# RAPS 2020 Euros Convergence

eSubmissions – regional moving towards global aspects

Marjan Dzeparoski Bionika Pharmaceuticals, Skupi 57, 1000 Skopje, Republic of Macedonia (e-mail: marjan.dzeparoski@bionikapharm.com)

RA

## Introduction

Obtaining marketing authorization can be a significant barrier to market entrance. A good knowledge of the medicinal products regulation is very important component of a product's marketing strategy, because there are differences in non European Union countries in comparison with EU countries. Development of a regulatory strategy early in the product life cycle can greatly accelerate time of commercial entrance.

The main goal of this study is to make comparative analysis of regulatory submission differences for medicinal products. The choise of countries is based upon where the company Bionika Pharmaceuticals is active.

#### **Figure 1 – Countries of interest**



marian.dzeparoski@bionikapharm.coj

арјан Џепароскі

Image source: https://images.app.goo.gl/CfawXSc6rto4wLjH7

## **Materials and Methods**

Comparative method is used, as required by the subject of the research. In the study have been analyzed medicinal products regulation and submissions for obtaining marketing authorisation in countries of interest: EU, Macedonia, Serbia, Montenegro, Albania, Kosovo, Bosnia and Herzegovina (figure 1).

## **Results and Discussion**

#### Case study

- In EU eSubmissions of medicinal products are mandatory for all types of Applications
- "Paper" CTD format is accepted in Montenegro
- "Paper" CTD format is accepted in Albania (evaluation in 2 separate consecutive phases)
- In Serbia partial eSubmissions are accepted from 20.12.2016 (e-appointments, cover letters and application forms, CPPs, advertising of medicinal products, variations\*, renewals\*), although "paper" CTD format is still in force for medicinal products.
- \*If the files are too large, they should be submitted in "paper format" (\*10 MB max. filedata).

From 02.12.2018 eSubmissions of medical devices are mandatory (first country from the region).

 In Bosnia and Herzegovina \*NeeS (non-eCTD format) is mandatory for all types of Applications starting from 01.07.2015 (first country from the region). On the Agency website is uploaded NeeS Checker.

### Figure 2 – Electronic submission platform in Macedonia

эшенија	Мои барања									
Лекови	Основни податоци Документација	Кореспонденција	Пораки за ба	рањето	0					th Has
Барања										
🔾 Ново барање										
Иекомплетирани барања	Административна техничка докум	ентација								
• Преглед Барања	Назив	Поставено од	Датум	Тип	Големин	Датум важност	Коментар за клиен	Прикачи		
🔲 Мои барања	*АДМИНИСТРАТИВНО ТЕХНИЧКА		Hurlin			H				
Барања за дополнување на документација	• ДОКУМЕНТАЦИЈА									
Барање за предлог решенија										
<ul> <li>Завршени барања</li> </ul>	Стручни мислења поврзани со ква	литетот на лекот.	претклини	аикл	иника					
📻 Барања за дополнување од										
комисија	Назив	Поставено од	Датум	Тип	Големин	Датум важност	Коментар за клиен	Прикачи		
Извештаи	*2.3.QUALITY OVERALL SUMMARY.pdf	Џепароски Марјан	24.06.2020 12:19:16	zip	8134KB				4	
Пораки	2.3.QUALITY OVERALL							<b>+ t</b> 0		1
Нова порака	SUMMARY.zip									
Inbox (9)	*2.4.NONCLINICAL OVERVIEW.pdf	Џепароски Марјан	09.06.2020 11:54:10	pdf	183KB				4	
	2.4.NONCLINICAL OVERVIEW.zip							• t 0		
Sent Items									_	
	oiBaranja.xhtml#prikazBaranje:tabMesse		09 06 2020						_	
Figure 3	edonian agency for n – Electronic submi		produ				I devices			
ata source: Mac <b>Figure 3</b> barnatari.rks-gov.net/View/P	edonian agency for n — Electronic submis	ssion pla	produ t <b>form</b>	in	Kos	0V0				
ata source: Mac <b>Figure 3</b> barnatari.rks-gov.net/View/P	edonian agency for n – Electronic submi	ssion pla	produ t <b>form</b>	in	Kos	0V0			🔊 Конта	кт листа
ata source: Mac <b>Figure 3</b> barnatari.rks-gov.net/View/P	cedonian agency for n — Electronic submis roductAuthorizationMarketing	ssion pla	produ t <b>form</b>	in	Kos	0V0			🔇 Конта	(т листа
Adjencia e Kosovës për Produk	cedonian agency for n — Electronic submis roductAuthorizationMarketing	ssion pla	produ t <b>form</b>	in	Kos	0V0			🕙 Конта	(т листа
//registracija.malmed.gov.mk/pages/baranje/mo ata source: Mac Figure 3 barnatari.rks-gov.net/View/P Bookmarks & Google Translate & Agjencia e Kosovës për Produk BARNATARI	cedonian agency for n <b>— Electronic submis</b> roductAuthorizationMarketing Pharmacovigilance Pharmacovigilance VARUS Connect We	<b>SSION pla</b> MALMED 🧳 Централ	produ tform нен региста	<b>in</b>	Kos егриран и	<b>OVO</b> H <b>()</b> EXIM	Marketing Authoriz.		Конта	(т листа

\*The company has developed its own in-house software for creation of NeeS format for submissions in Bosnia and Herzegovina and for other countries of interest.

- In Kosovo eSubmissions are mandatory only for new Marketing authorisations from 01.04.2018 (figure 3). For renewals and variations "paper" CTD format is still in force.

- In Macedonia eSubmissions are mandatory for all types of Applications starting from 18.09.2018 (figure 2)

Regional National Agencies have developed customized softwares for electronic submissions, but also documents in NeeS and eCTD format can be used for upload.

It is expected that all countries will develop similar network and management system in the near future.

Submission of products for obtaining marketing authorization by companies must be planned early in the product life cycle and in accordance with the current country regulation for specific product category.

Lion o legal assessmentication and bread to read
Samples of the finished medicinal product.
Evidence of fee payment
Packaging mock-ups or samples/specimens attached to the application
SPC proposal (in English, Albanian & Serbian languages)
Package leaflet / PIL / Package insert proposal (in English, Albanian & Serbian languages)
Materials of animal/human origin form completed
Ph.Eur. Certificate of Suitability for TSE
Attach CV and copy of contract of qualified person for pharmacovigilance with MAH ,as Annex 5.12
Manufacturing authorization for manufacturer releasing batches (original or copy)
Manufacturing authorization for all manufacturing sites mentioned in the application (original or copy)
Statement from competent authority that conducted last GMP inspection that site is GMP compliant (for each site including manufacturer of the active substance(s), or Declaration from Qualified Per batch release that the active substance is manuf
CPP (original)
Ph. Eur. Certificate of Suitability or Drug Master File(s)

Data source: Kosovo medicines agency

## Conclusion

There are differences concerning medicinal products regulation and submissions for obtaining marketing authorization in non European Union countries in comparison with EU countries.

Regional aspects are moving towards Global aspects - Harmonisation.

In "near" future eCTD format is expected to be mandatory for all submissions.

Benefits: data quality, reusability, faster access, more office space.

#### References

Law on medicines and medical devices ("Official Gazette of the Republic of Macedonia" No. 106/07, 88/10, 11/12, 147/13, 27/14, 88/15, 134/15).
 Law on medicines and medical devices ("Official Gazette of the Republic of Serbia" No. 30/2010, 107/2012 and 113/2017).
 Law on medicines and medical devices ("Official Gazette of the Republic of Serbia" No. 30/2010, 107/2012 and 113/2017).

