

DEUTSCHE GESELI SCHAFT 9th DGRA Annual Congress REGULATORY AFFAIRS **Electronic Regulatory Submission** from the

FÜR

Point of View of the National Drug Agencies - Germany

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European network of Agencies



Directives, regulations, specifications

EMEA

5

- Guidance for daily practice

National Agencies

 Decision making process, national add-ons

DI. Maus menges



Context

- Competition based on the same work done by several agencies (differently)
- Request to follow European specifications
- Partly different national and European rules
- Big number of complex procedures

Consequences

Electronic support for submission, processing and archiving is mandatory



Topics

- Regional requirements
- Mandatory or non-binding
- Electronic submisson technologies
- Electronic documents and data
- Perspectives for the future



Current situation

- Regional requirements
 - There are some
- Mandatory or non-binding
 - YES (AMG-EV) and NO (application forms etc.)
- Electronic submisson technologies
 - In accordance with European specifications, using standard technology
- Electronic documents and data
 - Management not fully sufficient
- Perspectives for the future
 - European orientation



Regional requirements

- Mandatory for module 1.3.1 and 2 as defined in specific ordinance (submission by e-mail)
- Optional for variations as a complete application (upload of .xml via portal)
- Dossiers should be submitted on CD or DVD, using EU M1 v1.2.1 and eCTD v3.2
- Paper is still mandatory at least partly



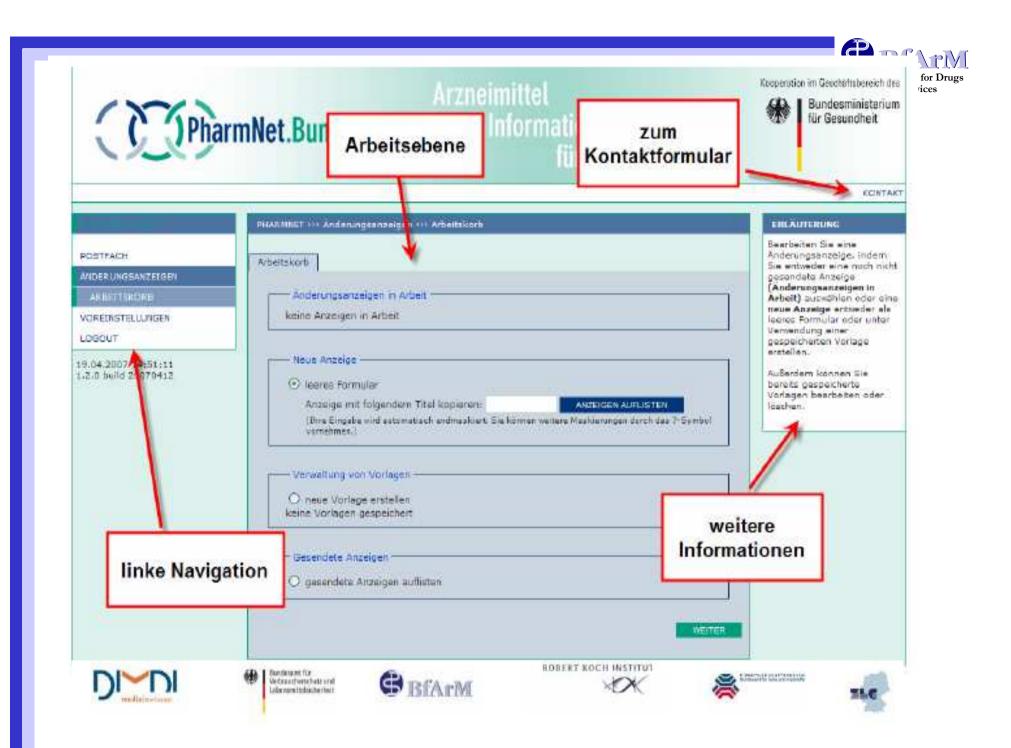
National E-Submission Ordinance Current requirements

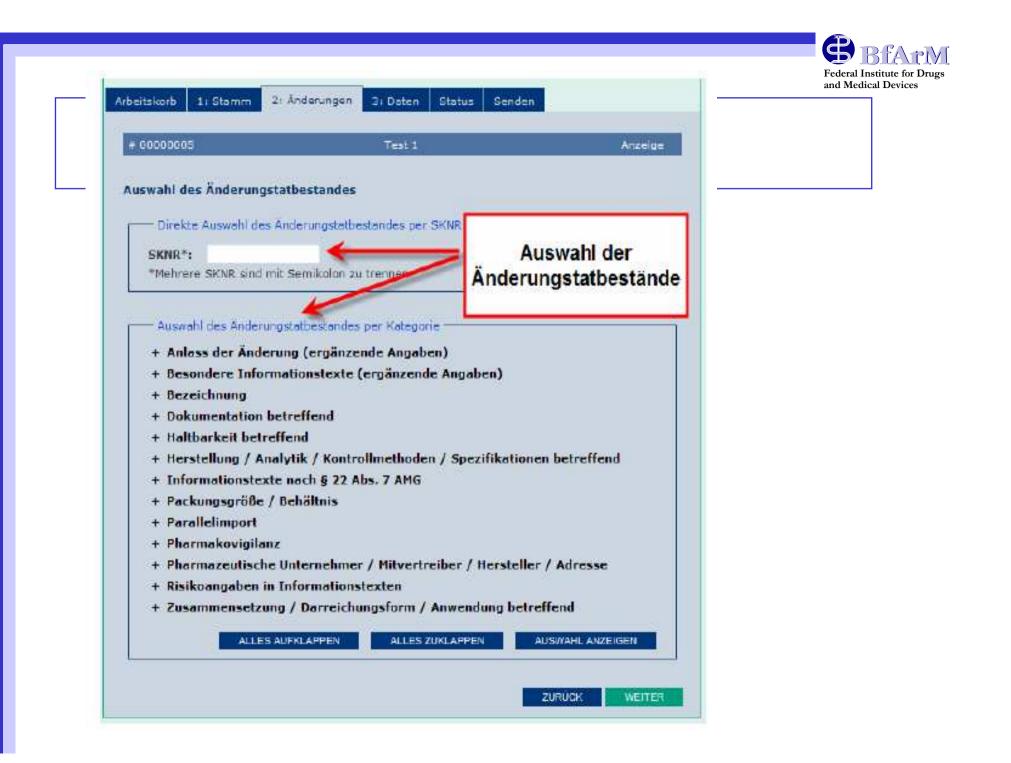
- Mandatory submission of product information (§§ 10, 11 und 11a AMG equivalent to Module 1.3.1) and Quality Overall Summary, Nonclinical and Clinical Overview (§ 24 AMG equivalent to Module 2.2, 2.3, 2.4, 2.6)
- Highly structured e-mail
- Compressed file container (ZIP, TAR)
- Envelope similar to European eCTD
- Attachment file format: RTF (partly PDF)
- Naming convention of the attachments
- Encryption: PGP
- Automatic technical validation and processing



onlineVariations

- Variations in national as well as in MR and DC procedures are supported
- Dynamic application form
- Online support to populate the form and to validate the content
- Reference to not completely processed cases
- Preparation of templates
- Export of .pdf and .doc files possible
- Upload of documents up to 10 MB







National recommendations for electronic submissions of full dossiers

- Strict adherence to the specification v3.2 for Module 2 to 5 www.ich.org
- Strict adherence to the specification v1.2.1 for EU-Module 1 http://ec.europa.eu/enterprise/pharmaceuticals/index_en.htm
- Reduced number of paper copies (once)
- Identity of paper version and e-submission is required (therefore no permant pagination, no link to folders or pages)
- References expressed as number of the Module or Sections (no titles, because they could be very long)
- Identifier and number of pages in the context of the single document on top or at bottom are rcommended
- Identifier in the Envelope will be the national ENR, available on request before preparing the CD / DVD finally
- I eCTD per national ENR, in MR procedures 1 eCTD per project

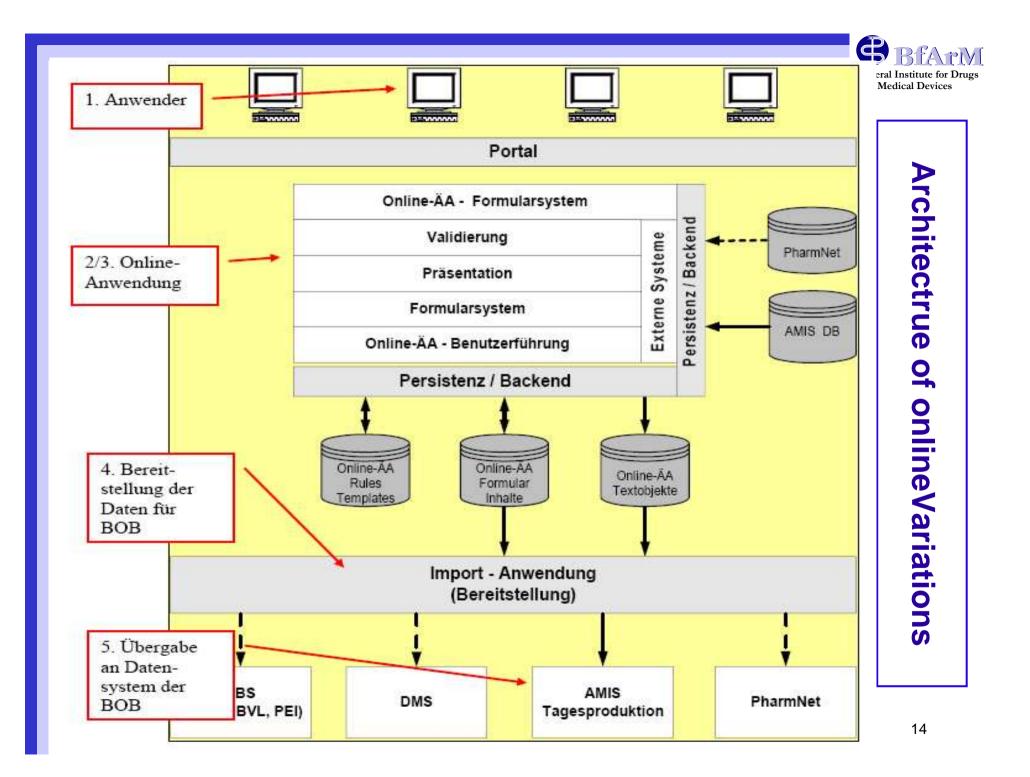


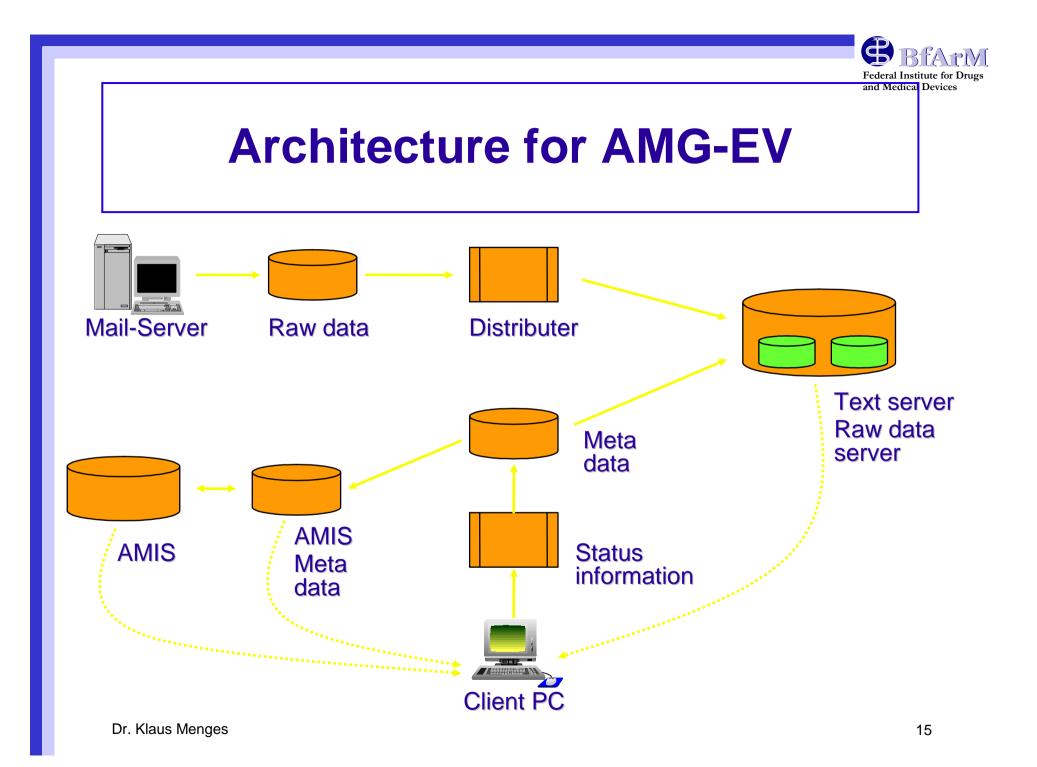
National recommendations for electronic submissions of full dossiers

	Module 1	Module 2	Module 3 - 5			
	Paper copy in addition to eCTD *					
National,	4-fold	2-fold	2-fold			
new subs.	1-fold	1-fold	1-fold			
National,	5/3-fold	<mark>3-fold</mark>	3/2-fold			
known subs.	1-fold	1-fold	1-fold			
DCP	5/3-fold	<mark>3-fold</mark>	3/2-fold			
MRP	1-fold	1-fold	1-fold			

* 2 electronic copies on CD-ROM, CD-R, DVD-R; no RW

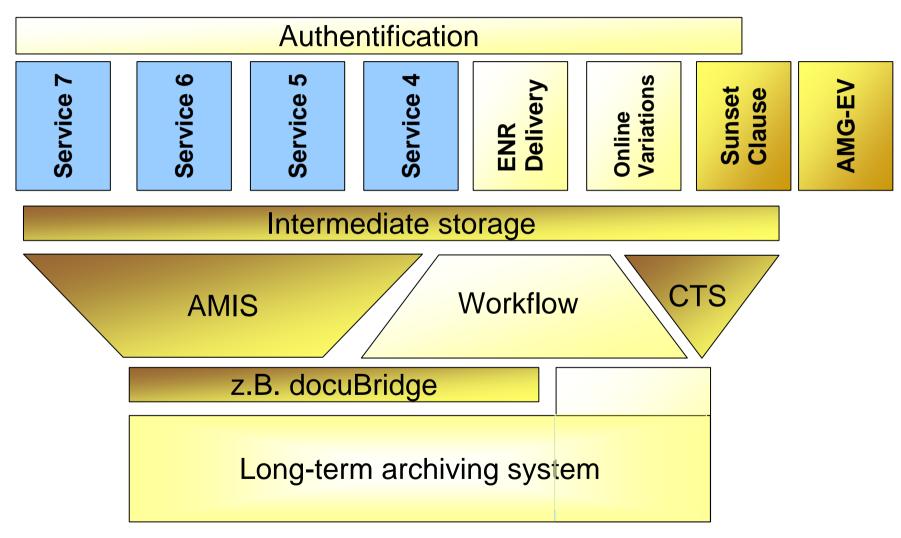
Submission technologies						
PharmNet.Bund		Arzneimittel Information für alle	Kooperation im Geschäftsbereich des Bundesministerium für Gesundheit			
			Kontakt Impressum			
НОМЕ						
ARZNEIMITTEL- INFORMATIONSSYSTEM ELEKTRONISCHE	ELEKTRONISC	HE ÄNDERUNGSANZEIGEN				
ÄNDERUNGSANZEIGEN BEHÖRDENANWENDUNGEN	Antragsstellung an c	ungsanzeige ist ein Teilprojekt der elektronischen Antragsste ie Bundesoberbehörden (unter Berücksichtigung der rechtlichen 1g von Produkt-Dokumentationen und laufenden Änderungsanzei	Rahmenbedingungen) für alle Verfahren			
	Die erste Ausbaustufe unterstützt die entsprechenden Verfahren beim BfArM und umfasst:					
	gegenseitige Procedure, D Online-Form Texte als An Online-Validi Online-Validi Mitarbeiter d	ung aller nationalen Änderungsanzeigen (ÄA) und Änderungen (n Anerkennung (Mutual Recognition Procedure, MRP) und dem de CP), inkl. der Gegenüberstellung von Alteintrag und Neueintrag lare zur elektronischen Übermittlung von ÄA inkl. der Möglichkei ang mit zu versenden grung zur Verbesserung der Datenqualität durch zentrale Daten u gen des Bearbeitungsstandes in einem nur für den jeweiligen pha er Bundesoberbehörden (BOB) zugänglichen geschützten Bereich on über hinterlegte E-Mail-Adressen bzw. ein virtuelles Postfach	zentralisierten Verfahren (Decentralised t, kleinere Dokumente und informative wie Kataloge und Partnerinformationen armazeutischen Unternehmer (pU) und die			
	Handbuch "Elektroni	sche Änderungsanzeigen" (PDF; 2,8 MB) Anleitung F	Registrierung (PDF; 328 kB)			
		Login-Bereich				
		Usercode:				
		Passwort:	Anmelden			
		Die pharmazeutischen Unternehmer können hier Ihre Zugang	redaten heantragen			







Principle of electronically supported processing





PharmNet-Portal							
Arzneimittel Konsentator im Geschäftsbersich des Mandesministerium für Gesundheit für alle							
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Stoffe »		0 Volitexte					
8ez.verordnung »		Suche Tipp: Abkürzen mit ?: heart?					
Registrierung »	Tipp: Abkurzen	mit /: heart/					
Sucharchiv »	Suche nach:		in Arzneimittelname	× -Z.>>			
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Volitextbestellung »	* Eingabezeile hinzufügen						
Voreinstellungen »	> Filter einblenden >> Hilfe >> >> zurucksetzen >> ** söbbrechen >> >> los >>						
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Current projects

- Authentification
- Online application submission
- Electronically supported processing
- Automated update of our drug information system AMIS and from there release of information to the public domain (for free)



Authentification: General aspects

- Necessary pre-requisite for E2B
- The requested technical infrastructure is defined
- Partners know each other and will sign a contract to acept conditions of electronic communication
- The data exchange must be adequately fast, safe and legally binding
- Simple business process as a starting point: submission of variation applications
- Final stage: two way data exchange



Authentification: Technical transport

based on internet applications (TCP/IP):

- VPN, SSL, HTTPS for dialogue and web services
- E-mail (incl. encoding)
- File upload (incl. encoding)

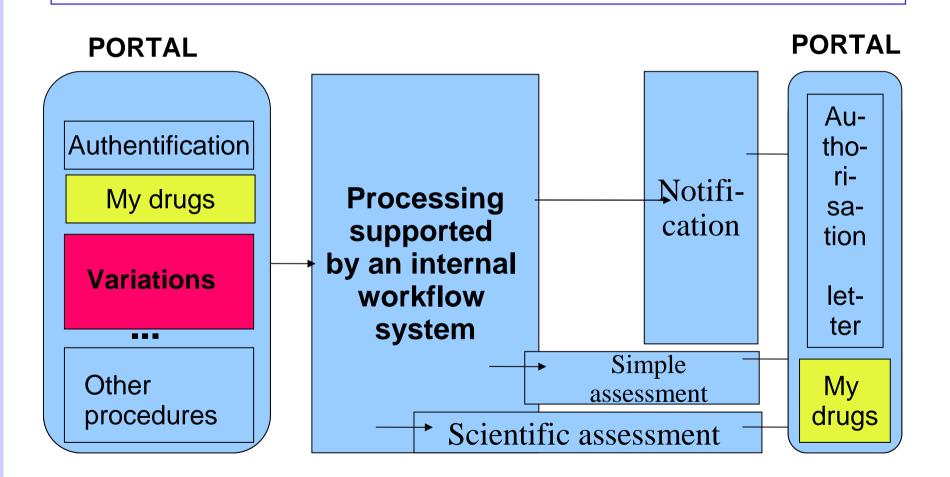


Authentification General principles

- Simple solution: user code, password
 - effective, but not legally binding per se, different from legal requirements in force in Germany
- Advanced solution: certificates
 - used internally in global acting companies
 - alternative in case a qualified signature is not realistic based on a specific agreement
- High end solution: digital / qualified signature
 - requested in accordance with German Signature Law



Assumption for processing in the future





Implementation Status Germany

- Implementation of the revised Annex I of Directive 2001/83/EC as amended and the new legislation by revision of the German Drug Law (14. AMG-Novelle)
- Principal acceptance of e-submissions.
- Outstanding legal issues
- Large number of applications are submitted electronically:
 - Most of the submission as electronic CTDs
 - Difficulties in validation of eCTDs
 - None of the review software fits all wishes of the assessors
 - Advantages will be realised more and more

Federal Institute for Drug and Medical Devices

The implementation of data processing without media breaks should be supported by...

- Release of the precedure number (ENR) via portal based on some key data introduced by the applicant
- Electronic submission supported by simple tools and defined folder structure as long as eCTD is not common
- In a transition period we have to accept different media and ways of submission
 - Application form as .xml file offline or online
 - Product information (PI, Modul 1.3.1) as .xml file at its best or at least as rtf. File via e-mail as per AMG-EV.
 - <u>Modul 3 to 5</u> in the structure and using the naming convention as outlined in the CTD specification (BfArM can add the xml backbone internally)
- Paper submissions should be scanned before processing

• Getting familiar with the review tools for eCTD und PIM This will result in a proper use of all electronic files e.g. for finalising the authorisation letter as fast as possible.



E-Submission Wishes from assessor's side

- Two screens or still paper copies for bigger documents
- Availability of all information electronically over an extended period of time
- Simple re-use of the data for preparing the authorisation letter (which should contain the final wording of the SPC, PL, Labeling and annex II) and any other assessment document
- Well structured submissions without "blocked" documents



European orientation – points for discussion

• eCTD "granularity"

Multiple strengths per pharmaceutical form may be acceptable, multiple pharmaceutical forms are too far. Problems will occur if those are not a GMA

• eCTD Document Operations recognised All operators (full LCM) as specified in eCTD specification v3.2, some national less restrictive rules may apply

Accepted media CD-ROM, CD-R, DVD-R, DVD-ROM

- .pdf file formats
 Minimal v1.4, should be readable by Adobe reader v5.0 or above, no restricted access, scanned images in exceptional cases
- **Signed documents required** Application form, module 1.4, confirmation of authentification
- Central repository System architecture and business rules to be defined