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e-CTD Compliance

A Canadian Industry Perspective



e-CTD Symposium - April 2014 - Toronto

AGENDA

1. **Context – e-CTD Landscape**
2. **The Shift – A New Paradigm**
Impact – Response – Interdependencies
3. **A New Regulatory Dimension**
Structure – Lifecycle Management – Formatting
4. **Complying to the e-CTD Guidance**
External & Internal Alignment
5. **Looking Forward**
Expectations & Involvement

1. CONTEXT - e-CTD Landscape

General Benefits from e-CTD Adoption

EFFICIENCY



Preparation Time
submission compilation



Savings
paper, supplies, shipping...



Archiving
documents & submissions

EFFECTIVENESS



Lifecycle Management
submissions



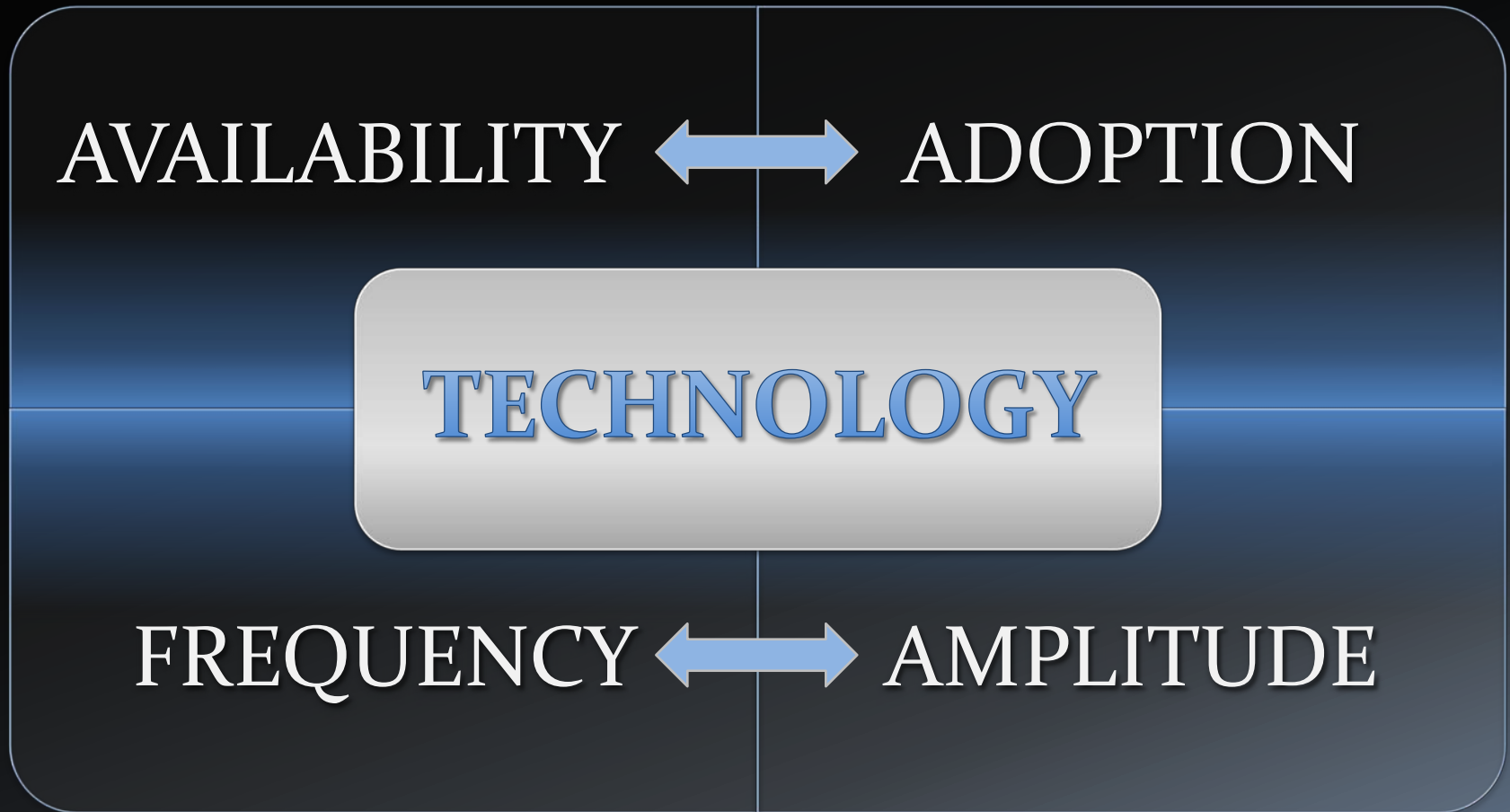
Global Submissions



Gateway Submissions
CESG

2. SHIFTING TO e-CTD - A New Paradigm

2.1 Impact Moderators



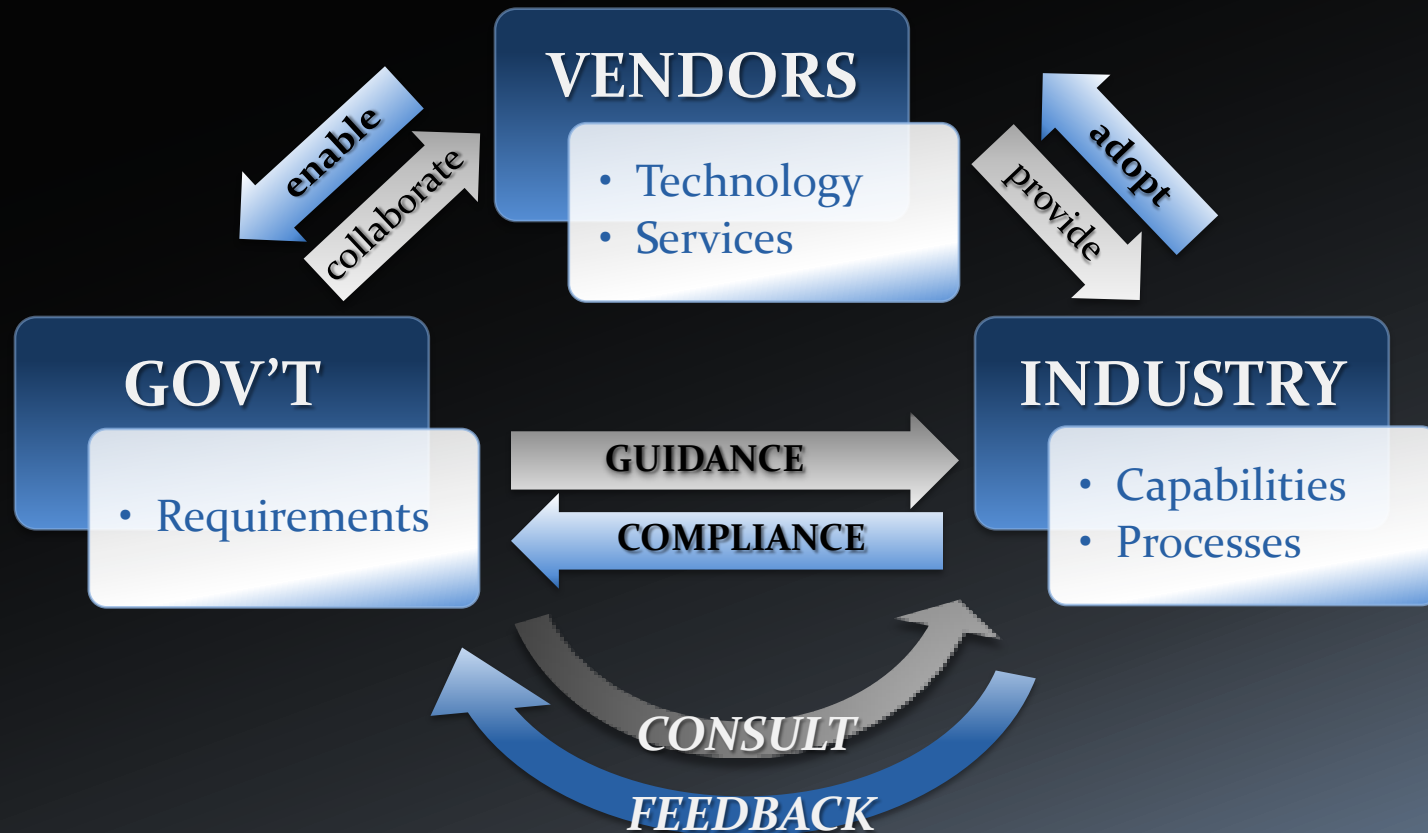
2.2 Impact Flow Model

e-CTD Era [A] – Past & Present



2.2 Impact Flow Model

e-CTD Era [B] – Shifting & Future



2.3 Response to Changes

INCREMENTAL	DISRUPTIVE
<p>Scope of Accepted Submissions</p>	<p>New CESG Gateway</p>
<p>New Validation Rules</p>	<p>RPS/e-CTD v4.0</p>
<p>ADJUST PROCESSES</p>	<p>ACQUIRE CAPABILITIES</p>

2.4 Interdependency Dynamics

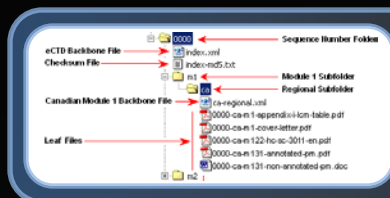


3. A NEW REGULATORY DIMENSION

3.1 Submission Structure

DTD/Schema & Validation Rules

e-CTD implementation has developed a new set of challenges within Industry



- specific, defined submission structure
- clearly established set of validation rules



- technical specifications for structure & formatting
- specialized publishing tools (eSMS) required



- diligent use of metadata in XML context
- compliance requires technical understanding

3.2 Lifecycle Management

Documents & Sequences

e-CTD adds a new layer of complexity with lifecycle management



- Specific rules – ADD/REPLACE/DELETE
- Challenging to interpret & apply – improves mostly through experience & best practices



- Significant downstream impacts in subsequent sequences
- Adding/deleting SUBNODES, modifying ATTRIBUTES, etc... – extensive rework to fix



- Only changes reflected in “INDEX.XML” are visible for the regulatory authority in its viewing tool
- What is shown on the Industry side may not be what HC sees

3.3 Document Formatting

Previously an internal process – now needs to conform to e-CTD standards



- Global complexity & variability of formatting specifications
- Challenges managing concurrent compliance to e-CTD requirements for different health authorities
- DTD vs Schema, different PDF versions, bookmarking and hyperlinking rules, etc...



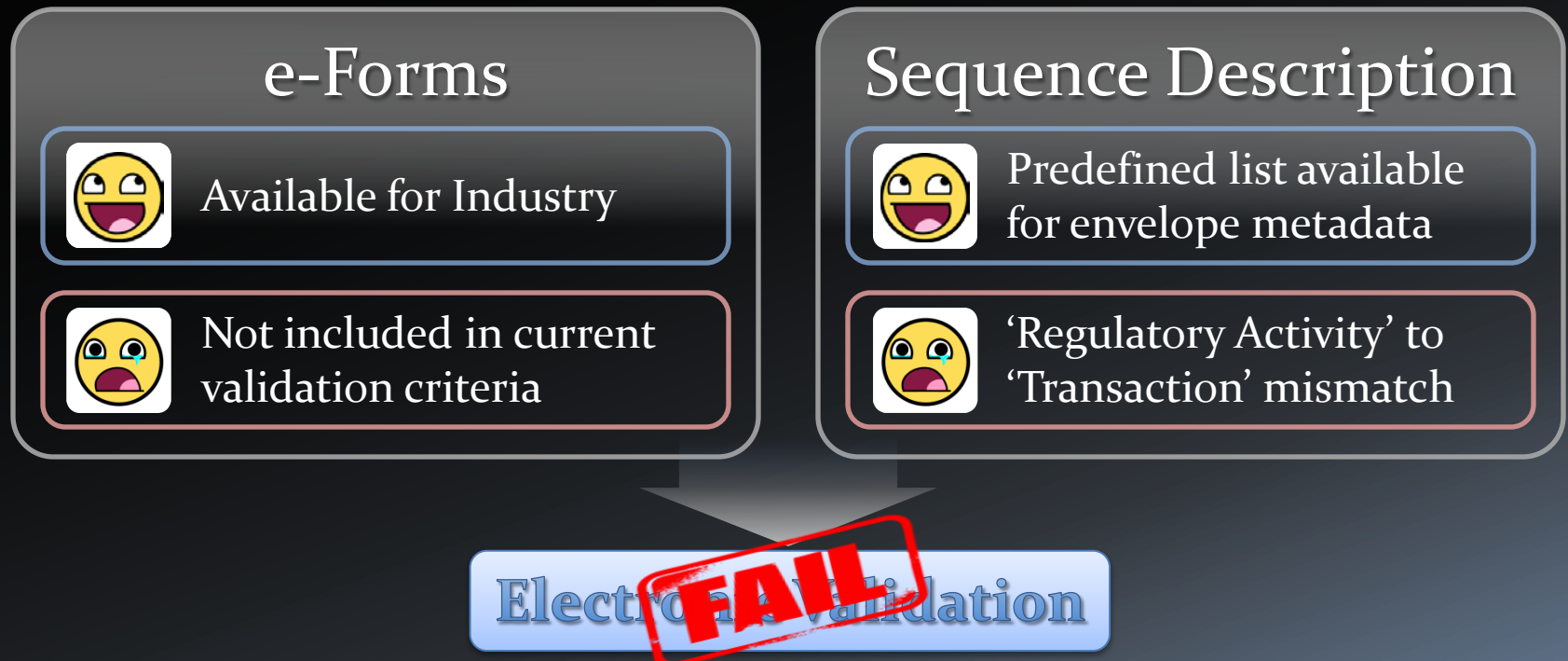
- Modifications to documents requirements (format and/or content) sometimes required to comply with e-CTD
- May conflict with internal procedures (e.g. protected PDF files)

4. COMPLYING TO THE e-CTD GUIDANCE

4.1 External Alignment

Regulatory Requirements Vs. Validation Criteria

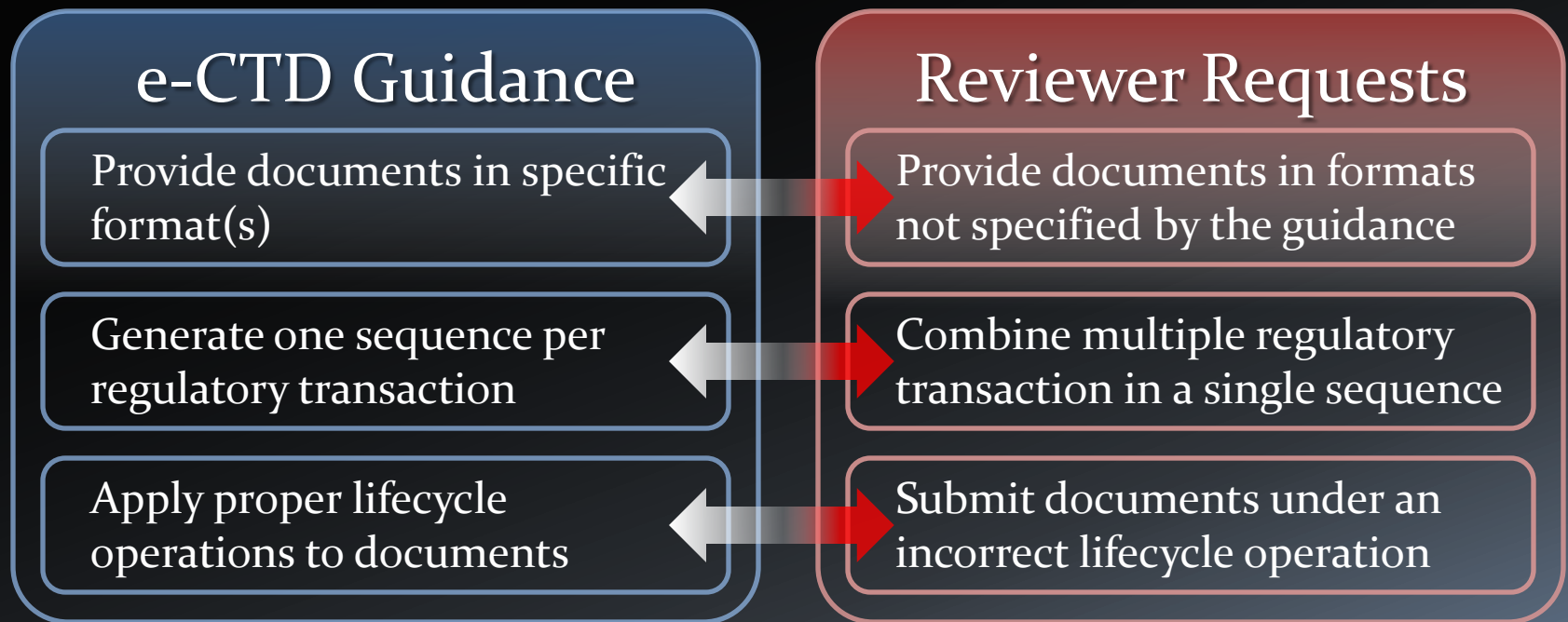
Industry attempts to comply with regulatory requirements are limited by the validation criteria











4.1 External Alignment

e-CTD Guidance Vs. Regulatory Review









Industry has to comply with both e-CTD guidance and reviewers requirements concurrently



4.2 Internal Alignment

	Regulatory Affairs	Regulatory Operations
Document & Submission Lifecycle Management	<p> Knowledge content and related documentation (logical organization, hyperlinks)</p> <p> Risk of misuse because of technical details & requirements</p>	<p> Technical understanding of requirements, XML & DVO environment</p> <p> Submission compilation quality depends on proper transfer of information from Regulatory Affairs</p>
Dedicated e-CTD Publishing Group	<p> Can focus on submission quality, regulatory content & strategy</p> <p> Requires clear internal alignment with Regulatory Operations (roles, responsibilities, processes...)</p>	<p> Understanding & high levels of compliance to electronic requirements</p> <p> Risks of altering regulatory documentation during formatting & compilation processes</p>

4.2 Internal Alignment

	Information Technology	Regulatory Operations
Software Upgrades & Maintenance	<p> Qualified technical personnel</p> <p> Upgrade/update timelines depend on prioritization of IT resources at a corporate scale</p>	<p> Efficient execution of installation-unrelated validation protocols (mainly OQ)</p> <p> Requires good level of technical comfort & solid understanding IT infrastructure/environment</p>
Application Troubleshooting	<p> Able to estimate business impact of actions implemented</p> <p> Risk of delay for 'urgent' requests from Regulatory Operations</p>	<p> Immediate issue resolution</p> <p> Risk of significant impact on eSMS/eDMS background processes, functions & data integrity</p>

5. LOOKING FORWARD - Expectations & Involvement

Expectations & Involvement



CONTINUED VISIBILITY

- Guidance documents that reflect current requirements
- Increased scope of e-CTD activities:
 - *updated validation rules*
 - *upcoming regulatory activities and transactions accepted in eCTD format (e-CTA, e-DMF...)*
 - *new initiatives (eForms, eSignatures, CESC deployment)*



Health
Canada

GERA

Group on Electronic Regulatory Activities



CGPA



BIOTECANADA

AN ONGOING & EVER-EVOLVING PROCESS

- Ultimately applicable to both for HC as well as Industry
- Best approach for the e-CTD ecosystem:
 - *be part of the change process*
 - *voice our reality while we work to establish a framework that is effective and efficient for both parties*
- Communicate with GERA members directly, or through Industry associations

Q&A



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Thank You!