



**IRISH MEDICINES BOARD
GUIDE TO ELECTRONIC SUBMISSIONS – HUMAN
MEDICINES**

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This guide does not purport to be an interpretation of law and/or regulations and is for guidance purposes only.

1. SCOPE

This guidance applies to all applications for human medicinal products (new and existing) and all other submission types supplied to the Irish Medicines Board (IMB).

2. INTRODUCTION

It was agreed by the Heads of Medicines Agencies (HMA) in Reykjavik on 28 February 2005 that by an agreed end-2009 deadline, the European regulatory agencies must have the infrastructure and processes in place to handle electronic-only eCTD submissions to successfully support the related decision-making processes for the authorisation of medicinal products within the European Union. The IMB has fully adopted the European Guidance for eCTD (electronic Common Technical Document) and NeeS (Non-eCTD electronic submissions).

The transition to electronic submissions brings with it several advantages, not only the obvious reduction in printing, archiving and transportation costs, but also facilitates consistency in information viewed across agencies, the ability to manage the lifecycle of the product, and improved navigation and assessment of documentation.

The IMB now accepts and strongly recommends electronic-only submissions, either in eCTD format or non-eCTD (NeeS) format without paper copies or through the IMB's online portal RIO. This applies to new applications; responses to validation queries and review of assessment questions, supplementary information, variations, renewals, periodic safety update reports (PSURs), active substance master files (ASMFs) / drug master files (DMFs).

The IMB is aware that some applications cannot follow the CTD format e.g. parallel import applications, and therefore cannot be submitted in eCTD or NeeS format. For these applications types only, electronic submissions without paper copies are acceptable in Word or PDF format.

Please see section 3.3 for a list of submission types accepted in electronic format either as eCTD/NeeS or Word/PDF.

The IMB is not in a position to accept electronic formats other than those mentioned above. Companies who have a particular problem with submitting electronic applications in one of the agreed formats should contact the IMB at customerservice@imb.ie before making an application to discuss their situation.

3. ELECTRONIC SUBMISSIONS

3.1 Definitions

3.1.1 eCTD

The *eCTD* electronic submission is an electronic version of the Common Technical Document (CTD). The structure corresponds to that of the CTD. The eCTD in addition contains additional technical components which enable management of the lifecycle of the product.

An eCTD application may comprise several dosage forms and strengths, all under one invented product name.

3.1.2 Non-eCTD (NeeS)

A *non-eCTD* electronic submission is any submission of electronic information formatted as a set of electronic files, organised into module folders containing PDF or MS Word files as per the CTD guidance. There is no ability to manage the lifecycle of the product in this format.

3.1.3 RIO

‘RIO’ – Regulatory Information Online – is the IMB medicinal products submission and tracking portal. RIO is designed to reduce the effort required to submit applications and to assist in the ongoing management and tracking of applications.

A limited number of application types can be submitted through RIO. The list of submission types currently possible through RIO is given in Section 3.3. There may be additions to this list over time; please refer to the IMB website www.imb.ie for updates.

Special Mail 5 may be used when submitting via the RIO portal. If a marketing authorisation holder (MAH) uses NeeS or paper, the RIO portal can also be used to submit applications independently of these formats.

It is envisioned that it will be possible to upload both NeeS and eCTD formats through the RIO portal in the future.

3.1.4 Other

Parallel import submissions should follow where possible the standard file and folder naming conventions where possible.

3.2 Guidance

1. [Guidance for Industry on Providing Regulatory Information in Electronic Format: eCTD electronic Submissions](http://estri.ich.org/eCTD/index.htm), as available on ICH website, <http://estri.ich.org/eCTD/index.htm>
2. [Guidance for Industry on Providing Regulatory Information in Electronic Format: Non-eCTD electronic Submissions \(NeeS\)](http://esubmission.emea.europa.eu/), as available on <http://esubmission.emea.europa.eu/>
3. [Volume 2B Notice To Applicants – Presentation and format of the dossier Common Technical Documentation](http://ec.europa.eu/enterprise/pharmaceuticals/eudralex/vol2_en.htm), see http://ec.europa.eu/enterprise/pharmaceuticals/eudralex/vol2_en.htm

3.3 Submission types

The IMB will now accept all human medicinal products in the following submission types in eCTD format and non-eCTD (NeeS) format without paper copies:

- New Applications for Centralised, Decentralised, Mutual Recognition and National procedures.
- Variations applications
- Article 61(3) notifications
- Line extension applications
- Responses to validation queries
- Responses to assessment questions
- Supplementary information
- Renewal applications
- PSURs
- Follow-up measures
- Active substance master files (ASMFs)/drug master files (DMFs)
- Vaccine antigen master files (VAMFs)
- Plasma master files (PMFs)

The IMB will also accept the following submissions through the RIO extranet.

- Variations
- MR Article 61 (3) notifications
- Withdrawals
- Batch-specific requests

For further details please see the ‘Dossier Requirements List’, also on our website.

The IMB will now accept the following submission types in PDF/Word format without paper copies:

- New Dual Pack Registration applications (DPRs)
- DPR annual compliance declarations
- New parallel import applications (PPAs)
- PPA variations

- PPA renewals
- Batch-specific requests
- Transfer before and after authorisation applications
- Withdrawal applications
- Clinical trial amendments
- Clinical trial annual safety reports
- Clinical trial end of trial declarations
- Clinical trial end of trail reports

Please note that this list is not exhaustive.

Further guidance regarding the application process and forms may be found in the specific guidance relating to those application types on the IMB website at www.imb.ie

For clinical trials, the IMB still requires paper copies of the protocol with all current amendments, the informed consent form and the subject information leaflet. Further details are in the ‘Guide to Clinical Trials’ on the IMB website, www.imb.ie . .

4. REQUIREMENTS FOR ELECTRONIC SUBMISSIONS

The requirements for electronic submissions are outlined in the eCTD and NeeS guidance referenced in Section 3.2 above. In addition the IMB would like to highlight the following items. The requirements of this section are applicable to both eCTD and NeeS submissions.

4.1 Process

It is recommended that MAHs submit applications electronically in either eCTD or NeeS formats or through the RIO portal. Once a submission has been received in eCTD format, all subsequent product information in relation to the submission should be submitted in eCTD format

For MAHs wishing to move from a NeeS or paper format to an eCTD format, where the application relates to a national application or where Ireland are the Reference Member State (RMS) or Rapporteur, it would be preferable that an eCTD baseline with a sequence tracking table is submitted prior to/along with an eCTD product submission. Baselines should be compiled as per the European guidance. Currently the IMB will accept the full dossier or relevant modules as a baseline for the product.

For non-CTD based applications, it is recommended that the MAH submits applications electronically in PDF or Word format directly to the IMB’s Receipts and Validation section.

4.2 Media

Ideally, there should only be one regulatory activity per medicinal product, per CD; where more than one CD is required please use a DVD. It is recommended that file sizes are reduced where possible; however the IMB does not accept ZIP files as electronic submissions.

If necessary, multiple eCTD sequences may be submitted for the same medicinal product on the same CD / DVD. This should be clearly indicated on the disc itself and the signed original cover letter that accompanies the disc.

Ensure any covering letter or other documents accompanying a disc are also present electronically within the same disc.

4.3 Media label information

Each CD or DVD submitted in electronic format should include the following label information, clearly presented and printed on the media as defined in the guidance in Section 3.2 above:

- Format: eCTD or NeeS
- Applicant's name
- Product (invented) name(s)
- International Non-proprietary Name (INN) of the active substance(s)
- Application number (if known)
- Sequence number(s) of the eCTD submissions contained on the CD / DVD
- Number of media units per full set and an indication of the place of the individual CD / DVD within this set (e.g. 1(5), 2(5), etc.)
- Submission type of each eCTD submission(s) contained on the CD / DVD (e.g. 'initial application decentralised procedure', 'variation Type II'), as per the eCTD envelope information
- Description of each submission type of each submission(s) contained on the CD / DVD (e.g. 'supplementary information following validation')

In addition this information should be available on the cover letter with the following:

- Application number
- Tracking table for eCTD sequences, including a description of each submission type
- Contact e-mail if problems arise with the CD/DVD

4.4 Label and leaflets

Label, leaflet and label-leaflet mock-ups for marketed presentations should be submitted as a set of consolidated PDF documents for all pack sizes and presentations of the product. Single documents in PDF and word files are not acceptable.

For parallel import applications, the PPA holder is still required to submit actual samples in addition to an electronic application.

4.5 Application form information

The application form and related Annexes should be clearly labelled including the relevant section as part of the document title, with preferably a clearly labelled separate document for country specific information, for example, as in Annex 5.1, 5.3 and 5.10.

5. VALIDATION OF SUBMISSIONS

An electronic submission will not be validated if it does not meet the eCTD and NeeS guidance outlined in section 3.2 and section 4.

eCTD submissions are technically validated as per the eCTD guidelines. This validation checks the submission format, structure, file and folder naming conventions. eCTD submissions with category A errors resulting from the validation will require the applicant to re-send a corrected eCTD file.

NeeS submissions are technically validated using the NeeS checker. This validation checks the folder and file naming conventions for a CTD submission in NeeS format. Applicants submitting a NeeS Submission where the submission technical validation score is below a pre-set requirement for the folder score and for the file score may be requested to resubmit the application.

6. IMB CONTACT POINTS

If you have a specific query regarding electronic submissions to the IMB, please contact customerservice@imb.ie. For information regarding the RIO extranet and registration please see our website, www.imb.ie.