



APAC
GOOD SUBMISSION PRACTICE (GSubP)
GUIDELINE FOR APPLICANTS

APAC RA-EWG

Table of Contents

1	INTRODUCTION	1
1.1	<i>Objective and scope</i>	1
1.2	<i>Background</i>	1
1.3	<i>Definition</i>	2
2	PRINCIPLES OF GOOD SUBMISSION	3
3	MANAGEMENT OF SUBMISSION	4
3.1	<i>Planning for Submission</i>	4
3.2	<i>Preparation and Submission of Application Dossier</i>	6
3.2.1	<i>Writing study reports and summaries</i>	6
3.2.2	<i>Compilation and assembling of dossier</i>	7
3.2.3	<i>Submission of application</i>	7
3.2.4	<i>Standard operating procedure for submission preparation</i>	7
3.3	<i>Quality Check</i>	8
4	COMMUNICATIONS	9
4.1	<i>Communications with the Review Authorities</i>	9
4.1.1	<i>Communications in pre-submission stage</i>	9
4.1.2	<i>Communications in post-submission stage</i>	10
4.2	<i>Communication within Applicants</i>	11
5	COMPETENCY AND TRAINING	12
5.1	<i>Core Competency of Applicants</i>	12
5.2	<i>Training and Capacity Building</i>	13
6	GLOSSARY	13
7	REFERENCES	14

1 INTRODUCTION

1.1 *Objective and scope*

The objective of this document is to provide general and high level guidance on APAC* Good Submission Practice (GSubP, see 1.3 Definition) principles and processes which applicants of new pharmaceutical products should keep in mind. It is not intended to provide detailed instructions on how to conduct each submission.

The goal of APAC GSubP is to enhance efficiency and quality of medicinal product registration process which leads to expedite the launch of innovative medicines for the peoples in Asia. The GSubP principles and elements described in this document will help applicants to achieve that goal.

Regarding detailed procedures for submission preparation, applicants should consider to generate Standard Operating Procedures (SOPs) in their own organization considering the general guidance provided in this document and specific conditions and requirements in each country.

This document is envisioned as a companion document to Good Review Practice (GRevP, see 1.3 Definition) guidelines, and sufficiently expandable to accommodate additional annexes or ancillary documents in the future.

This document applies to any aspects related to the regulatory submission for pharmaceutical product registration and its management by applicants. It also covers associated activities by applicants from planning to approval stage.

This document was written focusing on application submission of new pharmaceutical products for use in humans. The concepts described here may also be applicable to other line extension submissions such as additional indication and/or dosage, and clinical trial applications.

* Asia Partnership Conference of Pharmaceutical Associations

1.2 *Background*

APAC is a platform built by 12 Asian Pharmaceutical Associations to advocate industry proposals in order to expedite the launch of innovative medicines for the peoples in Asia. Regulations and Approvals Expert Working Group (RA-EWG), established under APAC, has been working to facilitate promotion of regulatory convergence in Asia.

APAC GSubP is one of the key activities of the RA-EWG to enhance the quality and efficiency of the drug registration process by improving the quality of submission as well as its management. It has been promoted in response to the GRevP led by the regulatory authorities.

In general, registration submission of new drug is made in the final stage following time consuming product development process. In that sense, it can be regarded as the compilation of all development program and activities of the product. In order to obtain early approval in the registration process, it is important for applicants to prepare and submit application with good quality dossier. It is also essential that applicants keep close communications with the review authorities and take prompt and appropriate actions to move forward the registration process smoothly. Application submission with poor quality of dossier and management will lead to failure in getting final approval or cause significant delay due to a large number of inquiries and requests from the review authorities. Applicants should always seek ways to improve their submission in quality and efficiency.

1.3 Definition

APAC Good Submission Practice (GSubP):

An industry practice for any aspect related to the process, format, contents and management of submission for registration of new pharmaceutical products by applicants. It is the practice to enhance the quality and efficiency of the drug registration process by improving the quality of submission as well as its management.

To promote continuous improvement, all aspects of GSubP should be evaluated and updated on an ongoing basis.

Applicant

The company who submits an application for a new marketing/import authorization or an update to an existing marketing authorization (e.g. line extension, variation, renewal) for pharmaceutical products.

For more clarification, applicants in this guideline include all the parties who are involved in preparation for and management of aforementioned applications. Preparation for an application is often performed by collaborations between or among multiple organizations locally, regionally and globally, e.g. local affiliate and headquarters, sponsor and co-development partners, originator and licensee companies. All these parties would be called as applicants in this document.

Good Review Practice (GRevP) (as defined in WHO GRevP guidelines ¹⁾)

Documented best practices for any aspect related to the process, format, content, and management of a medical product review. The objective of GRevP is to help achieve timeliness, predictability, consistency, transparency, clarity, efficiency and high quality in both the contents and management of reviews. This is done through the development of review tools (for example, SOPs, templates) and reviewer learning activities (for example,

training courses, mentoring, orientation packages, discussion sessions). To promote continuous improvement, all aspects of GRevP should be evaluated on an ongoing basis.

It has been introduced and moved towards step-wise implementation by many regulatory authorities to enhance the timeliness, predictability, consistency, transparency, clarity, efficiency and quality of product review. The GRevP guideline document was endorsed by World Health Organization (WHO).

New Pharmaceutical Products

New chemical and biological drug products which applicants intend to submit applications for marketing/import authorizations.

2 PRINCIPLES OF GOOD SUBMISSION

The objective of GSubP is to help applicants prepare good quality submission leading to successful registration. The ‘principles’ of a good submission describe the key elements of GSubP which applicants should follow in order to achieve successful product registration. The following five key principles of good submission are provided as a general guide. Applicants should keep them in mind when planning and implementing submissions.

Key Principles of Good Submission

Strong Scientific Rationale and Robust Data with Clarification of Benefit-Risk Profile:

A good submission should be based on strong scientific rationale and robust data in terms of integrity, relevance and completeness. The nature of the benefits and types of risks should be clarified with sound evidence.

Compliance to Up-to-date Regulatory Requirements:

A good submission is made in compliance with the up-to-date regulations. In addition, it should keep reasonable consistency with internationally harmonized regulatory standards.

Well-Structured Submission Dossier with Appropriate Cross-references:

A good submission will be made with well-structured dossier complying with the acceptable format by the review authorities. For ease of review, applicants are encouraged to use appropriate cross-references in the dossier.

Reliability, Quality, Integrity and Traceability of Submission Documents and Source Data:

A good submission is made ensuring the reliability, quality, integrity, and traceability of information and data described in submission documents including their sources.

Effective and Efficient Communications:

A good submission and timely review can only be achieved by keeping effective and efficient communications with the review authorities throughout the product development and registration process. In addition, good communications within the applicants' organization(s) are essential for successful submission as well as its management.

3 MANAGEMENT OF SUBMISSION

Preparation of an application submission is generally conducted by collaborative work in applicants' organization(s). For example, a project team consisting of clinical, non-clinical and quality experts, statisticians, medical writers, regulatory staffs, a project manager and members from other concerned parties works together for a submission .

Sometimes local and international collaborations among multiple organizations are required, e.g. local affiliate and headquarters, sponsor and co-development partners, originator and licensee companies.

In any of aforementioned working scheme, applicants should appropriately manage the whole process of registration submission. Appropriate resource management is especially important if simultaneous submissions in multiple countries are planned within limited time period.

The principles of project management and quality management are critical for well-organized submission preparation. The submission practices of careful planning, good communications and clearly-defined work instructions can maximize the quality and efficiency of submission process.

3.1 Planning for Submission

Preparation for application submission generally starts with planning phase. As noted, submission for product registration generally takes place in the last stage of lengthy product development process. Even so, applicants need to initiate discussions on submission strategy from an early stage of product development and establish a clear strategy for submission. Clarification of product profile as well as its update according to ongoing development program is a critical part of such strategic discussions. For that purpose, some companies use a document so-called 'Target Product Profile', a summary format of a drug development program described in terms of labeling concepts.

It is also important for applicants to conduct clinical and non-clinical studies in compliance with the up-to-date regulatory standards, guidelines and regulations. Applicants shall endeavor to obtain the regulatory information necessary for drug development and registration. Also, applicants need to cooperate with the review authorities so that appropriate regulations will be publicized in a timely manner.

It should be noted that progress has been made in regulatory convergence and harmonization by international cooperation scheme among the regulatory authorities, e.g. The International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH) and Harmonization of Standards and Technical Requirements in The Association of Southeast Asian Nations (ASEAN). It is necessary that applicants keep eyes on not only local but also regional and international standards, guidelines and regulations, and update their own submission strategy accordingly.

In order to plan and manage an application submission efficiently, applicants are recommended to prepare and use the following tools.

Check-list:

Applicants are encouraged to make a check-list to plan for every required component of submission dossier. The list may include name of each document with information such as responsible person/party, target date and status. Such list will be useful not only to check if there is any missing component but also to manage the whole process of submission preparation efficiently

Glossary:

It is important to keep consistency of terminology used throughout a submission dossier. Applicants are recommended to create a list of general glossary before initiating preparation of study reports and summaries.

Template:

Template is a standard file format document containing pre-defined layout, styles, texts and graphics. Templates help authors to prepare each component document in structured and consistent manner complying with the required format and contents, e.g. ICH M4 and E3. It will also enhance efficiency of preparation. Submission with a unified format of study reports and summaries also enables reviewers to perform review smoothly.

Timeline table:

Development and management of timeline is one of the most important tasks in submission planning phase especially when the submission is performed by collaborations among multiple parties of applicants. It is recommended that applicants generate and keep

updating a timeline table or a Gantt chart including the role and responsibility of each person/party to manage the whole process of submission preparation.

If necessary, applicants shall also plan for pre-submission meeting with review authorities (see section 4.1.1).

These activities in planning stage will enhance quality and efficiency of submission preparation and its management.

3.2 *Preparation and Submission of Application Dossier*

There are two main steps in preparation of an application dossier. One is preparation of each component, i.e. writing study reports and summaries, and preparing other required documents. The other is compilation and assembling of submission dossier.

In general, authors of reports and summaries are assigned from experts in each scientific field or medical writers, and overall handling of submission is conducted by regulatory function or professionals.

3.2.1 *Writing study reports and summaries*

The contents of study reports should be based on strong rationale and robust data with scientific evidence. Needless to say, applicants should ensure reliability, integrity and traceability of data described in the reports. Applicants also need to refer to the relevant guidelines on the format and contents of study reports which can be accepted by the review authorities, e.g. ICH M4 and E3.

Summary documents should be generated based on the contents of study reports to provide clear rationale with justification. It is also necessary to clarify the nature of benefits and risks of the product based on sound scientific evidence.

The contents of these documents shall comply with up-to-date standards and regulations at the time. In addition, it is essential to prepare these documents by taking into account of consistency with current international standards and guidelines.

The authors of these documents should strive to write a concise and easy to read document. Sometimes peer review by competent third party or person is effective in order to check the validity of scientific contents before final draft.

Translation of original documents to other language is sometimes required in the process of submission preparation. In such case, applicants should pay careful attention to accuracy and validity of translation.

Besides study reports and summaries, other types of documents are required at application submission by each regulatory authority as regional or country-specific requirements. They

include, but are not limited to, application form, proposed labeling, letter of authorization, patent statement, certificates issued by the competent authority, and so on. Type of required documents differs depending on the category of application and the local regulations. Applicants need to confirm the list of required documents provided by the national regulatory authorities.

3.2.2 *Compilation and assembling of dossier*

Before compiling and assembling submission dossier, applicants need to confirm the structure and format of dossier accepted by the national regulatory authorities, e.g. ICH-CTD. Collection and confirmation of each component document should be performed in reference to defined table of contents. A check-list will help applicants to manage the collection process efficiently. In compiling and assembling of submission dossier, applicants need to ensure that every document has been prepared consistently and placed in the correct location of the dossier.

Some regulatory authorities have been accepting application submission with electronic dossier. Applicants need to confirm the local regulatory requirements and follow the relevant instructions when intending to submit their application electronically.

3.2.3 *Submission of application*

Each review authority has defined acceptable format, process and route of application submission, e.g. hard copy or electronic dossier, on-line, mailing or on-site submission. Sometimes, a pre-submission consultation with the review authorities is required to fix the date of submission.

Applicants are required to submit application dossier following the procedure and instructions provided by each authority. To avoid rejection of filing, applicants should ensure that the submission is made in proper category and contains all the required information and materials using appropriate format.

3.2.4 *Standard operating procedure for submission preparation*

Preparation of application dossier is a complicated and time-consuming work. It is often performed by collaborations among applicants' parties or a group of organizations. It is therefore beneficial for applicants to generate SOPs and share them within the parties or organizations for proper management of the whole process of submission preparation.

SOPs may be structured to contain or refer to additional tools that could assist in performing the procedure for submission, e.g. template, standard format of check-list.

Additional working procedure documents may also be created to give more detailed instruction and structure in support of SOPs. These documents can describe in detail how a

particular process is performed, e.g. procedure for drafting, reviewing and finalization of each study report and summary. SOPs may also outline the workflow processes which facilitate project management when multiple parties work on different parts of the application dossier.

These SOPs need to be updated depending on the change in applicant's working environment, e.g. change in organization, scheme of work-sharing etc.

3.3 *Quality Check*

Quality control (QC) check of submission dossier and its components is critical and indispensable process in order to achieve a good quality of submission. The purpose of QC is to ensure that information and data described in submission dossier have sufficient quality in accuracy, integrity and traceability of scientific data/information, and to check compliance to pre-defined format, template and structure. Some regulatory authorities require submission of QC declaration by applicant.

The following types of QC can be defined depending on the subject, timing and stage of submission preparation.

QC of study reports and summary documents

The main purpose of this QC is to ensure accuracy, integrity and traceability of scientific data and information. This type of QC is usually conducted just before or at finalizing of each report, summary document or any other document which refer to the contents of these documents, e.g. product labeling.

It should also be conducted when making revisions to the contents of these documents.

In case translation of these documents to other language is required, it is necessary to confirm accuracy and validity of translation. In addition, compliance to pre-defined format and template, e.g. ICH M4, E3, needs to be checked as a part of QC process.

QC of submission dossier

This is the QC process to be conducted at compilation and assembling of submission dossier. The purpose is to check if every required component is ready and placed in the correct location of the dossier.

QC of electronic dossier

This type of QC is required in case of application submission with electronic dossier, e.g. ICH eCTD or NeeS (non-eCTD electronic submissions). The purpose is to confirm if the dossier is compliant with the review authority's electronic dossier requirements, e.g. electronic bookmarks, cross references and hypertext links are correctly functioned.

A record should be created when conducting QC. Also, applicants are highly recommended to have a written SOP for QC procedure.

4 COMMUNICATIONS

Good communications will help applicants to improve quality and efficiency of the product development as well as registration process, thereby realize speedy approval and earlier patient access to new pharmaceutical products. Applicants have to pay attention to both communications with the review authorities and those within applicants' organization(s).

4.1 Communications with the Review Authorities

Communication with the review authorities can take place in various form such as meetings, inquiry and response. Applicants should be aware of available communication mechanisms in pre- and post-submission stages and make effective use of them in product development and submission processes. It is recommended that main communications with the review authorities are conducted consistently through regulatory professionals for all projects.

During post-submission stage, applicants should make prompt and appropriate responses to the inquiries and/or requests from the review authorities. To do so, applicants need to track the progress of review in timely manner and adjust the schedule as well as internal resource accordingly. It is also important to ensure that the review authorities and applicants are able to share information about the timeline and progress of review.

4.1.1 Communications in pre-submission stage

Meeting with review authorities

Meetings with regulatory authorities in product development and pre-submission stages help applicants to fix design of planned clinical/non-clinical studies, clarify requirements and potential concerns of ongoing development program and envisage possible questions in coming application process. It enables applicants to progress their development program efficiently in compliance with regulatory requirements and prepare a good quality submission dossier by dealing with potential questions and concerns in advance. It will increase the probability of a positive outcome in coming application submission.

Applicants should proactively use pre-submission communication with the review authorities to make successful submission.

In order to hold effective and productive meeting, applicants should keep the following points in mind.

- Study and follow the defined rules and procedure for the meeting
- Clarify the purpose and discussion points
- Prepare good quality meeting materials
- Discuss based on reasonable scientific rationale
- Prepare and circulate meeting minutes/memo on discussion points and agreements
- Take appropriate follow-up measures on comments and advice received from authorities

4.1.2 *Communications in post-submission stage*

Meeting with review authorities

Opportunity of meetings in post-submission review stage is useful not only to confirm progress of review but also to discuss and solve potential issues, questions and requests raised by reviewers. It also helps applicants to have clear understanding on the background of received inquiries and prepare appropriate response to the point.

Availability of these meetings in post-submission stage depends on the review process adopted by each review authority. Often such meeting is held according to a request from review authorities. Applicants should follow the instructions described in previous section when having a meeting in post-submission stage.

Inquiry and response

Inquiry and response form the critical communication between reviewers and applicants. In general, inquiries from the review authorities are issued in two separated stages of the course of application review, i.e. in screening phase and in scientific review stage.

Screening or validation for application filing is usually performed by the review authorities at receipt of submission to ensure that the dossier is complete and of suitable quality for scientific review. In case any screening inquiry is received, applicants should correctly understand the contents and make prompt and appropriate action for response.

Once screening phase is finished, official scientific review starts. The review authorities may request additional information based on the outcome of scientific review.

At receipt of an inquiry in scientific review stage, it is important for applicants to clarify and understand the background as well as intention of the reviewer with that inquiry. To make it possible, the review authorities often allow applicants to ask for clarification. Applicants should make the best use of such opportunity.

When applicants received a critical inquiry which would require an additional study (or studies), they should have a consultation meeting with the review authority as much as possible to clarify details of the required study (or studies).

Proper management of the timeline for response preparation is another important element. Applicants need to confirm the deadline of response, set a reasonable timeline and appropriately manage prompt response preparation.

Preparation of response package needs to be conducted following the procedures and instructions described in section 3 MANAGEMENT OF SUBMISSION.

Depending on the country, the review authorities may request applicants to confirm the contents of draft evaluation report in the last stage of the review process. In such case, applicants should confirm the contents carefully.

4.2 *Communication within Applicants*

In many cases, preparation of an application submission is performed by collaborative work by concerned parties in applicants' organization. Sometimes collaborations among multiple organizations are required.

Applicants should understand that a good submission can be achieved only when concerned parties within or among applicants' organizations share a clear strategy and work collaboratively throughout the product registration process up to approval. Good communication within submission team is the key to successful submission.

It is highly recommended that the submission team clarifies and confirms its operation model as well as the role and responsibility of team members when they have a kick-off meeting. Good communications within the team will be facilitated by establishing and sharing standardized working procedure and having a platform of information sharing such as regular meetings.

In case of global product registration, collaboration among multiple regions with time and geographical differences are required for submission in each country. In such case, applicants should make an effort to achieve effective and efficient communications among the regions.

In the case that applicants have outsourced manufacturing, research and development or submission operations, it is applicants' responsibility to keep close communication with the contractor.

5 COMPETENCY AND TRAINING

Applicants need to have general core competencies to properly manage and conduct submissions. Type of required competencies depends on the role and responsibility of each person or a party in applicants' organization.

5.1 Core Competency of Applicants

A core set of general competencies which applicants need to have for good management of submission includes the following. Applicants need to confirm that they have sufficient professional competencies and skills to make a good quality submission. In case applicants plan to outsource submission operations to other organization, applicants need to make sure that the organization has these core competencies.

Scientific knowledge and expertise

Applicants should have professional knowledge and expertise that relate to the product safety, efficacy and quality. These knowledge and expertise are especially significant for the authors and reviewers of technical documents in submission dossier. Writing skills are also essential for the authors.

Logical application of each field of scientific knowledge, understanding on risk-benefit analysis, and critical thinking methodology to ensure compliance with regulatory standards and guidelines are also required competencies.

Good understanding of up-to-date regulations

Applicants should always keep abreast with the latest regulatory environment. This can be done by following the regulatory authorities' website and check updated news, notices or highlights. If available, applicants can also subscribe to a mail delivery service provided by the review authorities to allow applicants to receive updated regulatory information from the authorities' website periodically.

Applicants should carefully study published regulations, technical guidelines, notices, Q&A documents and so on. Applicants can also attend training programs provided by the regulatory authorities, industry associations or other third parties to help understand the contents and the background of these regulations.

Other hard and soft skills

Applicants, as a group, need have the following hard and soft skills and abilities as a part of their competencies to move forward submission and its management efficiently.

- Planning and project management
- Medical and technical writing

- Technical skills for electronic submission (as necessary)
- Problem-solving
- Communication

Integrity, reliability and ethical value

Applicants should have honesty, integrity and reliability not to jeopardize the confidence of the regulatory authorities and other stakeholders. Also, applicants need to follow sound ethical practices with sufficient transparency and accountability to maintain reliability of public and patients².

5.2 Training and Capacity Building

Training is essential for applicants to acquire sufficient core competencies and strengthen skills and capacity. For that purpose, applicants can make use of various opportunities of training programs provided by regulatory authorities, industry associations and other third parties.

For example, these parties often hold periodical educational programs, workshops and training sessions for applicants. Sometimes the authorities also provide briefing sessions for applicants when they release a new regulation or guideline, and prepare Q&A documents.

These external training programs are valuable for applicants to deepen their own scientific, technical and regulatory knowledge in the field of expertise. Applicants should strive to participate in these training programs as much as possible.

In addition, it is essential for applicants to acquire necessary skills and knowhow through their own day-to-day operations. Opportunities of in-house training, self-training and on-the-job training in applicants' organization should be leveraged as a part of capacity building program.

It is also recommended for applicants to establish good documentation practice to document submission requirements and past applications for reference and to allow good practices sharing within their organization(s) so that they can make good use of these valuable experiences and knowhow for future submissions as well as capacity building. Archival can be in the form of manuals, SOP, database or any other appropriate tools.

6 GLOSSARY

APAC	: The Asia Partnership Conference of Pharmaceutical Associations
ASEAN	: The Association of Southeast Asian Nations
CTD	: The Common Technical Document

ICH	: The International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use
ICH-CTD	: Common Technical Document agreed in ICH
ICH eCTD	: Electronic Common Technical Document defined by ICH
Inquiry	: Questions or information requests made by the review authorities on submitted registration application
NeeS	: Non-eCTD electronic Submissions
Q&A	: Questions and Answers
QC	: Quality Check
RA-EWG	: Regulations and Approvals Expert Working Group established under APAC.
SOP	: Standard Operating Procedure
Summary	: Module 2 documents in ICH-CTD or equivalent
Study report	: Module 4 and 5 documents in ICH-CTD or equivalent. Module 3 body of data can also be in this category.
WHO	: World Health Organization

7 REFERENCES

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