Guidelines for the introduction of electronic dossier in eCTD format submitted in national procedures

Upon entering the European Union, HALMED became a full member of the European medicines regulatory network and of the Heads of Medicines Agencies (HMA), thereby assuming the obligation of implementing HMA's common European strategy for the introduction of electronic submission of regulatory requirements for medicinal products. HMA's strategy has been published on the website of the European Medicines Agency (EMA) in the section HMA eSubmission Roadmap (strategy and associated annexes). In terms of the HMA strategy, detailed deadlines were set for introducing electronic dossiers which are to be submitted in centralised procedure (CP), mutual recognition procedure (MRP), decentralised procedure (DC) and national procedure (NP). The respective deadlines are mentioned in Annex 2 to the HMA eSubmission Roadmap: Implementation of Mandatory Use of eCTD format for Regulatory Submissions. The deadlines which are set in terms of the HMA strategy for introducing the eCTD electronic format for dossiersfor national procedures are for granting new approvals from 1 July 2018, whereas for other types of applications (changes, renewals, ASMF, PSUR, etc.) from 1 January 2019.

For HALMED to assess achievability of the set deadlines in the HMA strategy for national procedures in which approval for marketing authorisation is given only in the Republic of Croatia ("purely NAP"), during 2017 consultations were held with medicinal product manufacturers / marketing authorisation holders. Based on thee consultations, there was a need for adjusting the deadlines for implementation from the HMA strategy for the "purely NAP".

Based on conducted consultations, an achievable deadline of **1 January 2020** has been defined, from when it becomes mandatory to submit electronic dossiers in eCTD format for all types of applications in national procedures for approval of medicinal products in the Republic of Croatia (granting, changes, renewal, transfer and termination of approvals, changes based on Article 26 of the Ordinance on Granting Marketing Authorisation for Medicinal Products (Official Gazette, No. 83/13), ASMF, worksharing procedures, arbitration procedures, PSUR, etc.).

Upon transferring to the eCTD format, submitting baseline sequences is not mandatory. HALMED recommends submitting baseline sequences to facilitate assessment of regulatory procedures and tracking the lifecycle of medicinal products. In the event that all modules of the dossier cannot be included the baseline, at least module 3 of the dossier should be submitted or a larger part of the dossier which can be compiled. The baseline sequence includes compiled and approved dossier in eCTD format which has already been submitted to HALMED in hardcopy /NeeS form and assessed in procedures that were completed earlier.

The baseline sequence can be submitted when moving over to eCTD as the initial (0000) or latter (000X) in the lifecycle of a medicinal product after moving over to the eCTD format. If the baseline sequence is submitted, it then becomes necessary to:

- submit the baseline sequence along with the application / new regulatory activity (the baseline sequence and sequence of the new regulatory activity is attached which is submitted), and in no way should it be submitted on its own
- the written application is to state that the <baseline eCTD sequence> is being submitted and that only the format of the documentation changes, and also confirm that the content from the earlier approved dossier has not changed.

Exceptionally to what has been approved, the baseline sequence may also include dossier which has not been approved but submitted to HALMED in hardcopy/NeeS form in a previously submitted application(s) which remains unresolved prior the date for submitting the baseline sequence. In that case, this requires a written request which clearly states that all submitted but as yet unresolved applications which also includes the respective unapproved dossier previously attached in order for

HALMED to distinguish the unapproved documentation which HALMED must assess and is found in the baseline compiled together with the approved items. If all of the information from that part of the unapproved documentation included in the baseline is not approved in the final procedure(s), there will be a need to submit a consolidated sequence containing the correct information from the baseline in accordance with approved information/documentation. A more detailed explanation is found in Point 4.11 of the Instructions titled *Harmonised Technical Guidance for eCTD Submission in the EU*.

Additional instructions and replies to questions relating to the preparation and submission of electronic dossier in eCTD format can be found on the EMA website in the section eSubmission, and on the website of the Co-ordination Group for Mutual Recognition and Decentralised Procedures – Human (CMDh) in the sections ESUBMISSIONS and Q&A on mandatory eCTD in National Procedures (NP) as well as on HALMED's website in the section Instructions on Preparation and Attaching Electronic Dossier in eCTD and Nees Formats (in Croatian).