SG-HSA eCTD Question and Answers Document (Sep 2024)

Contents

1. General

1.1 When will HSA make eCTD Submissions mandatory?

eCTD will be implemented in phases and the adoption by industry will be on a voluntary basis during the initial roll-out. HSA will provide advance notice to the industry on subsequent phases.

1.2 Does HSA recommend any eCTD solution provider to help me publish my dossier in eCTD format?

HSA does not provide any recommendation on solution providers for the industry. It is the responsibility of the companies to ensure that they acquire the right solution for their needs. eCTD is an international standard and any software that is compliant with ICH and SG-HSA eCTD Specification and Validation Criteria will be compatible with the review system used by HSA to evaluate eCTD applications. Refer to the eCTD website for a guide on selecting an eCTD software vendor.

1.3 Are there additional fees for eCTD Submissions?

There are no additional fees imposed on eCTD Submissions.

1.4 Are there any advantages for companies to submit dossiers via eCTDs instead of PRISM/CD?

Submitting eCTD through the HSA eCTD Portal is an entirely paperless submission with the advantage of system validation to ensure successful receipt of the package by HSA. Unlike how documents are attached in PRISM, eCTD allows companies to submit common dossiers for multiple strengths/presentations/dosage forms in a single Application by uploading a single zip file. eCTD enables content reuse without the need to re-submit documents and facilitates lifecycle management for both industry and HSA.

1.5 If I submit in eCTD, can I later submit variations or amendments in another format?

Once a submission is made via eCTD, any subsequent variations should continue in eCTD. eCTD has a defined lifecycle management that allows the content to be filtered and viewed so that the evaluator can see the current view of the Application, as well as content which was previously approved.

Other formats lack the XML infrastructure to be able to build the above views and therefore switching between eCTD and non-eCTD formats should be avoided.

1.6 Will I be able to submit test submissions during the initial phase?

You will be able to submit test submissions during the first 6 months following the launch of eCTD. The contents of test submissions will not be reviewed by HSA and will be deleted from the system once testing is complete. More information on providing test submissions would be provided at a later date.

1.7 Can eCTD Submissions be in ACTD format?

eCTD Submissions should always be prepared in accordance with ICH specifications.

1.8 What is the Document Matrix?

The Document Matrix provides guidance to Applicants on the content that is required or disallowed for a particular Submission Type. During validation, the submitted package is checked for compliance against the Document Matrix. The content validation is only applicable to the initial Sequence of a Submission.

1.9 What is the Submission Type Matrix?

The Submission Type Matrix is provided to help Applicants make sure that they do not group Submission Types that need to be submitted in separate Submissions. It is also used during validation to check that the combinations of Submission Types are acceptable.

1.10 What is the difference between a Leaf Title and a File Name?

A leaf title is what is seen by an evaluator when viewing an eCTD Application via the XML file, whereas the file name is not visible to the evaluator in the review system. There are also fewer restrictions on leaf titles than on file names. While capital letters and special characters are allowed and there are fewer limitations on length, it is recommended to keep titles short and below 512 characters as per ICH specification. A file name is what is seen when viewing a folder structure without the XML and Style Sheet. For eCTD, the file names are unimportant.

2. HSA eCTD Portal

2.1 How do I register my company for submission of eCTD packages through the HSA eCTD Portal?

You need to register your company to use the HSA eCTD Portal eService via Corppass. Upon successful registration of the Corppass account, you will be able to log into the HSA eCTD Portal using your Corppass account to submit transmission and request for a SG eCTD ID.

The Corppass Administrator for your company should provide access to the required personnel within your company who needs to submit eCTD packages.

Local employees should use Singpass to login to the HSA eCTD portal. For foreign employees, a Singpass Foreign user Account (SFA) is required.

2.2 As a Corppass Admin, how can I provide access to HSA eCTD Portal to my colleagues?

eCTD will be a registered e-service, just like other Singapore government e-services. You can select the eCTD e-service and provide access to your colleagues via your Corppass Admin account.

2.3 What is a SG eCTD ID and how do I obtain it?

A SG eCTD ID is a unique number issued by HSA via the HSA eCTD Portal upon request by applicants. This SG eCTD ID is associated to the company's Entity ID (e.g. UEN) and cannot be deleted or amended once issued. The SG eCTD ID is required for submission of any eCTD package to HSA via the HSA eCTD Portal.

Applicants who are submitting a new eCTD Application must request for a SG eCTD ID via the HSA eCTD Portal. Once used for a specific eCTD Application, the SG eCTD ID remains associated with that Application for the rest of the product life cycle. The SG eCTD ID also remains unchanged regardless of additions and withdrawals of products contained in the Application. The SG eCTD ID is to be used as the Application Folder Name in all eCTD submissions for a specific Application.

2.4 Can I submit eCTD through PRISM or storage media?

No, the HSA eCTD Portal is the only method to submit eCTD Sequences to HSA. Refer to the SG-HSA eCTD Specification for more details.

2.5 Can I submit the eCTD package before submitting the Application in PRISM? If not, how soon after the PRISM submission should the eCTD package be submitted?

No, the PRISM Application must be submitted before the eCTD package as the PRISM Application number must be used in the eCTD envelope as the Submission Number. The eCTD package should be submitted within 10 working days of the PRISM Application date.

2.6 What is the file format and size limit of a single eCTD Submission?

All files contained in a single eCTD Submission must be compressed into one single zip file, without any encryption or password protection. The size limit is 50GB for the zip file and 500MB for each individual file.

2.7 Can I view what was submitted through the HSA eCTD Portal by a third party service provider engaged by me?

All users who logged in with the same Corppass account will be able to view all the eCTD transmission records. However, the transmission records only include Datetime stamp, SG eCTD ID, Sequence Number, File Name, File Size, and UEN details of the Submission. Other details of the Submission (e.g. dossier, type of Application, product name etc.) are not displayed.

2.8 Can I view what was submitted through the HSA eCTD Portal by the previous company following a transfer of product registrant?

A company who took over a transferred eCTD will be able to submit new Submissions for the SG eCTD ID but will not be able to view any previous transmission records made by the previous company for the same Application Number.

2.9 I am a DMF holder located outside Singapore. Can I submit my DMF in eCTD format via the HSA eCTD Portal to HSA?

Yes, you may submit the eCTD to HSA as long as you have a Corppass account. Please visit www.corppass.gov.sg for more information.

2.10 How will I know if my package has been successfully transmitted?

A receipt will be shown on the screen once the package is successfully transmitted. The receipt will contain the Transmission ID, Individual's Name, Company Name, SG eCTD ID, Sequence Number, File Name, File Size and Datetime Submitted (at confirmation step, not initial upload). You can save the receipt as a PDF or XML file as proof of transmission. The same information is available in the transmission records module.

3. Preparing your eCTD Submission

3.1 Application folder

3.1.1 How do I name Application Folders?

The Application Folder name is the SG eCTD ID e.g. e20230925sg0005. The folder name cannot be changed during the product's life cycle. Please see the SG-HSA eCTD Specification for more details.

3.2 Concurrent submissions

3.2.1 Can I submit multiple eCTD packages for different variation applications concurrently? Can these be combined in a single sequence (e.g. MIV-1 and MIV-2)?

If the variation applications had been successfully submitted in PRISM, the respective PRISM application numbers can be used for multiple concurrent eCTD package submissions. Please refer to the Submission Type Matrix to determine which submission types may be grouped in a single Submission.

Applicants should carefully weigh the pros and cons of using Work Grouping, as it can lead to issues when:

- One of the Submissions combined in the Work Grouping is Withdrawn
- One of the Submissions combined in the Work Grouping is Rejected

3.2.2 Must Sequences be submitted in running order? For example, I have prepared Sequences 0003 and 0004 but 0004 is ready to be submitted first.

Concurrent Submissions should be provided in chronological order. If this is not feasible, it is still possible to submit the eCTD regardless of the Sequence order if the Sequence does not reference another that has not yet been submitted. Companies should also ensure that documents intended for an earlier sequence do not replace the updated ones already present in the system for review.

3.3 Preparing the envelope

3.3.1 How do I obtain my Application Number and Submission Number?

For new product Applications, the Application Number is derived from the Submission Number associated with the first Sequence provided.

Please refer to the section 2.4 of the SG-HSA eCTD Specification for information regarding the Submission Number.

For the first Sequence, the Application Number and Submission Number should be identical with the exception that the Application Number will have a prefix "e". For example:

Submission Number: 2212345A

Application Number: e2212345A

For Baseline Submission of existing products, please refer to 9.4 on the Application Number.

For DMF Applications, the Application Number is the same as the DMF number with a prefix “e”.

3.3.2 Is there a limit to the number of characters for Sequence Description?

It is recommended to keep the Sequence Description short, precise, distinguishing and within 128 characters. Additional details can be included in the Cover Letter and/or Note to Evaluator.

3.3.3 What is the Sequence Date in the Envelope? Is it the receipt date of the Sequence? Why is it not auto-generated by system?

The Sequence Date is a date field indicating the planned submission date of the sequence (format: yyyy-mm-dd). The Sequence Date is mainly used to ensure the validity of the codes used from the Defined Lists. Based on the Sequence Date, the validation tools should check to ensure that the code used is valid at the time of the Sequence Date. Sequence Dates will be validated to ensure they indicate a date within 30 days of the date of validation.

3.3.4 My eCTD Application contains 4 products. If I want to submit an MIV which is only relevant for 3 out of the 4 products, should the proprietary name/Application number fields in the envelope reflect only the products involved in the eCTD Submission, or should it reflect all 4 products?

If a Submission only pertains to a subset of products within an existing Application, the envelope should only state the proprietary names, Application Numbers and SIN numbers relevant to the products involved in the Submission.

3.4 Technical information

3.4.1 Will there be a stylesheet to allow companies to view the eCTD content in a web browser?

In addition to the ICH standard stylesheet (ectd-2-0.xsl), the Singapore Module 1 is also provided with a standard stylesheet (sg-regional.xsl). Each stylesheet can be used to view the respective content (i.e., ICH or regional backbone file) in a browser, rendered dynamically, or can be used to create static HTML rendition of each backbone.

An HTML rendition of the ICH and/or Regional backbone can be provided in the eCTD folder. If provided, HTML renditions will not be reviewed, but must be created using the stylesheets provided in the “util” folder and placed beside the corresponding backbone file.

3.4.2 Are we able to have a naming system of the Leaf titles different from Appendix A of SG-HSA eCTD Specification?

The Appendix A Best Practice Leaf Title Recommendations serves as a guide to companies. Applicant may choose to use a different naming system as long as the Leaf titles are descriptive and distinctive.

3.4.3 How should I present the information in 3.2.R? Could HSA create the elements as a default structure or are companies required to create node extensions manually?

HSA will not be creating additional elements in 3.2.R as the structure of Module 3 is defined by ICH. Node extensions should be used to group documents made up of multiple Leaf elements or to organise multiple files under additional heading structures in 3.2.R. Refer to section 4.4.3 Node Extensions of the SG-HSA eCTD Specification for more information.

3.4.4 Am I required to use study tagging files (STF) or node extensions to organise clinical studies?

Node extensions should be used to organise all clinical studies, failure of which would result in a warning during validation. STFs are not required for eCTD submissions to HSA, but are acceptable if the dossier submitted to Singapore is the same as that filed to another agency. In this case, the STFs should still have the correct study file tags identifying the datasets.

4. Content

4.1 Re-using content

4.1.1 Can I reference files already submitted in other Applications or Sequences?

Yes, this is encouraged. Reusing content already submitted earlier helps facilitate the review process. Content reuse is allowed within the same Sequence, between Sequences of the same Application and between Sequences of different Applications. See the SG-HSA eCTD Specification for more information.

If you are unable to reuse content, you may resubmit the document provided in another Application or Sequence. Please indicate in the Note to Evaluator if any of the documents provided in the current Sequence has been previously submitted.

4.1.2 If a file is required in multiple sections of the CTD structure, should it be published in each of the sections?

No, the file should only be published once and then referenced in each of the locations of the eCTD backbone. Cases of content reuse should be addressed in the Note to Evaluator and you should indicate at which referenced location the document was physically published.

4.2 File format/signatures

4.2.1 What are the allowable file types for eCTD submissions?

In addition to PDF, the following file types are accepted:

Root and util folders	M1	M2-M3	M4-M5
DTD, XSD, XSL, TXT, XML, HTML	PDF, HTML, XML, DOCX, DOC, RTF, XLS, XLSX, PPT, PPTX	PDF, XML, JPEG, JPG, PNG, SVG, GIF, BMP, DOCX, DOC, RTF, XLS, XLSX, PPT, PPTX	PDF, XML, JPEG, JPG, PNG, SVG, GIF, BMP, DOCX, DOC, RTF, XLS, XLSX, PPT, PPTX, CSV, TXT, XPT, SAS, DAT, CSS, HTML

4.2.2 Can I still submit documents in Microsoft® Word format?

Source files are submitted in Microsoft® Word format. Refer to SG-HSA eCTD Specification for more information.

4.2.3 Can we insert the scanned or digital signatures into the PDF?

Scanned signatures can be added to a Microsoft® Word document and rendered to PDF or the signature image can be pasted into the PDF.

Submission of PDF documents with digital signature is also allowed. However, it should not restrict the ability to copy or print the file which may be necessary to facilitate the review process. Please also note that submission of PDF documents requiring password to open would result in an Error and rejection of the Sequence.

4.3 Documents

4.3.1 Do I still need to provide Module 1 documents/information in PRISM if I'm submitting these in eCTD?

Module 1 documents for all applications (except for Change of Registrant (transfer) applications) can be submitted in eCTD without uploading them on PRISM. However, the PRISM application form would still need to be completed as per current process.

4.3.2 Is it always necessary to provide a Note to Evaluator?

It is good practice to submit a Note to Evaluator, especially in every "Initial" Sequence of a Submission. Assuming that the evaluator who will be evaluating the Sequence is not the same as the evaluator who evaluated previous Sequences, the Note to Evaluator is your direct communication to the evaluator and is a good opportunity to address questions that you may be able to predict to reduce the number of iterations required for the evaluation.

4.3.3 Is a tracking table which lists all previous Sequences required?

HSA does not require tracking tables to be submitted. Should there be a need to provide a summary of the product's lifecycle prior to eCTD submission, companies may include the information in the Cover Letter.

4.3.4 Please clarify if it would be acceptable to include a separate "electronic submission information" leaf underneath the Cover Letter leaf containing the software used to check the files for viruses, information about the validation, and any explanations about electronic validation findings.

As Module 1 granularity allows only a single leaf in 1.0.1, it is recommended to provide a single comprehensive Cover Letter with bookmarks to facilitate review without creating node extensions under this heading.

4.3.5 Do we need to submit working documents folder as well?

Working documents are only provided upon requested by HSA (e.g. validation reports) and would be located in an external Working Documents folder located outside the official eCTD Sequence package.

4.3.6 If confidential information from a third party is required to support my application, is there a way to submit these restricted documents?

If a drug master file (DMF) is needed to support your application, it is recommended for the DMF holder to file the DMF in the eCTD portal. For other types of confidential information, the third-party supplier may contact HSA for options.

4.4 Submitting information related to pharmacovigilance

4.4.1 Where should pharmacovigilance reports related to post-marketing information (e.g. PBRERs, RMP reports, Clinical study reports) be submitted?

Please submit pharmacovigilance reports related to post-marketing information in section 5.3.6 (Reports of Postmarketing Experience) using node extensions. It is recommended to use Leaf Titles that identify the category of the content (e.g. Leaf Title beginning with PBRER, RMP report, or Clinical study report).

The submission of PBRERs is only required when stipulated under the product's post-approval registration conditions, or on an ad-hoc basis upon request by HSA.

If the documents are submitted to fulfil post-marketing registration conditions, please select Submission Type PV-PBRER/RMP Reports.

If the documents submitted are requested as part of a pre-authorisation application dossier, please select the associated Submission Type for the application (e.g. Submission Type NDA, MAV1).

4.4.2 Where do I submit new educational/RMP materials or post-authorisation new/revisions to educational/RMP materials requiring HSA's approval?

Draft copies of new educational/RMP materials that were part of a pre-authorisation application dossier should be submitted in section 1.8.3.1 (Clean Proposed - Educational/RMP Materials) and/or 1.8.3.2 (Annotated - Educational/RMP Materials) under the associated Submission Type for the application (e.g. Submission Type NDA, GDA).

For post-authorisation submission of educational/RMP materials (new materials, revisions to existing materials) requiring HSA's approval (i.e. affecting clinical/safety content), the proposed materials should be submitted in section 1.8.3.1 (Clean Proposed - Educational/RMP Materials) and/or 1.8.3.2 (Annotated - Educational/RMP Materials) under the Submission Type PV-EDU/RMP Materials. The reasons for the submission should be highlighted in a cover letter and submitted in section 1.0.1 (Cover Letter) under Submission Type PV-EDU/RMP Materials.

4.4.3 Following approval of contents by HSA, how do I submit the finalised artwork of educational/RMP materials?

Finalised artwork of new educational/RMP materials that were submitted as part of a pre-authorisation dossier should be submitted as a "Closing information" Sequence Type in section 1.8.3.3 (Finalised Artwork - Educational/RMP Materials), under the relevant application type (e.g. Submission Type NDA, GDA). The finalised artwork should not be provided in the "Initial" Sequence Type.

For finalised artwork of new/revised educational/RMP materials submitted in the post-authorisation setting, please submit the document(s) as a "Closing information" Sequence Type in section 1.8.3.3 (Finalised Artwork - Educational/RMP Materials) under Submission Type PV-EDU/RMP Materials.

All submissions of finalised artwork should also not contain new or unapproved content.

4.4.4 Where do I submit RMP materials requested by HSA for documentation purposes (e.g. Letter of Undertaking, Patient Informed Consent Form)?

If the RMP materials are part of a proposed RMP submitted with the pre-authorisation application dossier (e.g. pregnancy prevention programme, controlled access programme), please submit in section 1.8.1 (Singapore-Specific Annex) under the associated Submission Type (e.g. NDA).

If the RMP materials are submitted post-authorisation (e.g. new materials, revisions to existing materials), please submit in section 1.8.3.3 (Finalised Artwork - Educational/RMP Materials) under Submission Type PV-EDU/RMP Materials. The reasons for the submission should be highlighted in a cover letter and submitted in section 1.0.1 (Cover Letter) under Submission Type PV-EDU/RMP Materials.

4.4.5 Where do I submit post-authorisation administrative revisions to educational materials that do not require HSA's review (e.g. change in company address, correction of typographical errors)?

Please submit the finalised copy of post-authorisation administrative revisions in section 1.8.3.3 (Finalised Artwork - Educational/RMP Materials) under Submission Type PV-EDU/RMP Materials.

The administrative revisions should be highlighted in a cover letter and submitted in section 1.0.1 (Cover Letter) under Submission Type PV-EDU/RMP Materials.

As the administrative revisions do not require HSA's approval, please retain the existing approval date on the materials.

5. Document navigation

5.1 Are bookmarks mandatory?

Bookmarks should be created for all documents with 10 or more pages and that contain multiple sections, tables, or figures, except for Literature References or Educational/RMP Materials. They serve as an electronic table of content and increase the efficiency of evaluation.

5.2 Are there any requirements for Hyperlinking?

The review system used by the HSA will provide an analysis of all hyperlinks provided in the application which may be consulted during screening. You should provide hyperlinks where they are encouraged e.g., Modules 2.4-2.7 & 5.2.

Module 1: Hyperlinks should be created in the Response documents in 1.0.4 Response to Input Request to the section that is addressed and/or has been updated.

Modules 2/3: The frequent changes to Module 3, coupled with the detailed granularity of the Quality sections which make content locations more predictable, means that hyperlinks to Module 3 from 2.3 are discouraged.

Module 4: The lack of major changes to Modules 4, coupled with a less granular structure of the Study sections, means that hyperlinks to Module 4 are encouraged. Specifically, any reference to a specific study in the 2.4 Overview or the 2.6 Written and Tabulated Summaries should be linked to that study in 4.2

Module 5: The lack of major changes to Modules 5, coupled with a less granular structure of the Study sections, means that hyperlinks to Module 5 are encouraged. Specifically, any reference to a specific study in the 2.5 Overview, the 2.7 Summaries and Synopsis of Individual Studies or 5.2 Tabular Listing of All Clinical Studies should be linked to that study in 5.3.

5.3 Can I hyperlink to content submitted in earlier Sequences? Is it required for the publishing software to be the same?

Yes, it is possible to create hyperlinks to documents provided in earlier Sequences that have been imported for evaluation. This is independent of software tool used to create either Sequence. Please note the Hyperlinks must be made using a relative path.

5.4 Regarding Hyperlinks to another file in the same or earlier Sequence, does HSA require the file to Open in a new window?

It is generally recommended to prepare new PDF documents to let the external hyperlinks open in a new window. However, if the content has been submitted in another region with a different setting, it is not required to reprocess the PDF document for this purpose.

6. Validation

6.1 If my Sequence passes validation, does it mean the Application has been accepted for evaluation?

No, the acceptability of the eCTD dossier for evaluation is determined during the screening process. Refer to the Guidance on Therapeutic Product Registration for more information.

6.2 Can I submit a Sequence if there are validation Errors?

No, if any validation errors are found, the Sequence will be rejected automatically. If there are errors which are unavoidable and you wish to provide an explanation to HSA, please contact us prior to submitting the eCTD through the HSA eCTD Portal.

6.3 Can I submit a Sequence if there are validation Warnings?

Yes, but validation Warnings must be addressed in the Cover Letter. Warnings generally lead to a less efficient evaluation so should be fixed whenever possible. It is acknowledged that some of the Warnings associated with PDF may be unavoidable, but this type of Warnings should still be minimised as much as possible. The HSA officer will determine whether the issues should be resolved. Any adjustments should generally be addressed in the next Sequence.

6.4 Are documents marked with P (Possible) in the document matrix mandatory?

Documents indicated as 'P' in the document matrix are required only in certain circumstances for the particular Sequence Type. You are only required to provide justification in the Cover Letter for sections marked as 'W' (Warning).

6.5 If my Sequence was rejected by the eValidator, can I resubmit the same Sequence using the same Sequence Number?

Yes, you can adjust the package to address the errors which led to the rejection by the eValidator and resubmit the package using the same Sequence Number.

6.6 How do I correct a submitted sequence if i) I realised that wrong or missing documents were provided, or ii) I have been informed by HSA that the documents submitted in the sequence are not acceptable.

If there is a need to correct a sequence or restore the previous approved information in the above scenarios, a Sequence should be submitted under a new Sequence Number through a New, Replace or Delete lifecycle operation to rectify the sequence.

6.7 With reference to the criterion 6.4.7 of the SG-HSA eCTD Validation Criteria v1.0 document, what does annotation refer to? Why does it have severity level of Warning?

PDF annotations are a layer on top of the PDF content layer. A PDF annotation can be inadvertently left in a PDF, and therefore is potentially unintended content for an Evaluator. The basis for this criterion is to ensure the annotations represent content intended for review. This is for the benefit of applicant and evaluator. If they are left in,

they would not be reviewed. Therefore, as a best practice, PDF annotations should be flattened to ensure they are reviewed or they should be removed.

7. Managing your eCTD Applications

7.1 Can I change the information in the Envelope over time?

Yes, the information provided in the Envelope should represent the Application at the time the Sequence is submitted. The Envelope provides Application and Submission Information and should reflect the Sequence. For example, if additional products are added over time, i.e., additional strengths, those Application Numbers should be added to the Envelope (See section below on combining multiple strengths in a single eCTD Application). If products are removed e.g., via a Transfer of Application, the Application Numbers should be removed from the Envelope.

7.2 How do I update the envelope to include the SIN number once a new Application (NDA/GDA) has been approved?

The SIN number should be left blank for new Applications. Once the product is registered, the registration number should be provided in a Closing Sequence.

7.3 Is it possible to include additional changes in the eCTD package for an ongoing submission?

Additional information should only be provided if there is prior agreement with HSA.

7.4 How do I withdraw/cancel my eCTD Application? For Applications with multiple strengths, can we selectively withdrawal individual strengths?

There is no Submission Type for withdrawal and cancellation of eCTD Applications. These activities reside in PRISM system. HSA will update the status of the withdrawn eCTD Applications.

If the initial eCTD Application includes multiple strengths and subsequently one of the strengths is withdrawn, the Application Number and Singapore Registration Number may be removed from the envelope for subsequent Submissions.

8. Products with Multiple Strengths/Product Presentations/Dosage Forms/Manufacturing Sites

8.1 Can I submit products with multiple strengths under a single Application?

An Applicant may submit strength-specific Applications or combine multiple strengths of the same product in a single Application. When a new eCTD Application is provided, all strengths can be included in one eCTD Submission. An Application which comprises multiple strengths should have a single 3.2.P which covers all strengths, unless there are multiple drug components.

Applicants should carefully weigh the pros and cons of combining or separating the strengths based on the complexity of product life cycle management.

Refer to the SG-HSA eCTD Specification for more information.

8.2 Is there a way to consolidate existing eCTD Applications for multiple strengths into a single Application to improve efficiency? Is this also possible after Transfer of Applications to another Applicant?

Please consult HSA prior to consolidating the Applications with the proposed consolidation plan. The company may choose to use one of the existing SG eCTD IDs or request for a new SG eCTD ID for the purpose of consolidation. The other SG eCTD ID(s) will be deactivated. The approach taken should be clearly documented in the Cover Letter and/or Note to Evaluator. No other new physical files should be provided.

8.3 Can I include products with different dosage forms in a single Application?

An Applicant may submit separate Applications for each dosage form within a product range containing the same drug substance or may combine multiple dosage forms in a single Application. For Applications which comprise multiple dosage forms, each dosage form should be added in its own Submission, i.e. an eCTD Submission for an NDA should not add more than 1 dosage form at a time. Such Applications should have separate 3.2.P section per dosage form. When a new 3.2.P is added for a new dosage form, cross-referencing should be used to reuse previously submitted documents which are not dosage form-specific. Applicants should carefully weigh the pros and cons of combining or separating dosage forms based on the complexity of product life cycle management.

8.4 Can I include different formulations of the same product in a single Application?

New formulations of the same product, e.g. preservative-free version of an existing eyedrop, should be handled like a new dosage form, i.e. apply the same considerations to decide on separating or combining the Applications in eCTD.

8.5 Different Module 3 sections should be provided for different Drug Substance (DS) manufacturers. Can we provide a single 2.3.S for different DS manufacturing sites manufacturing the same DS?

One 2.3.S section should be provided for 1 DS manufacturer to facilitate lifecycle management with the exception whereby multiple DS manufacturers are included in the same Drug Master File or CEP. The applicant may consider the use of attributes if DS information is similar for all manufacturers.

9. Baseline Submissions

9.1 When are baseline Submissions required?

Baseline submissions for registered products should only be provided when there is an associated regulatory activity in PRISM (i.e. MAV/MIV/Transfer) and are required in the following instances:

- Transition of current registered product from non-eCTD to eCTD format
- During transfer of product registration;
  i. Transfer of product in non-eCTD format from relinquishing Applicant to eCTD managed by the acquiring Applicant.
  ii. Partial transfer of product (e.g., one out of two strengths or dosage forms) in either non-eCTD or eCTD format to eCTD managed by the acquiring Applicant

9.2 I have an existing product registered with HSA. Am I able to convert the current registered dossier to eCTD?

HSA is applying a phased approach to implementing eCTD submissions, beginning with new therapeutic product registrations.

Please notify HSA if you are switching to eCTD submissions for your registered therapeutic products.

9.3 For conversion to eCTD, am I required to submit a baseline of previously submitted and approved content, including full Chemistry, Manufacturing and Controls (CMC) data?

For baseline submissions, only a cover letter is required with the option for a Note to Evaluator or other administrative information. This provides a record of the content used to approve the registration of the product.

However, if you intend to submit previously submitted and approved content as a baseline submission, you will be required to provide a declaration stating that there is no change to content currently registered with HSA as part of the Cover Letter. Documents which are submitted as part of a baseline submission are not reviewed by HSA.

9.4 What is the Sequence Number to be used for baseline submissions if I wish to convert existing product from non-eCTD to eCTD? What about the Application Number?

Baseline submissions should be initiated with Sequence 0000, except in the case of a partial transfer of Application already in eCTD format where the Sequence Number is continued in the order of the original Application.

The eCTD Application Number would be based on the PRISM application number provided for an associated regulatory activity (e.g. MAV/MIV/Transfer).

Refer to the SG-HSA eCTD Specification for more details.

9.5 If I wish to submit a baseline submission that includes content previously registered with HSA, can I only do this for the initial submission? If so, can I submit only a portion of the eCTD (e.g., only Module 3 folder) and provide other modules at a later stage?

It is recommended that companies submit a complete baseline in a single sequence. Companies who wish to provide a baseline midway through the eCTD lifecycle may consult HSA.

10. Transferring eCTD Applications

10.1 In the case of a partial Application transfer, can a regulatory activity be on-going at point of transfer if the on-going regulatory activity only relates to the product which is not being transferred?

If the eCTD Submission for the on-going regulatory activity includes multiple Application Numbers, and one of the Application Number is to be transferred to another company, the relinquishing company can either wait for the regulatory activity to be completed prior to initiating the transfer, or the relinquishing company would have to submit a Withdrawal for the Submission prior to initiating the transfer (Change of Registrant) application in PRISM.

10.2 If my company is taking over a product from another company that had been using eCTD, what SG eCTD ID should I use when I need to submit eCTD packages for subsequent submissions?

For scenarios where the entire eCTD Application (i.e. all products in the package) is transferred to the new company, the acquiring company should inform us of this change when submitting the Change or Registrant (COR) application in PRISM. Following the approval of the COR application in PRISM, HSA will re-associate the SG eCTD ID of the eCTD Application with the UEN of the acquiring company. Once this re-association is complete, the acquiring company will be able to use the same SG eCTD ID to submit a Sequence with submission type: Transfer of Application to confirm the transfer of the SG eCTD ID. After which the acquiring applicant can proceed to submit eCTD packages for subsequent submissions.

For scenarios where the entire eCTD Application Folder is not transferred, the acquiring company should inform us of this change when submitting the COR application in PRISM. Following the approval of the COR application in PRISM, the new company will have to request for a new SG eCTD ID from the HSA eCTD Portal to submit a Sequence with submission type: Transfer of Application to confirm the transfer of the eCTD Application(s) for the products that the company had taken over.

10.3 Does the acquiring company need to submit a Baseline Submission?

See section 9 on Baseline Submissions.