <u>If Yes, go to step 12.</u>	<u>EMA</u>
<u>8</u>	<u>Was a positive ACK code 01 received?</u>	If yes, go to step 9. If no, perform no further processing on this version of the case and go to step 8.1	<u>EMA</u>
<u>8.1.</u> <u>1</u>	Await corrected <u>ICSR</u> .	The sender should correct every case with an error ACK and retransmit it within the regulatory reporting timelines. Periodically the EMA should assess all cases with an error ACK for which a corrected case has not been transmitted and contact the Qualified Person responsible for Pharmacovigilance (QPPV) sender to inform of these missing corrected cases. If a sender fails to correct cases, his information should be incorporated into data quality assessments and the appropriate committees should be informed. The sender should correct every ICSR with an error ACK and retransmit it within the appropriate regulatory timelines. <u>EMA periodically assesses all ICSRs with an error ACK for which a corrected version has not been transmitted and contact the sender to inform of these</u>	EMA

No.	Name	Description	Responsible Organisation
		<p>missing corrected ICSRs. If a sender fails to correct the ICSRs, this information is incorporated into data quality assessments and the appropriate committee is informed.</p> <p>ICSR stored in EV (step 10) while waiting for corrected version. Go back to step 4 upon receipt of the corrected ICSR.</p>	
912	Assess cases in message: Is ICSR from EEA?	<p>Whenever a message has passed the technical validation (step 11), the ICSR cases therein should be immediately assessed to determine the primary source country where the reaction occurred for regulatory reporting purposes.</p> <p>Is the ICSR from EEA?</p> <p>If Yes, go to step 13.</p> <p>If No, go to step 12.1.</p>	EMA
10	Was case from EU?	<p>For every case, assess whether the country of occurrence is in the EU.</p> <p>If Yes, go to step 11.</p> <p>If No, go to step 10.1</p>	EMA
1012 .1	End.	<p>The ICSR case is now stored in EV-1.</p> <p>It is &, following duplicate detection & recoding will be available for signal detection and data quality analyses following duplicate detection and recoding.</p>	EMA
1113	EEA ICSR processing for rerouting. Extract cases from message.	<p>The ICSR cases occurring in the EEA EU will be are extracted from the message for processing prior to retransmission to the relevant NCA.</p> <p>For the retransmission of E2B(R2) messages the 'Message sender identifier' (ICH E2B(R2) M.1.5) of the sending MAH is inserted in data element 'Sender organisation' (ICH-E2B(R2) A.3.1.2) prior to retransmission. This is to permit the receiving National Competent Authority (NCA) to unambiguously identify the MAH responsible for transmitting the ICSR to EV.</p> <p>For the retransmission of E2B(R3) messages the data element N.2.r.2 'Message sender identifier' remains unchanged with the MAH identifier.</p> <p>Go to step 14.</p> <p>See guidance in the EU ICSR Implementation Guide</p>	EMA

No.	Name	Description	Responsible Organisation
		(EMA/51938/2013) in case of system failure in safety message generation, submission, receipt, processing and rerouting.	
12	Technical Validation.	<p>For the retransmission of E2B(R2) messages the 'Message sender identifier' (ICH M2E2B(R2) M.1.5) of reporting MAH is inserted in data element 'Sender organisation field' (ICH E2B(R2) A.3.1.2) prior to retransmission. This is to permit the receiving National Competent Authority (NCA) to unambiguously identify the MAH responsible for transmitting the case to EV.</p> <p>For the retransmission of E2B(R3) messages the data element N.2.r.2 'Message sender identifier' will remain unchanged</p>	EMA
13 14	ICSR sSent to relevant NCA.	<p>The ICSR is transmitted to the relevant NCA of the Member State where the reaction occurred with no other changes.</p> <p>Where a Member State has more than one NCA responsible for post-marketing reports, the ICSRs occurring in that Member State are sent to all relevant NCAs. Go to step 15.</p>	EMA
145	Receive in Pharmacovigilance DataBase (PhV DB)-Message received in NCA database.	Message with The relevant NCA receives the message in its PhV DB EEA ICSRs are received in the relevant NCA database. Go to step 16.	NCA
156	Technical Validation (EV Business Rules).	<p>Every message should be validated against the EudraVigilance Business Rules (the same business rules as in Step-step 5 and an Acknowledgement message (ACK) is created specifying whether or not the message & and the ICSRs therein are valid.</p> <p>The acknowledgement message is sent to EV (step 17).</p> <p>A valid message ICSR will have an E2B(R2) ACK code 01. or E2B(R3) ACK code "CA". A non-valid message ICSR will have an E2B(R2) ACK code 02 (if a case contained therein is or E2B(R3) ACK code "CR". A non-valid) or 03 message will receive an E2B(R2) 03 or E2B(R3) "AR" transmission acknowledgement code (if the message itself is not correctly</p>	NCA

No.	Name	Description	Responsible Organisation
		<p>formatted}-</p> <ul style="list-style-type: none"> - <u>A correct E2B(R2) ICSR will have an E2B(R2) ACK code 01 (ACK B.1.8).</u> - <u>An E2B(R2) ICSR not correct will have an E2B(R2) ACK code 02 (ACK B.1.8).</u> - <u>An E2B(R2) message not correct will receive a transmission acknowledgement code 03 (ACK A.1.6) if the message is not correctly formatted.</u> - <u>A correct E2B(R3) ICSR will have an E2B(R3) ACK code "CA" (ACK.B.r.6).</u> - <u>An E2B(R3) ICSR not correct will have an E2B(R3) ACK code "CR" (ACK.B.r.6).</u> - <u>An E2B(R3) message not correct will receive a transmission acknowledgement code "AR" (ACK.A.4) if the message is not correctly formatted.</u> 	
16	Store in Pharmacovigilance DataBase (PhV-DB)-	Once the case has been validated, it is stored in the PhV-DB-	NCA
17 <u>17</u>	Send ACK message sent.	The acknowledgement message created in step 15 <u>16</u> is transmitted to EV <u>within 2 business days following the receipt of the ICSR no later than 2 business days following receipt of the case. Go to step 18.</u>	NCA
<u>18</u>	<u>ICSR stored.</u>	<u>The ICSR is stored in the NCA database. Go to step 19.</u>	<u>NCA</u>
<u>19</u>	<u>Was ICSR ACK positive?</u>	<u>Did the technical validation of the ICSR in step 16 create a positive ACK code?</u> <u>If no go to step 19.1.</u> <u>If yes go to step 20.</u>	<u>NCA</u>
<u>19.1</u>	<u>Await corrective action.</u>	<u>The concerned NCA with negative acknowledgement is contacted by EMA to resolve the technical issues and the message is retransmitted if needed.</u> <u>The ICSR is stored in the NCA database (step 18 while waiting for a corrected version). Go back to step 15 upon receipt of the corrected ICSR.</u>	<u>NCA</u>
17.1 <u>20</u>	End.	The <u>ICSR</u> is now stored in the <u>NCA's NCA database. It is Pharmacovigilance DataBase & available for signal detection and data quality</u>	NCA

No.	Name	Description	Responsible Organisation
		analyses following duplicate detection & recoding, will be available for signal detection and data quality analyses.	
18	Receive ACK	The acknowledgement message sent in step 17 is received & stored in EV.	EMA
19	End	The case has now been successfully retransmitted to the relevant NCA.	EMA

VI. Appendix 4 ~~Transmission-Submission~~ of ICSRs to ~~the~~ World Health ~~Organization-Organisation~~ (WHO)⁹³

~~Figure VI.4- Figure VI.5.~~ Business process map - ~~Transmission-Submission~~ of ICSRs to ~~the~~ World Health Organization (WHO) Collaborating Centre for International Drug Monitoring. [See steps description in Table VI.10.](#)

⁹³~~Once the functionalities of the EudraVigilance database specified in [REG Art 24(2)] are established.~~

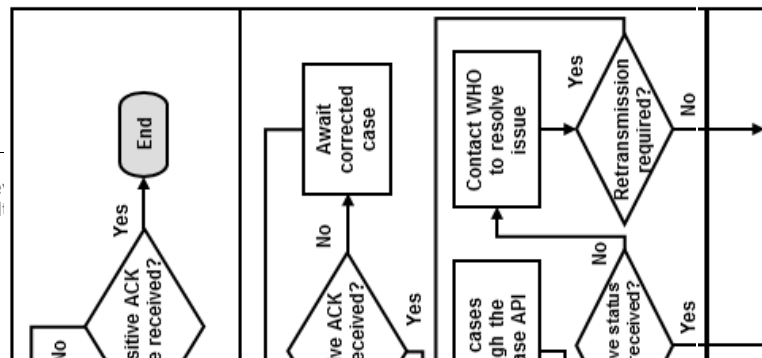
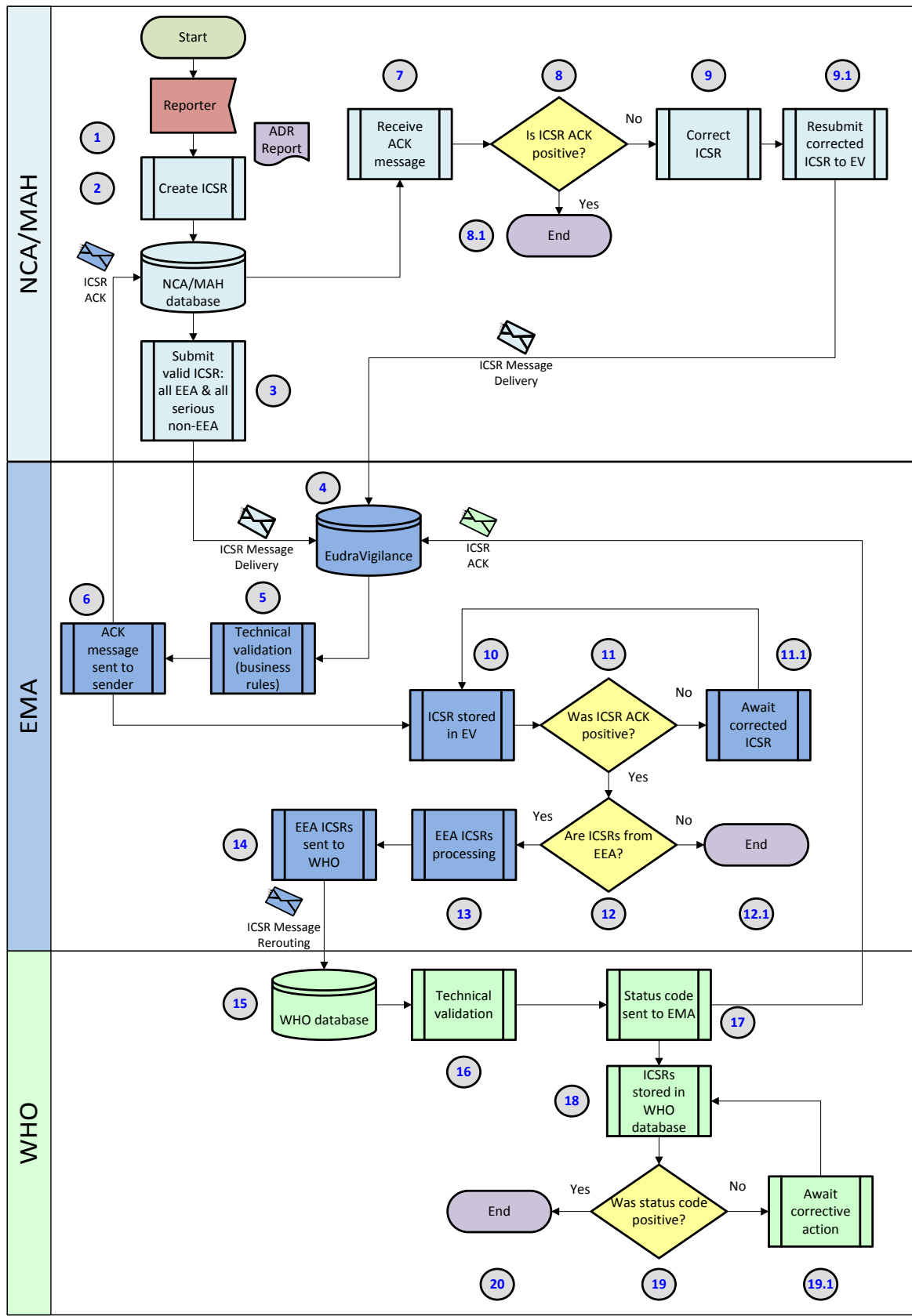


Table VI.9-Table VI.10. Process description - [Transmission-Submission](#) of ICSRs to [the World Health Organisation \(WHO\) Collaborating Centre for International Drug Monitoring](#). [See process map in Figure VI.6.](#)⁹⁴

No.	Step	Description	Responsible Organisation
1	Start. Receive report:	<u>Receipt by the NCA or the MAH of a report of a suspected adverse reaction related to a medicine-al product (ADR report). Go to step 2.</u> National Competent Authority (NCA) or Marketing Authorisation Holder (MAH) receives information on a suspected adverse reaction from a patient, healthcare professional or other valid reporter.	MAH/NCA/MAH
2	Create ICSR. Open case.	Open and create an individual case safety report (ICSR). Go to step 3.	MAH/NCA/MAH
3	Send Submit valid ICSR to EV.	Submit the valid ICSR (EEA and non-EEA serious, and EEA non-serious) to EudraVigilance (EV) Transmit the case electronically, in ICH-E2B(R2/R3) format as an xml XML message within the relevant time frames (15 or 90 days, as applicable), to EudraVigilance (EV). Non-serious non-EEA ICSRs should not be submitted to EV. Go to step 4. Proceed as outlined in VI.App.1.1. if the ICSR is not valid. See guidance in the EU ICSR Implementation Guide (EMA/51938/2013) in case of system failure in safety message generation, submission, receipt, processing and rerouting.	MAH/NCA/MAH
4	Message r Received in EV.	Receive the message in EV. Go to step 5.	EMA
5	Technical Validation (EV Business Rules).	Every message that is received in EV is validated against the EudraVigilance Business Rules and an Acknowledgement message (ACK) is created specifying whether or not the message & and the ICSR ase (s) therein are valid. The acknowledgement message is sent to the sender (step 6). - E2B(R2) messages will receive an E2B(R2) acknowledgement. - E2B(R3) message will receive an E2B(R3) acknowledgement. - A correct E2B(R2) ICSR will have an E2B(R2) ACK	EMA

⁹⁴~~Once the functionalities of the EudraVigilance database specified in [REG Art 24(2)] are established.~~

No.	Step	Description	Responsible Organisation
		<p><u>code 01 (ACK B.1.8).</u></p> <ul style="list-style-type: none"> - <u>An E2B(R2) ICSR not correct will have an E2B(R2) ACK code 02 (ACK B.1.8).</u> - <u>An E2B(R2) message will receive a transmission acknowledgement code 03 (ACK A.1.6) if the message is not correctly formatted.</u> - <u>A correct E2B(R3) ICSR will have an E2B(R3) ACK code "CA" (ACK.B.r.6).</u> - <u>An E2B(R3) ICSR not correct will have an E2B(R3) ACK code "CR" (ACK.B.r.6).</u> - <u>An E2B(R3) message will receive a transmission acknowledgement code "AR" (ACK.A.4) if the message is not correctly formatted.</u> <p>E2B(R2) messages will receive an E2B(R2) acknowledgement and an E2B(R3) message will receive an E2B(R3) acknowledgement. A valid message E2B(R2) ICSR will have an E2B(R2) ACK code 01. (ACK B.1.8). A non-valid message E2B(R2) ICSR will have an E2B(R2) ACK code 02 (if a case contained therein is (ACK B.1.8). A non-valid) or 03 message will receive an 03 transmission acknowledgement code (ACK A.1.6) (if the message itself is not correctly formatted). A valid E2B(R3) ICSR will have an E2B(R3) ACK code "CA" (ACK.B.r.6). A non-valid E2B(R3) ICSR will have an E2B(R3) ACK code "CR" (ACK.B.r.6). A non-valid message will receive an "AR" transmission acknowledgement code (ACK.A.4) (if the message itself is not correctly formatted).</p>	
6	<u>ACK message sent.</u> Store in EV.	<p><u>The acknowledgement message created in step 5 is transmitted to the sender no later than 2 business days following the receipt of the ICSR.</u></p> <p><u>Go to step 10 for EMA's next step.</u></p> <p>Go to step 7 for NCA/MAH's next step. Once the case has been validated, it is stored in EV.</p>	EMA
7	Send ACK.	<p>The acknowledgement message created in step 5 is transmitted to the case sender no later than 2 business days following receipt of the case.</p>	EMA
7-1	<u>Receive ACK message.</u>	<p><u>Receive the ACK message, associate it with the relevant ICSR case(s) and check to ensure that the ICSR case was considered valid.</u></p>	<u>MAH/NCA/MAH</u>

No.	Step	Description	Responsible Organisation
7.28	Was a positive Is ICSR ACK code 01 received positive?	<p><u>Is a positive acknowledgement code received for the ICSR?</u></p> <p>If Yes, go to step 7.28.1.</p> <p>If no, then the regulatory timeline clock has not stopped and the <u>ICSR</u> should be corrected and re-transmitted to EV within the relevant regulatory <u>reporting</u> timelines. Day 0 remains as the day that the first information was received. <u>Go to step 9 to correct the ICSR.</u></p> <p>Neither an ICSR not correct (E2B(R2) ACK code 02 or E2B(R3) ACK code "CR"), nor a message not correct (E2B(R2) transmission acknowledgement code 03 ACK does not constitute or E2B(R3) transmission acknowledgement code "AR" transmission acknowledgement code) constitutes new information. <u>Go to step 7.2.2 (Correct case).</u></p>	MAH/NCA/MAH
7.28 .1	End.	End the process of transmitting this version of the <u>ICSR</u> to EV. Normal follow-up activities should continue and if any follow-up is received, return to step 1.	MAH/NCA/MAH
7.2.29	Correct <u>ICSR</u> .	Correct the <u>ICSR</u> to remove the errors identified in the ACK and retransmit the case to EV (go back to step 3). <u>Go to step 9.1.</u>	MAH/NCA/MAH
9.1	<u>Resubmit corrected ICSR.</u>	<u>Resubmit the corrected ICSR to EV.</u> <u>Go back to step 4 for the receipt of the corrected ICSR in EV.</u>	NCA/MAH
10	<u>ICSR stored in EV.</u>	<u>Once the ICSR has been technically validated (step 5) and the acknowledgement message is transmitted to the MAH (step 6), the ICSR is stored in EV. Go to step 11.</u>	EMA
8.11	Was a positive ICSR ACK code 01 received positive?	<p><u>Did the technical validation of the ICSR in step 5 create a positive ACK code?</u></p> <p>If yes, go to step 9</p> <p>If no, perform no further processing on this version of the <u>ICSR</u> and go to step 8.11.1.</p> <p><u>If Yes, go to step 12.</u></p>	EMA
8.11 .1	Await corrected <u>ICSR</u> .	The sender should correct every <u>ICSR</u> with an error ACK and retransmit <u>it</u> within the <u>appropriate</u> regulatory <u>reporting</u> timelines. Periodically the EMA should assess all cases with an error ACK for which a	EMA

No.	Step	Description	Responsible Organisation
		<p>corrected case has not been transmitted and contact the Qualified Person responsible for Pharmacovigilance (QPPV) to inform of these missing corrected cases. EMA periodically assesses all ICSRs with an error ACK for which a corrected version has not been transmitted and contact the sender to inform of these missing corrected ICSRs. If a sender fails to correct the ICSR cases, this information should be incorporated into data quality assessments and the appropriate committees should be informed.</p> <p>The ICSR is stored in EV (step 10) while waiting for a corrected version. Go back to step 4 upon receipt of the corrected ICSR.</p>	
912	Is ICSR from EEA? Assess cases in message:	<p>Once a week, for every message that has passed the technical validation, the ICSR cases therein should be assessed to determine the country where the reaction occurred for regulatory reporting purposes.</p> <p><u>Is the ICSR from EEA?</u></p> <p><u>If Yes, go to step 13.</u></p> <p><u>If No, go to step 12.1.</u></p>	EMA
10	Was case from EU?	<p>For every case, assess whether the country of occurrence is in the EU.</p> <p>If Yes, go to step 11.</p> <p>If No, go to step 10.1.</p>	EMA
101 2.1	End.	<p>The ICSR case is now stored in EV, & following duplicate detection & recoding will be available for signal detection and data quality analyses following duplicate detection and recoding.</p> <p>The ICSR case is now stored in EV & following duplicate detection & recoding will be available for signal detection and data quality analyses following duplicate detection and recoding.</p>	EMA
11 3	EEA ICSR processing. Extract cases from message	<p>Prior to sending the ICSRs to the World Health Organization (WHO) Collaborating Centre for International Drug Monitoring, the ICSR cases occurring in the EU-EEA is are extracted from the message for processing prior to retransmission in line with the EudraVigilance Access Policy for Medicines for Human Use⁹⁵. Go to step 14.</p> <p>Prior to sending the ICSRs to the World Health Organization (WHO) Collaborating Centre for International Drug Monitoring, the ICSR cases occurring in the EU-EEA are extracted from the message for processing prior to retransmission in line with the EudraVigilance Access Policy for Medicines for Human Use⁹⁵. Go to step 14.</p>	EMA
12	Redact & replace Extract data in line with EV Data	<p>Prior to sending the cases to the World Health Organization (WHO) Collaborating Centre for International Drug Monitoring, the cases are</p> <p>Prior to sending the cases to the World Health Organization (WHO) Collaborating Centre for International Drug Monitoring, the cases are</p>	EMA

⁹⁵ Ref.: EMA/759287/2009; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data.](#)

No.	Step	Description	Responsible Organisation
	Access policy.	extracted copies of the cases have some data elements redacted and replaced in line with the EV Data Access Policy in order to ensure personal data protection.	
13 14	CopySend ICSR cases to physical media sent through the VigiBase AP to WHO.	The ICSR cases are copied to physical media sent through the VigiBase API which returns a messageID for each file submitted. Go to step 15.	EMA
14	Send to WHO.	The physical media is sent to WHO Collaborating Centre.	EMA
15 15	Message received physical media cases by WHO.	The submitted message with the EEA ICSRs is received by WHO Collaborating Centre receives the physical media cases. A Message ID for each submitted file is created and sent back to EMA. Go to step 16.	WHO
16	Technical Validation.	Technical validation is performed on the submitted ICSRs. A status code is recorded for each message. Go to step 17.	WHO
17	Status code sent to EMA.	The message status code created in step 16 is transmitted to EMA with the corresponding Message ID. Go to step 18.	WHO
16 18	Store cases in PharmacoVigilance DataBase (PhV DB). ICSRs stored in WHO database.	Once the ICSR cases have been validated, they are stored in the PhV WHO database DB. A status code is recorded for each message. Go to step 19.	WHO
16	EMA Checks status of ICSR Messages	EMA uses the messageID to check the status code of each submitted message.	EMA
19	Was a positive status code received positive?	If yes, go to step 19 Did the technical validation in step 16 create a positive status code? If no, go to step 189.1. If yes, go to step 20.	EMA WHO
189.1	Await corrective action. Contact WHO to resolve technical issue	WHO UMC is contacted by EMA to resolve the technical issues and the message is If a message needs to be retransmitted if needed. go to step 12, if this is not required go to step 19 ICSRs are stored in WHO database (step 18 while	EMA WHO

No.	Step	Description	Responsible Organisation
		waiting for corrected version). Go back to step 15 upon receipt of the corrected ICSRs.	
171 920	End.	ICSRCase are now stored in the WHO Collaborating Centre's Pharmacovigilance Database & , and are following duplicate detection & recoding will be available for signal detection and data quality analyses.	WHO

VI. Appendix 5 Nullification of cases

General principles regarding the nullification of cases are provided in [VI.C.6.2.2.10](#). The following recommendations outlined in [VI.C.6.2.2.9](#).

~~Examples of scenarios for which ICSRs should also be applied: be nullified, are provided in [Table VI.13](#).~~

- ~~b.—The value in the data element 'Report nullification' (ICH-E2B(R2) A.1.13) should be set to 'Yes' and the nullification reason should be provided in the data element 'Reason for nullification' (ICH-E2B(R2) A.1.13.1). The nullification reason should be clear and concise to explain why this case is no longer considered to be a valid report. For example a nullification reason stating, 'the report no longer meets the reporting criteria' or 'report sent previously in error' are not detailed enough explanations.~~
- ~~c.—An individual case can only be nullified by the sending organisation.~~
- ~~d.—Once an individual case has been nullified, the case cannot be reactivated.~~
- ~~e.—If it becomes necessary to resubmit the case that has been previously nullified, a new 'Sender's (case) safety report unique identifier' (ICH-E2B(R2) A.1.0.1) and 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) should be assigned.~~
- ~~f.—Individual versions (i.e. follow up reports) of a case cannot be nullified, only the entire individual case to which they refer.~~

~~Table VI.10- Table VI.11.~~ Examples of scenarios for which [ICSRs cases](#) should be nullified

Ex.	Scenario	Action
1	An individual case has been identified as a duplicate of another individual case previously submitted: by the same sender .	One of the individual cases should be nullified. The remaining valid case should be updated with any additional relevant information from the nullified case. <ul style="list-style-type: none"> • NOTE: In case of duplicate reports where one report needs to be nullified, the update of the remaining case should be performed in the form of a follow-up report⁹⁶. Information on the identification of the nullified case(s) should be provided in the follow-up ICSR (Section ICH-E2B(R2) A.1.11/ ICH-E2B(R3) C.1.9.1 'Other case identifiers in previous transmissions').
2	A wrong 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10/ ICH-E2B(R3) C.1.8.1) was accidentally used and does not refer to an existing case.	The case with the wrong 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10/ ICH-E2B(R3) C.1.8.1) should be nullified. A new case should be created with a correct 'Worldwide unique case identification number'.
3	On receipt of further information it is confirmed that that the adverse reaction(s) occurred before the suspect	The case should be nullified.

⁹⁶ See guidance provided in [GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports \(ICSRs\)](#), [EMA/13432/2009](#).

Ex.	Scenario	Action
	drug(s) was taken.	
4	On receipt of further information on an individual case, it is confirmed that the patient did not receive the suspect drug-(s). Minimum reporting -criteria for an ICSR submission as outlined in VI.B.2 are no longer met.	The case should be nullified.
5	On receipt of further information it is confirmed by the same reporter that the reported adverse reaction(s) did not occur to the patient. Minimum reporting criteria for an ICSR submission as outlined in VI.B.2 are no longer met.	The case should be nullified.
6	On receipt of further information it is confirmed that there was no valid identifiable patient for the individual case. The M minimum reporting -criteria for an ICSR as outlined in VI.B.2 are no longer met.	If it there is confirmation in a follow-up report that no patient was involved, not possible to obtain confirmation of verify the patient's existence, then the case should be nullified.

~~a. Individual cases that have been nullified~~ ~~Examples of scenarios for which ICSRs should not~~ ~~NOT~~ ~~be used for scientific evaluation, however, they should remain in the database for auditing purposes.~~

~~In addition, in case of duplicate reports where one report needs to be nullified, the update of the remaining case should be performed in the form of a follow up report⁹⁷. Information on the identification of the nullified case(s) should be nullified, are provided in the data element 'Source(s) of the case identifier (e.g. name of the company, name of regulatory agency)' (ICH E2B(R2) A.1.11.1) and in the data element 'Case identifier(s)' (ICH E2B(R2) A.1.11.2). ~~Table VI.14.~~~~

~~Table VI.11. Table VI.12.~~ Examples of scenarios for which ~~ICSRs~~ ~~cases~~ should NOT be nullified

Ex.	Scenario	Action
7	A wrong 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10/ ICH-E2B(R3) C.1.8.1) was accidentally used. This wrong ICH-E2B(R2) A.1.10 'Worldwide unique case identification number' referred to an different existing case.	The report with the wrong 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10/ ICH-E2B(R3) C.1.8.1) should not be nullified. A follow-up An amendment report should be submitted to correct the information previously submitted. A new ICSR should be created and submitted with the correct 'Worldwide unique case identification

~~⁹⁷ As presented in the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs), EMA/13432/2009.~~

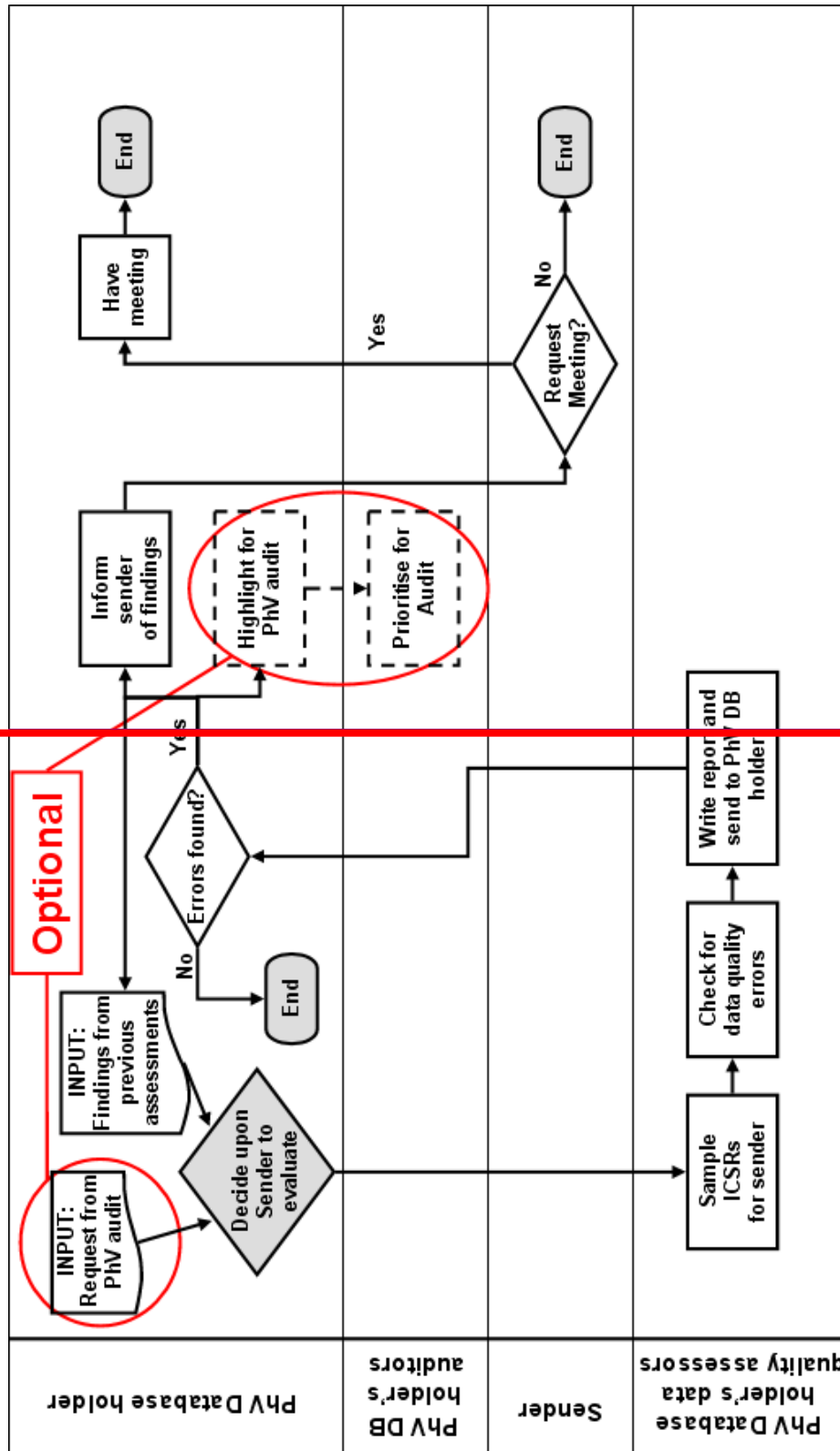
Ex.	Scenario	Action
8	<p>On receipt of further information on an individual case, it is confirmed that the patient did not receive the marketing authorisation holder's suspect drug medicinal product. However, the patient received <u>another suspected drug</u> product (active substance) <u>previously not reported</u> and the minimum reporting criteria for an ICSR <u>submission</u> are still met.</p>	<p>number'.</p> <p>The case should not be nullified.</p> <p><u>A follow-up should be submitted within the appropriate time frame with the updated information on the case.</u></p> <p><u>The case narrative should clearly indicate that the patient did not receive the company's medicinal product.</u></p> <p><u>The new suspected medicinal product (active substance) should be specified in section 'Drug information' (ICH-E2B(R2) B.4/ ICH-E2B(R3) G.k) of the ICSR. Further, it is recommended that the initial sender informs the other marketing authorisation holder about this case (including the 'Worldwide Unique Case Identification Number' (ICH-E2B(R2) A.1.10 / ICH-E2B(R3) C.1.8.1).</u></p> <p><u>The other concerned marketing authorisation holder should create a new case and specify the reference case number and the name of the initial sending marketing authorisation holder (ICH-E2B(R2) section A.1.11 / ICH-E2B(R3) section C.1.11).</u></p>
9	<p>On receipt of further information the reporter has confirmed that the reported adverse reaction is no longer considered to be related to the suspect medicinal product(s).</p>	<p>The case should not be nullified.</p> <p>A follow-up report should be submitted within the appropriate time frame with the updated information on the case.</p> <ul style="list-style-type: none"> • <u>ICH-E2B(R2): Section B.4.k.18 'Relatedness of drug to reaction(s)/event(s) (repeat B.4.k.18.1 through B.4.k.18.4 as necessary)' should be populated as necessary.</u> • <u>ICH-E2B(R3): Section G.k.9.i 'Drug-reaction(s)/ Event(s) Matrix (repeat as necessary)' should be populated as necessary.</u>
10	<p>Change of the individual case from serious to non-serious (downgrading).</p>	<p>The case should not be nullified.</p> <p>A follow-up report <u>or an amendment report (depending on whether new information was received or not)</u> should be submitted with:</p> <ul style="list-style-type: none"> • <u>ICH-E2B(R2): the data element A.1.5.1 'Seriousness' (ICH-E2B(R2) A.1.5.1) should be populated with the value 'No' without selection of a value for the data element A.1.5.2</u>

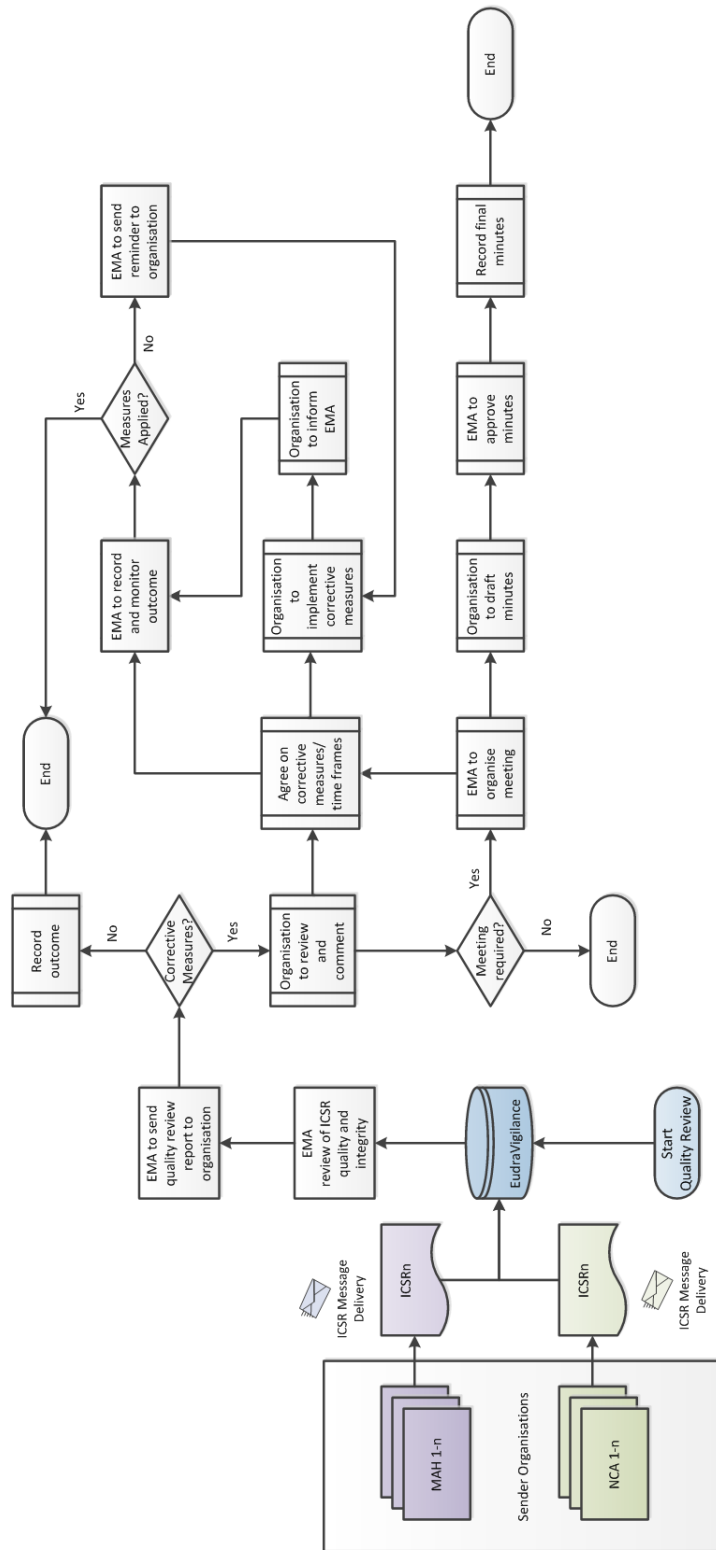
Ex.	Scenario	Action
		<p>'Seriousness criteria' (ICH-E2B(R2) A.1.5.2).</p> <ul style="list-style-type: none"> . The data element A.1.9 'Does this case fulfil the local criteria for an expedited report?' (ICH-E2B(R2) field A.1.9) should remain populated with the value 'Yes'. ICH-E2B(R3): the data element E.i.3.2 'Seriousness Criteria at Event Level' should not be populated if the reaction is not serious. The data element C.1.7 'Does This Case Fulfil the Local Criteria for an Expedited Report?' should remain populated with the value 'Yes'.
11	<p>The primary source country has changed, which has an impact on the ICH-E2B(R2) convention regarding the creation of the 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) ;/ ICH-E2B(R3) C1.8.1).</p>	<p>The case should not be nullified.</p> <ul style="list-style-type: none"> The ICH-E2B(R2): The data element A.1.0.1 'Sender's (case) safety report unique identifier' (ICH-E2B(R2) A.1.0.1) can be updated on the basis of the new primary source country code. However, the data element A.1.10 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) should remain unchanged. If, for some technical reason, the sender's local system is not fully ICH-E2B(R2) compliant and cannot follow apply this policy, then the sender should nullify the original case. A new case should be created <u>using the data element A.1.10</u> with a new 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) reflecting the changed primary source country code. The 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) of the case that was nullified should be reflected in the data elements <u>section A.1.11 'Other case identifiers in previous transmissions'</u> (ICH-E2B(R2) A.1.11). ICH-E2B(R3): The data element C.1.1 'Sender's (Case) Safety Report Unique Identifier' can be updated on the basis of the new primary source country code. However, the data element C.1.8.1 'Worldwide Unique Case Identification Number' should remain unchanged. <u>If, for some technical reason the sender's local system cannot apply this policy, then the sender should nullify the original case. A new case should be created using the data element C.1.8.1 with a new 'Worldwide Unique Case Identification Number' reflecting the changed primary source</u>

Ex.	Scenario	Action
		<p>country code. The 'Worldwide unique case identification number' of the case that was nullified should be reflected in the data elements C.1.9.1 'Other Case Identifiers in Previous Transmissions'.</p>
12	<p>The suspected medicinal product belongs to another marketing authorisation holder (e.g. a product with the same active substance but marketed under a different invented name).</p>	<p>The case should not be nullified.</p> <p>It is recommended that the initial sender informs the other marketing authorisation holder about this case (including the 'Worldwide unique case identification number''Unique Case Identification Number' (ICH-E2B(R2) A.1.10) used/ ICH-E2B(R3) C.1.8.1). The original organisation should also submit a follow-up report to provide this new information.</p> <p>The other concerned marketing authorisation holder should create a new case and specify the reference case number and the name of the initial sending marketing authorisation holder in the data elements 'Source(s) of the case identifier (e.g. name of the company name of regulatory agency)' (ICH-E2B(R2) A.1.11.1) and 'Case identifier(s)' (ICH-E2B(R2) A.1.11.2). This will allow grouping the cases in the EudraVigilance database.(ICH-E2B(R2) section A.1.11/ ICH-E2B(R3) section C.1.9.1'Other case identifiers in previous transmissions').</p>
13	<p>The suspected medicinal product taken received by the patient does not belong to the marketing authorisation holder (same active substance, the invented name is unknown and the report originates from a country, where the marketing authorisation holder has no marketing authorisation for the medicinal product in question).</p>	<p>The case should not be nullified.</p> <p>The marketing authorisation holder should submit a follow-up report with this information within the appropriate time frame.</p>
14	<p>The case is mistakenly reportedsubmitted by the marketing authorisation holder A although the marketing authorisation holder B as co-marketer is responsible for reporting the submission of the case.</p>	<p>The case should not be nullified.</p> <p>An explanation should be sent by the marketing authorisation holder A to the co-marketer marketing authorisation holder B that the case has already been reportedsubmitted. The marketing authorisation holder B should provide any additional information on the case as a follow-up report with the same 'Worldwide unique case identification number' (ICH-E2B(R2) A.1.10) / ICH-E2B(R3) C.1.8.1).</p>

VI. Appendix 6 Data quality monitoring of ICSRs transmitted electronically

Figure VI.5- Figure VI.6. Business process map - Data Review of quality monitoring and integrity of ICSRs transmitted electronically by the Agency in collaboration with competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See steps description in Table VI.13.





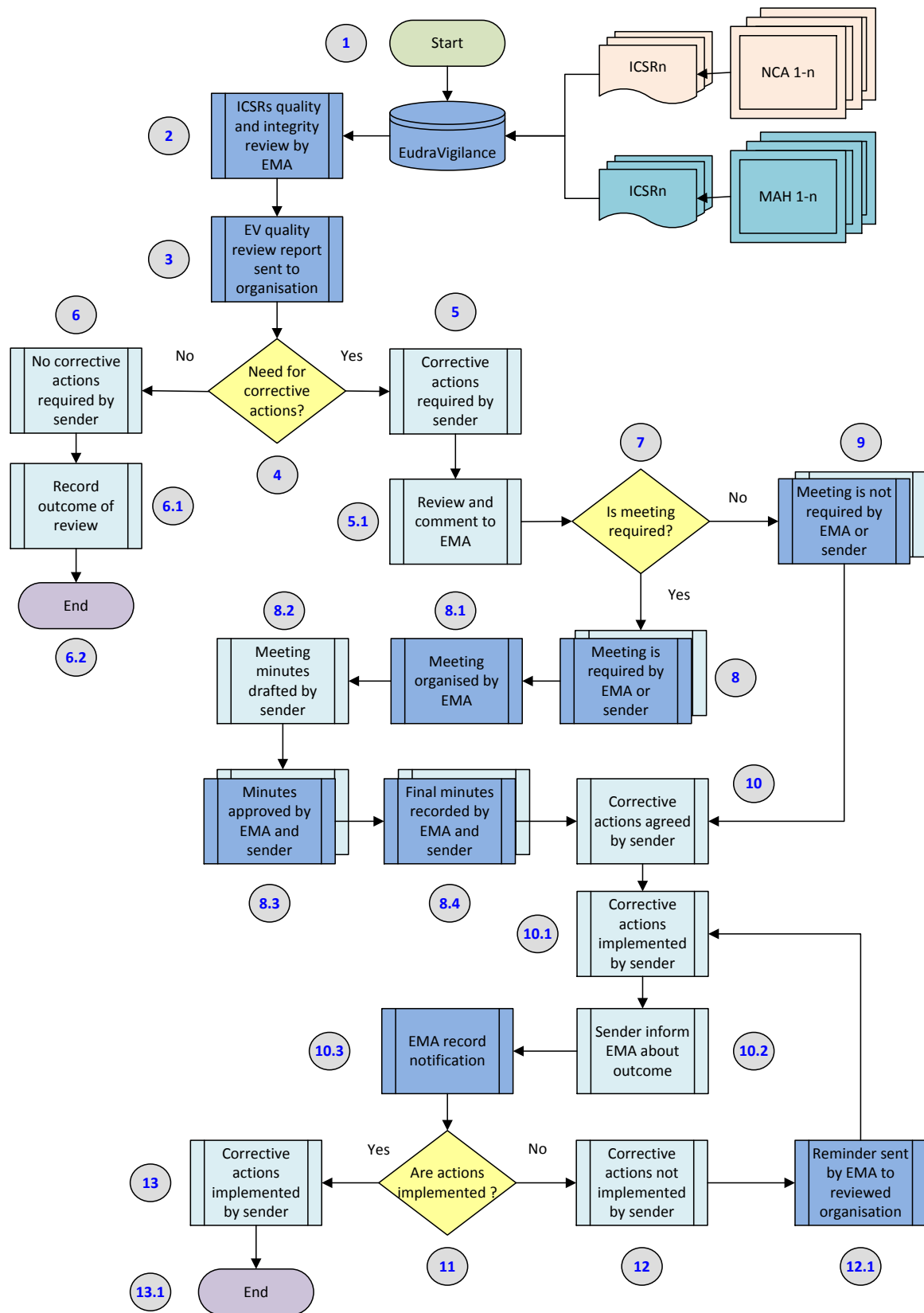


Table VI.12. Process description — Data quality monitoring of ICSRs transmitted electronically

Table VI.13. The business map and process description describe a system where there is a separation between a Pharmacovigilance DataBase (PhV-DB) holder, the PhV-DB holder's data Quality Assessors (QA) and the PhV-DB holder's auditors; however this is not mandatory and these functions may be performed by the same people or groups. Process description – Review of quality and integrity of ICSRs by the Agency in collaboration with competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs). See process map in Figure VI.7.

No.	Step	Description	Responsible Organisation
1	Start. Decide upon Sender to evaluate.	Receipt of ICSRs in EudraVigilance (EV) from sender organisations (NCAs and MAHs) with obligations for the submission of ICSRs related to medicinal products authorised in the EEA. Go to step 2. Select one of the organisations that has transmitted ICSRs to your database. Inputs into this decision can include, but need not be limited to findings from previous assessments and requests from pharmacovigilance audits. Review of quality and integrity of ICSRs by the Agency in collaboration with NCAs and MAHs in EEA Member States	PhV-DB holder EMA
2	Sample ICSRs from Sender. Receive reports of suspected drug adverse reaction(s) from NCAs and MAHs	Take a sample of ICSRs that were transmitted by the selected sender. ICSRs are received in electronic format in EudraVigilance from sender organisations with reporting obligations of suspected adverse reactions related to medicines authorised in the EEA	QA EMA
3	Check for data quality errors and integrity review by EMA.	Check the cases for data quality errors. The cases should be assessed against appropriate published standards and similar documents, for example the MedDRA Term Selection Points to Consider document. A review of the quality, integrity, and monitoring of compliance with reporting timeframes as well as the use of terminologies, and compliance with submission time frames is performed in accordance with the applicable SOP and WINS on the ICSRs submitted to EV in accordance with: 3194 SOP—EudraVigilance individual case safety report data quality checking (in draft) 3201 WIN—EudraVigilance how to check the quality of the data (in draft) Go to step 3.	QA EMA
4	Write A-EV quality review report	The findings from the data quality assessment should be collated into a single report. These can include	QA EMA

No.	Step	Description	Responsible Organisation
		<p>and send is sent to PhV-DB holder organisation.</p> <p>related checks, such as 15-day reporting compliance, whether error reports are corrected and similar statistical information. A draft report summarising the outcome of the quality review outcome is sent by e-mail to the concerned sending organisation (EU QPPV for MAH/ NCA hHead of PhVPharmacovigilance Department or MAH EU QPPV of NCA) by e-mail. Go to step 4.</p>	
53.1 4	<p>Errors found? <u>Are corrective actions required</u> Need for <u>corrective actions</u>?</p>	<p>Were any errors found during the analysis of the cases?</p> <p>Are corrective actions required by the organisation being reviewed (NCA/MAH)?</p> <p>If Yes, go to point step 45.</p> <p>If No, go to step step 5.1.</p> <p>If Yes go to steps 5.2, 5.3 & 6. point 106.</p>	<p>PhV-DB holder Organisation being reviewed (NCA/MAH)</p>
4.5	<p><u>Corrective actions required.</u> <u>Corrective actions are required by organisation being reviewed</u></p>	<p>Corrective actions are required by organisation being reviewed. Go to step 5.1.</p>	<p>Organisation being reviewed (NCA/MAH)</p>
54.5. 1	<p>End. <u>Review and comment.</u></p>	<p>If there were no errors found, then no further action needs to be taken. The process can end until the next time the sender is assessed. The PhV-DB holder may choose to share this information with the assessed sender and their auditors who may wish to factor this in to determinations of which sender to assess.</p> <p>Review the draft quality review report and provide comments to EMA within the requested time frame. Go to step 7.</p>	<p>PhV-DB holder Organisation being reviewed (NCA/MAH)</p>
5.2	<p>Highlight for PhV audit.</p>	<p>If the PhV-DB holder's organisation has an audit department, any significant findings should always be shared with them.</p>	<p>PhV-DB holder</p>
6	<p><u>No corrective actions required by sender.</u></p>	<p>No corrective actions are required following the quality review of the ICSRs submitted by the concerned organisation. Go to step 6.1.</p>	<p>Organisation being reviewed (NCA/MAH)</p>
6.1	<p><u>Record outcome of review.</u></p>	<p>Record the outcome of the quality review report. Go to step 6.2.</p>	<p>Organisation being reviewed (NCA/MAH)</p>
6.2	<p><u>End.</u></p>	<p><u>End of the quality review procedure.</u></p>	<p>EMA/ Organisation being reviewed</p>

No.	Step	Description	Responsible Organisation
			(NCA/MAH)
57.2 71	Prioritise for Audit. Is a meeting required?	Is there a need to organise a meeting between the reviewed organisation and EMA? The audit or inspections department should use the information provided to them to feed into decisions about prioritising organisations for audit or inspection. If Yes, progress to step 68. If No, progress to step 79.	EMA/ PhV-DB holder's auditors organisation being reviewed (NCA/MAH)
5.36 8	INPUT: Findings from previous assessments. A meeting is required by EMA or sender.	Any errors found (or even lack thereof) should be incorporated into decisions about which senders to evaluate & should also inform the performance of the assessments (e.g. targeting particular types of case) and the report (documenting whether previously identified issues have been addressed). A review meeting is requested by the Sender Organisation or is proposed by EMA. Go to step 8.1.	PhV-DB holder EMA/Organisation being reviewed (NCA/MAH)
68.1	A meeting is organised by EMA.	A meeting is organised (via TC or face-to-face). Go to step 8.2.	EMA
68.2	Inform sender. Draft Meeting minutes drafted by sender. of findings. the meeting	Inform the sender of the findings, including requested remedial actions (e.g. retransmitting certain cases) and time frames for those actions. Agreed actions and outcome of discussions to be summarised in draft meeting minutes. Go to step 8.3.	PhV-DB holder Organisation being reviewed (NCA/MAH)
68.3	Approve meeting. Minutes approved by EMA and sender.	Approve the meeting minutes as final. Go to step 8.4.	EMA/Organisation being reviewed (NCA/MAH)
68.4	Record final. Final minutes recorded by EMA and sender.	Record the final meeting minutes. Go to step 10.	EMA/Organisation being reviewed (NCA/MAH)
6.5	End		
79	Request a meeting? is NOT not required by EMA or sender.	The sender should have the option to choose to request a meeting to discuss the findings and appropriate remedial action and time frames. If no No review meeting is required (requested, go to step 7.1. If a meeting is requested go to step by the Sender Organisation or proposed by EMA). Proceed with Go to point step 810.	EMA/Organisation being reviewed (NCA/MAH) Sender

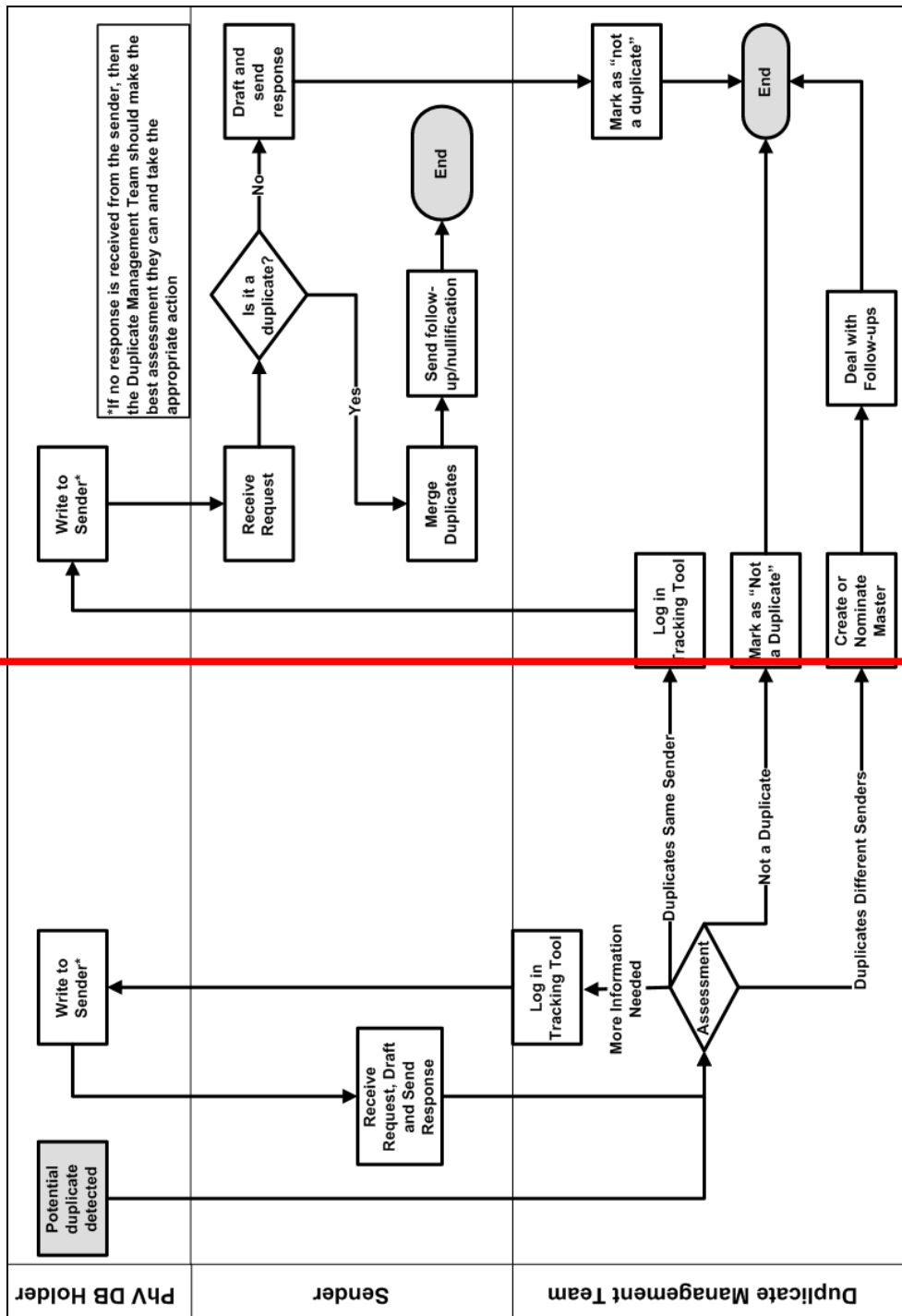
No.	Step	Description	Responsible Organisation
7.18 10	Address the findings & retransmit any required cases. Agree on corrective measure actions/tim eframes agreed by sender.	The Address all findings, take necessary steps to prevent recurrence of such findings & retransmit any required cases. Reach agreement on corrective measure actions/ and time frames are agreed by the sending organisation being reviewed. ; outcome of € The agreement is to be reflected on the basis of the final quality review report, which is to be recorded. Go to step 10.1.	SenderOrganisa tion being reviewed (NCA/MAH)
108. 1	Implement eCorrective measure actions implemented by sender.	The sending organisation should € implement the corrective measure actions in accordance with the agreed methods and time frames. Go to step 10.2.	Organisation being reviewed (NCA/MAH)
7810 .2	End. Sender i Inform EMA about outcome.	Once all findings have been addressed, the necessary steps taken to prevent recurrence of such findings and any required cases have been retransmitted, the process can end until the next time the sender is assessed. Inform EMA when the corrective measure actions have been implemented in line with the final quality review report. Go to step 10.3.	SenderOrganis ation being reviewed (NCA/MAH)
810. 3	Have meeting. RE MA record notificationand monitor outcome.	Upon request from one party, a meeting should be held to discuss the findings of quality assessments and appropriate remedial and preventive actions to ensure that the cases in the database are correct and shall be so in the future. Record The notification of implementation of the corrective actions in line with the final quality review report is recorded by the Agency. Go to step 11. and monitor the implementation the agreed corrective measures	PhV-DB holder & SenderEMA
98.4 11	End. Have Are corrective measure actions implemented? been applied?	Have the agreed corrective actions been implemented by the sending organisation? EMA Unless further action hasmonitors and € checks if the agreed corrective measure actions have been specified (e.g. future meetings or assessments) ,implemented. by the organisation If Yes, the process can will end until the next time the sender is assessed If No, proceed go to step 912. If Yes, go to step 13.	PhV-DB holderEMA

No.	Step	Description	Responsible Organisation
<u>12</u>	<u>Corrective actions not implemented by sender.</u>	<u>The agreed corrective actions have not been implemented by the sending organisation. Go to step 12.1</u>	<u>Organisation being reviewed (NCA/MAH)</u>
<u>912.1</u>	<u>Send reminder to organisation being reviewed Reminder sent by EMA to reviewed organisation.</u>	<u>Send reminder to the sending organisation being reviewed to implement corrective measureactions. Go back to step 10.1. and proceed with point 8.4</u>	<u>EMA</u>
<u>13</u>	<u>Corrective actions implemented.</u>	<u>The agreed corrective actions have been implemented by the sending organisation. Go to step 13.1</u>	<u>Organisation being reviewed (NCA/MAH)</u>
<u>13.1</u>	<u>End.</u>	<u>The ICSRs quality review procedure ends.</u>	<u>EMA/ Organisation being reviewed (NCA/MAH)</u>
<u>10</u>	<u>Corrective Measures are NOT required</u>	<u>The quality review did not reveal any corrective measures</u>	
<u>10.1</u>	<u>Record outcome</u>		<u>EMA/Organisation being reviewed</u>
<u>10.2</u>	<u>End</u>		

VI. Appendix 7 Duplicate detection and management of ICSRs

VI.App.7.1 Duplicate ~~D~~detection in EudraVigilance – Collaboration between the Agency, competent authorities in Member States and MAHsmarketing authorisation holders where- ~~d~~Duplicate ICSRs originate fromsubmitted to EudraVigilance by the same sender and identified by the Agency

~~Figure VI.6- Figure VI.7.~~ Business process map - Duplicate ~~detection and management of ICSRs~~Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) where- ~~d~~Duplicate ICSRs originate fromsubmitted to EudraVigilance by the same sender and identified by the Agency. See steps description in Table VI.14.



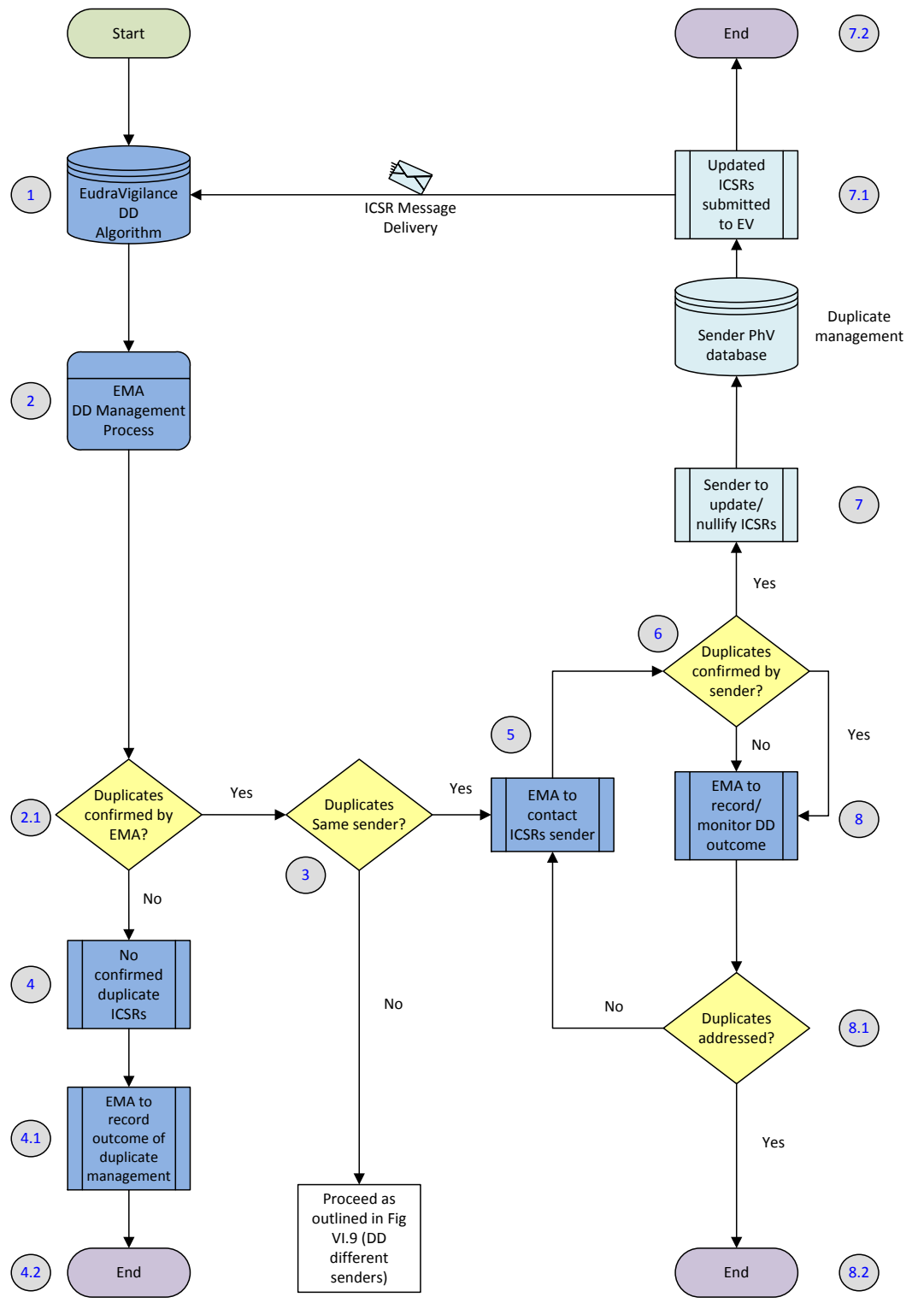


Table VI.14. Process description - Duplicate detection and management of ICSRs ~~DD~~ Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) ~~where duplicate ICSRs submitted to EudraVigilance originate from~~ by the same sender and identified by the Agency. See process map in Figure VI.8.

No.	Step	Description	Responsible organisation
±	Start Potential duplicate detected.	Potential duplicates have been detected by the Pharmacovigilance DataBase (PhV-DB) holder organisation or the PhV-DB holder organisation is notified of potential duplicates by a receiver of the cases. EudraVigilance (EV) Duplicate Detection with duplicate ICSRs originating from submitted to EudraVigilance by the same sender – Duplicates and identified by the Agency.	PhV-DB holder
1	Duplicate Detection (DD) in EudraVigilance Eudra Vigilance DD algorithm.	A duplicate detection algorithm is operated in EudraVigilance to detect potential duplicate ICSRs. Go to step 2.	EMA
2	Assessment: EMA Duplicate Detection DD Management Process.	All The potential duplicate ICSRs need assessment identified by the organisation Duplicate Management Team (DMT) to confirm or deny their duplicate status. Following assessment there are 4 possible outcomes: — Not a Duplicate (go to step 2.1), – More Information Needed (go to step 2.2), – Duplicates From Different Sender (go to step 2.3), – Duplicates From Same Sender (go to step 2.4). The outcome of all assessments should be recorded to avoid continually reassessing the same cases when further versions arrive. These recorded outcomes can also be used to refine the EudraVigilance duplicate detection methods during future development. algorithm are reviewed by EMA in accordance with the applicable SOP and WINS 3323 SOP – Performing duplicate detection in EudraVigilance (in draft) 3324 WIN – Evaluation and management of detected	DMT/EMA

No.	Step	Description	Responsible organisation
		potential duplicates in EudraVigilance (in draft). Go to step 2.1.	
2.1	Are duplicate ICSRs confirmed by EMA? Not a Duplicate: Mark as not a duplicate. Are there duplicates?	If the cases are assessed as not being duplicate ICSRs of one another, then mark both cases as such identified by the EudraVigilance duplicate detection algorithm confirmed by EMA? Go If Yes, proceed to step 3 (End). If No, proceed to step 4.	EMA
2.2	More information needed: Log in tracking tool.	There should be some form of tool for tracking when more information is needed, when correspondence has been sent, whether an answer was received and, if so, when.	DMT
2.2.13	Write to Sender. Are the confirmed duplicate ICSRs from the same sender organisation?	More information is required in order to be able to make a definite assessment. The sender (who transmitted the case(s) in question to the PhVDB holder's organisation) should be contacted to request specific information necessary to confirm or deny duplication. Personal data protection must remain paramount, so unsecured communications should not include sufficient data to identify an individual. Are the confirmed duplicate ICSRs from the same sender organisation or a different sender organisation? If Yes, proceed to step 45. If No, proceed according to the business process map related to duplicate detection of ICSRs from different senders outlined in Figure VI.119 and Table VI.15 for the management of duplicate ICSRs originate from submitted to EudraVigilance by different senders and identified by the Agency.	PhVDB holder EMA
4	No confirmed duplicate ICSRs.	As a result of the duplicate detection management process by EMA, it is confirmed that the individual cases are not duplicate ICSRs. Go to step 4.1.	EMA
4.1	EMA to record outcome of duplicate management.	The outcome of the duplicate detection management process is recorded in accordance with the applicable SOP and WINS. Go to step 4.2.	EMA
4.2	End.		EMA
2.2.	Receive request, draft and send	Once a request for more information has been received, the Sender of the case should respond	Sender EMA

No.	Step	Description	Responsible organisation
24-5	response. EMA to contact- ICSRs Sender.-(MAH/NCA)	promptly, either as a follow-up version of the case or by responding to the requester. The DMT should then reassess the case based on the new information (Go back to step 2). EMA contacts the ICSR-sender organisation (MAH/NCA) to inform about the potential duplicate ICSRs that have been identified and confirmed as duplicates in EudraVigilance in accordance with the applicable WIN: 3325-WIN Following up potential duplicates ICSRs with the original senders (in draft). Go to step 6.	
6	Are duplicates confirmed by sender?	Does the sender organisation confirm EMA assessment of the duplicate ICSRs? If Yes, proceed to step 7 for sender next step and to step 8 for EMA next step. If No, proceed to step 8 for EMA next step.	EMA/ Sender organisation (MAH/NCA)
2.34-1	Duplicates Different Senders: Create or nominate master. EMA to record/monitor the outcome of the duplicate management	Once cases have been determined to be duplicates of one another and have been transmitted to the PhV DB holder by different senders or reporters, then they should be merged under a master case, following the process described in chapter 2.3 "Management of duplicate cases" of the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs), EMA/13432/2009. Record the outcome of the duplicate management and monitor that duplicates have been addressed by the sender organisation	DMT EMA
2.3-1	Deal with follow-ups.	If any follow-ups arrive for any of the cases, this information may require a reassessment of the master case. Reassess and, if necessary, amend the master case as with any received follow-up information. Go to step 3 (End).	DMT
4.2-4	Duplicates Same Sender: Log in tracking tool. Are the duplicates addressed?	Once cases have been determined to be duplicates of one another, and have been transmitted to the PhV DB holder by the same sender, then this decision and the correspondence referred to in step 2.4.1 should be logged in the tracking tool referred to in step 2.2. Have the duplicates been addressed by the	DMT

No.	Step	Description	Responsible organisation
		<p><u>Sender Organisation?</u></p> <p><u>If Yes, the process ends.</u></p> <p><u>If No, progress with point 4</u></p>	
2.4.157	Write to Sender (MAH/NCA) to update/nullify cases.	<p>The sender organisation, as <u>Sender Organisation has to update/nullify</u> the source of the duplicates, should be contacted <u>duplicate cases</u> ICSRs in their pharmacovigilance database in accordance with chapter 2.3.3 of the <u>guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports</u> <u>Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs),</u> <u>(EMA/13432/2009).</u></p> <p>The sender should be asked to confirm or deny duplication and take appropriate steps in accordance with chapter 2.3.1 of the aforementioned Guideline.</p> <p><u>Go to step 7.1.</u></p>	Sender <u>PhV-DB holder</u> <u>Organisation (MAH/NCA)</u>
2.4.2	Receive request.	<p>Receive and log the communication containing information on suspected duplicates in the Sender's PhV-DB.</p>	Sender
2.4.3	Is it a duplicate?	<p>Assess the potential duplicates. Are the cases duplicates of one another?</p> <p>If Yes, go to step 2.4.3.1.</p> <p>If No, go to step 2.4.3.2.</p>	Sender
2.4.357.1	Merge duplicates. Sender (MAH/NCA) to send updated ICSR/nullification report <u>Updated ICSRs submitted to EV.</u>	<p>Merge the duplicates, taking into account <u>Flowchart 1 of chapter 2.3.1.3 of</u> <u>The Sender Organisation has to send</u> <u>submits an</u> the updated ICSRs/nullification reports to EudraVigilance in accordance with the <u>guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports</u> <u>Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs),</u> <u>(EMA/13432/2009).</u> <u>Go to step 7.2.</u></p>	Sender <u>Sender organisation (MAH/NCA)</u>
57.2	End.		Sender organisation (MAH/NCA)
8	<u>EMA to record/monitor duplicate</u>	<u>If the ICSRs are not confirmed as duplicates by the sender, EMA records the outcome of the duplicate</u>	<u>EMA</u>

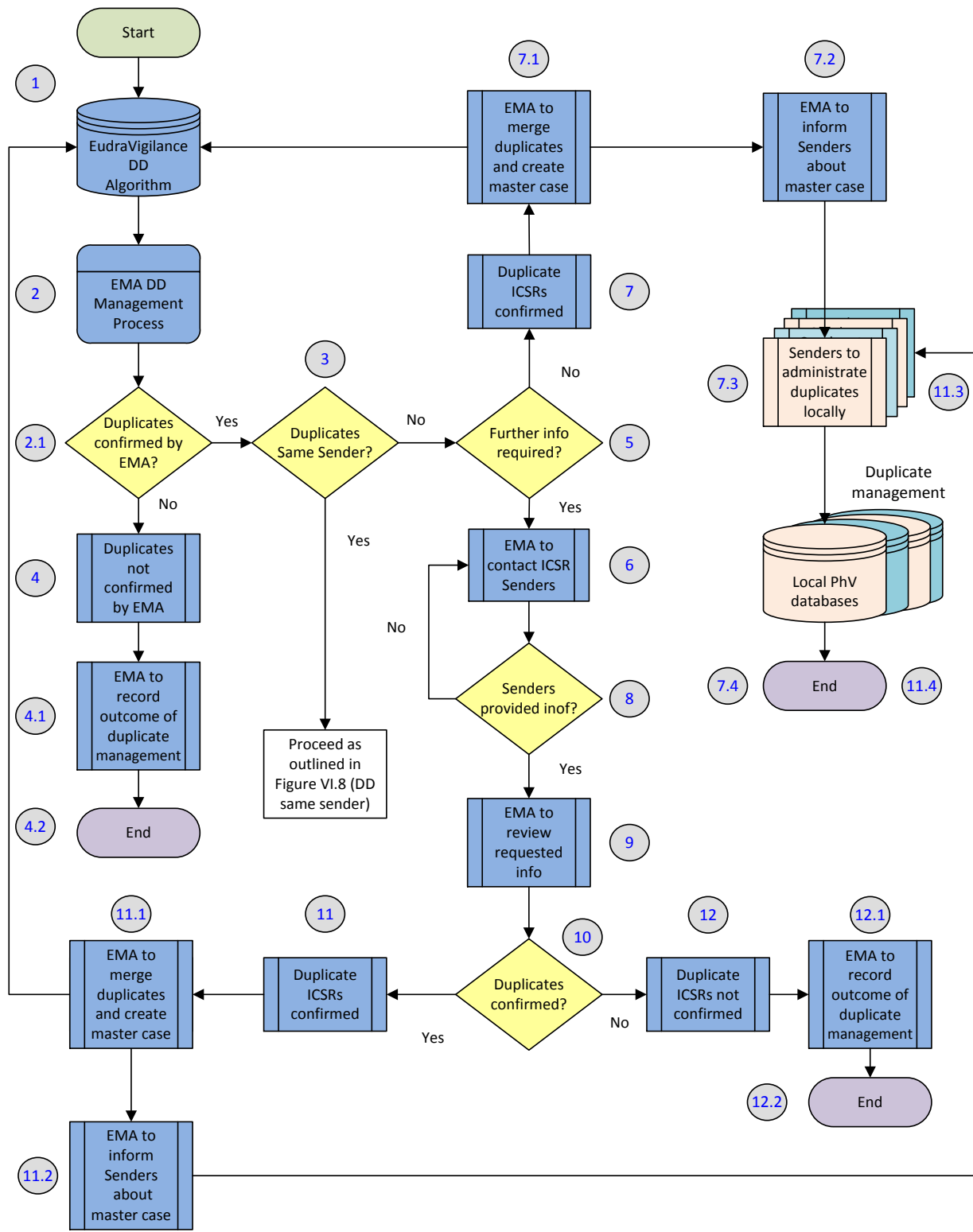
No.	Step	Description	Responsible organisation
	management outcome.	management. Go to step 8.1. If the sender confirms the duplicate ICSRs, EMA monitors that the sender has addressed them by submitting updated/nullified ICSRs to EV. Go to step 8.1.	
8.1	Are the duplicate ICSRs addressed?	Have the duplicate ICSRs been addressed by the sender organisation? If Yes, process to step 8.2. If No, process back to step 5.	EMA
8.2	End.		
2.4. 3.1. 16	Send follow-up/nullification. There are no confirmed duplicates	For the cases that are merged under the master, send a nullification message to the PhV-DB holder. For the case that is master, send the updated case to the PhV-DB holder as follow-up information. The merging & transmission should be completed promptly and in any case within 15 days of the date of receipt of the information from the PhV-DB holder. duplicate detection management process it is confirmed that the individual cases were considered to be possible are no duplicates. This date should be treated as the date of receipt of most recent information for regulatory reporting purposes.	Sender EMA
2.4. 3.1. 2	End:	The duplicates have now been removed from both the Sender's system and that of the PhV-DB holder and only the master should be available for signal detection and data quality analyses. Unless follow-up information is received, then no further steps need be taken.	Sender
2.4. 3.2	Draft and send a response.	Reply to the PhV-DB holder who sent the communication informing that the cases are not duplicates.	Sender
2.4. 3.26 1	Mark as "Not a duplicate to record outcome of duplicate management"	Upon receipt The outcome of confirmation from the Sender organisation that duplicate detection management process is recorded in accordance with the cases are not applicable SOP/WIN: 3323 SOP – Performing duplicate detection in EudraVigilance (in draft) 3324 WIN – Evaluation and management of detected potential duplicates, mark the cases as "Not a duplicate"	DMTEMA

No.	Step	Description	Responsible organisation
		& go to step 3 (End). in EudraVigilance (in draft)	
36.2	End:	No further action is required for this couple.	EMADMT

VI.App.7.2 Duplicate Detection in EudraVigilance – Collaboration between the Agency, competent authorities in Member States and marketing authorisation holders (MAHs) – where Duplicate ICSRs originate from submitted to EudraVigilance by different senders and identified by the Agency

Business process map - Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) where Duplicate ICSRs originate from submitted to EudraVigilance by different senders and identified by the Agency. See steps description in Table VI.15.

Figure VI.8.



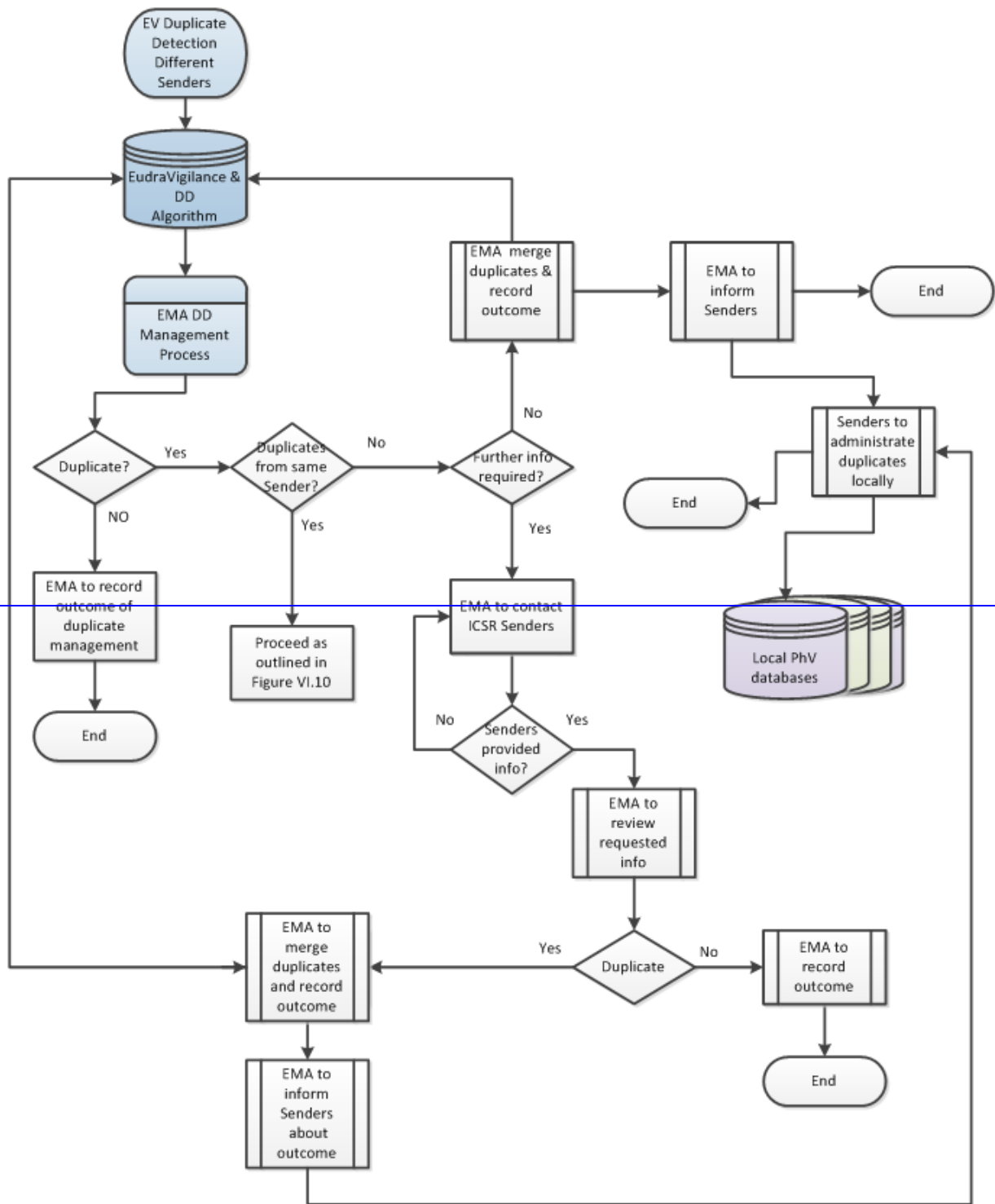


Table VI.15. Process description - Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) where duplicate ICSRs originate from submitted to EudraVigilance by different senders and identified by the Agency. See process map in Figure VI.9.

No	Step	Description	Responsible Organisation
	Start.	EudraVigilance (EV) Duplicate Detection with	

No	Step	Description	Responsible Organisation
		<p><u>duplicates originating from different Senders – Duplicates identified by the Agency</u></p> <p><i>Example: there is more than one suspect drug and the same case is submitted to EV by two MAHs senders; the patient reported the same adverse reaction to a NCA and the MAH.</i></p>	
1	Duplicate Detection (DD) in EudraVigilance EudraVigilance DD Algorithm.	A duplicate detection algorithm is operated in EudraVigilance to detect potential duplicate ICSRs. Go to step 2.	EMA
2	EMA Duplicate Detection-DD Management Process.	The potential duplicate ICSRs identified by the EudraVigilance duplicate detection algorithm are reviewed in accordance with the applicable SOP/ and WINs 3323 SOP – Performing duplicate detection in EudraVigilance (in draft) 3324 WIN – Evaluation and management of detected potential duplicates in EudraVigilance (in draft). Go to step 2.1.	EMA
2.1	Are duplicate ICSRs confirmed by EMA? Are there duplicates?	Are the potential duplicate ICSRs identified by the EudraVigilance duplicate detection algorithm confirmed? If Yes, proceed to point step 3. If No, proceed to steppoint 49.	EMA
3	Are the duplicate ICSRs from the same Ssender?	Are the duplicate ICSRs identified by the EudraVigilance duplicate detection algorithm confirmed from the same sender organisation (NCA or MAH)? If Yes, proceed as outlined in Figure VI.8 and Table VI.14 for the management of duplicate ICSRs submitted to EudraVigilance by the same sender and identified by the Agency 10 . If No, proceed to steppoint 45.	EMA
4	Duplicates not confirmed by EMA.	The potential duplicate ICSRs have been reviewed and are not considered as duplicate of a single case. Go to step 4.1.	EMA
4.1	EMA to record outcome of duplicate	The outcome of the duplicate detection management process is recorded in accordance with the applicable	EMA

No	Step	Description	Responsible Organisation
	<u>management.</u>	<u>SOP and WINS. Go to step 4.2.</u>	
4.2	<u>End.</u>		<u>EMA</u>
45	<u>Is further information required?</u>	<u>Is there further information necessary from the senders' organisations required to confirm if the potential duplicate ICSRs identified by the duplicate detection algorithm are duplicates?</u> <u>If Yes, proceed to steppoint 56.</u> <u>If No, proceed to steppoint 87.</u>	<u>EMA</u>
56	<u>EMA to contact ICSR Senders' organisations (MAH/NCA).</u>	<u>Contact the ICSR senders' organisations to obtain additional information on the individual cases that have been identified as potential duplicate ICSRs. Go to step 8.</u>	<u>EMA</u>
6	<u>Has Sender provided the information?</u>	<u>Check if the Senders have provided the requested information?</u> <u>If Yes, proceed to point 7.</u> <u>If No, proceed to 5.</u>	<u>EMA</u>
7	<u>Duplicate ICSRs confirmed.</u>	<u>The ICSRs are confirmed as duplicate of a single case. Go to step 7.1.</u>	<u>EMA</u>
7.1	<u>EMA to merge duplicate ICSRs and create master case.</u>	<u>EMA merges the duplicate ICSRs in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Go to step 7.2.</u>	<u>EMA</u>
7.2	<u>EMA to inform senders' organisations about master case.</u>	<u>EMA informs the senders' organisations (MAH/NCA) about the outcome of the duplicate management (creation of master case) to allow them to take action where necessary^{98;99;100}. Go to step 7.3.</u>	<u>EMA</u>

⁹⁸ NOTE: MAHs will be able to download "master cases" from EudraVigilance in line with the [EudraVigilance Access Policy for Medicines for Human Use \(EMA/759287/2009\)](#). The message type (E2B(R2) data element M.1.1; E2B(R3) data element N.1.1) will have the code "master" to distinguish it from all other ICSR messages, which will have the message type "ichicsr" (see [EU ICSR Implementation Guide; EMA/51938/2013](#)).

MAHs will be able to export from EudraVigilance the original ICSRs that have been merged under the "master case" and also any nullification to these ICSRs, where applicable (see [EU ICSR Implementation Guide; EMA/51938/2013](#)). It is up to the MAH to decide if they wish to process "master cases" or not.

If the MAH does process the "master case" and it results in the update of one of its own individual cases with the information from the EudraVigilance master case, the MAH MUST NOT resubmit an updated version of this individual case to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.

⁹⁹ A table of master cases and associated duplicates will be made available to aid the duplicate management by Sender organisations.

¹⁰⁰ NCAs can use the EudraVigilance Rerouting Rules Engine to update the rerouting rules to determine if they wish to receive EudraVigilance "master cases" or not (see [EU ICSR Implementation Guide; EMA/51938/2013](#)). The "master cases" MUST NOT be retransmitted by the NCA to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.

No	Step	Description	Responsible Organisation
7.3	Senders' organisations to administrate duplicate ICSRs locally.	<p>The senders' organisations of the individual cases identified as duplicate ICSRs manage the duplicate ICSRs locally in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports.</p> <p>The reference numbers of the duplicate ICSRs and of EMA master case are captured in data element 'Other case identifiers in previous transmissions' (ICH-E2B(R2) A.11/ ICH-E2B(R3) section C.1.9.1.).</p> <p>Go to step 7.4.</p>	Sender organisations (MAH/NCA)
7.4	End.		Sender organisations (MAH/NCA)
8	Have senders' organisations provided information?	<p>Check if the sender's organisations have provided the requested information?</p> <p>If Yes, proceed to step 9.</p> <p>If No, proceed back to step 6.</p>	EMA
79	EMA to review requested info.	Review the potential duplicate ICSRs together with the requested information provided by the senders' organisations. Go to step 10 .	EMA
10	Are duplicate ICSRs confirmed?	<p>Are the potential duplicate ICSRs confirmed following the receipt of the requested information from the sender's organisations?</p> <p>If Yes, proceed to step 11.</p> <p>If No, proceed to step 12.</p>	EMA
11	Duplicate ICSRs confirmed.	The ICSRs are confirmed as duplicate of a single case. Go to step 11.1 .	EMA
11.1	EMA to merge duplicate ICSRs and create master case.	EMA merges the duplicate ICSRs in EudraVigilance in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Go to step 11.2 .	EMA
11.2	EMA to inform senders' organisations about master case.	EMA informs the senders' organisations (MAH/NCA) about the outcome of the duplicate management (creation of master case) to allow them to take action where necessary ^{101;102;103} . Go to step 11.3 .	EMA

¹⁰¹ NOTE: MAHs will be able to download "master cases" from EudraVigilance in line with the EudraVigilance Access Policy for Medicines for Human Use ([EMA/759287/2009](#)). The message type (E2B(R2) data element M.1.1; E2B(R3) data element

No	Step	Description	Responsible Organisation
11.3	Senders' organisations to administrate duplicate ICSRs locally.	<p>The senders' organisations of the individual cases identified as duplicate ICSRs manage the duplicate ICSRs locally in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports.</p> <p>The reference numbers of the duplicate ICSRs and of EMA master case are captured in data element 'Other case identifiers in previous transmissions' (ICH-E2B(R2) A.11/ ICH-E2B(R3) section C.1.9.1.).</p> <p>Go to step 11.4.</p>	Sender organisations (MAH/NCA)
11.4	End.		Sender organisations (MAH/NCA)
12	Duplicate ICSRs not confirmed.	The potential duplicate ICSRs are not considered as duplicate of a single case based on the review of the information provided by the senders' organisations. Go to step 12.1 .	EMA
12.1	EMA to record outcome of duplicate management.	The outcome of the duplicate management process is recorded in accordance with the applicable SOP and WINs. Go to step 12.2 .	EMA
12.2	End.		EMA
7.1	Are the ICSRs duplicate of a single case?	<p>the The duplicate cases are to be reviewed based on the requested info that has been provided by the Senders to confirm if they are duplicates.</p> <p>If Yes, proceed to point 8.</p> <p>If No, progress with point 9.</p>	EMA
8	The cases are confirmed duplicates		EMA

[N.1.1](#)) will have the code "master" to distinguish it from all other ICSR messages, which will have the message type "ichicsr" (see [EU ICSR Implementation Guide; EMA/51938/2013](#)). MAHs will be able to export from EudraVigilance the original ICSRs that have been merged under the "master case" and also any nullification to these ICSRs, where applicable (see [EU ICSR Implementation Guide; EMA/51938/2013](#)). It is up to the MAH to decide if they wish to process "master cases" or not. If the MAH does process the "master case" and it results in the update of one of its own individual cases with the information from the EudraVigilance master case, the MAH MUST NOT resubmit an updated version of this individual case to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.

¹⁰² [A table of master cases and associated duplicates will be made available to aid duplicate management by Sender organisations.](#)

¹⁰³ [NCAs can use the EudraVigilance Rerouting Rules Engine to update the rerouting rules to determine if they wish to receive EudraVigilance "master cases" or not \(see EU ICSR Implementation Guide; EMA/51938/2013\). The "master cases" MUST NOT be retransmitted by the NCA to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.](#)

No	Step	Description	Responsible Organisation
8.1	EMA to merge duplicate reports and record outcome	Merge the potential duplicates in EudraVigilance in line with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009) .	Sender Organisations (MAH/NCA)
8.2	EMA to inform Senders about outcome	Inform the Senders about the outcome of the duplicate management to allow Senders to take action where necessary ^{104, 105, 106}	EMA
8.3	Senders to administrate duplicates locally	Senders of the cases identified as duplicates in EudraVigilance should follow the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009) Note: capture duplicate case reference numbers in data element 'Other case identifiers in previous transmissions' (E2B(R2) A.11/E2B(R3) section C.1.9.1)	Sender Organisations (MAH/NCA)
8.4	End		Sender Organisations (MAH/NCA)
9	The cases are NOT duplicates	The potential duplicates have been reviewed and are not duplicate cases	EMA
9.1	EMA to record outcome of duplicate management	The outcome of the Duplicate Detection Management process is recorded in accordance with the applicable SOP/WIN: 3323 SOP—Performing duplicate detection in EudraVigilance (in draft) 3324 WIN—Evaluation and management of detected potential duplicates in EudraVigilance (in draft)	EMA

¹⁰⁴ NOTE: MAHs will be able to download "master cases" from EudraVigilance in line with the [EudraVigilance Access Policy for Medicines for Human Use \(EMA/759287/2009\)](#). The message type (equivalent to E2B(R2) – M.1.1) will have the code "master" to distinguish it from all other ICSR messages, which will have the message type "ichiers" (see EU ICSR Implementation Guide, chapter I.C.3.1.1).

MAHs will also be able to export from EudraVigilance the original ICSRs that have been merged under the "master case" and also any nullification to these ICSRs, where applicable (see EU ICSR Implementation Guide, chapter I.C.6.1.2). It is up to the MAH to decide if they wish to process "master cases" or not.

If the MAH does process the "master case" and it involves results in the updating of one of their own individual cases with the information from the EudraVigilance master case, the MAH MUST NOT resubmit an updated version of this individual case to EudraVigilance.

¹⁰⁵ A table of master cases and associated duplicates will be made available to aid duplicate management by Sender organisations.

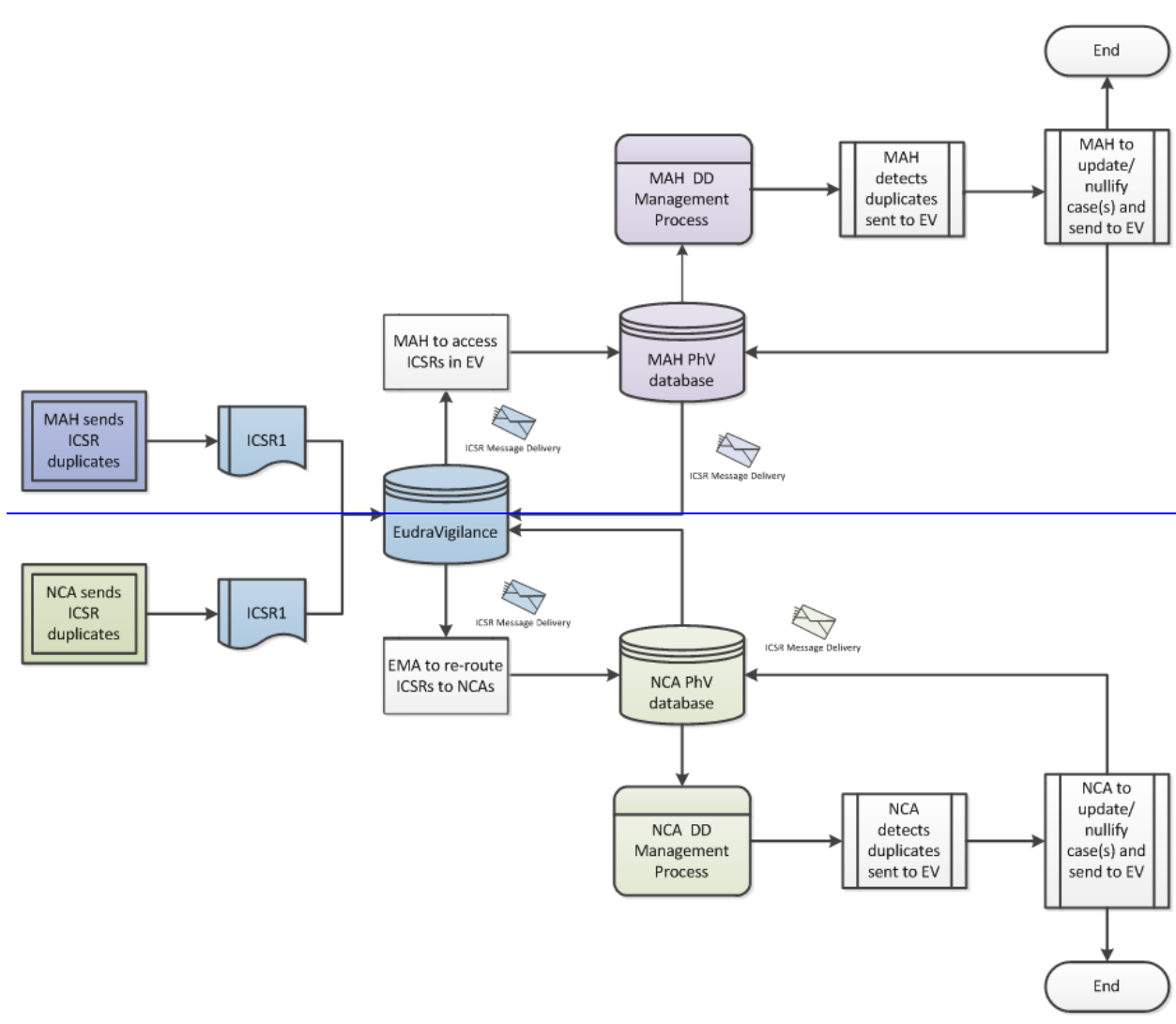
¹⁰⁶ NCAs can use the EudraVigilance Rerouting Rules Engine to update the rerouting rules to determine if they wish to receive EudraVigilance "master cases" or not. See also further guidance as outlined in EU ICSR Implementation Guide, chapter I.C.2.3 and I.C.6.1.2). The "master cases" must not be retransmitted by the NCA to EudraVigilance if there is no receipt of new information that warrants a follow up report.

No	Step	Description	Responsible Organisation
9.2	End		EMA

VI.App.7.3 Duplicate detection in EudraVigilance – Collaboration between the Agency, competent authorities in Member States and marketing authorisation holders – Duplicate ICSRs submitted to EudraVigilance by from the same Ssender Organisation – duplicates and identified detected by the sender organisation prior to the detection by the Agency in EudraVigilance

Figure VI.9. Business process map -- Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) – Duplicate ICSRs originating from submitted to EudraVigilance by a pharmacovigilance database of the same Ssender Organisation (NCA/MAH), which were sent to EudraVigilance – Duplicates detected and identified by the sSender Organisation prior to the detection by the Agency. See steps description in Table VI.16.

in EudraVigilance



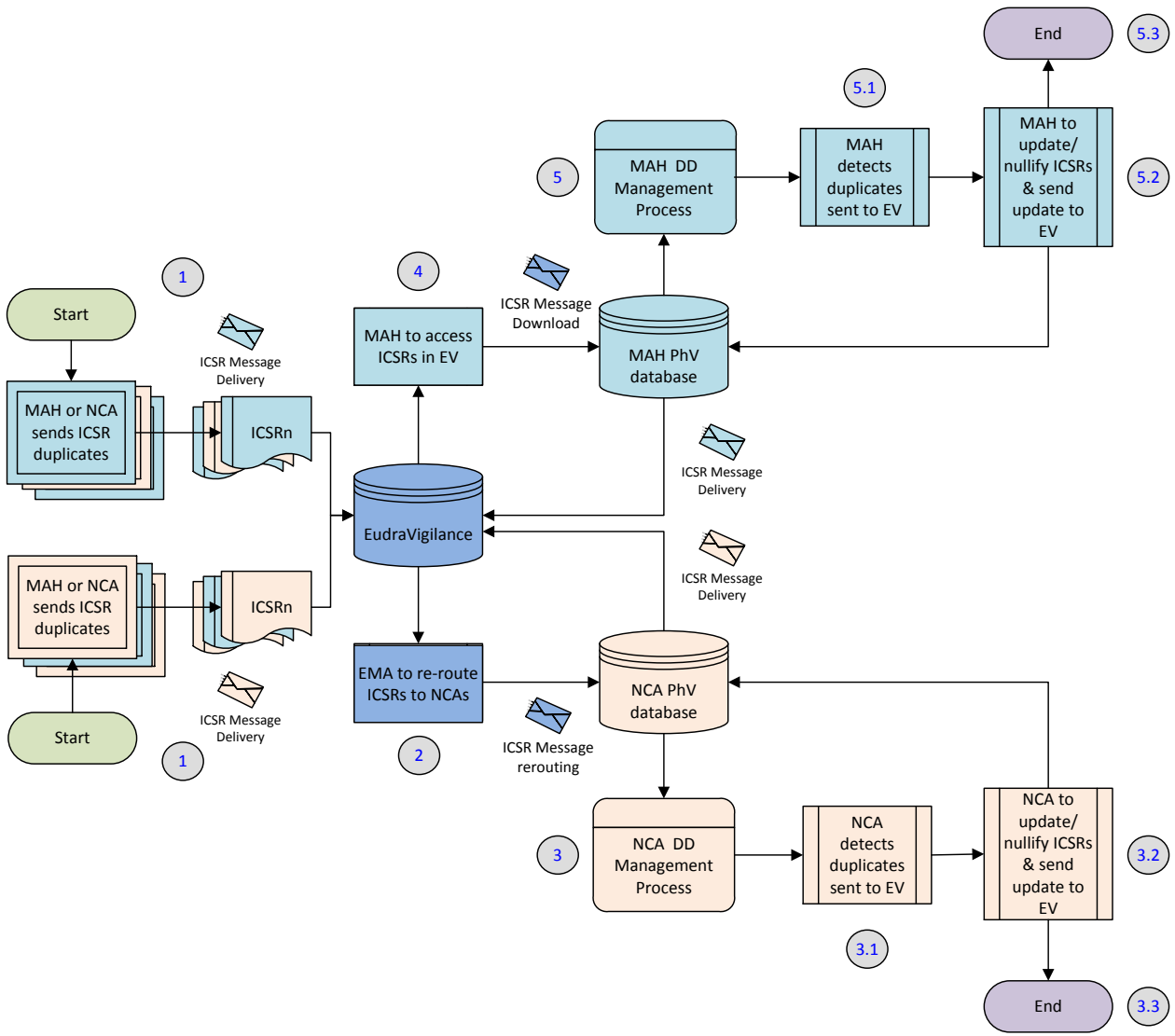


Table VI.16. Process description -- Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, Member States and MAHs - Duplicate ICSRs submitted to EudraVigilance originating from a pharmacovigilance database of by the same Sender Organisation (NCA/MAH) which were sent to EudraVigilance – Duplicates detected and identified by the sSender Organisation prior to the detection by the Agency. See process map in Figure VI.10. in EudraVigilance

No	Step	Description	Responsible Organisation
	Start.	Duplicate ICSRs submitted to EudraVigilance by originating from a pharmacovigilance database of the same Ssender (NCA or MAH) Organisation (NCA/MAH) which were sent to EudraVigilance – Duplicates detected and identified by the Ssender Organisation prior to the detection by the Agency.	
1	ICSR sDuplicate ICSRs are sentsubmitted to EudraVigilanceEV.	Duplicated ICSRs for the same individual case are sentsubmitted to EudraVigilance (EV) by the same sender (MAH or NCA). Go to step 2 for duplicate ICSRs submitted by a NCA. Go to step 4 for duplicate ICSRs submitted by a MAH.	Sender Organisation (NCA/MAH/NCA)
2	Re-routing of ICSRs to NCA.	MAHs EEA ICSRs are rerouted from EudraVigilance to the NCA in accordance with VI.C.4. and the rerouting principles described in the EU ICSR Implementation Guide (EMA/51938/2013). Go to step 3.	EMA/ EudraVigilance
3	Duplicate Management ProcessNCA DD and management process.	A routine duplicate detection process is performed regularly by the NCA in its pharmacovigilance database. Go to step 3.1.	NCA
3.1	Duplicates detected, which were sent to EudraVigilanceNCA detects duplicates sent to EV.	The The NCA identifies the duplicate ICSRs of its own cases after their submission s they sent to EudraVigilance as part of theirits routine duplicate management process. Go to step 3.2.	NCA
3.2	NCA to update/ nullify ICSRss and send update to EV.Review/update/ nullify cases and send to EV	The NCA rReviews and updates/nullifiesy its own duplicated individual casesICSRs and submitssend the updated ICSRs/ nullification ICSRs to EudraVigilance in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009)Go to step 3.3.	NCA
3.3	End.		NCA

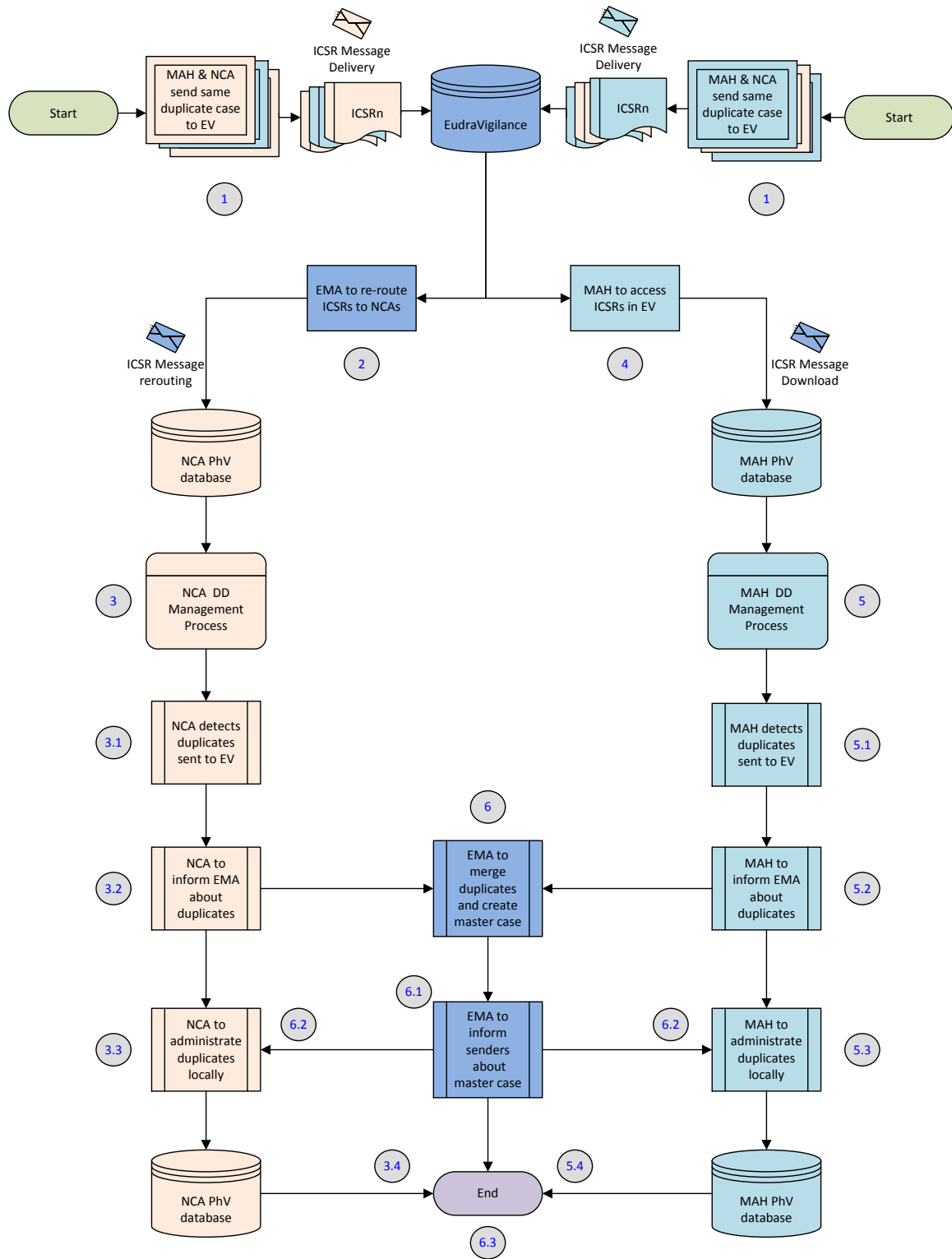
No	Step	Description	Responsible Organisation
4	Access to ICSRs in EudraVigilance by MAHs.	ICSRs are made accessible to MAHs in line with the EudraVigilance Access Policy for Medicines for Human Use ¹⁰⁷ . Go to step 5.	MAH
45	MAH Duplicate and Management Process.	A routine duplicate detection process is performed regularly by the MAH in its pharmacovigilance database. Go to step 5.1.	MAH
45.1	MAH detects duplicates sent to EV. Duplicates detected, which were sent to EudraVigilance	The MAH identifies duplicate ICSRs of its own cases Duplicates after their submission sent to EudraVigilance are identified as part of its their routine duplicate management process. Go to step 5.2.	MAH
45.2	MAH to update/ nullify ICSRs and send update to EV. Review/update/ nullify cases and send to EV	The MAH Reviews and updates/nullifies its own duplicated individual cases ICSRs and sends submits the updated ICSRs/ nullification ICSRs to EudraVigilance in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009) Go to step 5.3.	MAH
45.3	End.		MAH

¹⁰⁷ Ref.: EMA/759287/2009; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data](http://www.ema.europa.eu/en/home/human-regulatory/post-authorisation/pharmacovigilance/eudraVigilance/access-to-data).

VI.App.7.4 Duplicate detection in EudraVigilance – Collaboration between the Agency, competent authorities in Member States and marketing authorisation holders - Duplicate ICSRs submitted to EudraVigilance by ~~from different Senders Organisations~~ -and-Duplicates detected identified by an ~~Organisation~~ prior to the detection by the Agency in EudraVigilance

[Business process map -- Duplicate Detection \(DD\) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States \(NCAs\) and marketing authorisation holders \(MAHs\) - Duplicate ICSRs from submitted to EudraVigilance by different Senders - Organisations – Duplicates detected and identified by an Organisation prior to the detection by the Agency. See steps description in Table VI.17. in EudraVigilance](#)

Figure VI.10.



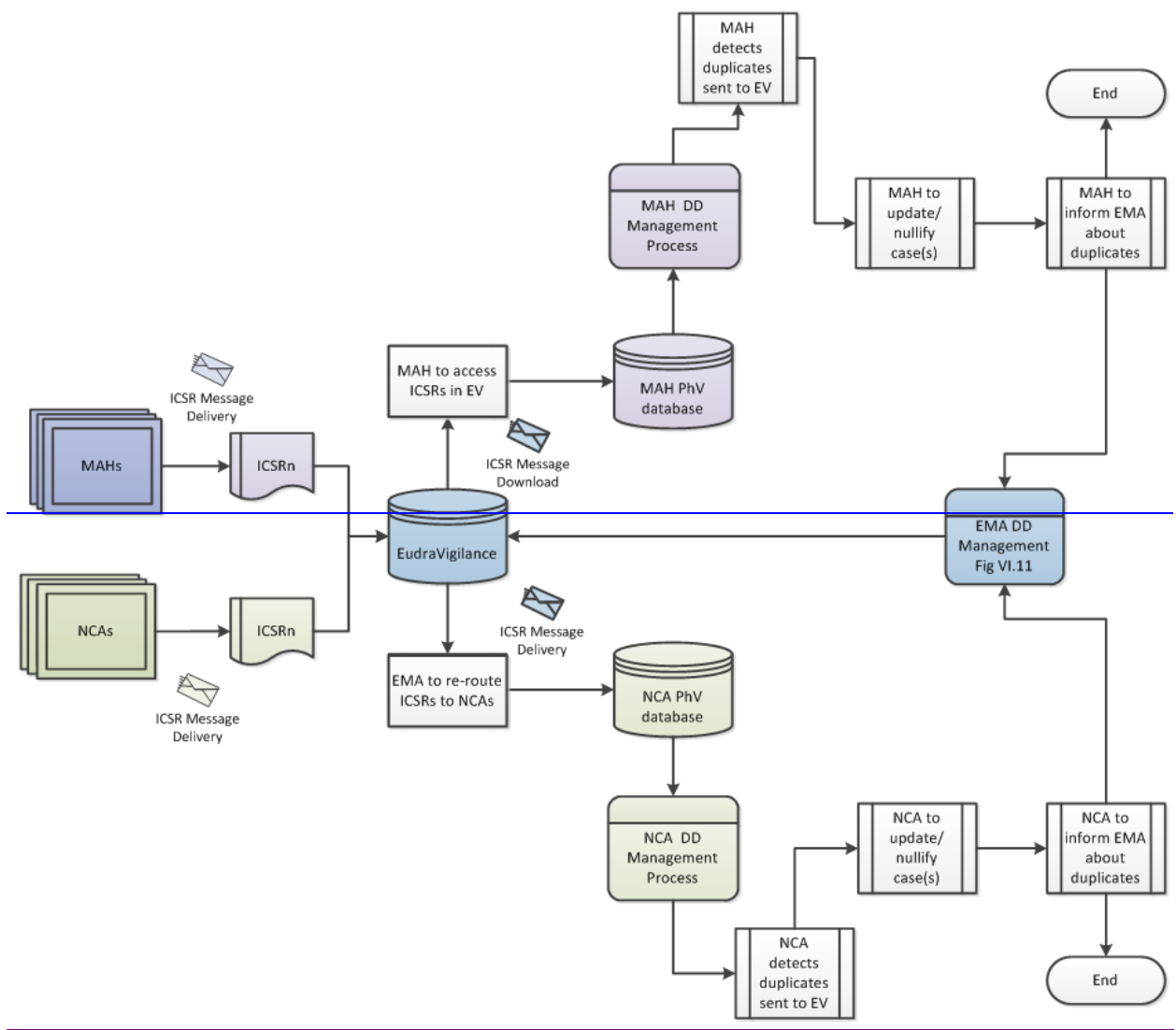


Table VI.17. Process description -- Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) - Duplicate ICSRs submitted to EudraVigilance by ~~from different Senders Organisations~~ – Duplicates detected and identified by an ~~Organisation~~ prior to the detection by the Agency in EudraVigilance. See process map in Figure VI.11.

No	Step	Description	Responsible Organisation
	Start.	<p><u>Duplicate ICSRs submitted to EudraVigilance by from different Ssender Organisations -and identified Duplicates detected by an Oorganisation prior to the detection by the Agency where duplicates were previously not identified in EudraVigilance</u></p> <p><i>Example: case series described in the medical literature submitted by MAHs to EudraVigilance; these were previously reported by healthcare professionals to a NCA, which submitted the cases to EudraVigilance. Primary source identifiers or patient identifiers were masked and the duplicate detection algorithm in EV did not identify the reports as potential duplicates.</i></p>	
1	<u>ICSR dMAH and NCA send same duplicate case to EV.uplicates are sent to EudraVigilance</u>	<p>Duplicated ICSRs for the same individual case are <u>sentsubmitted to EudraVigilance by different senders (NCAs and MAHs).</u></p> <p>Go to step 2 for duplicate ICSRs submitted by a NCA.</p> <p>Go to step 4 for duplicate ICSRs submitted by a MAH.</p>	Sender O organisation (NCA/MAH)
2	<u>Re-routing of ICSRs to NCA.</u>	MAHs ICSRs are rerouted from EudraVigilance to the NCA in accordance with VI.C.4. and the rerouting principles described in the EU ICSR Implementation Guide (EMA/51938/2013). Go to step 3.	EMA/ <u>EudraVigilance</u>
3	<u>NCA dDuplicate detection and Mmanagement Process.</u>	A routine duplicate detection process is performed regularly by the NCA in its pharmacovigilance database. Go to step 3.1.	NCA
3.1	<u>DNCA detects duplicates sends detected, which were sent to EUEudraVigilance.</u>	The <u>The NCA identifies the duplicate ICSRs after their submission it sent to EudraVigilance by multiple senders as part of its routine duplicate management process. Go to step 3.2.</u>	NCA
3.2	<u>NCA to inform EMA about duplicates.</u>	The NCA informs EMA by email (duplicates@ema.europa.eu) about the duplicate ICSRs.	NCA

No	Step	Description	Responsible Organisation
		<p>Go to step 3.3 for NCA next step.</p> <p>Go to step 6 for EMA next step.</p>	
3.23	NCA to aNCA to administrate duplicatess locally.	<p>The NCA manages the duplicate ICSRs locally in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports.</p> <p>The reference numbers of the duplicate ICSRs are captured in data element 'Other case identifiers in previous transmissions' (ICH-E2B(R2) A.11/ ICH-E2B(R3) section C.1.9.1.).</p> <p>Go to step 3.4Review and update/nullify individual cases and send updated ICSR/nullification ICSR to EudraVigilance in line with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009)</p>	NCA
8.3		<p>Senders of the cases identified as duplicates in EudraVigilance should follow the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009)</p> <p>Note: capture duplicate case reference numbers in data element 'Other case identifiers in previous transmissions' (E2B(R2) A.11/E2B(R3) section C.1.9.1)</p>	Sender Organisations (MAH/NCA)
3.3	End		
3.4	End.		
4	Access to ICSRs in EudraVigilance by MAHs.	<p>ICSRs are made accessible to MAHs in line with the EudraVigilance Access Policy for Medicines for Human Use¹⁰⁸. Go to step 5.</p>	MAH
54	MAH duplicate detection and mDuplicate Management Pprocess.	<p>A routine duplicate detection process is performed regularly by the MAH in its pharmacovigilance database. Go to step 5.1.</p>	MAH
54.1	MAH detects Dduplicates s	<p>The MAH identifies the duplicate ICSRs it sentafter their submission by multiple senders to</p>	MAH

¹⁰⁸ Ref.: EMA/759287/2009; EMA website: [Home/ Human regulatory/ Post-authorisation/ Pharmacovigilance/ EudraVigilance/ Access to data.](#)

No	Step	Description	Responsible Organisation
		detected, which were sent to EudraVigilance sent to EV.	
5.2	MAH to inform EMA about duplicates.	The MAH informs EMA <u>by email (duplicates@ema.europa.eu)</u> about the duplicate ICSRs. Go to step 5.3 for MAH next step. Go to step 6 for EMA next step. and	MAH
5.4.2 3	Review/update/nullify cases and send to EV/MAH to administrate duplicates locally.	The MAH manages duplicate ICSRs locally in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. The reference numbers of the duplicate ICSRs are captured in data element 'Other case identifiers in previous transmissions' (ICH-E2B(R2) A.11/ ICH-E2B(R3) section C.1.9.1.). Go to step 5.4. Review and update/nullify duplicated individual cases and send updated ICSR/nullification ICSR to EudraVigilance in line with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009)	MAH
4.3	End		
5.4	End.		
6	EMA to merge duplicate ICSRs and record outcome.	EMA m Merges the potential duplicate ICSRs in EudraVigilance in line with the guidance provided in GVP Module VI Addendum I – Duplicate management of adverse reaction reports. Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009) Go to step 6.1.	EMA
6.1	EMA to inform senders about master case.	EMA informs the sender organisations (MAH/NCA) about the outcome of the duplicate management (creation of master case) to allow them to take action where necessary ^{109, 110, 111} . Go to step 6.2.	EMA

¹⁰⁹ NOTE: MAHs will be able to download "master cases" from EudraVigilance in line with the EudraVigilance Access Policy for Medicines for Human Use (EMA/759287/2009). The message type (E2B(R2) data element M.1.1; E2B(R3) data element N.1.1) will have the code "master" to distinguish it from all other ICSR messages, which will have the message type "ichicsr" (see EU ICSR Implementation Guide; EMA/51938/2013). MAHs will be able to export from EudraVigilance the original ICSRs that have been merged under the "master case" and also any nullification to these ICSRs, where applicable (see EU ICSR Implementation Guide; EMA/51938/2013). It is up to the MAH to decide if they wish to process "master cases" or not.

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
<u>6.2</u>	<u>NCA/MAH to administrate duplicates locally.</u>	<u>Senders' organisations (NCA and MAH) of the ICSRs identified as duplicate administrate the information about the master case in their database (reference number of the master case created by EMA to be captured in ICH E2B(R2) A.1.11 / E2B(R3) C.1.9.1: 'Other case identifiers in previous transmissions'). The updated version of the ICSRs should not be resubmitted to EV. Go to step 6.3.</u>	<u>Sender organisations (MAH/NCA)</u>
<u>6.3</u>	<u>End.</u>		

If the MAH does process the "master case" and it results in the update of one of its own individual cases with the information from the EudraVigilance master case, the MAH MUST NOT resubmit an updated version of this individual case to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.

¹¹⁰ A table of master cases and associated duplicates will be made available to aid duplicate management by Sender organisations.

¹¹¹ NCA's can use the EudraVigilance Rerouting Rules Engine to update the rerouting rules to determine if they wish to receive EudraVigilance "master cases" or not (see EU ICSR Implementation Guide: EMA/51938/2013). The "master cases" MUST NOT be retransmitted by the NCA to EudraVigilance if there is no receipt of new information that warrants the submission of a follow-up report.

VI.App.7.5 Duplicate Detection in EudraVigilance – Collaboration between the Agency, Member States and MAHs where duplicates are first detected in a database other than EudraVigilance
Business process map – Collaboration between the Agency, Member States and MAHs – Duplicates first detected in a database other than EudraVigilance



Process description— Collaboration between the Agency, Member States and MAHs where duplicates are first detected in a database other than EudraVigilance

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
	<u>Start</u>	<u>EudraVigilance (EV) Duplicate Detection with duplicates originating from the same Sender— Duplicates identified by the Agency</u>	
<u>1</u>	<u>Duplicate Detection (DD) NOT in EudraVigilance</u>	<u>A duplicate detection process operating on a database other than EV detects potential duplicates.</u> <u>This is day zero for your process & for any updated versions that will be transmitted</u>	<u>MAH/NCA</u>
<u>2</u>	<u>MAH/NCA Duplicate Detection Management Process</u>	<u>The potential duplicates identified are reviewed in accordance with the applicable SOP/WIN</u>	<u>MAH/NCA</u>
<u>3</u>	<u>Are the duplicates confirmed?</u>	<u>Are the potential duplicates identified by the process confirmed?</u> <u>If Yes, proceed to 4.</u> <u>If No, proceed to 3.1.</u>	<u>MAH/NCA</u>
<u>3.1</u>	<u>End</u>		
<u>4</u>	<u>Where did the cases come from?</u>	<u>From where did your organisation receive the confirmed duplicate cases?</u> <u>If both cases came direct from a primary source or via non-EEA NCAs, proceed to 5</u> <u>If both cases came via EV (either rerouted for an NCA or accessed from EV for an MAH), proceed to 6</u> <u>If one case came direct from a primary source & one via EV, proceed to 7</u>	<u>MAH/NCA</u>
<u>5</u>	<u>Both cases came direct from primary source: MAH/NCA to administer the duplicates in accordance with internal policies</u>	<u>If the internal policy is to allocate one case as the master, proceed to step 5.1</u> <u>If the internal policy is to merge duplicates under a master, proceed to 5.2</u>	<u>MAH/NCA</u>
<u>5.1</u>	<u>MAH/NCA allocates one case as the master</u>	<u>Update one ICSR with the case numbers & other relevant information from the other & send that to EV as follow-up.</u> <u>Nullify the other case &, if it was already transmitted to EV, send the nullification message to EV</u>	<u>MAH/NCA</u>
<u>5.1.</u>	<u>End</u>		

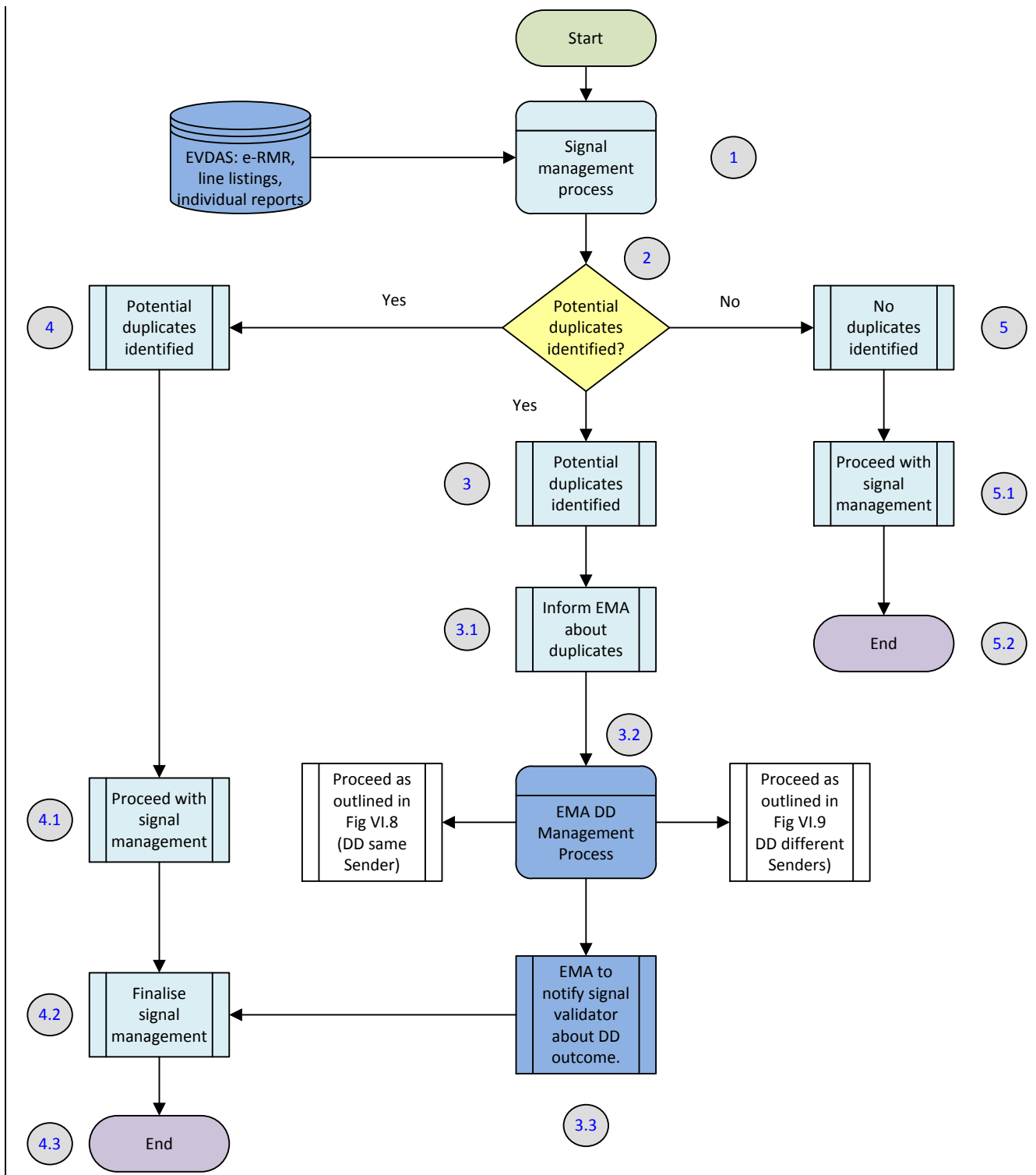
No	Step	Description	Responsible Organisation
1			
5.2	MAH/NCA merges the duplicates under a master case	Can the underlying duplicates be nullified and a nullification message sent to EV? If No, proceed to 5.2.1 If Yes, proceed to 5.2.2	MAH/NCA
5.2.1	The underlying duplicates cannot be nullified	The Sender Organisation has to send updated ICSRs for the duplicate reports to EudraVigilance in accordance with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009). The updated duplicates should include the case numbers of the other duplicates and also of the master case in the report duplicates section. The master case created from the duplicates should NOT be sent to EV¹¹².	MAH/NCA
5.2.2	The underlying duplicates can be nullified	The Sender Organisation has to nullify the duplicate cases in their pharmacovigilance database in accordance with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009). The master case created from the duplicates should be sent to EV. This case should be sent as a standard ICSR & cannot be sent as message type MASTER.	MAH/NCA
5.3	End		
6	Both cases were received via EV	Were the duplicates transmitted to EV by the same sender organisation? If yes, proceed with step 6.1 If no, proceed with step 6.2	MAH/NCA
6.1	Either inform sender organisation or EMA via dedicated mailbox	If you wish to inform the EMA via the dedicated mailbox proceed with step 6.2 If you wish to inform the sender directly, proceed with step 6.3	MAH/NCA
6.2	Inform EMA about duplicates via	Email duplicates@ema.europa.eu to inform them that you have detected that cases you received from Eudravigilance are duplicates of one another, including	MAH/NCA

¹¹² Where, in certain instances based on internal duplicate management process, the recommendation provided under section 5.2.1 cannot be applied by Member States, the management of duplicates will be handled by EMA. Requests should be sent to duplicates@ema.europa.eu with the relevant worldwide case safety IDs of the duplicate cases.

<u>No</u>	<u>Step</u>	<u>Description</u>	<u>Responsible Organisation</u>
	dedicated mailbox	the worldwide case safety IDs of the duplicate cases	
6.2.1	EMA proceed as outlined in Figure VI.11.	EMA to administer duplicates in accordance with defined duplicate management process as outlined in Figure VI.11.	EMA
6.2.2	End		
6.3	Inform sender about duplicates	Contact the sender organisation to inform them about the duplicates that they have transmitted to EV. Proceed with step 6.4	MAH/NCA
6.4	Sender to proceed as outlined in Figure VI.10.	The sender has to assess the cases and, if confirmed, either merge the cases under a master or allocate as applicable, in accordance with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009).	Original sender organisation (MAH/NCA)
6.5	End		
7	One case came direct from a primary source & one via EV	The sender has to update the ICSR received directly from the primary source with the case number of the case received via EV & retransmit to EV. The duplicates in the sender's database should be managed in accordance with the Guideline on the Detection and Management of Duplicate Individual Cases and Individual Case Safety Reports (ICSRs) (EMA/13432/2009). Once the updated case has been received in EV from the sender, proceed to step 6.2.1	MAH/NCA

VI.App.7.65 Duplicate detection in EudraVigilance – Collaboration between the Agency, competent authorities in Member States and marketing authorisation holders – Duplicate ICSRs identified as part of signal management as outlined in GVP Module IX - Collaboration between the Agency, Member States and MAHs

Figure VI.11. Business process map - Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) - Duplicate ICSRs identified as part of signal management ~~as outlined in GVP Module IX~~ process based on EudraVigilance data. See steps description in Table VI.18.



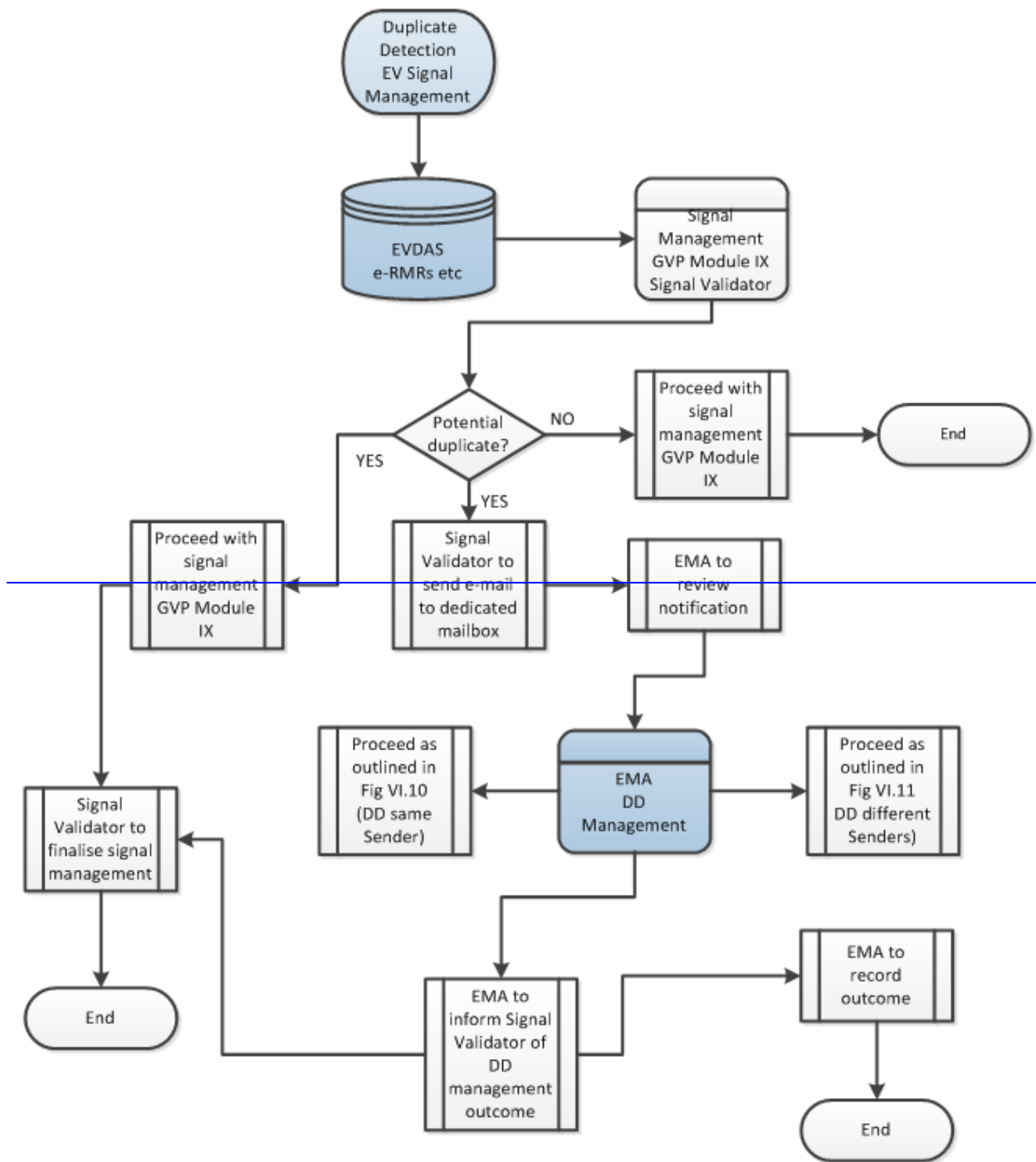


Table VI.18. Process description - Duplicate Detection (DD) in EudraVigilance – Collaboration between the Agency, competent authorities in Member States (NCAs) and marketing authorisation holders (MAHs) - Duplicate ICSRs identified as part of signal management process based on EudraVigilance data. See process map in Figure VI.12. ~~Process description – Duplicates identified as part of signal management based on EudraVigilance data as outlined in GVP Module IX~~

No	Step	Description	Responsible Organisation
	Start.	Duplicates identified as part of signal management as outlined in GVP Module IX. <i>Example: As part of the signal management process based on EudraVigilance data as outlined in GVP Module IX, there may be instances where a signal validator of the Agency, a Member State or a MAH may identify potential duplicate ICSRs.</i>	
<u>1</u>	Signal Management process in line with GVP Module IX	Signals are assessed in line with <u>GVP Module IX</u> based on electronic Reaction Monitoring Reports (eRMRs), case line listings and individual case report forms generated by EudraVigilance (EVDAS). <u>Go to step 2.</u>	Signal validator (EMA/ NCA/ MAH)
<u>2</u>	<u>Potential duplicates identified?</u>	As part of the review of the a signal there may be individual cases identified that could be potential duplicates from the signal validator’s perspective: <u>If potential duplicates are identified, proceed as outlined under steppoint 3 and steppoint 4.</u> <u>If no potential duplicate are identified, proceed as outlined under steppoint 5.</u>	Signal validator (EMA/ NCA/ MAH)
<u>3</u>	<u>Potential duplicates have been identified.</u>	Potential duplicates have been identified as part of the review of a signal. <u>Go to step 3.1</u>	Signal validator (EMA/ NCA/ MAH)
<u>3.1</u>	<u>Send e-mail to dedicated mailbox Inform EMA about duplicates.</u>	Send detail request for the verification of the duplicates to with the Worldwide Unique Case Identifier for all individual cases, which are considered as potential duplicates Inform EMA by email (duplicates@ema.europa.eu) about the potential identified duplicate ICSRs. <u>Go to step 3.2</u>	Signal validator (EMA/ NCA/ MAH)
<u>3.2</u>	<u>EMA to rReview notification.</u>	EMA to review notification of potential duplicates and initiate duplicate management process. <u>If duplicates are from the same Ssender organisation, proceed as outlined in Figure VI.8 and Table VI.14.</u> <u>If duplicates are from different Ssender organisations, proceed as outlined in Figure VI.9 and Table VI.15.</u>	EMA

No	Step	Description	Responsible Organisation
		Go to step 3.3.	
3.3	EMA to Notify signal validator about the outcome of the duplicate management	EMA informs the signal validator about the outcome of the duplicate management process. Go to step 4.2.	EMA
3.4	Record the outcome of the duplicate management	Record the outcome of the duplicate management	EMA
3.5	End		
4	Potential duplicates identified. Potential duplicates have been identified	Potential duplicates have been identified as part of the signal management activities. Go to step 4.2	Signal validator (EMA/ NCA/ MAH)
4.1	Proceed with signal management.	Proceed with the review of the signal in line with GVP Module IX guidance. Go to step 4.2.	Signal validator (EMA/NCA/ MAH)
4.2	Finalise signal management.	Finalise the management of the signal based on duplicate detection management feedback from EMA (step 3.3). Go to step 4.3.	Signal validator (EMA/ NCA/ MAH)
4.3	End.		
5	No (potential) duplicates have been identified	No (potential) duplicates have been identified as part of the review of a signal. Go to step 5.1.	Signal validator (EMA/ NCA/ MAH)
5.1	Proceed with signal management.	Proceed with the review of the signal in line with GVP Module IX guidance. Go to step 5.2.	Signal validator (EMA/ NCA/ MAH)
5.2	End.		

VI. Appendix 8 Examples of assessment of case validity:

Examples of assessment of the validity individual reports based on reporter and patient identifiability:

	<u>Examples of case reports (source: Report of GOMS Working Group V, 2001)</u>	<u>Validity assessment</u>
	<u>Dr. Isabella Queen reports that her patient, a 34 year old white male (initials A.V.) experienced hair loss after taking drug X. Dr. Queen's address and phone number are available.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Patient's qualifying descriptors available (initials, age, gender).</u>
	<u>Dr. Isabella Queen reports her patient, a male, was reported to have experienced hair loss after taking drug X. Dr. Queen's phone number is available.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Patient's qualifying descriptor available (gender).</u>
	<u>Dr. Feelgood reports that 2 patients were reported to have given birth, to a premature female infant in one case and a premature male infant in another, while on drug X. Dr.'s phone number and address are available.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>2 patients with qualifying descriptors available (gender).</u>
	<u>Dr. Bones reports via e-mail that her patient (initials X.X.) developed a melanoma after taking drug Z. While the physician's e-mail address is available, attempts to reach her yielded no response. Address and phone number are not available.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Patient's qualifying descriptor available (initials).</u>
	<u>A report from a Dr describes a patient (initials X.X.) who developed a melanoma after taking drug Z. No contact details are available regarding the reporter and the case cannot be followed-up.</u>	<u>Non valid case.</u> <u>Reporter qualification provided but no contact parameters available to allow verification of the case.</u>
	<u>Dr. Bones reports via e-mail that her patient developed a melanoma after taking drug X. Dr. Bone's address and phone number are not available, but she does respond by e-mail.</u>	<u>Non valid case.</u> <u>Identifiable reporter and qualification.</u> <u>No patient's qualifying descriptor available.</u> <u>Report should be followed-up.</u>
	<u>An employee of a drug company is at a barbecue at the house of paediatrician, Dr. Wiener, his neighbour. He hears from Dr. Wiener about his patient who developed</u>	<u>Non valid case.</u> <u>Identifiable reporter and qualification.</u>

	<u>Examples of case reports (sources)</u> <u>Report of CDMS Working Group X, 2011</u>	<u>Validity assessment</u>
	<u>hepatitis three weeks after one injection of the company's drug X. The employee sends a memo to the drug safety department with the clinical details he remembered on the patient and also includes Dr. Wiener's address and phone number.</u>	<u>No patient's qualifying descriptor available.</u> <u>Report should be followed up.</u>
	<u>Dr. Lindbergh on a commercial airplane flight from Paris to New York is seated next to an employee from a drug company. Dr. Lindbergh talks about his patient who experienced severe depression after taking the company's drug A (an oral contraceptive). The company employee, a marketing manager, reports the case to his drug safety department and provides the physician's business card.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Patient's qualifying descriptors available (gender). Patient presumably female as suspected product is an oral contraceptive.</u>
	<u>The safety department of pharmaceutical company A sends to company B a report it received of a 23 year old female who developed Stevens Johnson Syndrome after taking drug A (a company A product) and drug B (a company B product). On follow up with the reporting physician, Company A is told that their drug is not considered as a suspect causal agent. Company A sends the contact information on the identifiable physician to company B.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Patient's qualifying descriptor available (age and gender).</u>
<u>0</u>	<u>Professor Messer presents a paper at a medical convention (either orally or as a poster presentation) on a patient that developed thyroiditis after long term therapy with Drug X. The paper is seen (or heard) by a company employee who reports it to the drug safety department.</u>	<u>Non valid case.</u> <u>Identifiable reporter and qualification.</u> <u>No patient's qualifying descriptor available.</u> <u>Report should be followed up.</u>
<u>±</u>	<u>The International Herald Tribune publishes an article describing a 5 year old patient who died after Drug Y ingestion. There is no physician mentioned and no author is listed for the article. The editor of the IHT (or, for example, a reader of the paper) forwards the article to the company.</u>	<u>Valid case.</u> <u>Identifiable reporter and qualification (Editor to IHT, non-HCP).</u> <u>Patient's qualifying descriptor available (age).</u>
<u>2</u>	<u>A company employee reads in a newspaper that several patients at Massachusetts General Hospital have given birth prematurely while taking drug X.</u>	<u>Non valid case.</u> <u>Identifiable reporter and qualification (Author of article or Journal editor, non-HCP).</u> <u>No patient's qualifying descriptor available.</u>

<u>Examples of case reports (sources)</u>		<u>Validity assessment</u>
<u>2</u>	<u>Report of CDMS Working Group X, 2011</u>	<u>Report should be followed up.</u>
<u>3</u>	<u>Pharmacist Gene Type reports that a neighbour told him that a female taking drug Z had dyspepsia at that neighbour's house last week. Only the pharmacist's address and phone number are available. Further information is not forthcoming despite rigorous follow-up.</u>	<u>Non-valid case.</u> <u>No identifiable reporter and qualification (second hand information).</u> <u>Patient's qualifying descriptor available.</u> <u>Report should be followed up.</u>
<u>4</u>	<u>Dr. NoRed Cell reports that 6 patients developed aplastic anemia while on drug X. Dr.'s address and phone number are not available, but his/ her e-mail address is given.</u>	<u>Non-valid case.</u> <u>Identifiable reporter and qualification.</u> <u>Report describing definite number of patients with no qualifying descriptor available for each patient.</u> <u>Report should be followed up.</u>
<u>5</u>	<u>Dr. Onko Gene communicates to a company that 50 patients developed ovarian cancer while on drug X. The Dr.'s address, phone number and e-mail address are available, but attempts to reach her by the usual means are unsuccessful.</u>	<u>Non-valid case.</u> <u>Identifiable reporter and qualification.</u> Table VI.15. <u>Report describing definite number of patients with no qualifying descriptor available for each patient.</u> <u>Report should be followed up as possible.</u>