swissmedic

Guidance document
PSUR Signal Management TAM

Identification number:	ZL404_00_003
Version:	2.0
Valid from:	01.11.2025

List of contents

1 Terms, definitions, abbreviations

1.1 Abbreviations

ADR	Adverse Drug Reaction
CD	*Calendar days*
DLP	Data lock point
MAH	Marketing authorisation holder
PSUR	*Periodic Safety Update Report*
SMP	Signal Management Process
SPC	Summary of product characteristics
TPA	*Federal Act of 15 December 2000 on Medicinal Products and Medical Devices (Therapeutic Products Act; SR 812.21)*
TPO	*Ordinance of 21 September 2018 on Therapeutic Products (Therapeutic Products Ordinance; SR 812.212.21)*
VGVP	Guideline on Veterinary Good Pharmacovigilance Practices
VICH	Veterinary International Conference on Harmonisation

2 Introduction

Swissmedic uses this guidance document primarily as a resource for applying the legal provisions in a uniform and equitable manner. For applicants, the guidance document is intended to make clear the specific requirements that must be fulfilled so that Swissmedic can process corresponding applications as quickly and efficiently as possible.
The guidance document explains the submission obligation relating to PSURs/annual reports arising from the Signal Management Process (SMP) and the form in which they are submitted to the EU pharmacovigilance database.

3 Objective

The guidance document describes the requirements pertaining to the submission of PSURs for veterinary medicinal products and explains the formal and regulatory aspects.

4 Scope

This guidance document applies to the submission of PSURs for veterinary medicinal products.

5 Other valid documents

Other valid documents
VICH GL 29 (PHARMACOVIGILANCE)
Guideline on Veterinary Good Pharmacovigilance Practices (VGVP). Module: Signal Management (EMA/522332/2020)

6 Description

6.1 General

According to Art. 60 para. 1 TPO, marketing authorisation holders (MAH) of a medicinal product with a new active substance must periodically and spontaneously submit Periodic Safety Update Reports (PSURs) for this medicinal product to Swissmedic for 4 years after authorisation. The observation period covered by the report must include the date of the official decision and continue without any gaps for at least 4 years after the official decision on the authorisation application.

The annual report from the EU signal management process referred to in Art. 60 para. 1bis TPO does not satisfy the minimum content requirements for a periodic safety update report and **cannot be submitted to Swissmedic as a substitute for a PSUR** (see also section 6.2 letter B).

In case of variations of the authorisation after the PSUR obligation has expired, Swissmedic may – subject to a proviso (Art. 16 para. 1 TPA) – extend the 4-year period stated in Art. 60 TPO or start a new one.
The end date of the PSUR obligation is communicated to the marketing authorisation holder with the respective decision.

6.2 Content and format of the reports

A. For periodic reports according to Art. 60 para. 1 TPO (PSURs)

The format is based on point V of Guideline VICH GL 29 and the annex of this guidance document.

1. Veterinary medicinal products that are authorised exclusively in Switzerland:

The following information must be included in the report:

a) Reporting period dates
b) Sales figures for the reporting period
c) Incidence of reported adverse drug reactions.
d) Description of the observed adverse drug reactions (ADRs / side effects)

2. Veterinary medicinal products that are authorised both in Switzerland and abroad

The following information must be included in the report:

a) Adverse reactions internationally: The required details are defined in Guideline VICH GL 29 and are listed in the annex of this guidance document. In summary, the following key information is required:
   • Reporting period dates
   • SPC (Summary of Product Characteristics), brand name, name of the MAH and authorisation number
   • Details of measures to guarantee drug safety demanded by a competent authority or initiated by the MAH itself
   • Sales figures for the reporting period by country
   • Incidence of ADRs (see calculation formula in the annex)

• General assessment of drug safety with regard to the reported ADRs and any changes in the risk/benefit profile

b) Adverse reactions in Switzerland, sales figures and the incidence of reported ADRs in Switzerland for the reporting period.

B. For annual reports arising from the Signal Management Process according to Art. 60 para. 1bis TPO

As part of the EU signal management process (SMP), data have to be constantly evaluated for potential signals. Confirmed signals that result in a change in the risk/benefit profile and/or necessitate action have to be reported to Swissmedic within the deadlines set out in the guidance document *Drug Safety Signals VMP*. In the EU, the marketing authorisation holder must confirm that the SMP has been continuous. This confirmation (called an “annual report” in EU Regulation 2019/6) does not fulfil the minimum content requirements for a periodic safety update report as described in section 6.2 letter A. **This annual report cannot be submitted to Swissmedic as a substitute for a PSUR**.

The latest guidelines relating to Veterinary Good Pharmacovigilance Practices (VGVP) can be found under point 2 of Annex 3 TPO.

6.3 Time limits and periodicity

As regards periodicity, Swissmedic complies with the periods to be observed for the submission of PSUR reports as stated in Art. 60 para. 1 TPO, which are based on those stated in Guideline VICH GL 29, as follows:

• Every 6 months for the first 2 years after authorisation
• Once a year for the next 2 years

The intervals and periods for the PSUR can be submitted according to the "international birthday" (date of first authorisation abroad) of the product. The international birthday for the submission and periodicity of the PSUR report is applied at the request of the respective authorisation holder.

As a rule, all reports should be submitted within 90 CD of the data lock point (DLP).

6.4 Documentation

A covering letter must accompany the submitted report. If a PSUR is submitted as part of an authorisation application (e.g. a change to the product information), this must be mentioned in the covering letter.

6.5 Enquiries

Any enquiries should be sent to vetvigilance@swissmedic.ch

6.6 Miscellaneous

New national or international safety signals must be reported to Swissmedic on an ad hoc basis without delay (Art. 59 TPA / Arts. 61 and 62 TPO). Further information can be found in the guidance document *Drug Safety Signals VMP*.
This obligation continues to apply after the end of the 4-year period according to Art. 60 para. 1.

7 Annex: Contents and structure of the reports according to Art. 60 para. 1 TPO (PSURs)[1]

The PSUR should include information on the following types of adverse reaction reports/case histories received during the reporting period:

- All adverse reactions in animals and in humans, sent spontaneously to the MAH All adverse reactions forwarded to the MAH by the Competent Authority.
- Reports from post-authorisation studies
- All available information on investigations into inadequate withholding periods, lack of expected efficacy, adverse reactions related to off-label use or any potential environmental problems, caused by the product under the normal conditions of use.
- Information about any adverse reactions in humans as a result of administering or exposure to the veterinary medicinal product

The report should be structured as follows:

1. Marketing Authorisation Holder (MAH) and product details

2. SPC
The most recently approved version of the Information for healthcare professionals for the medicinal product in question

3. Narrative review of individual case histories

4. Incidence of Adverse Reactions

4.1 Sales figures

4.2 Calculation of Incidence of adverse reactions
It is suggested that MAHs adopt a two-tier approach to calculation of incidence of adverse reactions.

Step 1
In the first instance, the ratio of the number of animals reacting during a period to the amount of product sold during that period should be computed:

No of animals reacting during period / No of doses sold during period

[1] As specified in section 6 of the earlier Guideline EMEA/CVMP/183/96-Rev. 1

This calculation is based on data that tends to be accurate and can be used reliably to monitor trends from one PSUR to the next. Any increase in this ratio relative to previous PSURs may signal a problem and the need for more detailed evaluation of the pharmacovigilance data. Sales volume should be broken down by calendar year and the ratio of the number of animals adversely reacting to the amount of product sold should be computed for each of the years concerned by the report.

Step 2:
The incidence of adverse reactions in percent should be calculated by dividing the total number of animals reacting during the period by an estimate of the number of animals treated during the period of the report and multiplying by 100.

% Incidence = (No of animals reacting during period/Estimated No of animals treated during the period)x100

In the first instance, it is expected that % incidence will be calculated based on the total number of animals reacting during a period derived from all A, B and O/O1 coded reports. This calculation may then be revised to exclude O/O1 coded reports, that is, this final calculation focuses on A “probable” and “B possible” coded reports only.
The values included in the calculation of incidence must be justified. It is expected that the values used for estimation of the number of animals treated would be representative of the conditions of use of the veterinary medicinal product. When calculating the number of animals treated during a period, the following points should be taken into consideration:

- For some veterinary medicinal products, the number of doses (individual units) sold is equivalent to the number of animals treated (e.g. anthelmintic boli, flea collars). For veterinary medicinal products formulated as pastes, aerosols, eye/ear preparations or other formulations where it is likely that each unit of product (for example, syringe, single dose pipettes) will be dispensed for the treatment of an individual animal, the number of individual units sold should be considered equivalent to the number of animals treated.
- For the majority of pharmaceutical veterinary medicinal products, the number of animals treated will be a function of:
- **Recommended treatment regimen** (daily recommended treatment dose (mg/kg) x duration of treatment (days)), as detailed on the authorised SPC. Where a range for dose or duration of therapy is indicated on the SPC, it is appropriate to calculate incidence based on a 'worst case' scenario (that is, use the upper limit of the dose range and/or duration of therapy). Following from the worst case calculation, it is acceptable to propose alternative assessments of incidence based on known conditions of use of the product. Any such alternative calculations should be justified.
- **Average weight of target population (kg)**
- **Amount of product sold**

A proportion of veterinary medicines are indicated for more than one target animal species. Where this situation pertains, it is recognised that it is difficult to calculate individual species incidence of adverse reactions. However, it is suggested that the ratio be computed for each species based on the estimated conditions of use of the product (sales/species). This information is of importance to competent authorities although the arbitrary nature of such theoretical calculation is recognised.

A number of PSURs will show no reports of adverse reactions. In these cases it is not possible to calculate any incidence of adverse reactions.

5. Reports from other sources

6. Overall safety evaluation

The PSUR should include a concise critical analysis and opinion on the risk/benefit profile of the product written by suitably qualified experts for pharmacovigilance. This section should include:

- information on any previous action taken by either regulatory authorities or the Marketing Authorisation Holder as a result of safety issues
- any new important information on the following:
    - evidence of previously unidentified toxicity
    - increased frequency of a known toxicity
    - drug interactions
    - overdose and its treatment
    - adverse reactions associated with off-label use
    - adverse reactions in humans related to the use of the product.

For each of these points, lack of significant information should be reported.

7. Important information received after data lock point

8. If available: Individual case histories (PSUR line listings)

Change history

Version	Change	sig
2.0	Section 6.1 and 6.2 updated by the addition of references to annual reports from the EU signal management process.	muc
1.2	New layout, no content adjustments to the previous version.	dei
1.1	Remove HMV4 from file name and title No content adjustments	dei
1.0	First version	muc, fg