

Electronic Regulatory Submission in the EU:

Afssaps perspective – France

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*Agence française
de sécurité sanitaire
des produits de santé*



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Electronic Regulatory Submission

Afssaps perspective



Agenda

- eCTD priority
- Benefits and Requirements
- Status of implementation
- e-Submission
- Next Steps
- Conclusion

Electronic Regulatory Submission Afssaps perspective



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Electronic Regulatory Submission

Afssaps perspective



eCTD priority

European perspective:

- CTD is mandatory but eCTD is optional for industry;
- Heads of Agencies committed to implement eCTD by end of 2009, meaning that all agencies would be prepared to accept eCTD without paper by that target date;
- Some agencies are implementing eCTD earlier (PT, UK, BE, NL) and making electronic submission mandatory;
- EU eCTD review system ready for deployment in all MSs by EMEA;
- A Roadmap on eCTD implementation has been requested by HMA;

Electronic Regulatory Submission Afssaps perspective



eCTD priority

National Perspective :

- Committed executive management;
- Part of the Information Systems Development Plan 2006-2008;
- Part of Afssaps's vision (One of the 3 key projects for MAA);
- Communication with partners (NCA, Industry, Leem/EFPIA);
- Designation of a Core team/ Project Manager (Project team in place)
- Pilot phase – pragmatic approach
- Sharing understanding among teams

Electronic Regulatory Submission Afssaps perspective



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Benefits

- Improved handling and archiving of submissions
- Simplified business process
- Better information management and support of **Life Cycle Management**
- Immediate Access to complete and up-to-date information
- Search functionality for assessors and increased tracking ability
- Facilitated evaluation and better visibility of the process
- Reduced workload and reuse of information for assessment reports
- Controlled communication with external experts
- Better use of resources

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Requirements

- Improvement of IT infrastructure (Hardware, Network, Security)
- Building of a storage platform for long-term archiving
- Development of new processes
- Integration with workflow system and in-house databases
- Implementation of review tools
- Staff training
- **Change Management**

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Status of implementation : Pilot Phase

Objectives:

- Make sure that we understand the challenge
- To come up against the various potential problems linked with eSubmission in the « real life ».
- To find the appropriate solutions and adapt our business processes accordingly.
- To anticipate issues and solve them before accepting eCTDs and e-Submissions on a routine basis.
- To plan tasks and Resources allocation

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Status of implementation : The Deal

- Accompanied dossier : assistance of a consultant that linked with applicants to enter and follow up the pilot,
- Unique contact within agency,
- NO PAPER requested from Afssaps,
- Flow of eCTDs, various procedures and submission types,
- Technical assistance (readability),
- Controlled assessment timeframe,
- Change management strategy

Status of implementation : The Strategy

- Change is inevitable
- New ways of working (receipt, validation, processing and storage of CDs)
- Reluctance (Preparation stage, acceptance phase)
- Positive perception but Moderate implication of some users
- Convince External Experts

Electronic Regulatory Submission Afssaps perspective



Status of implementation : The Submission

- Submission meeting in Afssaps
- Afssaps project team leader, IT representant and records manager
- IT representant from the company assists
- CDROM directly /personnaly handed
- CDROM tested immediately for readability

Electronic Regulatory Submission Afssaps perspective



Status of implementation : Issue 1

- Technical requirements
- Communication with external experts
- Business process

Solution

- More powerful computers
- Double screens (19 inch)
- Adobe Acrobat 7.0
- Training of concerned assessors just before arrival of dossier
- Remote access to a server / web-based application
- Development of workflow system

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Status of implementation : Issue 2

- Non eCTD compliance

Solution

- The TIGes subgroup “eSubmissions Harmonisation Topic Group” works for harmonised guidance also for so called **NEES (Non eCTD Electronic Submissions)**
- Afssaps strongly recommend eCTD format but also accept NEES if conform to the CTD format.
- Check of structure and file name convention
- Generation of an index.xml file for archiving by an internal application.

Electronic Regulatory Submission

Current eCTD issues



- **Status of implementation : Issue 3**

Current eCTD Issues

- Impact of changes to specifications and MA application form and tools and agency systems
- Interoperability of eCTDs from different tools
- No strict adherence to the ICH specifications (Files not referenced in the backbone)
- Printing issues

Solution

- Production experience is the only way to resolve these issues
- Need for pre-process validation tool for applicants ?
- Access for external Experts
- Better Management of change process
- Printers

Electronic Regulatory Submission Afssaps perspective



Status of implementation : The outcome

- 25 dossiers – 62 submissions (25 Go)
- All types of procedures (FR = Rap or RMS)
- All types of dossiers (NCE, Ext. Indic., Line ext, Var, FUM, RMP)
- 15 dossiers - more than 1 sequence
- Staff involved (n=20) - All skills
- 40 people trained

Electronic Regulatory Submission Afssaps perspective



Status of implementation : The Conclusion

- Benefits of eCTD recognized at the agency,
- Afssaps willing to move from paper to electronic asap,
- Facts:
 - Limited number of companies ready to embrace eCTD
 - Limited understanding of implications
 - Transition might be long if eCTD remains optional ,
- EU agencies that made the move expect ROI in the short term,
- Handling electronic **AND** paper processes is cumbersome ,
- NEES begin to be accepted by some (EU Guidance to streamline implementation towards eCTD in preparation)

Electronic Regulatory Submission Afssaps perspective

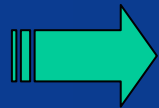


Agenda

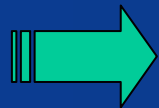
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e-Submission : Legal Context

Archiving paper or electronic : 2 imperatives



Access to the dossier for the users



Master the LCM of document in conformity with the legislation
(environment for storage, legal delay (France 30 years))

Electronic Regulatory Submission Afssaps perspective



1

Submission 0000



NEW Document: Each Document newly added to the submission

2

Submission 0001 and the following



DELETE Document: The document was added in submission 0000 and deleted in submission 0001



REPLACE Document: The document was added in submission 0000 and replaced in submission 0001



APPEND Document: The document was added in submission 0000 and appended in submission 0001



NEW Document: The document is added to the current submission for the first time

e-Submission : Legal Context

- Afssaps = PUBLIC INSTITUTION
 - under National Archives supervision by law (3 January 1979)
- Law of 13 March 2000: e-Submission same value as far as
 - Identification
 - Authentication
 - Integrity of data within the concerned legal timeframe
- Does not include implementation guideline

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Legal aspects

- eCTD = Original should be shown in case of lawsuit

- The company should ensure :

- Authenticity
- Integrity
- Everlastingness
- Accessibility
- Confidentiality

To maintain quality of physical archive

- Logistics & Economic

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1 - e-Submission type

- eCTD or NEES

2 - Completeness of the dossier

- Size (Mo)
- Number of folders/sequence
- Number of files/sequence
- Number of PDF pages (if available)

3 - Quantitative and Qualitative description per module

- Size
- Number of folders by module
- Number of files by module
- Qualitative description

4 - Durability

- CD-R (size < 650 Mo) otherwise DVD-R or DVD+R

5 – Software used for the generation of the eCTD

- Name of the software, Version, Company

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Conclusion

- eCTD is triggering and driving a fundamental change in publishing and assessment practices,
- The challenge of eCTD implementation is moving from an autonomous standalone model to a structured model of work,
- Current LCM is document based : submission of complete new documents taking into account new data,
- Future LCM is data based : submission of pieces of new information updating existing data,
- Replacement of current processes is the major change for both, agencies and industry,
- Once this is done, publishing and assessing e-CTD is relatively easy

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Next Steps

- Finalize reception/circulation/distribution processes for electronic dossiers,
- Complete e-Submission protocol for electronic dossiers and develop recommendations for applicants,
- Open tender for the outsourcing of archiving,
- Share experience with other EU agencies and contribute to guidance development

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Conclusion

- Afssaps is willing to accept NEES within a limit,
- Electronic dossiers' folder structure **MUST** follow CTD,
- Full benefits of e-Submission will not be available before industry is capable of structuring the dossier appropriately, and ultimately submit eCTD
- Afssaps is willing to accompany industry in the process,
- Pharmaceutical industry, French (LEEM) and European (EFPIA) syndicates will be kept informed,
- Pre-submission meetings could be arranged during the development of recommendations.
- At the end of the day Afssaps might strongly discourage paper submissions

Electronic Regulatory Submission Afssaps perspective



Thank you for your attention