

Q&A on mandatory eCTD in National Procedures (NP)

Topic	Question	Answer
1. Format change to eCTD	Is the mandatory eCTD in purely National Procedures (NP) applicable to all submission types, e.g. new MAAs, renewals, variations, PSURs and ASMFs?	Yes, eCTD format has been mandatory for new national MAAs since 1 July 2018 and from 1 January 2019 for all other submission types, in line with Annex 2 of the HMA eSubmission Roadmap .
2. Format change to eCTD	Is the mandatory use of eCTD in purely NP also applicable to submissions concerning ongoing regulatory activities (e.g. response) that started up in NeeS or other non-eCTD formats? If so, how should these submissions be handled?	Yes, the milestone for mandatory use of eCTD does apply also to ongoing regulatory activities. In these cases, please refer to the Q&A on how to handle ongoing procedures in relation to mandatory use of eCTD format for guidance.
3. Format change to eCTD	If the format for a dossier of a product authorised in a purely NP is not yet changed to eCTD and the first upcoming regulatory activity to be submitted after 1 January 2019 is a PSUSA to the PSUR repository, should it then be submitted in eCTD format?	Yes, the mandatory eCTD applies to all submission types including PSURs, even if this is the first submission in eCTD format for that product. It is highly recommended that a Tracking table is included also for NP and this is especially important if the first eCTD sequence for the eCTD lifecycle is a PSUR. (See also Q&A no.4 and no.13)
4. Format change to eCTD	If the format change to eCTD for an NP product dossier was done by the start of a PSUSA, sequence 0000 was sent to the PSUR repository only and might not have been downloaded to the NCA. How could we facilitate the continuous NCAs lifecycle handling of the NP product dossier?	When the next sequence for this NP product dossier is submitted to the NCA (e.g. as a variation submission), the MAH should provide a Tracking table which would indicate that the earlier sequences for this eCTD was submitted to the PSUR repository only.

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5. eCTD baselines	According to Annex 2 of the eSubmission Roadmap no baseline submissions are required. Nevertheless, it seems that some national competent authorities do request a mandatory baseline. Could you please clarify whether there will be a common harmonised approach considering Annex 2?	There is a clear agreement among the NCAs that baselines are recommended but not required. The applicant decides whether to submit a baseline or not.
6. Worksharing and PSUSA that include NP	Worksharing and PSUSA procedures for national products could in the past be submitted in one consolidated Nees application... How should this be handled now in eCTD format?	<p>The eCTD dossiers are built around a procedure for a marketing authorisation of a product (trade name), normally including all strengths and forms of that product. As each product authorised via NP are continuously handled as separate NPs in each MS, a separate eCTD product dossier is needed in each MS, and therefore a separate eCTD sequence has to be provided for each national eCTD dossier also for worksharing and PSUSA procedures. This is the same for eCTD dossiers regardless authorisation procedure (CP, DCP, MRP and NP).</p> <p>There is no other solution.</p> <p>To facilitate the assessment, it should however be clarified in the cover letter that the submitted documentation in each separate eCTD sequence is identical in relevant parts. For PSUSA submissions, the grouped submission feature in the PSUR repository should be used.</p>
7. National requirements	<p>Will there still be national requirements for wet signatures of e.g. eAF, cover letters and/or declarations in some countries?</p> <p>If yes, do these countries plan to change this in the near future without the need to implement qualified electronic signatures?</p>	Currently, some MSs still require a wet signature even though the submissions are in electronic format/eCTD. The national requirements can be found in the list of submission requirements at the CMDh webpage , which is also relevant for NP submissions. For some of the MSs, digital signature can be used, but this is optional.

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8. National requirements	<p>Will there still be additional national requirements, e.g. national portals and/or additional documents, after 1st January 2019?</p> <p>If yes, an overview (similar to the Excel Sheet for the Guidance published by Member States on the implementation of the Falsified Medicine Directive) with links to the respective information/portal would be helpful.</p>	<p>There are no specific changes planned in relation to the mandatory eCTD in NP that has been announced to the network.</p> <p>There is currently no overview list with national websites to consult. However, the lists of submission requirements at the CMDh webpage are applicable also for national procedure submission and give some guidance. There is also some national specific requirements information at the CESP website as well as links to NCA websites.</p>
9. National requirements	<p>Which regulatory activities in NP could be handled outside eCTD?</p>	<p>The purely national submissions for regulatory activities listed in the <i>BPG on the use of eCTD in MPR and DCP</i> as acceptable to submit outside the eCTD can normally also be submitted outside the eCTD in NP, i.e. MAH transfer, Change of local representative, Sunset Clause, Dose dispensing (dose distribution), and Change of mock-up design.</p> <p>However, some NCAs will require these regulatory activities to be handled within the eCTD lifecycle for NP to facilitate the administrative processes and if so, information would be found on the specific NCA website.</p>

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10. Product information	Should the Product Information in NP (national language) be handled inside or outside the eCTD?	<p>The Product Information in NP should always be provided as PDFs (clean) inside the eCTD structure for all types of regulatory activities that include these documents.</p> <p>However, communication on minor text updates during the procedure would normally be handled outside the eCTD. As a minimum, the first proposed and last agreed version should always be included in the eCTD, even if this might require a separate final sequence by the end of the procedure.</p> <p>A copy of the proposed Product Information included in the eCTD should in addition always be provided in MS Word format (with tracked changes when relevant) in a separate folder called xxxx-workingdocuments outside the eCTD, but in the same CESP submission, CD or DVD.</p>
11. eCTD dossiers	Is it possible to have only one eCTD dossier/lifecycle covering several strengths and forms for one product (trade name) even if there are different MAA numbers for each strength, forms and/or packages?	Yes, having several strengths and forms of a product (trade name) in the same eCTD dossier is acceptable and even recommended.
12. eCTD dossiers	Would it be possible to have only one eCTD dossier/lifecycle covering several different separate national MAA for one product approved via NP in different MSs?	No, it will not be possible since the product lifecycle is handled in totally separate NP and the separate national dossiers cannot be confirmed as being common. Also, the product cannot, from a regulatory perspective, be regarded as <i>one</i> product, since it is not handled in a European common procedure.

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13. eCTD dossiers	Is a Tracking table also required in NP?	<p>Although the validation criteria for eCTD currently only require a Tracking table for MRP/DCP, it is intended in the future that this will be mandatory for all procedures, since it is very useful for keeping track of the submissions made over time. It is already now highly recommended also for NP and especially important if the first eCTD sequence for the eCTD lifecycle is a PSUR.</p> <p>For NP, the operation attribute <i>Replace</i> should be used for this document in each new sequence.</p>
14. eCTD dossier	What number should normally be included in the eCTD envelope for NP?	If no specific guidance is given by the NCA, the national MA number or other specific national product number should be given. If relevant, more than one number could be included.
15. Referral submissions	Is eCTD format also mandatory for referral submissions?	<p>Yes, eCTD format is mandatory also for referrals. However, for EMA led referral procedures, a stand-alone eCTD lifecycle is recommended to cover all the concerned nationally authorised products.</p> <p>Any variation application required as a result of a referral outcome should be submitted in eCTD format per concerned product as for other variations.</p>
16. Art. 45/46 Paediatric worksharing	Is eCTD format also mandatory for Art. 45 and Art. 46 paediatric worksharing submissions?	<p>For Art. 46 submissions eCTD format is mandatory.</p> <p>For Art. 45 submissions eCTD format should be used where available.</p>