Status of European eCTD Implementation and eSubs

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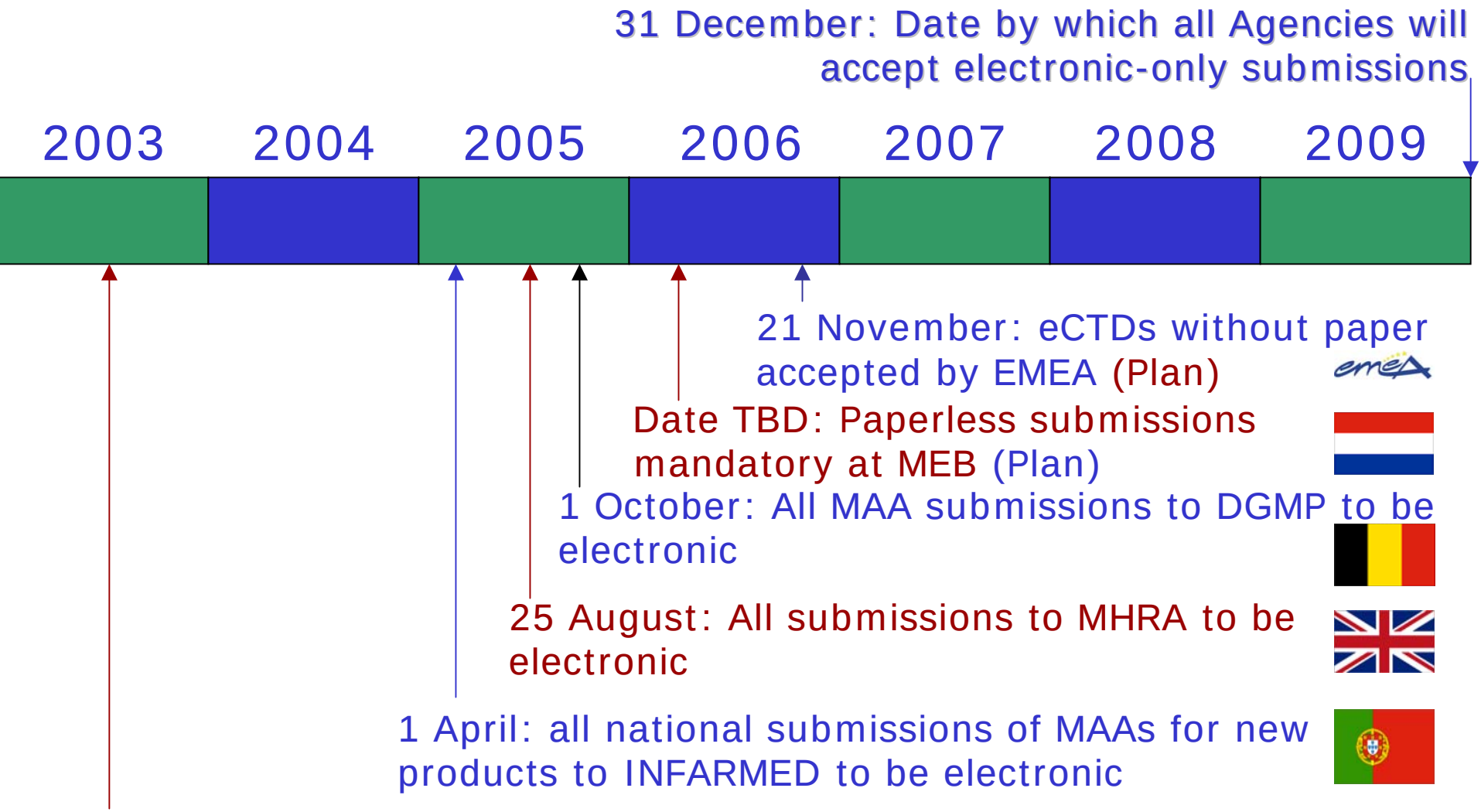
Background: The European Union

- As of 1 May 2004 25 EU Member States and 3 EEA Countries (+2+2 applicants)
- 42 National Competent Authorities
- European Medicines Agency
- ~4500 pharmaceutical companies
- Centralised, decentralised and national authorisation procedures

Implementation status



EMEA Electronic Acceptance

- Electronic Submission ≠ eCTD
- EMEA has accepted electronic submissions for some time
- Acceptance of eCTD only should encourage eCTD submissions
- eCTD offers clear practical advantages, navigation and lifecycle management capabilities:
  - Relationships between dossiers
  - Electronic workflow
  - Better quality dossiers
  - Better quality evaluation
  - Pharmaceutical Industry is global
  - Reduce regulatory burden
  - Harmonise regulatory process

Implementation activities (1)

- Three levels
  - Pan-European (Telematics Implementation Group)
    - Wider remit than eCTD
      - Regional standards
      - Regional change control
      - Implementation monitoring
      - Related applications
    - Recent focus:
      - PIM
      - EU-wide guidance for eCTD
      - Module 1 and Application Form specification
      - eCTD issues
      - *Avoid unilateral development*
  - Centralised
  - National

Implementation activities (2)

- Different Levels:
  - Centralised
    - Coordinated by EMEA
      - 31/03/2006: Analysis of business processes complete; Policies & guidelines in place
      - 31/05/06: Infrastructure/tool requirements finalised
      - 31/08/06: Lifecycle Management Requirements finalised; Formal pre-validation procedure established
      - 30/09/06: Electronic Archiving Policy/rules in place
      - 21/11/2006: **Subject to final confirmation by EMEA senior management,** start
  - National/Other joint procedures
    - Each Agency tailoring main implementation plan

Implementation Activities (3)

- Review System:
  - DocuBridge selected in 2003 for 12-month trial
  - EU Reviewers asked for an extension of 12 months + 2 additional tools (ISI+IABG) in order to build on requirements and gain experience
  - Decision on a final – single - EU tool will be taken in March 2006 after an open call-for-tender. (Specifications for tender being drafted, aim to select final tool by June 2006)
  - Will all NCAs follow? (No compulsion)

Implementation Activities (4)

- Review System Issues:
  - Number of eCTDs received by MS NCAs not sufficient to allow for adequate ‘testing’ of multiple tools in a business context
  - More administrative burden on those registering electronic submissions – repetition of effort for each tool
  - Increases resource burden- need to compare & contrast tools and functionality
  - Favourites/familiarity with one particular tool inevitably develop
  - Approach could be encouraging unilateral development

Implementation Activities (5)

- Review System Issues (continued):
  - The success of installations depends much on configuration to suit individual agency needs – there is a lot of communality, but some varying MS requirements
  - Bespoke development of integrated workflow and document/submission management systems – MHRA, IMB, Belgium etc – still place for a common review tool to be integrated into these systems, however
  - Need to manage common requirements and support common understanding of eCTD implementation requirements and issues, whilst supporting national configuration needs
  - Also need to understand industry validation and viewing needs for joint trouble-shooting
  - Final selected tool must meet these requirements

Central Repository for eCTD

- At least two initiatives to establish common repository:
  - IBM Trusted third party repository
  - Infobroker / Cebix
- EMEA will install common repository for Centralised Authorisation Procedure
- EMEA will probably pilot common repository for all EU Authorisation Procedures
- Wider political issue

EMEA eCTD Statistics (Centralised Procedure)

- 27 eCTD submissions received for new applications
- Up to 50 updates to a first submission
- -> very limited eCTD experience to date!
- Learning with each submission
- Experience in other Member States mainly more limited, exception of NL

Published Guidance (1)

Notice to Applicants, Volume 2B - Electronic Common Technical Document (eCTD)

- January 2006
  - **EU Module 1** eCTD Specification v 1.1 and Document Type Definition (DTD)
- January 2006
  - **Electronic Application Form**:
  - **New Application** Specification v 2.0 with Document Type Definition (DTD), stylesheet and example
  - **Variation Application** v 1.0 Document Type Definition (DTD), stylesheet and example

Published Guidance (2)

National & Centralised

- Individual countries
- EMEA
- EU-wide

Preliminary experience (1)

- Overall
  - Business case clarifying
  - Process and procedural issues surfacing
- Logistical & process issues
  - Paper & electronic in parallel difficult
  - Validation: Electronic perceived as an extra step
  - CD-ROMs create security issues
  - Still excessively manual
  - Two-way electronic communication

Preliminary experience (2)

- The Review
  - Possible, but room for improvement
  - Everybody still likes paper
    - (eCTD used as search-engine)
  - Life-cycle handling is positive but not fully understood/utilised
  - Workplace needs to be adjusted:
    - Double/large screen, high speed, etc.
  - Room for improvement in a Review System
  - Power of eCTD not fully appreciated by many reviewers

Specifications: Issues

- eCTD; EU Module 1; Application forms
  - Stability
    - eCTD currently under review at M2
    - Module 1 & application forms just issued
  - Clarity
    - Ambiguity
    - What you see is what I see
  - Maturity
    - Including complementary guidelines
  - Differing regional requirements
    - Create validation and review issues

Technology: Issues

- Lifecycle management
- Review environment (17” screens)
- Archiving
- Communication channel
- Appropriate repository
- Review Tool
- Clear demonstration of the capacity of technology to support the requirements of the whole process

Infrastructure: Issues

- Clear architectural and operating guidance
- Security
- Semantic interoperability with other EU systems, in particular PIM for product information
- Technical support
- Change control processes

Implementation: Issues

- Management commitment
- Sufficient financial resources
- Business ownership
- An established Business Process for receipt, validation, processing & storage of eCTDs, supported by SOPs.
- Buy-in by all stakeholders
- Pharmaceutical company creation and submission of eCTDs as standard format
- No legal basis to make mandatory

Summary

- The European environment is a complex one in which to introduce new systems and processes
- After a slow start, implementation of electronic submission (and thence, the eCTD) is gaining momentum
- Implementation of the eCTD involves reviewing and (in most cases) re-engineering processes
- Experience is clarifying expected issues and highlighting new ones

Conclusions

- The 31 December 2009 target date is not a reason to delay
  - Other factors (BPR) mean that this really is a backstop date
- Implementation of the eCTD is a major challenge
  - Requires all stakeholders to work together
  - Requires harmonisation within the EU

Final slide

Further information:

- http://www.emea.eu.int
- http://www.pim.emea.eu.int
- http://pharmacos.eudra.org/F2/eudralex/vol-2/home.htm

Thank you for your attention